

AGENDA

<i>Agenda Item</i>	<i>Subject</i>	<i>Page No.</i>
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EMERGENCY EVACUATION PROCEDURE

Committee Rooms 1, 2, 4 & Council Chamber:

Turn left, follow the green emergency exit signs to the main town hall entrance and proceed to the assembly point at St George's Square.

Committee Room 3:

Proceed straight ahead through the double doors, follow the green emergency exit signs to the main Town Hall entrance and proceed to the assembly point at St George's Square.

- 1. APOLOGIES FOR ABSENCE**
- 2. PUBLISHED RECORD OF THE MEETING**

22nd August 2016

SECTION 106, LOCAL GOVERNMENT FINANCE ACT 1992

Those item(s) on the Agenda affected by Section 106 of the Local Government Finance Act 1992 will be identified at the meeting. Any Members so affected is reminded that (s)he should disclose the fact and refrain from voting on those item(s).

DISCLOSURES OF INTERESTS

Members are reminded that they must disclose both the existence and nature of any disclosable pecuniary interest and any personal interest that they have in any matter to be considered at the meeting unless the interest is a sensitive interest in which event they need not disclose the nature of the interest.

A member with a disclosable pecuniary interest must not further participate in any discussion of, vote on, or take any executive steps in relation to the item of business.

A member with a personal interest, which a member of the public with knowledge of the relevant facts would reasonably regard as so significant that it is likely to prejudice the member's judgment of the public interest, must similarly not participate in any discussion of, vote on, or take any executive steps in relation to the item of business.

Disclosable pecuniary interests and Personal Interests are defined in the Council's Code of Conduct for Members and Co-opted members.

3. BUSINESS NOT COVERED BY CURRENT FORWARD PLAN: GENERAL EXCEPTION

The Executive Leader to report on any business which it is proposed should be considered by the Executive following compliance with Regulation 15 of the Local Authorities (Executive Arrangements) (Access to Information) (England) Regulations 2012.

4. BUSINESS NOT COVERED BY CURRENT FORWARD PLAN: SPECIAL URGENCY

The Executive Leader to report on any business which it is proposed should be considered following compliance with Regulation 16 of the Local Authorities (Executive Arrangements) (Access to Information) (England) Regulations 2012.

1. **Accountable Body for new Integrated Local Enterprise Partnership (SEMLEP)**
(Report of the Director of Planning & Infrastructure)

7 - 10

5. REFERENCES FROM COMMITTEES AND OTHER BODIES

6. RECOMMENDATIONS FROM SCRUTINY REVIEWS

7. PETITIONS

BUSINESS ITEMS

DISCLOSURES OF INTEREST

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REFERENCES FROM COMMITTEES AND OTHER BODIES

1. **Reference from OSB - Household Waste Recycling Centres** **11 - 14**
(Report of the Service Director, Policy, Communities and Engagement)
CUSTOMER & COMMERCIAL (FINANCE)
8. **Medium Term Financial Plan and Efficiency Plan** **15 - 40**
(Report of the Service Director, Finance and Audit)
9. **Business Rates Retention - Response to Consultation** **41 - 56**
(Report of the Service Director, Finance and Audit)
10. **Luton Cultural Services Trust - Future Funding** **57 - 60**
(Report of the Service Director, Public Health, Procurement and Commissioning)
PEOPLE (CHILDREN'S SERVICES)
11. **Proposals to Change Children Centres** **61 - 94**
(Report of the Service Director, Prevention & Early Intervention)
PLACE & INFRASTRUCTURE (PLANNING & TRANSPORTATION)
12. **High Town Master Plan** **95 - 226**
(Report of the Director of Planning and Infrastructure)
PLACE & INFRASTRUCTURE (REGENERATION)
13. **Skills and Employability Strategy 2016-2020** **227 - 276**
(Report of the Service Director, Business and Consumer Services)
14. **LOCAL GOVERNMENT ACT 1972, PART VA**
To consider whether to pass a resolution under Section 100A(4) of the Local Government Act 1972 to exclude the public from the meeting during consideration of any item listed above if it is likely that if members of the public were present during those items there would be disclosure to them of exempt information falling within the Paragraphs of Part 1 of Schedule 12A to the Local Government Act 1972.
15. **Private Report - Proposed Lease of Wigmore Valley Park to LLAL**
 - Information relating to the financial or business affairs of any particular person (including the authority holding that information);

Note: Five days' notice is hereby given of items to be considered in private as required by Regulations (4) and (5) of the Local Authorities (Executive Arrangements) Meetings and Access to Information) (England) Regulations 2012.

Details of any representations received by the Executive about why any of the above exempt decisions should be considered in public: none at the time of publication of the agenda. If

representations are received they will be published separately, together with the statement given in response.

<p>For: (x)</p> <table border="1" style="width: 100%;"> <tr> <td style="width: 80%;">Executive</td> <td style="width: 20%; text-align: center;">x</td> </tr> <tr> <td>CLMT</td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table> <p>Meeting Date: 19th September 2016</p> <p>Report of: Director of Place and Infrastructure</p> <p>Report author: Paul Adams</p>	Executive	x	CLMT	<input type="checkbox"/>	<h2 style="margin: 0;">Agenda Item Number: 4.1</h2>
Executive	x				
CLMT	<input type="checkbox"/>				

<p>Subject: Accountable Body for New Integrated Local Enterprise Partnership (SEMLEP) (For Executive Only)</p> <p>Lead Executive Member(s): Councillor Simmons</p> <p>Wards Affected: All</p>	<p><u>Consultations:</u></p> <p>Councillors <input type="checkbox"/></p> <p>Scrutiny <input type="checkbox"/></p> <p>Stakeholders <input type="checkbox"/></p> <p>Others <input type="checkbox"/></p>	<p>(x)</p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p>
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Recommendations

Executive is recommended to:

- a) Approve in principle the Council becoming the accountable body to the new integrated Local Enterprise Partnership subject to due diligence examination of relevant information, including full financial information; and
- b) Authorise the Corporate Director, Place and Infrastructure and Service Director, Finance and Audit, in consultation with the Leader of the Council, to confirm the decision once a full examination of documents and accounts has been completed.

Background

1. The Council has provided accountable body functions to the South East Midlands Local Enterprise Partnership (SEMLEP) since its inception in 2011. The Council receives a fee for providing this work to cover costs.
2. The role of accountable body is to oversee and support SEMLEP's use of public funds and is therefore critical to the accountability for public funds. This includes ensuring that the decisions and activities of the SEMLEP conform with legal requirements with regard to equalities, environmental and EU issues.
3. The SEMLEP area is unique in that the Northamptonshire Enterprise Partnership (NEP) sits entirely within the SEMLEP area. Following the approval to allow the 2 remaining Northamptonshire district councils (East Northamptonshire and Wellingborough) to join SEMLEP earlier this year a strategic decision was taken by the Boards of both LEPs to integrate NEP into SEMLEP.
4. The accountable body role for NEP is currently performed by Northamptonshire County Council.

The current position

5. Council officers have been in regular contact with SEMLEP staff over accountable body matters but it became apparent in early September that NEP would, in effect, cease to operate at the end of the month by which time all NEP staff will have departed the organisation.

6. On 9 September 2016 the Council received a letter from the SEMLEP CEO formally asking the Council if it would be prepared to take on the accountable body role for the new integrated LEP (still to be called SEMLEP). Given the short timescale before NEP staff leave, an urgent report to Executive was requested and approved, to allow a decision to be taken and communicated to SEMLEP, NEP and government about accountable body status and to allow the examination of key documents to fully understand the financial landscape.
7. The SEMLEP CEO has indicated that the functions include three key areas:
 - a) The transfer of Growing Places Fund (GPF) resources that were previously managed by Northamptonshire County Council. The initial GPF allocation is approximately £5.7m of which £1.6m is currently unallocated.
 - b) The transfer of any unspent Local Growth Fund resources for 2016/7 currently held by Northamptonshire County Council.
 - c) Taking responsibility for NEP's Local Growth Fund (LGF) projects for rounds 1 and 2. Documents suggest spend of approximately £27m in 2016/7 should projects progress according to plan.
8. A meeting with the Northamptonshire County Council Section 151 officer has been arranged for 19 September 2016, coinciding with the Executive meeting date. At the time of writing the timing of the meeting with NCC starts at 5pm, making it most unlikely that a verbal update on matters will be possible.
9. The project to integrate NEP into SEMLEP is moving swiftly, compounded by the fact that NEP staff depart at the end of the month. In order to be satisfied that becoming the accountable body does not expose the Council to unacceptable financial risk a significant piece of work to scrutinise documents and accounts will need to take place over the coming weeks. NEP has indicated that full information will be made available by 19 September.
10. An Executive decision to approve in principle the Council becoming the accountable body for the integrated SEMLEP organisation is required given the substantial sums of public money involved and the high profile of this integration at local authority, LEP and government level. An "in principle" decision will assist the integration process and give authority for examination of all relevant papers to enable an informed decision to be taken in the coming weeks.
11. The Council will charge for the additional work created to arrive at a final decision on accountable body status and for any additional work thereafter.

Goals and Objectives

12. To provide sufficient information to allow the Executive to make an informed decision, in principle, over the Council becoming the accountable body for the new integrated LEP.

Proposal

13. It is proposed that the Executive approve, in principle, the Council becoming the accountable body for the new integrated LEP.

Key Risks

14. At the time of writing the report SEMLEP officers were waiting for key documentation to be made available and, until that is provided, the Council would not be in a position to assess the risks of providing the accountable body function for significant sums of public funds. Furthermore the short timescale before NEP in effect ceases to function means that there is insufficient time to provide Executive with a firm recommendation based on due diligence assessments. This is why an "in principle" decision is requested at this stage and why a request has had to be made as an

urgent matter for the Executive.

15. Should Executive decide not to agree to SEMLEP's request, the Council's current accountable body role would end at the end of the current financial year with the loss of associated fees generated from this activity.

Consultations

None

Appendices attached:

None

Background Papers:

There are no background papers in connection with this report.

IMPLICATIONS

For Executive reports

- grey boxes must be completed
- all statements must be cleared by an appropriate officer

For CLMT Reports

Clearance is not required

		Clearance – agreed by:
Legal	Legal aspects are covered in the report and referred to in Finance implications. No other comments to make at this stage.	Steven Sparshott Planning Solicitor 14/09/16
Finance	<p>A full due diligence exercise will need to be undertaken to assess all financial information relating to current and proposed NEP projects. This is essential to ensure that the risk to the Council is minimised as far as possible. There will be a cost to the Council in undertaking this due diligence, which will be charged to SEMLEP.</p> <p>It is essential that all inherited projects have updated funding agreements with SEMLEP to ensure proper governance and financial control. Any funds inherited from NEP will be accounted for separately but will become subject to the same stringent conditions in place for existing SEMLEP funds. This will ensure that the Council's exposure to risk is minimised as far as possible.</p> <p>The inheritance of additional projects from NEP will require additional work in terms of the Council's role as accountable body, which will be chargeable to SEMLEP. The amount to be charged is still to be negotiated but will need to cover Council costs as well as contributing to overheads. If SEMLEP are unwilling to pay the additional fee, it is likely that the Council's accountable body role will cease at the end of the financial year.</p>	Darren Lambert, Finance Manager for Place & Infrastructure, on 13 th September 2016

Integrated Impact Assessment (IIA) – Key Points		
Equalities/ Cohesion/Inclusion (Social Justice)	There are no equalities implications within this proposal	Maureen Drummond, Cohesion and Equalities Adviser, 13 September 2016
Environment	There are no direct environmental impacts arising from the contents of this report	Rod Black Highway Development & Sustainable Travel Manager 13 th September 2016
Health	At this stage there are no Public health implications within this proposal	Public Health Stephen Gunther Service Director 14/9/16
Community Safety		
Staffing		
Other		

FOR EXECUTIVE ONLY - Options:

Executive may either:

- a) Approve in principle to the Council becoming the accountable body to the new integrated LEP, or
- b) Decline the invitation, in which circumstances SEMLEP will be advised and it is anticipated that the current accountable body role will cease at the end of this financial year.

For: (x) <table border="1" style="width: 100%;"> <tr> <td style="width: 80%;">Executive CLMT</td> <td style="width: 20%; text-align: center;">x <input type="checkbox"/></td> </tr> </table> Meeting Date: 19 th September 2016 Report of: Head of Policy, Communities and Engagement Report author: Lisa Jerome	Executive CLMT	x <input type="checkbox"/>	Agenda Item Number: 5.1	
Executive CLMT	x <input type="checkbox"/>			
Subject: Reference from Overview and Scrutiny Board – Reduction of Hours of Council Household Waste Recycling Centres (For Executive Only) Lead Executive Member(s): Councillor Tom Shaw Wards Affected: All	Consultations: Councillors Scrutiny Stakeholders Others	(x) <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>		

Recommendations

1. **Overview and Scrutiny Board recommends that the Council’s Executive reconsiders the decision to reduce Household Waste Recycling Centres opening hours after a six months trial period if there is any evidence of an increase in fly tipping.**

Background

2. At the Executive meeting held on 22nd August 2016, the Executive considered a report of the Director, Director of Place & Infrastructure entitled “ Waste Savings – Consultation Outcome”. The original Executive report and appendices are attached to this report.

3. The Executive decided as follows:

(i) That, subject to a comprehensive and Borough wide residents’ campaign, engagement and communications exercise, the implementation of the Recycle Right scheme be approved in light of Consultation feedback.

(ii) The amendment of the Household Waste Recycling Centre (HWRC) opening hours be approved as follows and a review of the outcomes be carried out one year after implementation:

- Mondays and including Bank Holiday Mondays – 9am to 7pm
- Tuesdays to Fridays – 9am to 5pm
- Saturdays and Sundays – 8am to 5pm
- Each site to close for one weekday per week between Monday to Friday

(iii) That the measures set out at Paragraph 15a in the Report of the Director of Place & Infrastructure (Ref: 12) that random proof of identity will be sought to ensure that the HWRCs are utilised solely by Luton residents be agreed.

4. The following reason given for the above decision:
 “To reduce the amount of waste.”

5. The decision was subject to the Call-in process and in accordance with Standing Order 55.2, decision EX/112/16(ii) was ‘Called-In’ by two Members of the Council, Councillors David Franks and Anna Pedersen.

The current position

6. The Overview and Scrutiny Board met on 12th September to consider the call-in.

7. The Board recognised that:
- The financial advice included in the officers' report to the Executive said that reducing the HWRC opening hours would not produce any financial saving and might lead to an increase in fly-tipping if people were unable to access a site due to its being closed.
 - 40% of the consultation respondents said that if a reduction in recycling centre opening hours was necessary they favoured 9am to 5pm Monday to Friday and 8am to 5pm Saturday & Sunday.
 - 30% said they preferred 9am to 5pm every day winter & summer.
 - 57% said closing the centres on one day a week would make their ability to recycle their waste a little more difficult, much more difficult or impossible.
 - When you want people to recycle more it makes no sense to make recycling more difficult. If you want people to behave in a particular way, the easier you make it for them the more likely they are to do so.

Goals and Objectives

8. Executive to note the views of the Overview and Scrutiny Board and agrees to reconsider the decision to reduce Household Waste Recycling Centres opening hours after a six months trial period if there is any evidence of an increase in fly tipping.

Proposal

9. That the Executive reconsiders the decision to reduce Household Waste Recycling Centres opening hours after a six months trial period if there is any evidence of an increase in fly tipping.

Key Risks

10. The reduction in the opening hours of the HWRC could reduce the amount of recycling and increase fly tipping in the town.

Consultations

11. As attached in Appendix A – Executive Report

Appendices attached:

12. Appendix A – Executive report – 22nd August 2016

Background Papers:

IMPLICATIONS

For Executive reports

- grey boxes must be completed
- all statements must be cleared by an appropriate officer

For CLMT Reports

Clearance is not required

		Clearance – agreed by:
Legal	There are no legal implications arising directly from this report	Steven Sparshott on 13th September 2016
Finance	As contained in Appendix A. The only change to the recommendation of the Executive would be to undertake a review after 6 months instead of 12 months if there was an increase in fly tipping.	Darren Lambert, Finance Manager for Place & Infrastructure, on 13th September 2016

	This will have no additional financial implications.	
Integrated Impact Assessment (IIA) – Key Points		
Equalities/ Cohesion/Inclusion (Social Justice)	As contained in Appendix A	Agreed Sandra Legate Equality and Inclusion Manager 13th September 2016
Environment	As contained in Appendix A	Rod Black Highway Development & Sustainable Travel Manager 15th September 2016
Health	As Public Health said in the previous report, making it easier for Luton households to recycle and reduce waste saves businesses and households money. Any increase in Fly tipping can increase the spread of bacteria and create a more hazardous environment which increases detrimental impact on the environment, and the health and well being of the local residents.	Public Health Stephen Gunther Service Director 14/9/16
Community Safety		
Staffing		
Other		

FOR EXECUTIVE ONLY - Options:

To agree the recommendations of the Overview and Scrutiny Board in full, reject all or some of them or request further information.

For: (x) <table border="1" style="width: 100%;"> <tr> <td style="width: 80%;">Executive</td> <td style="width: 20%; text-align: center;">X</td> </tr> <tr> <td>CLMT</td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table> Meeting Date: 19 th September 2016 Report of: Service Director of Finance and Audit Report author: Dev Gopal	Executive	X	CLMT	<input type="checkbox"/>	<h2 style="margin: 0;">Agenda Item Number: 8</h2>
Executive	X				
CLMT	<input type="checkbox"/>				

Subject: Medium Term Financial Plan and Efficiency Plan (For Executive Only) Lead Executive Member(s): Cllr Malcolm Wards Affected: All	<u>Consultations:</u> Councillors <input checked="" type="checkbox"/> (x) Scrutiny <input type="checkbox"/> Stakeholders <input type="checkbox"/> Others <input checked="" type="checkbox"/> X
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Recommendations

1. Executive is recommended to:

- 1) approve the updated Medium Term Financial Plan, including the Budget Guidelines for 2017-18 included as an appendix to the plan;**
- 2) approve the Efficiency Plan for publication on the web and submission to the Secretary of State for Communities and Local Government, in order to apply for a multi-year financial settlement; and**
- 3) submit the Efficiency Plan to Council for approval of the Flexible Capital Receipts Policy**

Background

2. Central Government has been reducing its funding of local government each year in this decade, as a part of its overall plan to manage the public finances. As a result, the Council has aimed to increase its income from other sources, and make efficiency savings wherever possible, in order to continue to provide excellent services to the people of Luton, enabling Luton to be proud, vibrant, ambitious and innovative.
3. To continue to do this successfully, the Council has to continue to reassess its financial position and prospects on a regular basis, and plan how to best provide those services given the level of funds likely to be available.
4. As part of the 2016-17 financial settlement, the then Secretary of State for Communities and Local Government, Greg Clark, offered local authorities the prospect of a multi-year financial settlement covering 2016-17 to 2019-20, in order to give them greater financial certainty, to aid future planning. This is something that Councils had requested prior to the settlement.
5. In order to apply for the offer, Councils have to produce an efficiency plan, publish it clearly on their website, and apply to the Department for Communities and Local Government (DCLG) by 14 October 2016 including a working link to the efficiency plan on the Council's website.
6. While the multi-year settlement involves substantial annual grant reductions, as set out in Appendix B, it should be noted that Greg Clark's letter accompanying the offer of a four year settlement stated that: "Those councils that chose not to accept the offer, or do not qualify, will be subject to the existing yearly process for determining the local government finance settlement. Allocations could be subject to additional reductions dependent on the fiscal climate and the need to make further savings to reduce the deficit. At present we do not expect any further multi-year settlements to be offered over the course of this parliament".

7. Greg Clark did not give detailed guidance on efficiency plans, stating that they should be 'locally owned and locally driven'. He did however state that they should 'show how this greater certainty can bring about opportunities for further savings. They should cover the four year period and be open and transparent about the benefits this will bring to both your council and your community.'
8. A practitioner event, which DCLG civil servants attended as observers, produced some tips on the production of local authority efficiency plans, and these have been taken into account in the preparation of the draft plan.

The current position

9. The 2016-17 local government settlement included indicative figures for revenue support grant for 2017-18, 2018-19, and 2019-20. The multi-year financial settlement is based on those figures being funding levels for each year 'barring exceptional circumstances'. (The figures are shown in Appendix B and are based on substantial reductions each year.)
10. In addition the offer includes a guarantee that the business rates 'top up' received by Luton (£10.84million in 2016-17, increasing in line with the consumer price index annually) will not be altered for reasons related to the relative need of local authorities.
11. Increased certainty is extremely helpful for financial and service planning, although the potential for the offer being withdrawn 'in exceptional circumstances' does need to be noted, particularly if the Government's overall financial position is subject to significant change in future.
12. The Medium Term Plan attached at Appendix A reflects the latest known position in relation to both expenditure and income. The base case figures assume the Council receives the multi-year financial settlement. The total ongoing savings required over the 3 year period beginning 2017-18 are now estimated to be £17million.
13. The significant changes since the plan prepared as part of the 2016-17 budget process are set out below.
 1. The Education Services Grant is likely to cease in September 2017, with some residual funding transferred into the Dedicated Schools Grant. Full year impact (from 2018-19) a reduction of approx. £2.5m per annum.
 2. Annual pension costs rising approximately £0.7million per annum following the 2016 fund review (a triennial review carried out on the Bedfordshire fund by independent actuaries Hymans Robertson).
 3. Estimated impact of the apprenticeship levy of approx. £0.5m per annum.
14. The Council's financial regulations include a requirement for the Executive to approve the budget guidelines annually, and these are appended to the Medium Term Financial Plan, including the prospect of introducing multi-year budgeting for the period 2017-18 to 2019-20 if the Council's application for a multi-year financial settlement is approved.
15. In the longer term the Government is proposing to change the basis of local government financing to a system based on 100% retention of increases in business rates. A consultation paper on this is elsewhere on this agenda. Implementation (other than potential pilots) is currently expected to begin in 2020/21.

Goals and Objectives

16. To ensure that the Council's financial planning is as effective as possible, in order to enable effective medium term service planning so that the people of Luton are offered the best possible services that can be provided using the finances that are likely to be available in the period to 2019-20.

Proposal

17. It is proposed that:
 1. the efficiency plan set out as appendix B is approved and published on the Council's website

- prior to October 14th, and that the link is sent to DCLG confirming that the Council wishes to apply for the multi-year settlement; and
2. the medium term financial plan attached as Appendix A, including the budget guidelines for 2017-18, is approved.

Key Risks

18. If the efficiency plan is not approved, or the Government determines that there are 'exceptional circumstances' nationally that mean it cannot keep to the multi-year settlement guarantee, then the Council will have to revert to annual financial settlements and the potential for significant variation in revenue support grant and/or business rate top-up income.

19. Key budget risks have been identified as part of the 2016-17 budget process, and a budget risk management strategy is already in place (see Appendix B of the 2016-17 Budget Report).

Consultations

20. None

Appendices and additional background papers attached:

Appendix A – Medium Term Plan

Appendix B – Efficiency Plan

IMPLICATIONS

For Executive reports

- grey boxes must be completed
- all statements must be cleared by an appropriate officer

For CLMT Reports

Clearance is not required

		Clearance – agreed by:
Legal	There are no specific legal implications arising from this report	J. Newman 08/09/2016
Finance	The financial implications are dealt with in the body of the report	D Gopal, 08/09/16
Equalities	There are no specific equality implications arising from this report	Maureen Drummond, Cohesion and Equalities Adviser, 8 September 2016
Environment	There are no specific environmental implications arising from this report	Rod Black Highway Development & Sustainable Travel Manager 8th September 2016
Public Health	There are no specific public health implications arising from this report	Stephen Gunther, 08/09/16
Staffing	There are no specific staffing implications arising from this report	
Other		

FOR EXECUTIVE ONLY - Options:

(a) Reject the proposals

(b) Approve the proposals with a modification

(c) Approve the proposals subject to them meeting a specific condition (conditional approval can only be granted in the limited circumstances specified in the regulations).

Medium Term Financial Plan

Introduction

1. The medium term financial plan sets out how resources will be prioritised in order to achieve the Council's objectives, including enabling the successful implementation of the Luton Investment Framework.
2. For many years the Council has provided value to the taxpayers of Luton by setting a Council Tax below the national average, and considerably below the level of the council tax elsewhere in Bedfordshire.
3. The current medium term plan is based on the need to find substantial levels of efficiency savings in future years. This plan sets out the Council's overall objectives and priorities, and how the Council can seek to achieve them in the context of the expected reductions and uncertainties in future Council funding and costs.
4. The Council's recently refreshed mission statement is 'Enabling Luton to be proud, vibrant, ambitious and innovative', and its vision statement is that:

As a leader and shaper of Luton we will:

- deliver high quality services to improve the life opportunities of our people
 - work with our partners to ensure Luton is dynamic, prosperous, safe and healthy
 - celebrate our diversity and vibrancy and come together to build sustainable communities
 - provide strong leadership and a voice for the town.
5. The Council's priorities, as agreed in June 2016, are as follows.
 - Building economic growth and prosperity
 - Enhancing skills and education
 - Improving health and wellbeing
 - Developing quality homes and infrastructure
 - Supporting safe, strong and inclusive communities
 - Integrated, efficiency and digital service delivery – striving for a 'one Luton' approach.

NATIONAL CONTEXT

Introduction

16. Luton's financial and service planning takes place within the context of the national economic and public expenditure plans. This part of the Medium Term Plan discusses the broad assumptions within which the budget and Medium Term Plan are framed.

The Economy and Public Expenditure, and Prospects for Local Authority Funding

17. The 2015 Autumn Statement was produced at a moment when the amounts of Government borrowing were reducing, and as a result the Government's reductions in public spending for 2016/17 and 2017/18 were less than it had previously anticipated. This position has not been sustained, and the national financial outlook is now more uncertain than ever before, prior to negotiations beginning over Brexit. The new Chancellor of the Exchequer has announced that he could take the opportunity to reset the country's fiscal policy in the 2016 Autumn Statement, if he deems it necessary to do so 'in the light of the data that will emerge over the coming months'.
18. The Local Government Settlement for 2016/17 gave indicative grant figures for the period of this parliament. It also stated that authorities could apply to fix elements of grant funding (for Luton, the revenue support grant and the business rates top-up) for the following 3 years (2017/18 to 2019/20). To do this the Council must apply by 14 October, including a link to a published efficiency plan setting out how the multi-year grant offer will help the Council deliver the efficiencies required. The efficiency plans will be appraised by Government to determine whether or not they are acceptable. There is no pro-forma or guidance as to what is expected, although the Government has said that the process will be 'as simple and straightforward as possible.' Those Councils that do not apply, and whose efficiency plans are not acceptable to Government, will be subject to an annual grant settlement process.
19. It should be noted however that it is not yet clear whether the new Secretary of State will be able to maintain this funding guarantee, and the original offer was caveated with the statement that 'unforeseen circumstances' could cause the Government to change agreed settlement amounts.
20. The Government has announced that it wishes to end the grant settlement process and replace it with full business rate retention, subject to initial equalisation between authorities. A consultation paper on this was issued in July 2016. The method used for the equalisation is likely to have a major impact on the Council's future financial prospects. It should also be noted that full business rate retention brings with it additional financial risk, as well as opportunity that should arise if the Council can successfully enable fast development of its Investment Framework. The risk not only relates to the health and development of the local economy, but also to technical appeals against business rate valuations made by HMRC's Valuation Office. For example, surgeries nationally are challenging their business rates designations, and Virgin Media is appealing for all its infrastructure valuations to be incorporated into one, based in Tewkesbury. Thus appeals and technical valuation arguments in which the Council is not a party can have a major impact on the Council's spending power.

21. It is expected that the new system will be used from the 2020/21 financial year, with the potential being explored of an earlier pilot in London. Until the start points, and detail of the equalisation proposals are known, it is not possible to assess the full financial implications, except to note the following.
- Taking on 100% of the risk of appeals and other business rate volatility will require a review of the minimum reserve level required from 2020/21, and, all other things being equal, it should be expected that the minimum reserve level will need to increase significantly, unless effective measures are introduced nationally to reduce the number and value of business rate appeals. The Council as part of its approach to financial management will look at its current level of reserves and take necessary measures to mitigate any future risks.
 - The Office for Budget Responsibility assesses that the national level of increase in Business Rates yield by 2020/21 is likely to be in the region of £9billion, and the Government is planning on adding additional funding responsibilities to local government as a result. There is a risk that the distribution of cost of those funding responsibilities across councils are quite different from the distribution of additional rate income – as well as the risk that the level of increase is overstated. Therefore additional cost pressures at an individual council level may not be sustainable. It also needs to be borne in mind that the addition of significant new demand-led responsibilities would also require an increase in the minimum level of reserves.

Financial pressures for Local Government Nationally

22. The pressures on care services arise from increasing numbers of cases of learning and physical disability, the increasing size of the elderly population requiring care, and the number of children assessed as requiring care.
23. Council Tax and Housing Rent collection is more difficult when financial pressures are being experienced by many people. The problem for local authorities is expected to be exacerbated by the implementation of Universal Credit. This is because it is due to be paid directly to the claimants. Currently many tax and rent payments, including payments in respect of arrears, are made by direct deductions from benefits. There is provision in the Universal Credit arrangements for rental payments to be made direct to landlords where tenants declare to Job Centre Plus that they are struggling to manage their money, and landlords, including local authorities, can ask for direct payments where tenants are at least 2 months in arrears, but there is no specific provision for direct payment of rates. The pressure on individuals is exacerbated by increases in market rents.

24. The demand for regeneration services increases as the job market reduces. It has also become crucially important for the Council as its future income is dependent on business rates. Unemployment also increases the need for welfare and Education services.
25. Capital receipts from the sale of land, buildings and council housing, which have been the traditional source of funding for Council capital programmes for some years, are difficult to realise outside London and the most affluent areas in the current property market.
26. The Government is planning to introduce an apprenticeship levy which is likely to result in a new pressure on Council budgets. The levy, which will be collected from employers with an annual paybill of more than £3million per annum, will be set at a level of 0.5% of an employer's annual paybill, less £15,000. If schools are defined as separate employers for this purpose, this is likely to cost the Council approximately £435,000 per annum. While theoretically the Council could recoup the cost by employing a large number of apprentices, the tax will be an additional cost to the Council. This is because currently, nearly all our apprentice training costs are covered by central government. In addition to the Apprenticeship levy, the government also intends to introduce a new public sector duty, included in the Enterprise Bill, requiring all Councils to meet a target of having 2.3% of their workforce (including community schools) starting apprenticeships each year. This also appears likely to begin in 2017/18. This will create budget pressures as it will either require the Council to recruit more staff or to convert existing vacant posts into apprenticeships through major workforce planning changes.
27. The costs of the local government pension scheme are reviewed every 3 years. The indicative results of the 2016 review show that Luton's employer contribution rate for current staff will be likely to need to increase by 0.5% per annum over the next 3 years, at an estimated annual cost to the Council's General Fund of £0.7million. Unlike civil service pensions, which are funded by government on a pay-as-you-go basis, local government is required to account for, and make payments into the pension fund now, to cover the costs of all current and future pension entitlements that have been earned to date by its staff, past and present. Therefore longevity estimates of pensioners and staff in the pension scheme are an important component in the Council's finances, and are made by independent actuaries. In 2013 the Bedfordshire Pension Fund, of which the Council is a member, was estimated by the fund's actuaries to be only 70% funded. Hence the Council's current payments to the Pension Fund includes a lump sum each year to pay for that past service deficit, as well as covering the estimated costs of the future pensions benefits currently being earned by existing staff, that are not covered by employees' own contributions.

Inflation

28. The government's preferred rate of inflation, the Consumer Price Index, CPI, was at 0.6% in July 2016. The former measure, the retail price index, or RPI, was 1.9%. It is likely that the volatility in the value

of the pound will impact on future inflation levels, though reduced interest rates may counter-balance this to some degree.

Education Funding

29. Schools and school-related funding is provided 100% by the Department for Education (DfE), in the form of the Dedicated Schools Grant (DSG). The Government committed to maintaining school funding nationally at a flat cash rate per pupil, with the pupil premium as additional funding intended to enable schools to raise the attainment of disadvantaged pupils. It is payable per pupil who was eligible for free school meals in any of the last 6 years. For secondary schools the rate is £935 per pupil, and for primary schools it is now £1,300 per pupil. Additional funding is given per Looked After Child.
30. The Department for Education (DfE) is consulting on a new national formula for early years providers, and has declared its intention to move towards a national funding formula for schools in the current parliament. The complexities involved have delayed progress to date, and for 2017/18 individual schools funding will continue to be allocated via locally approved formulae.
31. Major changes are being made in the funding of education support, as provided by the Council and others. Currently this is funded in 2 ways: 1) as the 'central share' of the Dedicated Schools Grant, which requires the approval of the Schools Forum, and 2) as a per pupil allocation in the Education Services Grant, payable to local authorities for pupils in maintained schools, and to academy organisations for pupils in their schools.
32. The former Chancellor's 2015 Autumn Statement included a saving of £600million in the Education Services Grant (ESG). In 2016/17 the ESG was substantially reduced and according to statements in the March 2016 Department for Education consultation paper, it will only be maintained for 5 months of 2017/18. After that, it will cease. The Council's 2016/17 budget for Education Services Grant is £2.9million. The consultation makes clear that school improvement will not be a council function in the 2017/18 school year, but that transition funding to new arrangements will be available. Enabling suitable arrangements will be a key service challenge for the Council
33. Funding for remaining local authority statutory education functions will need to come from the Dedicated Schools Grant, with the agreement of the Schools Forum. Otherwise they will become an additional pressure on the Council's budget. The paper makes clear that there is no local authority funding for music, visual and performance arts, outdoor education, or pupil support. These are expected to be fully funded by schools from their existing budgets.
34. The Government proposes to move towards a formulaic basis of allocation of a central block of DSG, which will include the funding of those residual education duties that will be retained by local authorities, currently allocated £15 per pupil in the ESG - just under 20% of the current ESG total. It should also be noted that with effect from 2017/18,

the only historical commitments that can be included in any Council's allocated share of the Dedicated Schools Grant have to be shown, to the satisfaction of the Department for Education, to have been agreed by the Schools Forum prior to April 2013. In Luton the significant commitments to which this applies are the equal pay settlement and the Building Schools for the Future maintenance contract.

Health Funding

35. Public Health is funded from a ring-fenced grant. While the budget is prepared on a net nil basis (the budget assumption being that the grant is fully spent) the importance of public health to the financial strategy is fundamental, in that successful public health campaigns and outcomes will in the long term reduce the numbers requiring care, as well as reducing hospital admissions. The 2016 settlement included planned reductions in the grant for future years, of , 2.5% in 2017/18, and 2.6% in both 2018/19 and 2019/20, despite Public Health being seen as a key enabler for the NHS in the 2014 'Five Year Forward View' document that the Government stated it accepted in full.

Improved Better Care Fund.

36. 2015/16 was the first full year of the Better Care Fund, in which the Government allocated £3.8billion nationally to improve the integration of health and social care, with the particular aim of reducing the number of delayed transfers from hospital to care settings. This continues in 2016/17, but the vast majority of the funding is provided to, and therefore controlled by, Clinical Commissioning Groups (CCGs). As part of the 2016 financial settlement the Government announced that over this parliament it will add a further £1.5bn of funding that will be paid directly to local authorities, via the Improved Better Care Fund. Luton's allocation is £0.37m in 2017/18, £3m in 2018/19 and £5m in 2019/20. A key issue for the financial future of local authorities is working effectively with the local Clinical Commissioning Groups (CCGs to ensure both parts of the Better Care Fund are used to improve outcomes and achieve savings across the health and care systems. This is likely to include restructuring and joining up of health and care services.

New Homes Bonus

37. In December 2015 the Government issued a consultation paper on New Homes Bonus that set out options for sharpening the focus of the Bonus on delivering new homes, and reducing the level of the grant so that more funding could be allocated to authorities with particular financial pressures, such as increasing costs of adult social care. This proposed reducing the number of years' payments from 6 to 4, but there were also options for further reductions in the numbers of years' payments, together with the suggestion that those like Luton who do not have an approved local plan might not receive the bonus. Government has not yet published

the results of that consultation. The potential changes are expected to be implemented in 2017/18.

LUTON'S LOCAL CONTEXT

Partnerships

38. The Council is working closely with the NHS Luton Clinical Commissioning Group (CCG) on achieving an integrated approach across the health and social care sectors for both Children and Adults, via the Better Together project, as well as working on the Better Care Fund. This is now developing over a wider footprint as the Council is working with Bedford, Central Bedfordshire and Milton Keynes Councils, and the Bedfordshire and Milton Keynes CCGs, to develop a Sustainability and Transformation Plan (STP) covering health and care services in Luton, Bedfordshire and Milton Keynes. There are a number of other specific local public partnership bodies that provide joined up services between public sector organisations, such as in mental health services. The Council adopts a collaborative procurement approach using the Central Buying Consortium (CBC), Pro 4, and other national and local procurement groupings, as well as buying into contracts negotiated nationally by the Office of Government Commerce, and this continues to develop. One specific example where the Council's own contracting expertise is used by other public sector bodies is the temporary staffing and recruitment contract, where others buying in include Police and Fire, Bedford Borough, and Suffolk County Council.
39. In the medium term the Council is reviewing options for a greater use of partnerships in the management and delivery of services, in order to achieve the levels of savings that will be required.
40. The Council's People Strategy notes that we are also 'planning future workforce requirements in collaboration with our main partners'. This will include developing joint strategies to overcome medium and long term skills shortages and ensuring our workforce reflects the community it serves.
41. The Council aims to set up a wholly owned housing company, to which it may lend funds and potentially sell land in order that the company can develop housing in Luton, initially for private sector rental, and potentially for later sale. Each investment proposal will need full appraisal of the business case, on a case by case basis, to ensure that the investment is value for money for the tax payer, and that the level of risk involved is reasonable.

Budget Approach

42. It is essential that the revenue budget and capital programme are considered together. Many resources, both capital and revenue, are only available to spend on specific projects, but others, such as the Airport Dividend, can be switched between revenue and capital spend. The key indicator in the prudential code of capital finance is the revenue effect of the capital programme on the level of council tax and housing rents over

the medium term. The ongoing revenue impact of capital programme proposals is one of the key issues to be considered when reviewing the capital programme.

43. Looking at revenue and capital resources and spend decisions together therefore helps the council to ensure that its resources are used to best effect and that decisions are taken in a 'joined-up' manner.
44. The long-term aim is to have sustainable levels of revenue budget and capital programme focused on council priorities that will enable the council to achieve the targets of the sustainable community strategy and corporate plan, meet its statutory requirements, satisfy the aspirations of residents, demonstrate best value, and keep the Council Tax at affordable levels. This appeared a very demanding aim prior to this period of sustained reductions in Government grant, and is even more difficult now. However, budget setting in any one year cannot be seen in isolation from the medium-term projections and this long-term aim.
45. There are some limiting factors, and key ones are set out below.
 - **Scope for increasing non-domestic (business) rates in Luton.** One of Luton's key issues in relation to the new finance system is that it is already very heavily developed, with limited amounts of land available for business development, and with major housing need that also has to be considered. These issues are fundamental to the development of the local plan, a draft of which was produced in October 2015. Significant business expansion is now key to the delivery of additional funding for Council services, and the Council's aims in this area are set out in the Investment Framework.
 - **Demand-led Spend.** Many areas of the Council's spend are demand-led, and have to be provided in accordance with statute. Costs of service provision to the vulnerable are particularly an issue here, and the only way they can be managed down is by implementing effective preventive measures, such as re-ablement, and edge of care services. As life expectancy continues to increase, the numbers of the elderly also increases significantly.
 - **The need to reduce the amount of waste sent to landfill.** This continues to be a major financial issue facing councils. The Council needs to develop a Waste Management Strategy and action plan to address the issue. This is likely to have significant financial implications which cannot be assessed until the Strategy is complete and costed.
 - **The need to produce a 5-year capital programme that is fully resourced.**
 - **The financial risks surrounding major capital schemes, both individually, and in terms of their combined effect.** The draft programme includes major schemes which are funded by way of capital grant. Any scheme spend in excess of the grant amounts will fall wholly on the Council. Moreover the Council has plans for future capital projects in the near future which will add to the risk.

- The assumption that London Luton Airport Limited will continue to fund trusts and voluntary organisations via charitable donations that qualify for gift aid. The overall level of LLAL donations estimated for 2016/17 is now £10million.
 - A level of Council Tax in 2016/17 that was below the average of unitary authorities, and much lower than that of the rest of Bedfordshire.
 - An relatively low yield from any increase in Council Tax, due to the fact that 84% of Luton's properties are in tax bands A, B, or C, and the number currently receiving single person discount is also above average. 1% on the 2016/17 Council Tax now yields £623K. This has improved compared with 2015/16 figures due to recent changes to the tax base.
 - The Council cannot increase its part of the dedicated schools spend by more than the percentage increase in schools spend, without the agreement of the schools forum.
46. The Council needs to continue to ensure that all its human resource, pay, and recruitment and retention policies for the present and future are set up, maintained and managed in such a way that no new equal pay liabilities emerge. The Capital Programme included in the Estimates Book is set out for 5 years, in line with the medium term revenue projections. The estimated revenue costs of the capital programme are included in the revenue projections set out below, with the following key assumptions.
47. The risks relating to the size of the programme are addressed in the Budget Risk Management Strategy. . This is a major issue for the Council, and excellent project management of the capital programme, to budget and to original specification, is fundamental to the Council's financial health, and therefore to its key objectives, particularly the one of being a financially sound and efficient council. In addition, it is essential that the schemes are built to minimise whole life running costs.
48. The resources used to fund the capital programme were reassessed as part of the 2016/17 budget process. This includes assumptions relating to airport dividend and capital receipts which both require ongoing review as they are market-dependent. The programme, projects and potential for resources will need to be kept under regular review to ensure expenditure and resources remain in balance over the medium term.
49. The Council's wholly-owned airport company, London Luton Airport Limited (LLAL), is the freehold owner, but not the operator, of London Luton Airport. LLAL is developing a business case for major investment in a mass passenger transport system to enable passengers to move speedily and efficiently from Luton Parkway Station to the Airport, rather than relying on airport buses. This will require major capital investment, with the resources provided by the Council, and the spend included in the Council's capital programme. The Council will need to take its own independent advice as to the advisability and risks involved in making such an investment. Loans made by the Council to LLAL must be at a commercial rate, reflecting the nature of the risk, to avoid any question of state aid issues. Given the Council's ability to borrow at historically low

rates, this is likely to generate a significant risk premium. However, the Council, as shareholder and as investor, must be confident of the commercial viability of the scheme, and of LLAL making such an investment, before proceeding. Fundamentally, to protect taxpayers' interests, the Council must be confident that LLAL will be able to repay the amounts borrowed, with interest, over the life of the loan.

Revenue

50. If the Government is able to maintain its offer of a four year funding settlement to 2019/20, and the Council's efficiency plan gets Government approval, then the Council can really work on an effective longer-term financial plan to achieve its objectives, developing a 3 year budget for 2017/18 to 2019/20, rather than the previous focus on one year. This would enable the Council to consider budget management over the 3 year period, with automatic carry forward of overspends and underspends at the end of each of the first 2 years, removing the risk of managers spending up to budgets at the year end, rather than managing strategically. The overall annual budgets would be brought into line with contributions to and from reserves.
51. If the four year funding settlement is confirmed, it will also give the Council certainty over a significant part of its income base. This is important as the Council aims to increase its trading income, and make investments that are intended to generate significant additional income in return. Both of these are inherently risky, and would on their own require a review of the minimum reserve level, to reflect the increased risk. However, certainty over revenue support grant and business rates top up would mitigate against this for the period to 2020.
52. It needs to be appreciated that the Council's financial profile is changing as it becomes more reliant on generating its own income, with grants reducing or ceasing. The level of risk associated with its income sources will increase, and hence there is a gearing effect as there is greater reliance on income generation than grants.
53. The key assumptions in the base revenue model are as set out below.
 - The revenue support grant reductions and business rates top ups for 2017/18 to 2019/20 are in line with the indicative figures as per the finance settlement.
 - Pay awards at 1% per annum each year.
 - The Council Tax increase (including precepts for adult social care) being a 3.95% increase in yield per annum, being 2% specifically for social care, shown as the Social Care precept, and 1.95% for general expenditure. (Yield depends upon the number of properties, and the provision for non-collection, as well as the percentage increase in council tax). It should be noted that the ongoing annual 2% increase for social care is in line with government assumptions in their spending power calculations produced as part of the 2016/17 local government financial settlement. There is a significant risk to the yield on the introduction of Universal Credit, given that many who are used to their

rates bill being paid by direct payment from benefit will be responsible to making the payments to the Council themselves, and for prioritising the use of their very limited funds.

- Provision for price increases is limited to specific contractual requirements where there have not been underspends in previous years. Contractual inflation for 2017/18 and future years has been estimated at 1%. No other allowance for inflation is included.
- Interest rates continuing at the current historically low levels for at least the next 2 years.
- The currently estimated revenue impact of the capital programme, does not make provision for any un-programmed costs arising from major projects where Government grant is cash-limited. However, the Council does have a Major Projects Reserve as a consequence of this risk.
- No additional costs arising from risks shown in the budget risk management strategy apart from those listed here.
- The reduction of New Homes Bonus payments from 6 to 4 years, as per a December 2015 consultation paper (it should be noted that the Government is also considering reducing the payments to either 2 or 3 years, and also withdrawing the Bonus from those authorities, like Luton, who have not yet had their local plans examined and approved).
- Allowance for Growth over the planning period that was identified as part of the 2016/17 budget process, including growth in Adult Social Care Limited to precepts, Care Act Better Care and Improved Better Care Funding, plus an allowance of a further £1million per annum of growth as yet unidentified.
- Provision for the apprenticeship levy at 0.5% of the employee pay bill, less the £15,000 allowance per employer, plus provision for meeting the proposed statutory target (included in the Enterprise Bill) requiring all Councils to have 2.3% of employees starting apprenticeships each year, including the administration and workforce planning required to make this happen.
- Provision for Business Rate appeals continuing at their current financial cost.
- Education Services Grant ceasing with effect from September 2017, as per the March 2016 consultation proposals, with residual funding switching to Dedicated Schools Grant.
- Provision for additional costs of £0.7million per annum arising from the 2019 revaluation of the pension scheme, taking effect from 2020/21.
- Additional responsibilities being transferred to local government with effect from 2020/21, as per the Government's intention in the consultation paper on 100% Business Rates Retention. The financial impact is estimated at approximately £3million a year.

Appendix A

- Additional business rates income of approximately £2million with effect from 2019/20, as a result of the implementation of the Council's Investment Framework.
 - Additional dividend from London Luton Airport Limited in line with the latest business plan approved by the company.
 - Additional income from the net effect of lending at commercial rates to enable London Luton Airport Limited to undertake its proposed development strategy as discussed in paragraph 49 above.
54. No estimate has been included for significant increases in unfunded demand pressures in future years. Any such estimate would increase the savings requirement. If this is to be avoided, it is essential that positive preventive action continues to be taken, particularly in the care sector in terms of family support, and enabling people to live independently. Demand management plans will be required and any growth contained within budget.
55. It is assumed that the additional funding from the Improved Better Care Fund, along with the Council's share of the increase in the Better Care Fund, is wholly used to fund pressures in the adult social care budget.

MTFP 4 Year Summary	2016-17	2017/18	2018-19	2019-20
	£million	£million	£million	£million
Net Expenditure	147.789	138.703	136.301	134.955
Funding				
Revenue Support Grant	-28.769	-21.102	-15.941	-10.704
Business Rates	- 33.284	-33.343	-34.945	-37.347
Business Rates Top Up	-10.841	-11.058	-11.279	-11.505
Council Tax exc. Social Care Precept	-62.305	-63.520	-64.759	-66.021
Social Care Precept	-1.222	-2.518	-3.815	-5.139
Total Council Tax and General Grants	-136.421	-131.541	-130.739	-130.716
Annual Additional Savings Requirement	-11.368	-7.162	-5.642	-4.239
2016-17 Budgeted Additional Savings	-11.368			
Additional Savings from Efficiency Plan		-7.162	-5.642	-4.239

56. The table below takes forward the Medium Term Financial Plan for the following 3 years - the 1st 3 Years of the new 100% Business Rates Retention System - assuming that the net impact of underlying Business Rates growth is roughly in line with inflation, the equalisation method (yet to be determined) protects the Council against loss as a result of the introduction of the new system, the top-up and safety net

arrangements are protected, and the investment framework is successful in delivering further business rate expansion.

Medium Term Financial Plan of 1st 3 years of 100% Rate Retention

MTFP 2020/21 to 2022/23	2020/21	2021/22	2022/23
	£million	£million	£million
Net Expenditure	137.545	139.256	142.507
Funding			
Business Rates 100% retention including equalisation	-60.466	-61.422	-63.396
Council Tax exc Social Care Precept	-67.309	-68.620	-69.959
Social Care Precept	-5.139	-5.139	-5.139
Total Council Tax and Business Rate Income	-132.914	-135.181	-138.494
Additional Savings Requirement	-4.632	-4.074	-4.044

57. The starting budget for each year is net of estimated changes in capital financing, etc., and the assumptions set out in the bullet points in paragraph 53.

Sensitivity Analysis

58. There are a vast number of very possible events which could change the figures significantly. For example:
- a. Each 0.5% variation in the pay award would result in approximately £0.65m variation in costs for each year concerned;
 - b. Each 1% variation in non-pay contractual inflation would result in approximately £0.-5m variation in costs for each year concerned;
 - c. Each 0.5% variation in the Council Tax yield would result in approximately £0.31m variation in income for each year concerned;
 - d. Each 0.5% variation in the Council's business rates base would result in approximately £0.17m variation in income for the year concerned in the years to 2019/20, and double that variation in subsequent years.
 - e. There could be significant new growth, not currently identified in the medium term plan, over and above the amounts included in the plan.
 - f. There could be significant additional spend pressure from demand-driven services, particularly care services, if prevention and edge of care services are not effective in keeping costs down.
 - g. Should the airport passenger throughput be 10% less than the levels assumed in the LLAL business plan, it is likely that the company would need to reduce its dividend to the Council by approximately

£1.7million. However, consideration of options in such a case is a matter for the company and not the Council.

- h. The Council could decide that the level of risk involved in making additional debenture loans to London Luton Airport are too great for the Council to finance the development, in which case the level of estimated savings required over the period to 2019/20 would increase by approximately £9million.
 - i. The investments required to deliver increases in business rates, and the jobs that should accompany them, may be delayed due to the circumstances of the private sector investment market. Should investments not result in additional business rates until 2020, the additional savings requirement over the efficiency plan period to April 2020 would increase by £2.3million.
 - j. The Government's welfare benefit changes could have a significant impact on the position. It is likely to make Council Tax debt collection more demanding, and could impact on non-collectable amounts. Further, the changes are likely to make historic housing benefit overpayments very difficult to collect. Many are being collected as direct deductions from current benefit payments at very low monthly levels. When the ability to make direct deductions is removed, the feasibility of further collection will have to be assessed.
 - k. The base budget position could vary from that shown. It could be significantly worse if not all the savings are successfully delivered and there are major overspends on capital. It could be better than shown, if the savings are delivered and there is slippage in the capital programme, which will then improve the capital and interest position.
59. On this basis, when considering targets for planning purposes, the Council needs to bear in mind that the figures shown in the medium term estimates table are a single point in a range of potential outcomes. The level of savings required each year could easily vary by £3m either way.
60. The Efficiency Plan, and a number of the documents that were published with and alongside the 2016-17 Budget Report should also be seen as a vital part of the medium term financial plan. In particular, they are the Budget Risk Management Strategy (Budget Report Appendix B), the Financial Strategy (Budget Report Appendix C), the analysis of Government Funding (Budget Report Appendix D), the assessment of capital resources (Budget Report Appendix G) the assessed lists of proposed savings (Budget Report Appendix L), the unavoidable growth items (Budget Report Appendix M), and the Treasury Management and Investment Strategies.

Medium Term Financial Strategy

61. The medium term financial plan and sensitivity analysis above shows that the position for future years involves significant financial risks and uncertainties, which will be much greater if DCLG is not able to provide the four year funding guarantee. .
62. This strategy aims to maximise income generation and efficiency savings and keep down costs in order to minimise the impact on essential

services to the public. However, the extent of the savings that have already been made in previous years does mean that it is more challenging each year to find major further efficiencies.

63. The key principles in the Council's medium term financial strategy are as follows.
- a. Officers will continue to embed the principles and practices of the 'lean' approach, in order to improve service provision and reduce costs on an ongoing basis.
 - b. The potential for net additional income (over and above any additional costs incurred in raising that income) will be rigorously assessed and effort invested into viable schemes to improve the Council's financial position.
 - c. Further efficiency savings will be continually sought and placed on the corporate savings list, with clear accountabilities for delivery by project managers, project leads, and project sponsors.
 - d. The resources of the Luton Excellence support team will be focussed on areas where they can have the greatest corporate impact and return on investment.
 - e. Specific plans will continue to be developed and implemented within overall service commissioning strategies to address and try to use preventative measures to reduce budget growth in the key demand-driven services, such as caring for complex disabilities in both adults and children, home care and residential care for the elderly, homelessness and the costs of looked after children especially out of borough placement. This will focus on improving the life-experience and independence of the vulnerable, and ensuring that appropriate levels of care are provided.
 - f. An investment plan will be further developed in accordance with the principles of the Council's Investment Framework, to enhance investment in Luton and achieve the £1.5billion of new inward investment projected in the Framework.
 - g. The Council will continue to seek ways to maximise recycling and minimise landfill.
 - h. The Council will aim to work co-operatively with its public sector neighbours, and any other appropriate authorities, to develop a shared service approach to the provision of services, particularly back office services, in order to rationalise service provision and minimise costs. A benchmarking exercise will be carried out and best practice adopted.
 - i. Every service will continue to focus on value for money, in terms of efficiency, effectiveness and economy, in order to minimise costs and improve services to the public.
 - j. The council will aim to use information technology to support transformation, reduce long-term requirements for office accommodation, minimise manual administration and hence reduce

- costs. It will aim to use its human resources services as an agent of organisational development to improve service and minimise costs.
- k. The transformation of the council will continue be based on the design principles adopted by Executive in 2010 (minute EX/126/10), which included, once opportunities for efficiency and service modifications have been optimised, determining which are essential services and prioritising non-essential services for cuts, and moving towards a commissioning approach as the default position for service provision.
 - l. Officers will use e-procurement to ensure transparent procurement policies and the use of corporate framework contracts to minimise costs and achieve rebates where appropriate. The Council has centralised its procurement service and is seeking to achieve £8million savings from procurement by 2020.
 - m. Structures will continue to be assessed on a One Council basis to ensure that the organisation is focussed on excellent customer service at the minimum cost to the council taxpayer, and that structures facilitate rather than hinder achievement.
 - n. Officers will continue to monitor budgets extremely closely, ensuring that outturn predictions reflect current realities, and that all variations are raised corporately in order that the budget can be managed effectively at an overall level, avoiding unexpected overspends so that the accounts can be closed in line with estimates. This remains key to managing budget risks, and avoiding the need to increase reserves.
 - o. The council will continue to seek to develop its commercial approach, without impacting on the services to the vulnerable
64. A key aim is to continue to improve collection of Council Tax and Business Rates, including arrears, in order to maximise the income available to the Council, and to ensure that those who do pay their tax are not subsidising those who can afford to pay, but try to avoid paying.
65. The Council will strongly encourage appropriate business development in the town and in the Enterprise Zone.
66. The Council will strive to minimise costs and maximise income from treasury management, but this will be within the context of the overriding importance of minimising risk to the Council's investments.
67. The Council will continue to develop sites, and consider marketing for sale non-operational land and buildings which do not yield significant rental income in order to generate capital receipts to pay for capital expenditure on the maintenance of buildings, highways and street lighting, including work required for health and safety reasons. The state of the property market will continue to be assessed to determine the most appropriate time to make major sales.
68. The scale of the Council's current capital programme brings with it risks and risk management requirements, particularly in terms of managing the level of financial risk and commitment made at any one time across the programme as a whole, rather than simply managing the risk of a single project, or a single department's projects. The Council is addressing this

at officer level through its Major Projects Group, which takes an overview of those major projects.

69. The other general principles guiding the strategy will be:
- a. To maintain a balanced budget position which is robust, affordable and sustainable without the ongoing use of reserves, and as part of the budget process, to set a medium term financial plan demonstrating how that position will be maintained.
 - b. Spending plans will be aligned with the Council's aims and objectives.
 - c. The Council will maintain a prudent level of reserves on an ongoing basis.
 - d. Revenue and Capital budgets will be continually reviewed and modified where necessary to ensure that resources are used effectively and targeted to achieve key objectives.

Luton Borough Council

Efficiency Plan 2016/17 to 2019/20

Introduction

1. This plan is based on the Council's mission statement: *'Enabling Luton to be proud, vibrant, ambitious and innovative'* and links with the Council's 2016/17 Budget and its Medium Term Financial Plan for 2016/17 to 2019/20. It shows how the Council will strive relentlessly to seek efficiencies in order to balance its budgets with the minimum reduction in services to the public over the next four years.

The National Context

2. The current government have offered to give greater financial certainty to Councils over the forthcoming four years by offering a multi-year financial settlement for Councils, subject to consideration of their efficiency plans. This offer is stated to guarantee Councils their minimum funding levels for the whole of the current government's spending review period, 'barring exceptional circumstances'.

The Offer to Luton Borough Council

3. The Government's grant offer to Luton is set out in the following table.

Revenue Support Grant for Year	2016/17	2017/18	2018/19	2019/20
	£m	£m	£m	£m
Grant Level	28.77	21.10	15.94	10.70
	% change	% change	% change	% change
Annual % reduction on like-for-like basis	25	26.6	24.5	32.9

4. In addition, the Government have stated that the business rates 'top up' given to Luton, which increases by inflation, will not be altered for reasons related to the relative needs of authorities. This offer will give much greater certainty to the Council's financial planning, aiding financial stability and enabling multi-year budgeting.

The Local Context

Delivering Efficiencies

5. Luton has been making substantial levels of efficiency savings each year since 2011/12, in order to balance its budget. In fact, it needed to make savings each year before 2011/12, even though Government grant levels were increasing year-on-year at the time. This was because the Council's underlying spend levels were increasing faster than its income.
6. Over the last 5 years the Council has strengthened its income base. In addition it has made substantial savings by focussing wherever possible on efficiencies. In so doing,

it has avoided large-scale redundancies that impact negatively on the local economy and the Council's reserves. As a result:

- a. £82million of budget reductions have been made successfully in the last 5 years;
 - b. The vast majority of the budget reductions to date have been efficiency savings or income increases, rather than reductions in service; and
 - c. the imbalance between underlying spend and income levels has been substantially reduced.
7. This has had the effect of reducing the levels of further savings needed in future years, despite the extent of grant reductions.

Efficiency Savings Targets

8. The efficiency savings required, and currently being delivered to balance the 2016/17 budget total £11.4million. In the Council's latest Medium Term Financial Plan the estimate of the total additional budget reductions required for the 3 period 2017/18 to 2019/20, based on the four year settlement and expected levels of increase in Council Tax yield (excluding any improvements in tax collection levels) is £17million, giving a total estimated requirement over the 4 year period of £28.4million. (It should be noted that this excludes savings that are required from the public health and housing revenue account budgets, which are both separately ring-fenced.)

Savings included in the Council's 2016/17 budget

9. The Council's Budget Book includes a detailed list of all the reductions in budget that are part of the 2016/17 budget, and are currently being delivered. These are reductions in net spend. Some of them are additional net income that will be generated by the Council without impacting on services to the public. The Budget Book also outlines some further proposals for future years, which are not yet part of the budget but have been put forward for consideration at this point. They can be found at: [ADD WEB ADDRESS OF SAVINGS HERE.](#)

Detailed Budget Savings/Additional Income by Type	2016-17 Total
	£m
Savings from efficiencies in the way existing services are provided	2.96
Savings from procurement	1.11
Savings from Commissioning	0.60
Savings from Service Redesign	2.86
Savings from budget reductions	1.88
Savings from additional net income generated	2.06
Total Efficiency Planning figure for 2016/17	11.47

Efficiency Planning between 2017/18 and 2019/20

10. The Council aims to deliver the further £17million of efficiencies required to meet its budget reduction targets to 2020 using the following approaches.
- a. Strategic commissioning and procurement savings, following the centralisation and strengthening of the procurement function in 2016. The financial planning

certainty provided by four year grant and top up figures will also enable discussions with existing providers about how efficiencies in ongoing service provision can be made to benefit service users and reduce costs for both providers and the Council, via renegotiation of aspects of existing contracts.

- b. Development of transformational projects, managed by the Luton Excellence Team, to change the way services are provided.
- c. Zero-based budgeting, building up budgets for a service area from scratch by questioning what is needed.
- d. Cross-organisational service redesign as part of the Better Together project, to improve outcomes in health and social care and manage demand.
- e. Invest to save projects, using reserves on a one-off basis to invest in order to reduce ongoing costs or to increase ongoing income, and to enable the reserves to be replenished over time.
- f. Increase net profits on public to public service trading. The Council plans to restructure its trading services, including areas which are not currently trading significantly but are deemed to have real trading potential, into one commercial trading service, to give this a much greater focus in future.
- g. Investments that over time will increase the business tax base of the Council, and hence its income.

11. The latest estimates of the amounts achievable from general fund savings options identified to date can be categorised as set out in the following table

Estimated Savings 2017/18 to 19/20 by type	
	£m
Procurement savings following centralisation and strengthening of the Procurement Function	8.0
Net additional income	3.2
Efficiencies in the way existing services are provided	1.5
Savings from service redesign	1.4
Savings from changing the commissioning approach to existing services	1.5
Total of savings identified	15.6
Additional savings to be identified	1.4

Risks and Risk Management

12. The Council assessed its principal budget risks, both short and medium term, as a part of its budget setting process in 2016/17. This also includes mitigations, and can be found at: <http://democracy.luton.gov.uk/cm5public/Meetings/tabid/70/ctl/ViewMeetingPublic/mid/397/Meeting/4725/Committee/1051/Default.aspx> under Item 10 Appendix B Part 1.
13. The greater planning certainty offered by the four year funding settlement also makes more viable the use of reserves to deal with any unexpected delays in delivering savings, where it remains clear that ultimately the saving will be delivered.
14. In terms of reserves, however, it should be noted that the move to 100% business rate retention will lead to increased income volatility, and hence an increase in the

minimum level of reserves required, unless the Government is successful in its aim to reduce the level of business rates appeals prior to the introduction of the new system.

15. Reserves are not used to fund ongoing expenditure. This is because once they are used, they are gone, but the ongoing expenditure commitments remain. Reserves not earmarked for specific purposes, over and above the minimum level needed to maintain ongoing viability, can be used for one-off schemes that will clearly improve the Council's longer-term financial position.

Capital Receipts Flexibility Strategy

16. The statutory guidance on the flexible use of capital receipts, as updated in March 2016, enables local authorities to use capital receipts achieved from the sale of fixed assets to be used to fund set up and implementation expenditure on projects designed to generate ongoing revenue savings in the delivery of public services. To qualify, authorities are required to prepare an annual Capital Receipts Strategy, which can be part of the Efficiency Plan. Accordingly, these paragraphs are put forward as the Council's Strategy for 2016/17.

17. The Council does not have any unallocated capital receipts from fixed asset sales, and the receipts from projected future sales are already earmarked to cover the current capital programme. As a result, there are currently no plans for the flexible use of capital receipts in 2016/17. Projects designed to generate ongoing revenue savings are funded from revenue, in accordance with the principles set out in 9b and 9e, above. Should this position change, a revision to this Strategy will be brought forward.

Prudential Indicators

18. As there is no proposal for the flexible use of capital receipts, this Strategy has no impact on the Prudential Indicators previously approved by Council in February 2016 as part of the 2016-17 Treasury Management Strategy Statement and Annual Investment Strategy.

Monitoring the Delivery of the Efficiency Plan

19. Delivery will be monitored annually in the Council's financial Outturn report, published on the Council's website as part of the Executive Agenda in June each year.

Links to the Council's 2016/17 Budget and its updated Medium Term Financial Plan, 2016/17 to 2019/20.

20. The 2016/17 Budget Report can be found at <http://democracy.luton.gov.uk/cm5public/Meetings/tabid/70/ctl/ViewMeetingPublic/mid/397/Meeting/4880/Committee/1106/Default.aspx> and the latest Medium Term Financial Plan can be accessed at:



For:	(x)	Agenda Item Number: 9
Executive	<input checked="" type="checkbox"/>	
CLMT	<input type="checkbox"/>	
Meeting Date: 19 th September 2016		
Report of: Service Director of Finance and Audit		
Report author: Dev Gopal		

Subject: Business Rates Retention – Response to Consultation (For Executive Only) Lead Executive Member(s): Cllr Malcolm Wards Affected: All	<u>Consultations:</u>	(x)
	Councillors	X
	Scrutiny	<input type="checkbox"/>
	Stakeholders	<input type="checkbox"/>
	Others	X

Recommendations

1. Executive is recommended to:

- 1) approve the attached response to the Government’s consultation document entitled Self Sufficient Local Government: 100% Business Rates Retention; and
- 2) approve the attached response to the Government’s consultation document entitled Check, Challenge, Appeal – Reforming Business Rates Appeals – consultation on statutory implementation.

Background

2. On 5 July the Government published its consultation document on 100% Business Rates Retention. On 17 August the Government published a consultation document on reforming business rates appeals.
3. Both of these documents are extremely important for the Council's financial future. Under the proposals for 100% Business Rates Retention, the Business Rate is likely to become the Council's most important source of income.
4. Since the current system of retention of almost half of the Business Rate began, the most difficult aspect for the Council has been the appeals system, as technical challenges, to which the Council is not a party, can reduce its income substantially.

The current position

5. Since 2013 the Council has retained 49% of any increase in business rates, with 1% going to the Fire Authority, and 50% going to Government.
6. In 2015 George Osborne proposed to change fundamentally the basis of local government finance by moving to a system of 100% Business Rates Retention. The consultation paper sets out how the Government proposes to introduce this change.
7. While this is a major change in the method of distribution, which will result in winners and losers amongst local authorities, it should be noted that the current system already requires Government to allocate all of the funds received from Business Rates to local government, and an account of the use of business rates is published each summer, currently showing that the amount not retained by Councils in business rates is returned to them in revenue support grant.
8. The Office for Budget Responsibility estimates that by 2020, when the new system is expected to begin, the amount of business rates will have increased substantially. As a result, Government proposes to increase the responsibilities of local government, and to reduce specific grants as well as removing revenue support grant, so that the new system does not enable local government to

become better off, and that its financial challenges are at least equivalent to those faced by the rest of the public sector.

9. The types of issues this raises at an individual authority level are twofold:
- 1) there will be differential impacts on local authorities dependent on the scope to achieve future increases in business rates; and
 - 2) there will be differential impacts dependent on underlying levels of demand for those services which are brought into business rates funding. For example, switching early years funding into business rates will place greater pressure on those authorities with high birth rates, such as Luton. Adding in further funding responsibilities for the care of the elderly will impact more on authorities with the highest levels of those at 65+.
10. The Government have stated that it aims to include an element of 'equalisation' and reset into the new system. Until options on this are clarified and modelled, it is not possible to estimate the impact on Luton or any other individual authority. However, as an authority currently receiving a top-up of business rates (in contrast with authorities such as Central Bedfordshire who currently pay a tariff that is used to fund top-ups) it should be noted that the equalisation system is particularly important for Luton, and however it is done it will not protect from continuing increases in future demand: it will be based on assessment of relative demand, or proxy measures of relative demand, available when the new system is set up.

Business Rates Appeals

11. There are many concerns about the current appeals system, including the sheer volume of appeals currently undetermined. The national total is said to be around 300,000 at present. Under the current system an appeal can be lodged and the basis of the challenge not revealed until it comes to tribunal. This would make it difficult for Councils to establish the likelihood of success, and the potential financial implications for the Council, even if the Council had the right to access the information, which in most cases it does not. The consultation proposes incentives and requirements to encourage early statement of facts. It also proposes to introduce penalties for providing false information, together with fees for appeals (refundable if the appeal is successful), which may reduce the prevalence of the 'no win no fee' firms in the current appeals market.
12. Another proposed change is to ensure that tribunals only order a change in rateable value where the current valuation is 'outside the bounds of reasonable professional judgement'. This is intended to limit the scope for, and amount of, appeals.
13. There is a specific section on the role of local authorities, acknowledging that councils need to know more about the state and progress of cases, and using the Enterprise Act 2016 to enable the Valuation Office Agency (VOA) to disclose information to local authorities in certain circumstances, including giving authorities the right to ask to see information on pre-appeal challenges received by the VOA, and to give the VOA information they consider relevant relating to those challenges. It is also proposed that councils will be given greater access to information on appeals made to tribunals.
14. However, the consultation proposes to remove the ability councils currently have to appeal against valuations of some properties other than their own. Councils currently have 'interested party' status in relation to some properties. Many council officers believe that as councils' income is dependent on rateable values, councils should be interested parties in all business rate valuations, so they can challenge any valuations which appear to be clearly far too low.

Goals and Objectives

15. The aim of the responses to the consultations is to make the best possible case to government to create a business rates retention system that gives Luton the best chance of being financially sustainable, in order for it to enable the provision of quality services in Luton.

Proposal
16. That the proposed responses, attached as appendix A and appendix B, are approved for submission to Government.
Key Risks
17. That the new business rates retention system is introduced in a way that is not financially sustainable for some local authorities, and that Luton is adversely affected. The consultation response is aimed at mitigating this risk.
18. That business rate appeals make the business rate retention system extremely volatile for local authorities, and that the scale of appeals continues at a rate that requires councils to make very large provisions in case those appeals reduce their income substantially. The consultation response, and many of the proposals in the consultation document, are aimed at mitigating these risks.
Consultations
19. None
Appendices and additional background papers attached:
Appendix A – Proposed response to the consultation on 100% Business Rate Retention Appendix B – Proposed response to the consultation on Reforming Business Rate Appeals Weblink to Business Rate Retention consultation paper: https://www.gov.uk/government/consultations/self-sufficient-local-government-100-business-rates-retention Weblink to Business Rate Appeals consultation paper: https://www.gov.uk/government/consultations/reforming-business-rates-appeals-draft-regulations

IMPLICATIONS

For Executive reports

- grey boxes must be completed
- all statements must be cleared by an appropriate officer

For CLMT Reports

Clearance is not required

		Clearance – agreed by:
Legal	There are no specific legal implications arising from this report	J. Newman, Solicitor Legal Services on 08/09/2016
Finance	The financial implications are dealt with in the body of the report	D. Gopal, Service Director, Finance & Audit on 07/09/16
Equalities	There are no specific equality implications arising from this report	Maureen Drummond, Cohesion and Equalities Adviser, 8 September 2016
Environment	There are no specific environmental implications arising from this report	Rod Black Highway Development & Sustainable Travel Manager 8th September 2016
Public Health	There are no specific public health implications arising from this report	Stephen Gunther, 08/09/16
Staffing	There are no specific staffing implications arising from this report	
Other		

FOR EXECUTIVE ONLY - Options:

(a) Reject the proposals

(b) Approve the proposals with a modification

(c) Approve the proposals subject to them meeting a specific condition (conditional approval can only be granted in the limited circumstances specified in the regulations).

Self Sufficient Local Government: 100% Business Rates Retention Consultation Document

Question 1: Which of these identified grants / responsibilities do you think are the best candidates to be funded from retained business rates?

The Guiding Principles set out in Section 3.7 of the consultation are a good base for determining candidates, and in particular section 4 is key. It should also be noted that transferring demand-dependent grants will have the effect of requiring individual authorities to build up and retain greater levels of reserves in order to deal with the increased financial risk.

On this basis, devolution candidates are:

- Revenue Support Grant
- Rural Services Delivery Grant
- The core ongoing element of the GLA transport grant
- Public Health Grant, but **only** if the grant allocation for the final year of the existing system is radically changed to align it with the NHS need based formulae. If this is not done the system will embed an allocation that is unequal, and that is not sustainable. Any such ongoing inequity would also have to be acknowledged in the equality assessment of any proposal.
- Independent Living Fund
- Council Tax and Housing Benefit administration
- Youth Justice

Grants identified by Government which are **NOT** good candidates are:

- Attendance Allowance
- Early Years

This is because they do not meet the criteria set out in 3.7. for the reasons set out below.

As they are very demand dependent, and demand is volatile:

- a) If they are devolved, each authority will need to keep a substantial level of reserves – significantly greater than current levels – in order to be financially prudent given the increased level of risks that they will face. This will impact negatively on the level of funding available for local services, and hence will have negative outcomes for local services and people, and will not support economic growth, as well as having a negative impact on the medium term financial position of local government.
- b) Those authorities with high increases in numbers of children and in those eligible for attendance allowance will become disproportionately poorer over the period to the next needs reset, at the very same time as their need to spend increases.

The Department for Education has been committed to developing a formula for a fair distribution of Early Years Funding since 2012. It confirmed in its July 2014 report entitled Fairer Schools Funding that 'a fair distribution of early years funding would be best achieved by putting in place a national

early years funding formula and we remain committed to achieving this' and it announced in March 2016 that it would consult on a separate Early Years Formula later this year. It is not appropriate for merging into the Business Rates system the moment such a formula is created.

Question 2: Are there other grants / responsibilities that you consider should be devolved instead of or alongside those identified above?

Community Voices Grant

Question 3: Do you have any views on the range of associated budgets that could be pooled at the Combined Authority level?

This needs to be considered by Combined Authorities and those currently considering this approach.

Question 4: Do you have views on whether some or all of the commitments in existing and future deals could be funded through retained business rates?

Commitments funded through retained business rates need to be ongoing at a consistent spend level, rather than those that are time-limited, subject to a bidding process, or volatile at a local level.

Question 5: Do you agree that we should continue with the new burdens doctrine post- 2020?

Ye. This is essential, and it is pleasing to see the Government proposing to continue with this.

Question 6: Do you agree that we should fix reset periods for the system?

Yes, essential for planning purposes

Question 7: What is the right balance in the system between rewarding growth and redistributing to meet changing need?

Equally important.

Question 8: Having regard to the balance between rewarding growth and protecting authorities with declining resources, how would you like to see a partial reset work?

A partial reset every 5 years with a focus on areas where the numbers of those in high cost care have increased disproportionately compared with the national average.

Question 9: Is the current system of tariffs and top-ups the right one for redistribution between local authorities?

The current system of tariffs and top-ups can be made to work, if that starting point at resets is right.

Question 10: Should we continue to adjust retained incomes for individual local authorities to cancel out the effect of future revaluations?

Yes, this is an important protection.

Question 11: Should Mayoral Combined Authority areas have the opportunity to be given additional powers and incentives, as set out above?

No.

Question 12: What has your experience been of the tier splits under the current 50% rates retention scheme? What changes would you want to see under a 100% rates retention system?

Not applicable to Luton as a unitary authority

Question 13: Do you consider that fire funding should be removed from the business rates retention scheme and what might be the advantages and disadvantages of this approach?

Yes. This would give a clearer link between local authorities' success in growing business rates, and the funding of those authorities.

Question 14: What are your views on how we could further incentivise growth under a 100% retention scheme? Are there additional incentives for growth that we should consider?

No. A 100% retention scheme generates huge incentives for growth. It is not appropriate or reasonable to consider further incentives.

Question 15: Would it be helpful to move some of the 'riskier' hereditaments off local lists? If so, what type of hereditaments should be moved?

Yes, but only if there is a fully compensating change to the tariff/top up that takes place at the same time, so that authorities are not adversely affected by the change.

This should only be considered in relation to national infrastructure where local authority action is not generating economic growth. So the national cable network, for example.

(NOTE NOT PART OF DRAFT RESPONSE NB – there is a risk that this is applied to national infrastructure assets, which could be construed as including Airports. Luton needs to fight to keep airports on local lists, hence the comment that this should not apply to places where local authority action generates economic growth.)

Question 16: Would you support the idea of introducing area level lists in Combined Authority areas? If so, what type of properties could sit on these lists, and how should income be used? Could this approach work for other authorities?

This will not work unless local authorities are in combined or pooled areas

Question 17: At what level should risk associated with successful business rates appeals be managed? Do you have a preference for local, area (including Combined Authority), or national level (across all local authorities) management as set out in the options above?

In a system of 100% rate retention, the risk needs to be managed at the level of the list concerned, unless a substantial part of the income is retained nationally to address the appeals risk.

Question 18: What would help your local authority better manage risks associated with successful business rates appeals?

Local authorities being designated interested parties in all appeals proceedings, receiving full information on all appeals in their areas, so that they can make better judgements on necessary provisions in advance of the appeals.

Question 19: Would pooling risk, including a pool-area safety net, be attractive to local authorities?

Only where authorities are working as a combined area.

Question 20: What level of income protection should a system aim to provide? Should this be nationally set, or defined at area levels?

This needs to be nationally set. The current level is a reasonable compromise.

Question 21: What are your views on which authority should be able to reduce the multiplier and how the costs should be met?

As a unitary authority this is simple. Views on combined authority areas need to come from those authorities.

Question 22: What are your views on the interaction between the power to reduce the multiplier and the local discount powers?

It is important to retain local discount powers for targeted reliefs, operating alongside the power to make a structural change, which will have major consequences for an authority's income receivable from each business.

Question 23: What are your views on increasing the multiplier after a reduction?

If there are limitations on authorities' powers to increase the multiplier after a reduction, there will be very few reductions in multipliers, because of the extent of the financial risk it will generate for the authority. If it does not work, in terms of bringing in substantial additional business and business rates, authorities need the ability to increase it back to the national rate in one go. There has to be a viable contingency plan to enable action in local government.

Question 24: Do you have views on the above issues or on any other aspects of the power to reduce the multiplier?

No

Question 25: What are your views on what flexibility levying authorities should have to set a rateable value threshold for the levy?

It should be for levying authorities to determine a rateable value threshold for any levy.

Question 26: What are your views on how the infrastructure levy should interact with existing BRS powers?

The power to raise an infrastructure levy should not be restricted to Combine Authority Mayors. It should be available to all authorities

Question 27: What are your views on the process for obtaining approval for a levy from the LEP?

LEP approval, if required, should apply to all the LEPs within the proposed area of application of the levy.

Question 28: What are your views on arrangements for the duration and review of levies?

Durations should be in whole years, transparently related to the costs of the infrastructure project or projects, and set out in the initial prospectus for the levy.

Question 29: What are your views on how infrastructure should be defined for the purposes of the levy?

The Community Infrastructure Levy definition can be used

Question 30: What are your views on charging multiple levies, or using a single levy to fund multiple infrastructure projects?

A single levy could fund multiple infrastructure projects. Charging multiple levies at once would not be appropriate, as proposals need to be capable of simple explanation.

Question 31: Do you have views on the above issues or on any other aspects of the power to introduce an infrastructure levy?

Powers to raise an infrastructure levy should be extended beyond Combined Authority Mayors. Authorities will automatically consult beyond the LEP, but the LEP has to be the formal process. There is no need to micromanage via legislation. Referenda are expensive in terms of time, resource and money, and should not be required.

Question 32: Do you have any views on how to increase certainty and strengthen local accountability for councils in setting their budgets?

The fundamental volatility of the business rates system prevents certainty. The way to provide slightly more certainty is to ensure local authorities have full detail of all appeals, as per the answer to Question 18 above.

Question 33: Do you have views on where the balance between national and local accountability should fall, and how best to minimise any overlaps in accountability?

Local authorities are primarily accountable to their taxpayers, and the audited Annual Governance Statement and Annual Accounts are key documents in this accountability. The National Audit Office's current role, with its remit of reviewing local government spend overall, but not reviewing individual authorities, keeps the balance between local and national accountability at an appropriate level. It is important that there is no extension of the NAO's role, or that of the Public Accounts Committee, beyond that overview of Local Government.

Question 34: Do you have views on whether the requirement to prepare a Collection Fund Account should remain in the new system?

The Collection Fund needs to be retained where there are billing and precepting authorities. Therefore there needs to be a Collection Fund for Council Tax, and for Business Rates in two-tier authority areas. If Fire Authorities are funded directly by Government Grant, under the options considered in this consultation, then Unitary Authorities will not have precepting authorities or a central government share of local business rates income. In those circumstances there would be no justification for the inclusion of business rates in the Collection Fund for unitary authorities.

Question 35: Do you have views on how the calculation of a balanced budget may be altered to be better aligned with the way local authorities run their business?

The calculation should ensure that the focus is on key financial performance measures, by being set out as follows:

Gross Service Expenditure
Other expenditure
Income other than grants and rates
Grant income
Forecast Business Rates Income
Transfer to/from reserves
Council Tax Requirement

Question 36: Do you have views on how the Business Rates data collection activities may be altered to collect and record information in a more timely and transparent manner?

No

Check, Challenge, Appeal

Reforming Business Rates Appeals – consultation on statutory implementation

Q1. Do you agree that the draft Regulations put in practice the agreed policy intention as set out in the Government policy statement?

In general the draft regulations appear to put in place a system to manage the flow of cases in a structured and transparent way, as per the agreed policy intention, provided that the Valuation Office Agency has sufficient administrative resources to be able to manage its responsibilities during the check and challenge stages in an efficient manner.

Q2. We would welcome your views on the approach to implementing fees for the appeal stage.

The Council welcomes the proposed approach as it considers that it, if combined with the amended proposals for determining appeals, it should discourage the speculative 'no win no fee' approaches made by some firms to taxpayers.

Q3. We would welcome your views on the approach to implementing penalties for false information.

The Council considers that this is entirely appropriate and brings business rates in line with other tax regimes.

Q4. We would welcome your views on the approach to implementing the package for small businesses and small organisations.

The Council supports the definition of small business being attached to the size of the business rather than the size of the property, as some large businesses do have a number of small properties.

Q5. We would welcome your views on the approach to dealing with Material Changes in Circumstances.

The Council agrees with the general approach stated in the consultation document, including in particular that 'the ratepayer should submit a check as soon as possible after the Material Change in Circumstances event'. However, the Council cannot see how the regulations will ensure that those checks are submitted as soon as possible, and suggests that this needs addressing in the final regulations.

Q6. We would welcome your views on the amended approach to determining appeals against valuations.

The Council considers it essential that the Government implements a system that substantially reduces the extent of appeals, for the reasons set out in the answer to question 7 below. Therefore, the Council welcomes the proposal to limit changes in rateable value to valuations outside the bounds of reasonable professional judgement.

Q7. We would welcome your views on the role of local authorities in the reformed system.

The Council is pleased to note the acknowledgement of the increased role of local authorities in the appeals process, due to the importance of business rate funding in local authority finance.

In particular, Government needs to bear in mind that when the system of 100% Business Rate Retention is introduced, appeals will have an even greater impact on public finances than is currently the case. If the extent, value and backlog of appeals is not substantially reduced, local authority chief financial officers will be forced to advise their authorities that the level of minimum reserves required will need to be increased, because of the increased risk of financial volatility for individual local

authorities. This is because a larger proportion of each authority's income will be subject to potential reduction if appeals are successful.

Given this, the 'statutory gateway' in the Enterprise Act 2016, allowing disclosure of VOA information, needs to be used to enable local authorities to have very clear information on checks challenges and appeals, to ensure that the extent of public funds that has to be tied up in local reserves and provisions relating to challenges and appeals is kept to only those amounts that are absolutely necessary.

The proposed statutory rights for authorities to provide and receive information on challenges are therefore essential, as are the rights for authorities to be sent full information on the outcome of checks and challenges.

Authorities also need the greater access proposed in relation to information on appeals lodged with Tribunals. More than this, authorities need the right to be 'interested persons' with the ability to register an interest in an appeal and to provide information to tribunals should it be relevant.

Further, authorities need to retain the right to be interested persons with the ability to appeal against a valuation. This is required in order to complete the natural system of checks and balances necessary for a valuation process. The ability for taxpayers to appeal enables a check of any valuations that may be too high. The ability for local authorities to appeal enables a check of any valuations that may be too low. In practice with the proposed introduction of the limitation of successful appeals to those outside the bounds of reasonable professional judgement, the number of local authority appeals is likely to be extremely limited, and will only be used in relation to those valuations that really stand out as being much too low. It is however very important that there is such an external scrutiny of valuations to establish whether or not there are ones that are anomalously low.

Business Rates Reform

Fair Funding Review: Call for evidence on Needs and Redistribution

Question 1: What is your view on the balance between simple and complex funding formulae?

The aim should be to find measures that are relatively easy to obtain yet adequately explain a great proportion of need to spend. Too simple measures will not adequately differentiate between differing needs. There is no point in complexity for the sake of it.

Question 2: Are there particular services for which a more detailed formula approach is needed, and – if so – what are these services?

Care formulae need to be constructed in sufficient detail given the huge cost of single individuals with complex needs.

Question 3: Should expenditure based regression continue to be used to assess councils' funding needs?

Where there are not better measures.

Question 4: What other measures besides councils' spending on services should we consider as a measure of their need to spend?

Wherever feasible, consistent measures of actual need to spend should be used. The opportunity to use actual numbers of clients and actual conditions of road should be explored, rather than simply taking actual spend, which some will say rewards inefficiency in some instances.

In the past, because need was reviewed annually, it was essential to find proxy measures to avoid 'perverse incentives', or encouraging spend in order to receive more funds in future years.

In this new system, where the option of 'frequent' reviews of the formula is taken to be every 5 years, there is no real issue of perverse incentives, particularly if stratified client numbers, or similar, can be used.

Therefore, in terms of care, the following should be considered:

- Numbers of elderly clients in residential care in substantial need
- Numbers of elderly clients in residential care in critical need
- Numbers of Local Authority clients in nursing care in substantial need
- Numbers of local authority clients in nursing care in critical need
- Numbers of children with learning disabilities in each of the SEN criteria
- Numbers of children with physical disabilities
- Numbers of adults who meet the criteria for care and support needs under the Care Act 2014

Each multiplied by the average annual cost of care for the particular client group in the region or sub-region of a particular authority. (Sub-regions being used where there is a significant cost differential within a region, and particular client groups being differentiated by levels of need and the type/intensity of assessed care package required.)

Question 5: What other statistical techniques besides those mentioned above should be considered for arriving at the formulae for distributing funding?

- Non-expenditure regression.
- Multi Level Modelling

In terms of highways, road condition surveys should be used in alliance with the length of the road network to determine relative need to spend, rather than using traffic flows, which are a proxy for actual condition.

In terms of waste collection and disposal, actual numbers of bins collected, and the weights of waste disposed of by the various methods should be used.

Question 6: What other considerations should we keep in mind when measuring the relative need of authorities?

As noted in the paper, 'super dense' urban areas have additional costs as well as those that are 'super sparse'.

The demands in areas where there are particularly high levels of diversity, in terms of:

- effective communication when the local population has more than 120 different first languages,
- requirement for expenditure on community cohesion
- 'Prevent' demands

Question 7: What is your view on how we should take into account the growth in local taxes since 2013-14?

The growth in local taxes since 2013-14 should be taken into account when assessing resources available to each Council. It would be seen as perverse by local taxpayers to revert to a 2013-14 resource base for a redistribution calculation for 2019-20.

Question 8: Should we allow step-changes in local authorities' funding following the new needs assessment?

It is difficult to be definitive on this until the outcomes of the new needs assessment are seen. The degree to which damping mechanisms may be required will be dependent on the results of the combination of the needs assessment with the

estimated income for authorities in the first year of the new system. As a general rule, major step changes down, beyond standard planning levels in current circumstances, should not be allowed unless the authorities concerned have a substantial level of reserves deemed by their external auditors to be in excess of the amounts reasonably required given their business needs and risks.

Question 9: If not, what are your views on how we should transition to the new distribution of funding?

There should be an aim of setting a fixed period over which damping should be phased out. The period should be assessed once the extent of any variations are known.

Question 10: What are your views on a local government finance system that assessed need and distributed funding at a larger geographical area than the current system – for example, at the Combined Authority level?

Combined Authorities will need to comment on the proposal in relation to their areas. The Council is against the use of such an approach in its own area, as it does not believe it could be made to work in current circumstances.

Question 11: How should we decide the composition of these areas if we were to introduce such a system?

This needs to be based on areas volunteering to pilot such a system.

Question 12: What other considerations would we need to keep in mind if we were to introduce such a system?

The formulae should not be amended to treat such areas more favourably than others in financial terms – that would go against the principles of a need-based distribution.

Question 13: What behaviours should the reformed local government finance system incentivise?

The local government finance system incentives growth, which is key to the economy as a whole. This is simple to focus on and understand. Any attempt to add additional incentives will complicate the message and risks moving the focus away from growth, which would be counter-productive for the Government and the economy.

Question 14: How can we build these incentives in to the assessment of councils' funding needs?

The Government should stick to its focus on growth. Efficiency is a necessary product of the current and future financial situation, and as reports have shown, local government has been more successful at it than other parts of the public sector.

Agenda Item Number: 10

Luton

For:	(x)
Executive	<input checked="" type="checkbox"/>
	<input type="checkbox"/>
Meeting Date: 19 th September 2016	
Report of: Director of Public Health, Procurement and Commissioning	
Report author: Adam Divney	

Subject: Luton Cultural Services Trust – Future Funding (For Executive Only)	Consultations: Councillors Scrutiny Stakeholders Others	(x) <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
Lead Executive Member(s): Cllr A Malcolm and A Khan		
Wards Affected: ALL		

Recommendations

1. **The Executive is requested to confirm the level of funding of £1m per annum to the Luton Cultural Services Trust (LCST), subject to the parties entering into a Service Level Agreement in respect of the provision of the statutory library service for 2017/18/19.**

Background

- The Public Libraries and Museums Act 1964 places a statutory requirement on local authorities to provide for a 'comprehensive and efficient' public library service and that the basic lending and reference services should be free at the point of use.
- Since 2008, when LCST was formed, the delivery of a statutorily compliant library service by LCST under the terms of the Management Agreement with the Council, for the provision of the wider cultural offer which also includes the wider cultural offer of museums, the library theatre, hat factory and events.
- In the estimates for 2016/17 and Medium Term Financial Plan, provision was made for £1m to fund LCST to deliver the statutory element of the library offer.

The current position

- Officers have been in negotiations with LCST to agree a Service Level Agreement to define and deliver the statutory library service and disentangle the non-statutory element, which will remain within the Management Agreement.
- Agreement has been reached in principle, subject to the proviso that LCST are seeking from the Council a level of assurance to this level of funding for the period 2016/17/18/19. Their position being that they have experienced very significant reductions in funding from other sources and they are seeking this assurance so they in turn can be confident about maintaining the library offer to the current levels and thereby ensure compliance with the statutory requirements is being maintained.

Goals and Objectives

- To secure an agreement with LCST for the delivery of the statutory library service at an annual cost of £1m.

Proposal

- To provide an assurance to LCST that the £1m levels of funding for the statutory library service

Key Risks

- The Council's financial position worsens and the £1m level of funding is not affordable.
- Mitigation: The SLA with LCST will include the proviso that the Council would have absolute and sole discretion to vary the Service or terminate the SLA Agreement if the funding available to the Council to provide the Service is reduced or withdrawn. The Council may also face further

reductions from Central Government and the 100% Business Rates Retention brings further uncertainties which may result in the Council facing serious financial difficulties. Hence the Council will have to review its financial commitments on a yearly basis as part of the normal budget setting process.

11. LCST wish to introduce changes the library service that might have a negative impact on the service overall and in particular the compliance with the statutory element.
12. Mitigation: Any changes to the library service would be subject to extensive consultation and ultimately require a confirmatory decision of the Council as the statutory authority that any changes did not compromise the services statutory compliance.
13. With regards to the IIA – there is no change proposed to how the library service will be delivered. A comprehensive IIA was completed in 2013 (Executive on 29th July 2013, appendix G2) which provided an analysis of impact of the new model of library service for the Town and how it meets the needs of the local community.

Consultations

As per previously completed IIA (see comment above)

Appendices attached:

N/A

Background Papers:

N/A

IMPLICATIONS

For Executive reports

- grey boxes must be completed
- all statements must be cleared by an appropriate officer

For CLMT Reports

Clearance is not required

		Clearance – agreed by:
Legal	There are no immediate legal implications contained within this report	Legal – John Newman 05.09.16
Finance	The financial implication is that funding is committed for library services until 18/19. However, any future government policy changes for example retention of business rates and extra financial responsibilities come with these changes and its impact on the Council’s overall budgets will need to be reviewed thoroughly on yearly basis.	Atif Iqbal (Finance Manager, Housing, Community Living, Adult Social Care & Public Health)
Integrated Impact Assessment (IIA) – Key Points		
Equalities/ Cohesion/Inclusion (Social Justice)	With regards to the IIA – there is no change proposed to how the library service will be delivered. A comprehensive IIA was completed in 2013 (Executive on 29th July 2013 APPENDIX G2) which provided an analysis of impact of the new model of library service for the Town and how it meets the needs of the local community.	Social Justice Unit 26.08.16
Environment	N/A	Strategy & Sustainability

Health	Please see Equalities section – no change is suggested in respect of how the library service will be delivered. The provision of a free local library services is a key contributor to the health and wellbeing of local residents, this provision will support education indicators to increase Luton Literacy levels through access to reading and learning, as well as reduce isolation	Public Health 02.09.16
Community Safety		
Staffing		
Other		

FOR EXECUTIVE ONLY - Options:

- a) to reject the recommendation
- b) to request further information



<p>For: (x)</p> <table border="1" style="width: 100%;"> <tr> <td style="width: 80%;">Executive CLMT</td> <td style="width: 20%; text-align: center;">x <input type="checkbox"/></td> </tr> <tr> <td></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table> <p>Meeting Date: 19.09.16</p> <p>Report of: Proposed Changes to Children Centres in Luton Report author: Jo Fisher, Service Director for Prevention and Early Intervention</p>	Executive CLMT	x <input type="checkbox"/>		<input type="checkbox"/>	<p>Agenda Item Number: 11</p>
Executive CLMT	x <input type="checkbox"/>				
	<input type="checkbox"/>				

<p>Subject: Proposed Changes to Children Centres in Luton (For Executive Only) Lead Executive Member(s): Cllr Hussain Wards Affected: All</p>	<p><u>Consultations:</u></p> <p>Councillors <input type="checkbox"/></p> <p>Scrutiny <input type="checkbox"/></p> <p>Stakeholders <input type="checkbox"/></p> <p>Others <input type="checkbox"/></p>	<p>(x)</p>
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Recommendations

- That the Executive approve the proposed changes to Children’s Centres below, in order to make them more flexible and to extend integrated service delivery across the town.**

Background

- Under the Childcare Act 2006 (“the Act”) local authorities have a statutory duty to provide sufficient children’s centres to meet the needs of parents, prospective parents and young children in the authority’s area. It follows from the legislation that children’s centres are as much about making appropriate and integrated services available, as it is about providing buildings in particular geographical areas.

The current position

- Children’s centres currently provide a wide range of services and activities across Luton for children aged 0-5 years and their families. In 2012, following a review of children’s centres in the town, the 23 children’s centres were restructured into the current ‘hub and satellite’ arrangement: this incorporates 7 children’s centre hubs and 16 satellite buildings used to deliver children’s centre services and the use of an additional 20 buildings to deliver occasional activities across the town. The centres are managed by different lead organisations with two being led by the Council, four led by Nursery Schools and one with a PVI (private, voluntary or independent) provider as the lead organisation.
- Key drivers for change:
 - The DfE produced new guidance for children’s centres in April 2013, after the previous review was complete, on delivery models for inspection: Stand-alone, Collaborative and Group. Luton’s current hub and satellite model does not fit with these although they have been treated as stand-alone as a ‘best fit’.
 - A strategic push to link children centres more with the Council’s Early Help services, Health Visiting and Flying Start – bringing together prevention, early intervention and targeted services for children from pregnancy right up to the age of 19.
 - A budget reduction target of £1 million for children’s centres.

Goals and objectives

5. Our vision is to develop a new approach that is better for families and makes more effective use of the money we have available, focused on the delivery of evidence based interventions. Our plan is to deliver an Integrated 0 – 19 Health and Wellbeing offer and to roll this out in a phased approach starting with Phase 1 (0-5 years) from September 2016.
6. In the first instance this will bring together all of the support currently on offer under the Children's Centre programme, the Flying Start programme and the Healthy Child 0-5 Programme. In the longer term this will ensure better coordination of all family support, all the way from conception and birth through childhood and into the teenage years.
7. We will put in place a skill mix integrated team, with family support workers at the centre - working alongside families, providing regular, more frequent and consistent contact to particularly to families with additional and often complex needs and a greater focus on prevention and early intervention to reduce the risk of family need escalating to the threshold that requires high cost, reactive interventions. This is a model based on the key worker model of Luton's Stronger Families and is the model currently operating in Leeds and planned in other areas such as Essex and Suffolk. Families will be offered a core offer of services across the whole of the town, so all families can access the same services at all children centres, with some local variation based on community needs.
8. Key short term objectives:
 - Extend children's centres to deliver the non-clinical aspects* of the 0-5 Healthy Child Programme (as agreed with Public Health Commissioners);
 - Link children's centres and the work they do even more closely to the Council's Early Help offer, Health Visiting and Flying Start, bringing together prevention, early intervention and targeted services for children from pregnancy to 5 years of age in Luton – thereby reducing duplication and ensuring a single approach to early years in Luton;
 - Further develop our skilled workforce within children's centres through training in evidence based parenting programmes and key primary prevention messages to deliver the Flying Start core offer;
 - Embed a single consistent approach to children's centre services in Luton regardless of where families live in the town;
 - Achieve a saving of £1 million against the children's centre delivery.

Proposal

9. The proposal is to have a **single children's centre 'group' model**. In essence this means the Council will lead and manage all of Luton's children's centres, centrally managing staff and services, ensuring an equitable service model across the town and providing consistent service delivery – and holding accountability for children's centre services.
10. The recent consultation by the DfE on future Ofsted inspection arrangements indicated a shift to inspecting the Council's Early Intervention and Prevention and Children's Centre services (the inspection framework details are due to be confirmed in the Autumn 2016). The centralisation of a single children's centre model will ensure readiness for this: the inspections of centres sharing this type of arrangement will take place simultaneously. Each children's centre in the Group is not seen as a stand-alone centre nor will it receive its own report; only one inspection report is

received.

11. We are proposing to **rename and extend the current children's centres by integrating them with Flying Start and the 0-5 Healthy Child Programme**; and then in the longer term to link them more closely to the 5-19 Healthy Child Programme and School Nursing, as well as Early Help Family Support. They will be called Flying Start Children's Centres.
12. In the proposed service model, children's centre staff will work closely with health visiting staff and the Flying Start programme, making sure that:
 - Universal and targeted services for families are delivered across the town with staff that families know and in buildings that are easy for families to get to;
 - Duplication of services is minimised, with children centres delivering the non-clinical aspects of the 0-5 Healthy Child Programme and Flying Start programme;
 - In the longer term, children centres developing to work with the whole family, all the way from conception and birth through to childhood and into the teenage years.
13. We are proposing to stop calling buildings children's centres and instead put in place **4 Flying Start Children Centre neighbourhoods (or hubs) called North, Central, South and West**. This neighbourhood model is based on the organisation of health visiting services and Flying Start and will be the focal point for co-ordinating services and support for families in the area.
14. This will mean a reduction in the number of registered children's centres from 7 to 4 across Luton, which will be coordinated and inspected as part of one children centre Luton-wide group. This model would see a reduction in the number of managers needed and would bring some advantage due to the ability to realise some savings through centralisation of finance and some of the data administration/inputting required within children's centres.
15. Decisions regarding how the town has been divided into the 4 neighbourhood have been based on detailed examination of the data and discussions with partner agencies. Service users were also consulted on this model as part of the latest consultation.

Buildings

16. There are a lot of buildings available in every existing children centre area in Luton. Some are used a lot and others not very much. These proposals are designed to make the best use of the buildings that families use.
17. As set out above, we intend to establish Flying Start Children Centre Neighbourhood Hubs: these will be based in an existing children's centre building that takes on the role of delivering support and activities in each neighbourhood but will also have a role in co-ordinating all of the support and services for families with children from pregnancy up to the age of 19.
18. Whilst we are proposing to reduce the number of registered children's centres, support and services will still be available locally through a combination of children centre main delivery sites and linked sites where families can get help and advice in a much more accessible and flexible way, offered through a range of local buildings. Families can travel, as they always have,

anywhere in the town to access their services.

Staff

19. Children's centres rely on the experience and skills of their staff to deliver quality services for the families in their reach areas – reach being determined by the number of 0-5 year olds they deliver services to.
20. As part of the review of children's centres and in readiness for the savings target of £1 million to be made, hub managers have held vacant posts where this was possible. As a result, numbers of staff have steadily dropped year on year. During the financial year 2015/16 numbers of children's centre staff dropped again from 104 staff to approximately 90 staff. This equates to approximately 64 FTE posts. It is considered that this current level of staff numbers is the minimum to deliver a safe and good quality service in Luton.
21. Of these 90 staff, around 80 are employed directly by the Council or by one of the 4 nurseries operating from schools (whose workforce's employer is also the Council). The remaining staff are employed by a voluntary sector organisation which is wholly funded from the Council. In essence therefore, the salaries costs currently associated with these staff either sit with Council directly or via funding.
22. The proposals move from having, in essence, 7 teams working across the town to 4 teams. The £1m savings proposal has been forecast based on 4 teams with broadly similar staffing structures to the current model. This will be worked out in more detail over the next 5 months as children's centres and Health Visiting are brought closer together as part of Phase 1 of the 0-19 integrated health and wellbeing model.
23. It is proposed that children's centre staff will be transferred via TUPE into the council and then restructured by way of an organisational change assessment (OCA). This is for a number of reasons and is considered relatively low risk to the budget and to staff:
 - There are broadly 90 roles to be created and there are approximately 90 staff currently, including a range of full time and part time staff. It is therefore anticipated that any redundancy costs to the Council will be at a minimum;
 - To restructure first and then transfer staff via TUPE increases the risk of challenge under these regulations and would place one voluntary sector organisation and four schools that currently hold the lead organisation roles in a financially difficult position. Any redundancy costs would need to be met by them. The schools and the voluntary sector have not budgeted for this and, in some cases, did not realise this could be the case. The voluntary sector organisation would be significantly and adversely affected by this which would, in turn, impact on whether the organisation could stay in business.

Key Risks

24. The continued use of Redgrave Children and Young People's Centre – this constitutes a high cost premises resource (also known as Redgrave Gardens or the Edwin Lobo Centre by health professionals) and is a pressure on the children's centre budget. It remains a priority to ensure all partners, including health partners pay their share of the usage costs to ease the pressure on the children's centre budget.
25. Impact of the proposed changes on one current lead Voluntary Sector provider, which over the past few years has become wholly dependent on funding via the council's children's centre budget. This means that the proposal to bring the leadership and management of children's

centres (i.e. the lead organisation role) into the council will have a direct impact on this provider and their ability to remain a charity as staff are transferred via TUPE into the Council. The charity would receive some funding for the use of their building but the larger amount of funding and the line management of the staff to deliver the children's centre services would be brought into the Council. This would leave a minimum of staff within the organisation to lead on charitable aspects of its work and potentially result in its closure.

26. To mitigate the risk to this lead organisation, we are in discussion with the organisation about the feasibility of a financial step-down package, whereby the organisation would receive £50,000 in the first year, £25,000 in the second year and zero in the third year to ensure and develop sustainability whilst the organisation bids for additional and alternative sources of funding. This money would be used to pay for management posts. This financial step-down package to the voluntary sector provider is identified within the budget.
27. Whilst redundancies and costs will be kept to a minimum - following transfer under TUPE the Council will assume the liabilities associated with any redundancies. The Council already holds the liabilities for these costs for directly employed staff and for those within the schools/nurseries workforce (in these particular circumstances). In addition the Council will assume liability for any redundancy costs associated with the staff currently employed by the voluntary sector organisation.
28. The Department for Education Short Guide for Local Authorities (reviewed in March 2016) describes the Council's position regarding claw back on children's centre buildings. This is described below:
29. "When a local authority puts forward proposals on change of use of capital projects which were funded through the Sure Start and Early Years Capital Grant, they must inform the Department of the proposed changes and set out whether the new use would fulfil the conditions of the capital funding and what legal advice, if any, they have received on their proposals with regard to staying within the original conditions of grant". In carrying out the consultation and children's centre review the Department for Education have been consulted for advice on the implications of the proposals. At this point in the review, there are no clawback implications.

Consultations

30. Local authorities are under a statutory duty to consult everyone who could be affected by any proposed changes -before opening, closing, merging centres or making significant changes to the range and nature of services provided through children's centres.
31. Over the past 8 months, Luton Borough Council has implemented a 2-phased consultation process on how to best organise our children centres, to offer a wider range of services to meet the needs of the whole family whilst achieving budget reductions of £1m. We have been clear that this means re-thinking the way we have been doing things, and includes working more closely with health services and in particular with the community health service provider (Cambridge Community Service) who lead on the delivery of the DOH 0-5 Healthy Child Programme.
32. In November 2015 we started talking to families and organisations across Luton as part of the children centre review. Using our web-based consultation, questionnaires, face to face discussions in the community, we asked about how much children's centres were used and what for, as well as seeking families and stakeholders' ideas.
33. The second phase of the consultation took place between 16th May and 10th June 2016. This

described:
<ul style="list-style-type: none"> • The proposed service model – at a high level; • How the town would be split from a children’s centre management perspective; • What sites/buildings are proposed to be used.
34. We have listened to the comments from local families and professionals over the past few months, and thought about how we can deliver flexible services most effectively in the community. Parents told us that they want to continue to get support from a range of local venues that they already use, like buildings on school sites and community spaces, and that are easily accessible.
Appendices attached:
none
Background Papers:
none

IMPLICATIONS

For Executive reports

- grey boxes must be completed
- all statements must be cleared by an appropriate officer

For CLMT Reports

Clearance is not required

		Clearance – agreed by:
Legal		John Newman, 05.09.16
Finance	Proposal achieves a budget reduction of £1m.	agreed by Dev Gopal, Finance, 22.8.16
Integrated Impact Assessment (IIA) – Key Points		
Equalities/ Cohesion/Inclusion (Social Justice)	The outcomes of these changes are positive for all groups identified in the Equality Act (2010) and have come about with engagement with service users and staff to produce the best model for Luton’s children.	Agreed Sandra Legate Equality and Inclusion Manager 22nd August 2016
Environment	Overall the contents of this report are not expected to result in a direct environmental impact. The potential increase in travel resulting from a reduction in centres/hubs from 7 to 4 is likely to be offset by the amalgamation of services	Rod Black Highway Development & Sustainable Travel Manager 7 th September 2016
Health	The proposed model provides both opportunities and risks for improving children’s wellbeing. The opportunities include integrating working practices and extending the reach of support for families. The risks include transition of workforce and working practices which may have a detrimental impact on families during the transition. This needs to be carefully managed.	Stephen Gunther Public Health 7 th September 2016
Community Safety		
Staffing		
Other		

FOR EXECUTIVE ONLY - Options:

- a) to reject the recommendations
- b) to request further information

Integrated Impact Assessment Form (IIA) from June 2013

This form replaces the previous Integrated Impact Assessment form used by LBC.

The key aim of an impact assessment is to ensure that all Council policies, plans and strategies support the corporate mission statement that

'The needs of Luton's people will be first in everything we do'.

1. Why do I need to do an IIA?

The aim of this impact assessment process is to:

- Ensure adherence to the legal duties contained within the Equality Act 2010 and associated Public Sector Duty to analyse the impact of decisions to be undertaken by Council.
- Ensure the Council has **due regard** to equality taking a proportionate and timely approach to analysing the impact on citizens
- Minimise duplication of initial impact assessments with regards to Environment and Health and maximise consideration of other key Council priorities of Inclusion and Community Cohesion
- Ensure that the Council has been able to consider the social, health, environmental and economic impacts in its decision making in a single document and, where necessary enable the production of a comprehensive action plan to mitigate any potential negative impacts identified

2. When do I need to do an IIA?

An IIA must be started at the beginning of any project, policy or strategy, and cannot be finalised until such time as all consultations, as required, are undertaken.

- The Impact Table will help you to make early consideration of the potential impacts of your proposal and should be used from the point at which preliminary report is taken to Corporate Leadership and Management Team (CLMT) where appropriate. By using this table at your earliest point in the project, potential impacts can be highlighted and it will also be clear whether you need to carry out a full IIA.
- If you complete this table and *all* impacts identified are neutral, i.e. there is no noticeable impact on characteristics and priorities listed *and* you are fully confident of this, please contact the SJU by email setting out how you have reached this judgement as it is *unlikely* you will need to carry out a full IIA.
- An IIA must at all times identify those who will be affected by the decision, policy or strategy.
- At a time of economic austerity IIA authors are minded to consider the whole range of decisions, both locally and nationally when analysing the impact on citizens
- Your first early draft is to be sent to the Social Justice Unit for comments and guidance
- Once consultation has ended, the IIA must be updated with results of the consultation and returned to Executive, where required, for further consideration and approval – at this stage it will be signed off as completed by the Social Justice Unit

**If at anytime you need further guidance please contact the Social Justice Unit.
For your convenience, please see links at the end of this document to key Corporate and Partnership documents that may help you complete this IIA.**

Tracker 2 No: C&L/14/019

Proposal Title: Children's Centre Review

Date of IIA: 11/06/15

Updated after consultation - Date:

Lead Officer Name:

Bridget Cameron

Early draft Seen by:¹ Sandra Legate.

Finalised IIA Signed and seen by SJU :

Name: Sandra Legate

Date: 22nd August 2016

Please include the names of all other contributors and stakeholders involved in the preparing of this proposal who have been consulted with and **agreed** this assessment. *(Please note the IIA must not be carried out by one person):*

Michelle Gwyther
Children Centre Hub Managers
Pre School Learning Alliance Strategic
Team
Gordon McCullough
Public Health
Sandra Legate (SJU)

If there is any potential impact on staffing please include the name/s of the trade union representative/s involved in the preparation of this assessment or any supporting evidence of request to participate:

To be confirmed once permission to consult has been given.

¹ Please send an early draft of your IIA to the SJU to ensure all impacts are being considered at the appropriate time

PLEASE PROVIDE AN OUTLINE OF YOUR PROPOSAL:

The strategic proposal

A single Children's Centre lead agency with a model comprising continued delivery of children's centre services across the town in up to 4 local areas. This model will:

- deliver the £1m savings,
- ensure consistency of approach and equity of service,
- have the least detrimental impact on children and families in Luton,
- offer greater flexibility and efficiency in the use of existing and future premises and resources, and
- would be most likely to achieve good or outstanding ratings in Ofsted inspections of Children's Centres.

The proposal being brought to Executive at this point in the process is to go out to consult on options i.e. 1 children's centre lead agency with up to 4 delivery localities. The final proposal will be shaped with the results of the consultation.

Drivers for Change

Since the Children's Centres were restructured in 2011, new guidance has been produced by the Department for Education, published in April 2013, that local authorities, commissioners of local health services and Jobcentre Plus must have regard to when carrying out duties relating to Children's Centres under the Childcare Act 2006. This updated guidance requires 'local authorities and 'relevant partners' to work together to deliver integrated early childhood services' emphasising the closer links to midwifery, GPs and health visitors with every centre having access to a named health visitor. Opportunities should also be furthered for links with Jobcentre Plus, early education and childcare providers (including childminders and schools) and through links with Social Workers and Stronger Families' co-ordinators with a link to a named Social Worker.

Children's Centres need to be embedded even more firmly in the Council's Early Help Strategy and to better evidence the impact that efficient Children's Centres services are having on the lives of families in Luton.

The Chief Executive and Leader of the Council's commitment to support the Flying Start delivery model through a grant donation in Luton will require Children's Centres and the Flying Start programmes to work together to develop the Early Years Core Offer and the Children's Centres Core Offer that, in turn will deliver both the Children's Centre Core Purpose (statutory) and the Early Years Strategy in Luton.

The Children's Centres' Reflection Day (9th July, 2014) brought together existing Children's Centre managers, lead agencies, partner organisations, professionals and relevant stakeholders to consider how Luton's Children's Centre services should/could be more effectively and efficiently delivered in the future. Responses and ideas included:

- Review buildings and review of community centres
- Source additional funding
- Hire buildings by the hour
- One Children's Centre organisation rather than many
- Fewer Hubs
- Children's Centres lead on a parenting strategy for 0-11 year olds
- Maintaining the focus on need
- A core offer for all centres and additional services based on reach area
- Refine customers i.e. either 0-5s or 0-3s
- Locality teams with borough-wide co-ordination of targeted/specialist services
- Mobile delivery of some services
- Community run, social enterprise, link to CCG procurement

Children's Centres

'Sure Start Children's Centres statutory guidance' published in April 2013 provides a statutory definition of a Children's Centre.

'A Sure Start Children's Centre is defined in the Act (the Childcare Act 2006) as a place or a group of places:

- which is managed by or on behalf of, or under arrangements with, the local authority with a view to securing that early childhood services in the local authority's area are made available in an integrated way;
- through which early childhood services are made available (either by providing the services on site, or by providing advice and assistance on gaining access to services elsewhere); and
- at which activities for young children are provided.'

The document continues: 'It follows from the statutory definition of a Children's Centre that Children's Centres are as much about making appropriate and integrated services available, as it is about providing premises in particular geographical areas... A Children's Centre should make available universal and targeted early childhood services either by providing the services at the centre itself or by providing advice and assistance to parents (mothers and fathers) and prospective parents in accessing services provided elsewhere. Local authorities must ensure that Children's Centres provide some activities for young children on site.'

The core purpose of Children's Centres is 'to improve outcomes for young children and their families and reduce inequalities between families in greatest need and their peers in:

- child development and school readiness;
- parenting aspirations and parenting skills; and
- child and family health and life chances.

Where, in discharging their duty in Section 5E of the Act, [Childcare Act 2006] local authorities, commissioners of local health services and Jobcentre Plus decide to make early childhood services available through Children's Centres, they should do so in ways which enable Children's Centres to achieve their core purpose.

The core purpose relates directly to the wider duties local authorities have (under section 1 of the Act [Childcare Act 2006]) to improve the well-being of young children in their area and reduce inequalities between young children in the area.

Section 1 of the Act places a duty on local authorities to:

- Improve the well-being of young children in the following areas:
 - Physical and mental health and emotional well-being
 - Protection from harm and neglect
 - Education, training and recreation
 - The contribution made by them to society; and
 - Social and economic well-being.
- Reduce inequalities between young children in those areas; and
- Make arrangements to secure that early childhood services in their area are provided in an integrated manner which is calculated to:
 - Facilitate access to those services; and
 - Maximise the benefit of those services to parents, prospective parents and young children.

Children's Centres are key to making this happen. Local authorities should commission Children's Centres to achieve this core purpose as a key component of their strategy to improve the well-being of young children. They will need to satisfy themselves that there is evidence of the effectiveness of activities undertaken to achieve the core purpose.'

The core purpose puts an onus on a cross-sector approach and effective local partnerships, particularly between social workers, health visitors and Children's Centre outreach workers, so that vulnerable families are supported into appropriate interventions. Centres will also work with a range of other partners to help them deliver this core purpose, for example, other early years' providers, Jobcentre Plus, GP consortia, information and advice organisations, schools and voluntary and community sector organisations.

INFORMATION SUPPORTING THE PROPOSAL (WHO, WHAT, WHERE, HOW²)

Children's Centres are an integral part of the Early Years service delivery within Luton and changes will affect all families with children under 5 years of age though not all families will access services at the centres.

Children's centres record how many children are registered with them as well as how many participate in activities provided by and at the centres. Registrations can be over 100% of their reach area (the population of families with children aged 0 to 5), but this simply reflects families who choose to register at a centre that is not, perhaps, their closest centre but is one that suits them and their needs better. There is no requirement that families register with the centre in whose reach area they live.

The current children's centre model

Prior to April 2012, Luton had 23 separately managed and designated Children's Centre sites in the town. This model was reviewed during 2011 and, from 1st April 2012, a new 'merged model' of 7 hub centres and 16 satellites was introduced that retained all 23 delivery sites comprising:

- Two local authority managed centres:
 - Redgrave – Northwell ward
 - Hatters – Dallow ward
- Four school governor managed centres:
 - Meadows – Lewsey ward
 - Community Link – Leagrave ward
 - Building Blocks – Biscot ward
 - ABC – Farley ward
- One voluntary organisation managed centre:
 - East Luton – Round Green ward

Registration and participation numbers provided in annual conversations in March 2015 are given in the table below:

Centre	Registrations %	Participation %
ABC	93.5	65
Building Blocks	102	63
Community Link	101	66
East Luton	97	77
Hatters	102	62
Meadows	98.3	67
Redgrave	92	80.3

NB. – Participation rates are based on 5 or more contacts over the year

Where registrations are over 100% this may include families from outside of Luton or where population numbers have increased over and above latest Child benefit data

Registrations and participation rates have significantly increased over the last two years with Centres focusing on targeting their resources better e.g. focusing in on target groups and local target areas. e.g.:

- ABC report 100% of teen parents registered
- East Luton report 100% of traveller families registered
- Meadows focused on targeted areas where registrations were lowest by identifying 'LSOA (local super output area) champions' who worked in partnership with local schools Family Workers and were able to access school activities such as parent's evenings and PEEP (parents early education programme) at

² Breakdown of present users by ethnicity, age, gender, disability, religion/belief, sexuality (if recorded)

Also, show areas in the town with the biggest and lowest needs.

Greater emphasis is required at the start of the IIA on the service, how it is delivered now and how the new service will be delivered

which Children's Centre services were promoted and new families are registered

- Building Blocks targeted new birth notifications and reported 81% agreeing to a home visit
- Redgrave work with the co-located Health Visiting team in order to home visit as many new parents as possible
- Hatters focused on their most deprived ward and achieved 100% registrations
- Community Link focused on target groups such as young parents and identified those who were not accessing regularly. Plans are put in place to encourage engagement via outreach work and other innovative ideas.

Footfall is measured monthly and is an indicator of need and relevance to the families they serve. In March 2015, the footfall was calculated as:

Children's Centre	Total footfall by session – March 2015
ABC CC	2003
Building Blocks CC	3399
Community Link CC	2383
East Luton CC	1485
Hatters CC	1439
Meadows CC	2226
Redgrave C&YPC	2805
TOTAL	15740

Each Children's Centre produces a Self Assessment Form that is itself linked to the judgements that Ofsted will make at inspection. Its purpose is to:

- help Centres in their own self-evaluation
- be used as a basis for the inspection of a local area's children's centre/s.

To understand the profile of families attending Children's Centres in Luton, extracts from these forms and the annual conversations that are held between the Children's Centre and the local authority each year are included here.

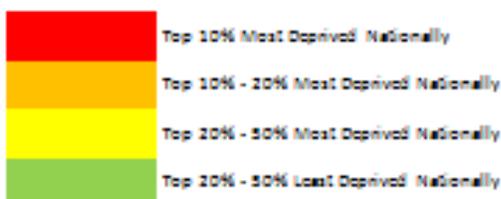
ABC Children's Centre

All sites are located in the South, Farley or High Town Wards of Luton and the approximate reach area is 2,495 within 18 LSOAs.

Reach Deprivation



Number of U5's	% of Hub Total	LSOA
475	19.6%	3
755	31.1%	5
875	36.1%	7
320	13.2%	3



1230 children under 5 years living in the top 20% most deprived areas nationally

50.7% of reach

ABC Children's Centre, taking steps to achieving goals

There are approximately 2,425 under 5s in the ABC reach area – this number has significantly increased 21% since 2008, the largest increase in under 5s across Luton (average 7%).

- 700 families in the reach area with under 5's have 3 or more children.
- The Luton average for number of births since 2008 has decreased by 6%. ABC has seen a growth of 8%.
- Just over 15% of Luton's total Looked after Children under 5s live in ABC Children's Centre reach area. This is the highest in comparison with other Children's Centre Hubs.
- 21% of Luton's total unemployed adults live in ABC Children's Centre reach area.
- Over 19% of Luton's workless benefit claimants live in ABC CC reach Area.

All wards in the ABC reach area (South, Farley Hill and High Town) are above the Luton average for families living in poverty with one SOA with the highest child poverty ranking (62.1%) and 3 SOAs that sit in the top 10% most deprived in England (IMD).

Area Profile

There are 18 LSOAs within ABC Children's Centre reach area of which:

- 3 fall into the top 10% most deprived nationally
- 5 fall into the top 10%-20% most deprived nationally
- 7 fall into the top 20%-30% most deprived nationally
- 3 fall into the top 20%-50% least deprived nationally

A snapshot (5/10/12) of benefit claimants showed the two main wards in ABC's reach area (Farley & South) had the highest number of Housing & Council Tax benefits claimants in Luton. These wards also have the

highest number of Local Authority Tenants as well as the highest claimants for Disability Benefits and Job Seekers Allowance.

With the deprivation levels and high % of workless claimants, ABC Children's Centre's sole priority is to reduce Child and Family Poverty.

Site specific information

- Chapel Street Nursery School:

Chapel St Nursery School and Children's Centre serves a residential area in the centre of Luton and is situated in Farley ward close to the border with South ward. Families generally live within walking distance of the Centre. Properties are mainly council owned or privately rented and are of poor quality consisting mainly of flats and tenements. A lot of children do not have access to a garden. The children and families come from a wide range of different cultures and countries.

Farley is the 4th most deprived ward on the Index of Multiple Deprivation (IMD) in Luton. It is the most deprived using the health domain index and the third most deprived using the income deprivation scale. South has the highest levels of unemployment in Luton with high levels of young people requiring Job Seekers allowance. Working parents work locally in retail and business with some commuting to London. There are high levels of crime in the area.

Services are delivered from a dedicated Family Room with the Nursery School and due to the popular demand for services the Children's Centre have expanded into the large community room.

- CC @ The Mall

Operates from 2 shop units within the main indoor shopping centre in the centre of Luton, close to public transport links. This unique delivery site provides accessibility and acceptability for the many families who use its services.

- Park Town

Park Town is a purpose built extension to the Community Centre. This allows centre services to operate alongside the 0-99 age range remit the community centre offers and provides a range of additional support services and signposting opportunities. Childcare is offered onsite in the community centre.

One super output area is within the top 10% most deprived national areas adjacent to top 20-50% sourced from IMD data (2010). The centre is located in the heart of three high-rise blocks of flats, housing a large number of people, many suffer from mental health issues, drug and alcohol abuse is rife. 30% of housing in the area is rented from the Local Authority or Housing Associations.

There are higher than average levels of unemployment in the area compared to other areas of Luton. The centre has identified many of the families in the area are from historically workless households, with few qualifications, many are lone parents

White ethnicity representation is higher than the average for Luton. However, the diverse community has also seen a recent influx of families from Eastern Europe, and the high and low rise flats house a large percentage of asylum seekers & refugees from around the world. The population is highly transient.

- Whipperley

Whipperley Children's Centre is situated in the Farley Ward of Luton. The centre is located on the Whipperley Infant Academy site. Early education and childcare is provided on site by a Nursery who are a Voluntary Provider. The Nursery provision is registered for 84 childcare places.

This area has seen an increase in families moving into Luton from the London region, due to the high cost of living in London. Some London authorities are also using Luton to house their temporary accommodation and homeless families.

Farley Hill is made up of Council properties, privately rented accommodation and owner occupied properties. There are a number of 3 storey flats in the area that house a percentage of families. Families living in these flats have commented on the lack of outdoor space available to them and their children. Farley Hill has a transient population with a number of families living in privately rented accommodation, thus, when their lease ends, they move to a different property or area of Luton.

Building Blocks Children's Centre

Integrated working ensures 98% of target group families are engaged or appropriate referrals are made to ensure outcomes for children are improving. 100% of the reach area families have been registered with the Centre with detailed analysis of LSOA data identifying anomalies in data and targeted outreach implemented.

Data Headlines & Evidence/Impact Report references:

(LSOA Data Analysis Report Apr 13-Oct 2014)

- 100% of reach area under fives were registered at Jan 15. Comprehensive analysis of attendance & registration figures by Ward & LSOA, Census data 2011 & ethnicity registration audit.
- 1,638 under fives accessed Children's Centre services Apr 14 to Jan 15 (between Apr 14 to Oct 14 this was a 36% increase on the previous 6 month period).
- 2,737 individual parents accessed services (50% increase on the previous 6 months, attributed to increased registration rates, persistent outreach from new birth visit forward & increased capacity through additional adult learning opportunities, advice sessions & partner service delivery supported).
- 290 lone parents claim workless benefits in the reach area however the data refers to those with children aged 0-19yrs.
- Liaison with Job Centre Plus indicates the highest area of lone parents (145) in Biscot Ward receiving income support (72% advised at registration) & lowest Barnfield Ward (30) (47% advised at registration), with data used to direct service delivery & targeted support.
- 225 lone parents have disclosed at registration with the centre an increase of 19% over the previous 6 month period. 59% accessed services a 19% increase over the past year. This figure would therefore appear to equate to over 76% of lone parents with under fives known to the Centre.
- 5 teen parents registered, 95% accessing services.
- 21 targeted vulnerable young parents in hostel accommodation, 100% outreach contact; 83% regularly accessing support services.
- Young parent support worker has increased access to support services for teen parents by developing a programme of support for vulnerable young parents living in hostel accommodation. Twice weekly sessions including protective behaviours, challenging behaviour, importance of play & language, Bookstart scheme, safety awareness are part of a ten week programme that is a requisite for those accessing the hostel and written into the care plan in partnership with hostel support staff.

Much of the support offered involves referral to specialist services & work with parents where there is not the recognition or acceptance of a child's possible Special Educational Needs and/or Disabilities (SEN&D).

- 71% of children with a disability, as recognised by the parent who are registered are accessing services. (Feb 14) Increased to 94% Oct 2014. *See Data Analysis report Oct 14.*
- 100% of the children identified by the Centre as requiring SEN&D early support are accessing services.
- 49 children with disabilities according to local data live in the reach area.
- The centre is supporting 47 children with a disability, 5 of these children live or have moved out of area, therefore engaging 93% in reach area.
- 36 (77%) of the children are accessing early support where referrals are in process. Saints, Dallow & Biscot Wards have the highest figures for low birth weight across the Borough. Dallow & Biscot Wards do not have high DLA (Disability Living Allowance) claimant rates, however local knowledge informs that many members of these communities have no recourse to public funds, spousal visa, language barriers may also impact on the data and the Centre has supported 7 new DLA applications this financial year.

January 2015 Ethnicity audit of BME (black and minority ethnic) attendance: Transient Families:

- Building Blocks has registered 331 families believed to be living in temporary accommodation
- 61 of these families are receiving additional support as a target vulnerable group where child protection and domestic abuse are identified.

Protected Characteristics (BME Groups): Census 2011 Baseline data: 70.75% BME Groups in reach area Wards

- 70.74% BME Groups registered across the Reach area

Jan 2015: Most recent change in local demographics include:

- increase in Polish families accessing services from Dallow & Biscot Wards.
- Increasing numbers of Roma families migrating to the Bury Park area, particularly Romanian.
- Increasing numbers of new migrant families with European nationality of Asian, Arabic & African heritage.
- Increasingly high levels of need identified at transfer into area home visits when referred by health visiting under social isolation.

It is recognised that large numbers of families in areas of temporary & rented properties are re-located from London Boroughs, particularly Barnet, where historical domestic abuse is disclosed by lone parents.

Area Profile: The merged model reach area incorporates three Dallow Ward LSOA's and encompasses Biscot & Barnfield Wards with additional Saints Ward LSOA's totalling 21 in the reach area.

- 3 LSOAs are ranked in the top ten percent most deprived nationally:-
- 6 in the Top 10 & 20%
- 6 in the top 20 to 50%
- The area is densely populated with a combined reach figure estimate of 4,005 under fives.
- Registration figures have been dramatically increased since the merged model's development.

December 2012: 49% of under fives in the reach area were registered, equating to 1,860 families & 6,487 individual records. By April 2014 the registration total has been increased to 92% & October 2014 to 100% On average an additional 22% of new registrations per month are accessing from out of reach. Footfall trends show considerable monthly increases.

Domestic abuse disclosure rates are particularly high (104 families supported April 14 to Jan 15), with regular MARAC (multi agency risk assessment conference) referral, recognised as a success of the culture of safety developed by the Centre.

Fathers: 1124 registered (Jan 13) increased by 59% to 2755 Jan 15

Community Link Children's Centre

Currently (June 2015) 109% of reach under 5s are registered with the Community Link Children's Centre although the centre is working on 2013 data for a reach of 2835. This is over 100% as families from other Children's Centre reach areas also access Community Link's services.

Registrations appear to be fairly evenly spread across the 18 SOAs with 2 exceptions where registrations have been lower for a number of years. Previous low registration areas have been targeted and have been brought into line with other areas. Current low registrations centre around Pirton Hill Primary school.

The other area highlighted due to lower registrations within the reach area is one of the least deprived areas around the local hospital. Having run services for a 6 month period in this area to try and increase registration and participation rates, uptake remained low and further investigation of this suggested that the area comprised more working families who are less able to attend children's centre activities.

Community Link Children's Centre (CLCC) covers the majority of the west area of Luton and has an estimated reach area of 2835 (2012) under 5s - an increase of 90 from 2745 (2011). The Luton wards within the CLCC are known as Challney and Legrave and in the IMD (index of multiple deprivation) (2007) ranking there are 18

LSOAs within this area. 2 of these are within the Saints ward and 1 in the Dallow wards of Luton. Of the 18, 2 are in the top 10-20% most deprived nationally

- 14 in the top 20 – 50% most deprived &
- 2 in the top 20-50% least deprived.
- There are NONE in the top 10% least deprived.

Challney ethnicity data (2001 census)

British	Irish	Other	Mixed	Asian or Asian British	Black or Black British	Chinese or other ethnic group
54.7%	4.1%	2.2%	2.7%	26.6%	8.4%	1.3%

Leagrave ethnicity data (2001 census)

British	Irish	Other	Mixed	Asian or Asian British	Black or Black British	Chinese or other ethnic group
67.9%	4.7%	2.2%	3.9%	10.3%	10.2%	0.7%

A larger proportion of the population around the Beechwood & Chaul End children's centre delivery sites are from Minority Ethnic families, predominantly of Pakistani heritage. However there are small numbers of families from a variety of South Asian, African, Caribbean and Eastern European backgrounds. This gives a colourful and rich mixture of cultures, languages and religions, but also some challenges in understanding and changing established cultural practices.

Ethnic breakdown of reach area from Children's Centre database September 2014

Ethnic Origin

	Apr-15	May-15	Jun-15
Did not wish to be recorded	0.05%	0.05%	0.05%
{NOT ASSIGNED}	40.82%	40.71%	39.90%
a) White-British	9.64%	9.48%	9.27%
a) White-Irish	0.39%	0.38%	0.31%
a) White-Other	5.69%	5.67%	5.80%
b) Other Mixed	1.34%	1.34%	1.33%
b) White/Asian	1.10%	1.08%	1.10%
b) White/Black African	0.94%	0.92%	0.89%
b) White/Black Caribbean	0.90%	0.88%	0.88%
c) Bangladeshi	4.63%	4.72%	4.94%
c) Indian	3.81%	3.83%	3.91%
c) Other Asian	3.25%	3.31%	3.32%
c) Pakistani	19.66%	19.89%	20.50%
d) African	4.07%	4.08%	4.11%
d) Caribbean	1.35%	1.35%	1.38%
d) Other Black	0.77%	0.77%	0.78%
e) Chinese	0.09%	0.09%	0.09%
e) Other ethnic Group	0.80%	0.79%	0.77%
Traditional Traveller	0.02%	0.02%	0.02%
Traveller of Irish Heritage	0.07%	0.07%	0.07%
Unknown	0.60%	0.57%	0.59%

East Luton Children's Centre

East Luton Children's Centre has 95% of the reach area registered (2198 – January 2015) of its reach area with a higher percentage of families from the deprived area accessing the centre. East Luton currently has 2305 under 5s in the area, this is a decrease of 1% on 2012 (2395) The most deprived SOA in the area has 97% under 5s registered.

The reach area has 2 main pockets of deprivation (top 20% of the most deprived) which are in the Round Green and Crawley wards.

East Luton is a predominately white British area, with 69.5% being white British compared with Luton at 44.6% white British. There is a Traveller population in east Luton, both settled travellers as well as a caravan site. 74.7% of households are economically active compared with 69.1% in Luton overall and 69.7% nationally.

The population density of east Luton is 34.3% compared to Luton at 46.9%

21.4% of the east Luton population have no qualifications which is below Luton average at 23.6% and the national average at 22.7%

(all data taken from Luton Census 2011)

The Children's Centre has 39 children with a disability in the area (September 2014) and, during September 2014, there were 30 attendees to groups for children with disabilities. (Hearing Impaired Group and Special Harts).

Hatters Children's Centre

Hatters Children's Centre has developed strong working relationships with partners in order to identify children under five in the area and their families.

- As of June 2015, 106% of children in the reach area under five were registered with Hatters Children's Centre.
- There are 1,300 families registered with the Centre.

The centre is made up of 6 LSOA, and has a potential reach of 1,155 children under 5.

LSOA	No. of Children under 5	LSOA
HAT E01015724	255	HAT E01015724
HAT E01015728	185	HAT E01015728
HAT E01015729	150	HAT E01015729
HAT E01015730	255	HAT E01015730
HAT E01015734	140	HAT E01015734
HAT E01015795	170	HAT E01015795
Total	1,155	

The Centre serves a geographically small (6 LSOA's), but densely populated area predominately within Dallow Ward in South Luton (4 LSOA's Dallow, 1 Farley, 1 South). There are 1,155 under 5s in the reach area, an increase of 8% since 2008.

Data indicates that the reach area includes families which are in the bottom 30% in England with regard to deprivation. A significant number of families are in the bottom 10%. Most families in reach area are of Asian origin, but there are growing numbers of families with Eastern European backgrounds. Most families speak

English as a Second Language.

Children's skills, knowledge and abilities on entry to early year's provision are below expected for their age. The proportion of families where no one is in work is higher than the national figure at around a third.

The area is one of significant deprivation where unemployment and the proportion of families who are dependent on workless benefits are well above the national average (63% compared with 3.5% nationally). Due to the decline of traditional manufacturing industries in the area, there is a shortage of employment opportunities, coupled with the fact that 35% have no access to their own transport to help find work elsewhere.

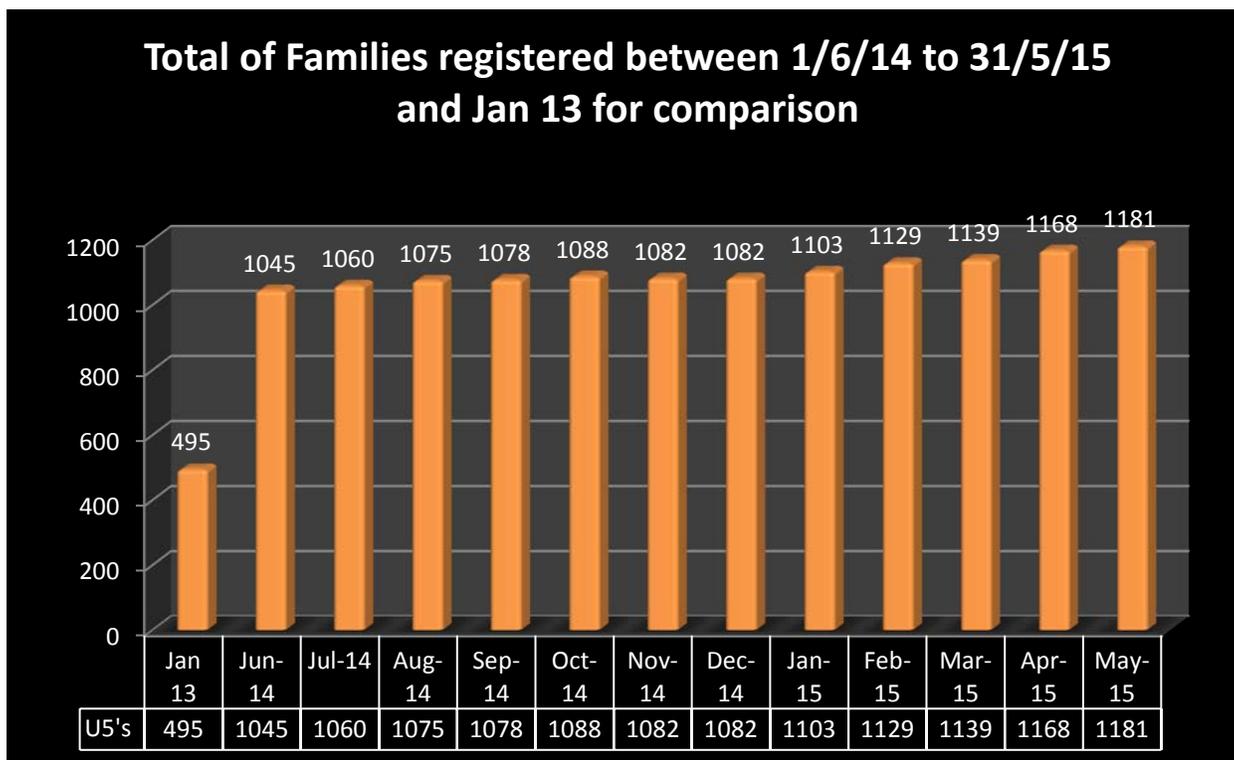
The inequality of the area is visible and real. Life expectancy in Dallow is significantly lower than the Luton average for males and females (the latter is the lowest in Luton), reflected in high rates of mortality from premature circulatory disease, cancer and smoking related causes, and the highest diabetes prevalence in Luton. There is a high prevalence of residence suffering from long term illnesses. Crime levels are high with violent crime at twice the national average. (Source: Dallow Fair Share Trust)

Much of the local housing is temporary accommodation and is often overcrowded, and in a poor state of repair. There are significant issues with damp, mice and rat infestations.

Dallow has a relatively high proportion of under 19's; this continues to grow due to high birth rates. The population of Dallow is projected to increase by approximately a third between 2010 – 2030 (Source: Luton Population Projections 2012).

Meadows Children's Centre

Current registration stands at 1181 under 5's (31.05.15). There has been a steady increase in registrations since 2013: Jan 2013 – 495 under 5s (see graph below).



There are estimated to be 990 children under 5 in Meadows' reach area and families with 3 or more children have increased by 10% to 440 between 2008 and 2012 (Child benefit small area data HMRC as at 31st August 2012). The children's centre is currently engaging with several large families with 6, 7 or more children.

The birth rate has decreased by 44% between 2007 and 2012 (NHS Luton) yet the number of children in the area has increased by 1%. The centre has noticed recently that there are many new families moving into the area from other parts of the town. Some of these have moved into brand new housing which is close to the main Hub site.

Lewsey is part of the “West Neighbourhood” and one of 19 wards in Luton. Lewsey borders Houghton Regis and Dunstable – both of which are located in Central Bedfordshire. The children’s centre works with both Luton and Central Bedfordshire Health Visitors, Doctors surgeries and Social Care.

Meadows Children’s Centre is situated in a residential area consisting of a mixture of council, privately rented, and owned properties. Due to the amount of rented properties in Lewsey, families often move around the area or the town. Some families are placed in Lewsey in temporary accommodation. The majority of the properties were built in the 1960s – 1970s, although there has been some new building recently.

- Poverty

Index of Multiple Deprivation – IMD: Lewsey ward is among the top 10-50% deprived nationally. The centre of Lewsey is 10% - 20% and the rest of the area is 20% - 50%. (Luton Borough Council 2010)

Income Deprivation Affecting Children Index (IDACI): This supplementary index shows that Lewsey is partly in the 10-20% most deprived areas nationally and partly in the 20-50% areas most deprived nationally. A small area closest to Leagrave is top 20 – 50% least deprived nationally. (LBC 2010)

- Crime

Lewsey is within the top 10% most deprived areas in terms of crime and disorder in England. This based on the rate of recorded crime in four crime types – burglary, theft, criminal damage and violence. (Luton CDRP and Police Strategic Assessment Aug 2009).

2 LSOAs in Lewsey are in the lowest 10% of child well-being in England in terms of crime. (Local Index of Child Well-being LBC Mar 2010)

The children’s centre is experiencing an increase in Domestic Abuse cases – disclosures and referrals, but data shows that there has been a decrease in cases referred to Social Care in Luton in 2012/13 to 20.3% from 32.0% the previous year.

- Unemployment

According to the Mid-2012 Population Estimates for Lower Layer SOAs in England and Wales (ONS), there are 7,780 people of working age living in Lewsey – this shows a decrease of 311 since 2010. There are 1,410 benefit claimants with the highest number in the 25 – 49 years age group (770) and 175 in the 16 – 24 age group.

Reasons for worklessness and benefits include; claiming Job Seekers Allowance, ESA and incapacity benefits, lone parent, carer, and disabled. The highest figure (640) is for ESA and Incapacity benefits. (Benefits claimants – working age clients for small areas, NOMIS, Feb 2013 - recommends figures to be treated with caution)

- Ethnicity

Lewsey is an area with a diverse community. The figures for the 2011 census for Lewsey Ward confirm that there has been an increase in the number of Asian families moving into Lewsey since the previous Census in 2001, an increase in white other and a decrease in white British.

The children and families registered with, and using the centre are a reflection of the community as the table of the centres data compared to the Lewsey Ward Data for the Census 2011 shows;

ETHNICITY – all residents	Number - Lewsey	% Lewsey	% Luton	Meadows
White: English/Welsh/Scottish/N. Irish/British	6,791	54.2%	44.6% 22.73%	
White: Irish	326	2.6%	3.0%	0.66%
White: Gypsy or Irish Traveller	17	0.1%	0.1%	0%
White: Other White	588	4.7%	7.0% 8.38%	
Mixed/multiple: White & Black Caribbean	418	3.3%	1.9% 1.74%	
Mixed/multiple: White & Black African	40	0.3%	0.5% 1.39%	
Mixed/multiple: White and Asian	116	0.9%	0.9% 0.86%	
Mixed/multiple: Other Mixed	110	0.9%	0.9% 1.49%	
Asian/Asian British: Indian	550	4.4%	5.2% 2.76%	
Asian/Asian British: Pakistani	742	5.9%	14.4% 8.70%	
Asian/Asian British: Bangladeshi	515	4.1%	6.7% 4.50%	
Asian/Asian British: Chinese	40	0.3%	0.7% 0.10%	
Asian/Asian British: Other Asian	500	4.0%	2.9% 5.77%	
Black: African	587	4.7%	4.5% 5.06%	
Black: Caribbean	862	6.9%	4.0% 2.00%	
Black: Other Black	195	1.6%	1.3% 1.61%	
Other ethnic group: Arab	52	0.4%	0.8%	0%
Other ethnic group: Other Not assigned on CCM	70	0.6%	0.7% 0.46%	
			31.07%	

(ONS 2011 Lewsey Ward Data/Meadows CCM data June 2014)

70% of the children at Pastures Way Nursery School have an ethnic minority background. The children are rich in their diversity and 40% have English as an additional language speaking 25 languages and dialects. (PWNS School Plan 2013 -14)

Redgrave Children and Young People's Centre

Registration at 31/3/15 was 98% of reach area, an increase of 14.5% over the year. Registration at 31/06/14 was 83.5%. The children's centre is co-located with the Edwin Lobo Child Development Unit, which provides services for children with impairment up to the age of 19 across the Borough. This unit's team includes paediatricians, physiotherapists, Occupational Therapists and speech & language therapists. Co-location has enabled joint training sessions, enhanced communication between professionals, and increased information

and support provided for parents and children.

Redgrave Children & Young People's Centre covers the north area of Luton. This includes Northwell, Limbury, Icknield, Bramingham and Sundon Park wards. There is a wide variation in the profile of the ward areas.

Northwell Ward (Marsh Farm), has 2 LSOAs with poverty rates over 50%, and 4 LSOA's in the 10% lowest areas for child wellbeing. 39.2% of children overall live in poverty in Northwell.

Assessments and referrals indicate that there is a high level of unemployment in this area (8.1%, Luton average 5.7%, England Average 4.4%; housing is often inadequate and overcrowded. There are high numbers of families where household members come & go frequently, high numbers of lone parents (13.6%, Luton average 8.2%, England Average 7.2%), and a transient population due to temporary housing. There are high levels of depression, domestic abuse and drug & alcohol abuse. Neglect is an issue in many families, where the situation has persisted through several generations. The teenage pregnancy rate is higher than the Luton average (ONS 2008-10). 26.8% of the population have no qualifications. Approximately 845 children under the age of 5 years live in the Northwell ward (31/08/2013 child benefit small area data HM Revenue & Customs).

The community come from a variety of ethnic backgrounds, with the majority groups being White/White Irish 54.5%, Other white, mainly Polish or Romanian 4.10%, Indian, Pakistani or Bangladeshi 14.9%, Black African or Black Caribbean 15.4%. Child obesity is high in two SOA's in this ward.

In contrast, Bramingham Ward has approximately 8% of children living in Poverty (Campaign to End Poverty 2012). With fewer (4.1%,) lone parents, fewer children living in workless households, unemployment lower than the national average at 3.4%. Housing is mainly owner/occupier (83%). And 37% of the population define their occupation as managerial or professional. The needs of families in this area include social isolation, depression and support for working parents. Approximately 380 children under the age of 5 years live in Bramingham ward. (Child Benefit Area Data 31/8/13)

Unemployment in Limbury ward is slightly below the Luton average at 5.3%. 59.4% have a level 2 qualification or below. 8.2% of families are lone parent families. 74% of properties are owner/occupier. Limbury is in the top 20% -50% most deprived wards on the IDACI index (2010). Although small numbers of children are measured, NHS Data for 2011/12 indicates that 39% of children in Reception year in the area were considered obese or overweight, compared to a Luton average of 23%. The needs of families in this area include social isolation and depression. Approximately 490 children under the age of 5 years live in Limbury ward. (Child Benefit Area Data 31/8/13)

Sundon Ward has a large development of new social housing. This has produced an increase in new births in the area (150% increase 2009 -2013 Public Health data). One SOA is in the top 20 -50% most deprived according to the Index of Multiple Deprivation, and 3 SOA's in the 20 -50% least deprived. 5.6% of the population are unemployed, with 25.6% having no qualification. There are a high number of lone parent families (11.4%) and an increasing number of larger families, (increase of 41% in families with 3 or more children 2009-13). Referrals and assessments indicate a high number of families with social care involvement, particularly in the SOA with higher level of deprivation. Needs of families in this area include support with drug and alcohol issues and chaotic lifestyles. Approximately 640 children under the age of 5 years live in Sundon ward. (Child Benefit Area Data 31/8/13)

Icknield ward has approximately 380 under fives in the reach area (Child Benefit Area Data 31/8/13). Unemployment in the area is lower than the Luton average at 3.6%. And 37.6% are qualified to level 3 or above. The number of lone parents is below the Luton and national average at 5.6%. The majority of housing in the area (72.9%) is owner occupied. The needs of families in this area include social isolation, depression and support for working parents.

The wide variation in the profiles of the wards across the reach area has meant that services need to be differentiated to meet the community needs in each locality. With limited resources the centre has had to target the wards with the majority of families and multiple needs.

Looked after children

The age profile of all looked after children at 31st March 2014 mirrors the national profile, with one in five children coming into care being under 5 years of age, 41% are under 10 years old, and 59% over 10 years old. However, in recent years, the age profile has changed with babies coming into care again mirroring a national trend likely to be due to earlier identification of risk particularly during pregnancy.

Staffing within Children's Centres

Monitoring of Children's Centres budgets last year highlighted approximately 77% of centre spend being used for staffing costs within the centres with 14% (the next highest budget allocation) going to property costs. Although the review is likely to result in a reduction in the number of centres, it will not be possible to make significant savings against the Children's Centre budgets without a staffing restructure. It is anticipated that the majority of these changes are likely to be at management and administrative levels and TUPE (Transfer of Undertakings (Protection of Employment) Regulations 2006) are likely to apply.

Luton Borough Council Human Resource Managers and Human Resource Managers representing **all persons affected will** be involved, with trade unions in the review with periods of consultations (formal and informal) taking place at relevant points in the process.

Consultation statutory guidance

Sure Start Children's Centres Statutory Guidance, July 2013 states Local Authorities **must consult** before:

- "Opening a new children's centre;
- Making a significant change to the range and nature of services provided through a children's centre and/or how they are delivered, including significant changes to services provided through linked sites; and
- Closing a children's centre; or reducing the services provided to such an extent that it no longer meets the statutory definition of a Sure Start children's centre."

The statutory guidance states:

"Local authorities (or a third party acting on the authority's behalf) should consult everyone who could be affected by the proposed changes, for example, local families, those who use the centres, children's centres staff, advisory board members and service providers. Particular attention should be given to ensuring disadvantaged families and minority groups participate in consultations.

The consultation should explain how the local authority will continue to meet the needs of families with children under five as part of any reorganisation of services. It should also be clear how respondents views can be made known and adequate time should be allowed for those wishing to respond. Decisions following consultation should be announced publically. This should explain why decisions were taken."

Focus areas for the Luton Children's Centre consultation

It is proposed that the consultation focuses on current and future delivery of Children's Centre services regarding:

- How far families are prepared to travel to access children's centre services;
- Access hours/times e.g. times of day/evenings or weekends;
- What additional services might be missing that are felt would be useful within the centres;
- Whether there needs to be 'more of' any particular service from a family's/community's point of view within the centres;
- Any support/help families need in accessing services i.e. Interpreter and Translation services, services and support being available in different languages/media;
- Any definitive or proposed amendment to premises i.e. through the reduction in budget to the 'premises, activity and other' cost budgets;
- The proposal to deliver services through a single children's centre lead agency with preferences and reasons being sought for whether there should be:
 - One locality delivery model that covers the town;
 - Two locality delivery models i.e. north and south;

- Three locality delivery models, i.e. north, central and south;
 - Four locality delivery models, i.e. north east, north, south, east.
- These proposals would also include descriptors to allow families and the community to see what these proposed models would look like in practice and give their reasons for their preferences.

Staff consultation would be required, formally and informally, with an informal staff consultation period between Children’s Centre employers and their staff.

Following appropriate consultation, the outcomes and delivery model would need to pass through appropriate sign off processes within Luton Borough Council and shared with staff working with (or affected by) any changes to the current Children’s Centre delivery model.

The questions in the consultation will address the points above and will help the Council and partners to determine the impact of proposed different delivery models on the community, service users and staff. There will be the opportunity for respondents to also offer alternative models that (a) deliver the savings and (b) ensure a consistent and equitable model across the town.

The consultation focuses on services for children aged 0-5 years, their families, parents and carers. Children’s Centres collect detailed data on their populations including data on the number of registrations and the participation of children/families with 0-5 year olds in their reach areas.

IMPACT TABLE

The purpose of this table is to consider the potential impact of your proposal against the Equality Act 2010 ‘protected characteristics’ and the Council’s Social, Environmental and Economic priorities.

Once you have completed this process you should have a clearer picture of any potential significant impacts³, **positive**, **negative** or **neutral**, on the community and/or staff as a result of your proposal. The rest of the questions on this form will help you clarify impacts and identify an appropriate action plan.

Protected Groups	Citizens/Community			Staff (for HR related issues)		
	Positive	Negative	Neutral	Positive	Negative	Neutral
Race			X			
Gender			X			
Disability			X			
Sexual Orientation			X			
Age			X			
Religion/Belief			X			
Gender Reassignment			X			
Pregnancy/Maternity			X			
Marriage/Civil Partnership <i>(HR issues only)</i>			X			

³ “Significant impact” means that the proposal is likely to have a noticeable effect on specific section(s) of the community greater than on the general community at large.

Care Responsibilities ⁴ (HR issues only)			X			
Social & Health⁵						
Impact on community cohesion			X			
Impact on tackling poverty			X			
Impact on health and wellbeing			X			
Environment						
Impact on the quality of the natural and built environment			X			
Impact on the low carbon agenda			X			
Impact on the waste hierarchy			X			
Economic/Business						
Impact on Luton's economy and/or businesses			X			
Impact on jobs			X			
Impact on skills			X			

Please answer the following questions

1. Research and Consultation

1.1 Have you made use of existing recent research, evidence and/or consultation to inform your proposal?
Please insert links to documents as appropriate.

1.2 Have you carried out any specific consultation with people likely to be affected by the proposal? (if yes, please insert details, links to documents as appropriate).

Guidance Notes: If you have not yet undertaken any consultation you may wish to speak to the Consultation Team first as a lack of sufficient consultation could place the Council at risk of legal challenge.

[Click here Luton Observatory](#)
For local demographics and information

[Click here for LBC Consultation Portal](#)
To access available relevant research already carried out

⁴ This is a Luton specific priority added to the 9 protected characteristics covered under the Equality Act and takes into account discrimination by association.

⁵ Full definitions can be found in section 3

1.1. Insert any links to references including websites below

1.2. Consultation – insert any links to consultation documents

Children's Centre statutory guidance, April 2013
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/273768/childrens_centre_stat_guidance_april_2013.pdf

[For advice and support from Consultation Team click here](#)

1.3 Have you carried out any specific consultation with citizens/staff likely to be affected by the proposal? If yes, please insert details, links to documents, as appropriate above. Please show clearly who you consulted with, when you consulted and the outcomes from the consultation. Mitigations from consultation should be clearly shown in Action Plan at end of document.

The Children's Centre review was first discussed in the Children's Centre Strategic Review Group with Children's Centre Hub Managers being informed of progress and with questions and points raised as needed.

Bridget Cameron, the officer leading the change then attended the Children's Centre Hub Manager's meetings and continued to do so throughout the process. These were informal consultative, question/answer meetings.

The CLMT paper of 18th June 2015 began the consultation process by asking permission to go out to public consultation. It also asked to begin the informal and formal staff consultation processes.

Over the next 8 months, Luton Borough Council implemented a 2-phased consultation process on how to best organise the Towns children centres, to offer a wider range of services to meet the needs of the whole family whilst achieving budget reductions of £1m.

The Council remained clear that this meant re-thinking the way we have been doing things, and included working more closely with health services and in particular with the community health service provider (Cambridge Community Service) who lead on the delivery of the DOH 0-5 Healthy Child Programme.

In November 2015 we started talking to families and organisations across Luton as part of the children centre review. Using our web-based consultation, questionnaires, face to face discussions in the community, we asked about how much children's centres were used and what for, as well as seeking families and stakeholders' ideas.

The second phase of the consultation took place between 16th May and 10th June 2016. This described:

- The proposed service model – at a high level;
- How the town would be split from a children's centre management perspective;
- What sites/buildings are proposed to be used.

The comments and ideas presented during the consultation have been listened too, as have the comments from local families and professionals over the past few months, and much thought has been given about how we can deliver flexible services most effectively in the community.

Parents told us that they want to continue to get support from a range of local venues that they already use, like buildings on school sites and community spaces, and that are easily accessible. These concerns have helped shape the new delivery model.

2. Impacts Identified

2.1 Where you have identified a **positive*** impact, for **communities or staff**, please outline how these can be enhanced and maintained **against each group identified**. Specific actions to be detailed in action plan below.

**By positive impact we mean, is there likely to be a noticeable improvement experienced by people sharing a characteristic?*

In the Impact Table above, I have cited neutral impact. At a minimum, this is expected however, the current model, with management by local authority, schools and a voluntary organisation results in a varied Children's Centre delivery approach across the town in certain aspects. For example, through the different parenting programmes used, or the extent to which centres use outreach workers in their delivery models.

Key outcomes for the proposed review/remodelling of the Children's Centres in Luton are:

- To ensure there is an agreement about what a good Children's Centre in Luton should look like and what it should deliver, including which of the aspects of the Early Years Core Offer Children's Centres will deliver directly and which they will have an indirect role in (e.g. through use of premises or as part of a partnership/group approach). This links directly with the Flying Start vision.
- To have a consistency of approach and equity of service across the town regardless of where families live.

This positive impact would be noted by all groups using Children's Centres and for those who move between them in being able to have a consistent model applied across the Borough.

[For advice & support from the Social Justice Unit click here](#)

2.2 Where you have identified a **negative*** impact please explain the nature of this impact and why you feel the proposal may be negative. Outline what the consequences will be **against each group identified**. You will need to identify whether mitigation is available, what it is and how it could be implemented. Specific actions to be detailed in action plan below.

**By negative impact we mean is there likely to be a noticeable detrimental effect on people sharing a characteristic?*

At this time no negative outcome has been recognised. However the Council will continue to monitor the outcomes of children and families attending and receiving support and guidance from our Children's Centres.

2.3 Where you have identified a **neutral*** impact for any group, please explain why you have made this judgement.

You need to be confident that you have provided a sufficient explanation to justify this judgement.

**By neutral impact we mean that there will be no noticeable impact on people sharing a characteristic*

Example statement:

In point 2.1 above, it is noted that there are anticipated positive effects of the Children's Centre restructure. At the minimum, there is no evidence currently available to suggest that the Policy will have a noticeable impact, either positive or negative, on any of the groups identified above.

[For advice & support from the Social Justice Unit click here](#)
[For advice and support from the Public Health team click here](#)

3. Social & Health Impacts

If you have identified an impact on community cohesion⁶, tackling poverty⁷ or health and wellbeing⁸, please describe here what this may be and who or where you believe could be affected, **Please also ensure that you consider any possible impacts on Looked After Children.**

Guidance Notes:

Please use this section to describe the social and health impacts and detail any specific actions or mitigations in the action plan below.

The model will meet the requirements within the revised Children's Centre Statutory Guidance, April 2013: that states local authorities, commissioners of local health services and Jobcentre Plus must have regard to when carrying out duties relating to Children's Centres under the Childcare Act 2006.

This updated guidance requires 'local authorities and 'relevant partners' to work together to deliver integrated early childhood services' emphasising the closer links to midwifery, GPs and health visitors with every centre having access to a named health visitor. Opportunities should also be furthered for links with Jobcentre Plus, early education and childcare providers (including childminders and schools) and through links with Social Workers and Stronger Families' co-ordinators with a link to a named Social Worker.

Supporting Lutons children at an early stage of development, encouraging good parenting, having social interaction for parents, and enabling bonding of parent and child bring huge beneficial outcomes for the child, the parent and our communities as whole. Early age intervention supports better outcomes for children later in life, which in turn will support our work in tackling poverty and encouraging greater social mobility.

⁶ is the proposal likely to have a noticeable effect on relations within and between specific section(s) of the community, neighbourhoods or areas.

⁷ is the proposal likely to have a noticeable effect on households that are vulnerable to exclusion, e.g. due to poverty, low income and/or in areas of high deprivation

⁸ Is the proposal likely to have a positive or negative impact on health inequalities, the physical or mental health and wellbeing of an individual or group, or on access to health and wellbeing services?

4. Impacts on the natural & built environment

Environment Impacts

If you have identified any impacts related to the built and natural environment⁹, low carbon¹⁰ and waste minimisation please describe here what this may be and who or where you believe could be affected (please see footnote below)

Is the proposal likely to impact on the waste hierarchy which includes issues shown in the table below:

Waste Hierarchy



5. Economic Impacts

If you have identified any impacts related to Luton's economy and businesses¹¹, creating jobs¹² or improving skill levels¹³, please describe here what this may be and who or where you believe could be affected (– please see footnote below)

Guidance Notes:

Please use this section to describe the social impacts and detail any specific actions or mitigations in the action plan below.

⁹ Is the proposal likely to Impact on the built and natural environment covers issues such as heritage, parks and open space, cleanliness, design, biodiversity and pollution.

¹⁰ Is the proposal likely to impact on low carbon includes issues such as use of energy, fuel and transport.

¹¹ Is the proposal likely to impact on Luton's economy and businesses for example by creating an opportunity to trade with the Council, support new business opportunities?

¹² Is the proposal likely to impact on the creation of new jobs in the local economy? This will also link to health and well-being and the reduction of poverty in the social box.

¹³ There are significant skills gaps in Luton's economy. Is the proposal likely to create opportunities for up skilling the workforce or to create apprenticeships?

Please detail all actions that will be taken to enhance and maintain positive impacts and to mitigate any negative impacts relating to this proposal in the table below:

Action	Deadline	Responsible Officer	Intended Outcome	Date Completed/ Ongoing
<u>Work with Public Health to emphasise close links to midwifery, GPs and health visitors in the final delivery model so that every delivery centre has access to a named health visitor</u>	<u>March 2016</u>	<u>Bridget Cameron</u>	<u>Every delivery centre has access to a named health visitor</u>	

A review of the action plan will be prompted 6 months after the date of completion of this IIA

Key Contacts:
Bridget Cameron
Michelle Gwyther

Next Steps

- All Executive Reports, where relevant, must have an IIA attached
- All report authors must complete the IIA section of Executive Reports (equalities, cohesion, inclusion, health, economic, business and environment)
- All reports are to be forwarded to the Social Justice Unit, Public Health and Strategy & Sustainability Unit for sign off in time for Executive deadline
- On the rare occasion that the Social Justice Unit are unable to sign off the report, e.g. recommendations are in breach of legislation, a statement will be submitted by Social Justice Unit Manager or Equality and Diversity Policy Manager

Completed and signed IIA's will be published on the internet once the democratic process is complete

Corporate Plan

<http://intranet/SupportServices/Document%20library/Corporate%20plan%2011th%20July%202011.doc>

Equality Charter

<http://intranet/SupportServices/socialjustice/Document%20library/Equality%20charter.pdf>

Social Justice Framework

http://www.luton.gov.uk/Community_and_living/Lists/LutonDocuments/PDF/Social%20Justice/Social%20Justice%20Framework%202012%20-2026.pdf

Family Poverty Strategy

http://www.lutonforum.org/Forum/Documents/Family-Poverty-Strategy-Final-October2011_001.pdf

Joint Strategic Needs Assessment (JSNA)

http://www.luton.gov.uk/Council_government_and_democracy/Lists/LutonDocuments/PDF/Consultation/Reports/Final%20JSNA%202011.pdf

Community Involvement Strategy

<http://www.lutonforum.org/Forum/Documents/CISfinaljune2010.pdf>

<p>For: (x)</p> <table border="1" style="width: 100%;"> <tr> <td style="width: 80%;">Executive</td> <td style="width: 20%; text-align: center;">x</td> </tr> <tr> <td>CLMT</td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table> <p>Meeting Date: 19th September 2016</p> <p>Report of: Director of Place and Infrastructure</p> <p>Report author: David Carter</p>	Executive	x	CLMT	<input type="checkbox"/>	<h2>Agenda Item Number: 12</h2>
Executive	x				
CLMT	<input type="checkbox"/>				

<p>Subject: High Town Master Plan</p> <p>(For Executive Only)</p> <p>Lead Executive Member(s): Councillors Castleman, Shaw and Timoney</p> <p>Wards Affected: High Town</p>	<p><u>Consultations:</u></p> <p>Councillors</p> <p>Scrutiny</p> <p>Stakeholders</p> <p>Others</p>	<p>(x)</p> <p>x</p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p>
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<p>Recommendations</p> <p>1. Executive is requested:</p> <ol style="list-style-type: none"> a) That the response to the consultation on the High Town Masterplan as summarised in Appendix 2 to this report be noted. b) That the proposed amendments to the High Town Masterplan as set out in Appendix 3. c) That subject to the amendments in Appendix 3 that the High Town Masterplan should be adopted as a Supplementary Planning Document (SPD) with immediate effect. d) That the existing East Village Design Codes should be retained as a Supplementary Planning Document (SPD) to sit alongside the new High Town Masterplan and that the existing High Town Supplementary Planning Document (dated Nov 2007) should be revoked. e) That the High Town Masterplan Delivery Group continues to provide the momentum to ensure effective implementation of the Masterplan
<p>Context</p> <ol style="list-style-type: none"> 2. The Luton Local Plan (2011-31) identifies High Town as one of eight Strategic Allocations where the bulk of investment and development is likely to be concentrated over the next 15 years. 3. The vision for the area is succinctly set out in the Local Plan policy which sets out “to create a sustainable vibrant, historic neighbourhood destination delivered through residential-led mixed use development whilst protecting the historical environment and assets including small scale offices / workshops, live work units and increased retail provision which will enhance the area including increased footfall, better pedestrian access and permeability, more public open space and an enhanced natural environment.” 4. The local plan anticipates that High Town has the potential to deliver the highest concentration of new housing (750 units) in the town, building on the strengths of the area including the historic Conservation Area concentrated on High Town Road on the one hand and its strategic location adjacent to Luton's main line connection to London and proximity to the town centre on

the other.

5. Earlier efforts to regenerate the area in the late 2000's ground to a halt with the onset of the deep economic downturn which undermined the property market and viability to secure investment and development.
6. The latest High Town Masterplan was commissioned both against this backdrop and in the context of emergence from recession and improving development viability. The Masterplan produced for the Council (attached as Appendix 1) builds on several existing planning documents produced and adopted by the Council in the late 2000's and the emerging local plan. Focussed consultation with the local community (July-August and November 2014 and January 2015) has been a critical part of the plan-making process and in April/May 2016 the Masterplan was published for a further round of public consultation with a view to subsequent adoption as a Supplementary Planning Document. The January 2016 version of the Masterplan is available on the Council's website.
7. The remainder of this report highlights the response to the recent consultation and proposes that the Masterplan, subject to amendment should be adopted as a Supplementary Planning Document.

Consultation Arrangements

8. As indicated in paragraph 5 the Masterplan was the focus of a period of public consultation for a period of six weeks during April and May 2016. The launch date coincided with the launch of Luton's Investment Framework. No further periods of public consultation are required.

Goals and Objectives

9. The overall objective is to deliver the vision for High Town set out in paragraph 2 above. The Masterplan is an important step in this process and following completion of the necessary consultation the Council is now in a position to adopt the masterplan as a Supplementary Planning Document. This adds status to the document and will assist in the delivery and implementation phase. The Masterplan includes a final section which points to action in four areas which have already been taken up by the High Town Masterplan Delivery Group:
 - (i) Design guidance. The new Masterplan provides design guidance across the High Town area. This updates and supercedes the 2007 version of the Masterplan which can now be revoked, with one exception. This relates to the East Village Design Codes (2009) which should be retained, also as Supplementary Planning Document. The Design Codes provide more detailed design guidance for a part of High Town. Periodic monitoring of the High Town Masterplan will provide the opportunity to consider whether further consolidation of design guidance might be necessary.
 - (ii) Streetscape design co-ordination. This is a crucial for the future of High Town and relates to the identification of high quality materials, street furniture, signing and lighting themed to complement the Conservation Area which can be implemented on a phased basis as and when resources are available. In relation to this the scope to secure developer contributions to facilitate improvements to the public realm and Conservation Area should be noted.
 - (iii) Formation of a High Town Masterplan Delivery Group. This has now been formed and will draw on relevant Executive Members, Local Members and senior officers as appropriate. The group may also wish to co-opt others from other bodies and organisations.
 - (iv) A workshop or carry-forward event but also potentially involving other events and non-development related activities. Management of this could be best handled by the High

Proposal

10. In response to the recent public consultation about 55 representations were received in total from 12 representors. Given the focus on the local community of the earlier consultations it is not surprising that the bulk of the responses to the latest consultation were from 'statutory' bodies such as Historic England, Highways England and the Chilterns Conservation Board and other infrastructure providers. In addition respondents included the local MP Gavin Shuker and Central Bedfordshire Council.
11. Appendix 2 to this report provides a summary of all the comments made, structured in the order of the Masterplan document. The fourth and fifth columns of the schedule suggests an appropriate response to the comments made. In some cases these suggest a modification is made to the Masterplan or that the comment is referred to the Delivery Group for consideration as part of ongoing project development. In a number of cases the comments are noted but no further action is deemed necessary. For clarity, where it is suggested that changes to the Masterplan might be made these have been brought together in Appendix 3.
12. Following the completion and analysis of the results of the recent public consultation it is recommended that the High Town Masterplan should be adopted as a Supplementary Planning Document (SPD). This will help add to the status of the Masterplan. The new Masterplan should sit alongside the existing East Village Design Codes which it is proposed should also be retained as SPD with the proviso that in the event of any conflict between the two documents then the new Masterplan should take precedence. Since the Luton Local Plan (2011-31) is already the subject of a Sustainability Appraisal it is not considered necessary that the Masterplan is required to be taken through a separate process although it is recognised that this report will need to satisfy the Council's own Integrated Impact Assessment.
13. Subject to Executive approval it is proposed that the High Town Masterplan should be adopted as an SPD with immediate effect. Pending completion of the updated Masterplan the operational Masterplan will comprise the January 2016 version of the Masterplan as amended by the schedule of changes at Appendix 3.

Key Risks

14. Ensuring that the current developer interest is delivered into action on the ground.
15. That the developments that take place meet the aspirations of both the local community and the Council.
16. The need to 'protect (and enhance) the goose that lays the golden egg' i.e. the High Town Conservation Area so that it can thrive as one of the most historic parts of the town leading to it coming off Heritage England's 'at risk' register.

Direct Financial Implications

17. The direct financial implications arising from this report are limited to include publication of the final version of the Masterplan as a Supplementary Planning Documents. These costs will be controlled within existing budgets and through electronic publication of the final documentation. If paper copies are required these can either be self-printed or at cost if the Council is requested to supply a copy.
1. The programme of projects is likely to lead to additional revenue and capital expenditure on a scheme-by-scheme basis. Separate reporting arrangements are in-place to cover these. It is

also likely that the investment in new developments will result in income through developer contributions and additional New Homes Bonus that will help offset the expenditure.

Legal Implications

18. The proposed adoption of the Masterplan as a SPD will help add weight to the provisions set out in the plan as part of the Development Management process.

Consultations

19. The comments received during the most recent consultation are summarised in this report. Documentation summarising earlier consultation is available on the High Town Masterplan section of the Council’s website.

Appendices attached:

- Appendix 1: Luton High Town Masterplan, January 2016
- Appendix 2: Luton High Town Masterplan, Summary of responses to public consultation, April to May 2016
- Appendix 3: Luton High Town Masterplan, Proposed Changes to the January 2016 version of the High Town Masterplan.

Background Papers:

- i. Luton Local Plan (2011-31), October 2015.
- ii. Responses to Policy LP10 High Town as part of the Pre-submission consultation on the Luton Local Plan (2011-31), available on Objective.

IMPLICATIONS

For Executive reports

- grey boxes must be completed
- all statements must be cleared by an appropriate officer

For CLMT Reports

Clearance is not required

		Clearance – agreed by:
Legal	Consideration of the additional round of public consultation carried out April to May 2016 enables the Council to consider adoption of the High Town Masterplan.	Steven Sparshot, Legal Services on 6 th September 2016
Finance	The direct costs arising from the publication will be contained within existing revenue budgets. Future capital and revenue spending and receipts will be monitored by the High Town Masterplan Delivery Group with the various elements subject to separate approvals. Any proposals that require the Council to incur capital spend will need to be appraised and approved through the agreed capital programme process. Any appraisal will need to include an analysis of future and on-going revenue costs and income.	Darren Lambert, Finance Manager for Place and Infrastructure, on 5 th September 2016

Integrated Impact Assessment (IIA) – Key Points

Equalities/	In most respects the High Town Masterplan is	Maureen Drummond,
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Cohesion/Inclusion (Social Justice)	expected to have a neutral impact on most groups although new construction and improvements to the public realm will be to present-day standards which are more conducive to the needs of people with disabilities.	Cohesion & Equalities Adviser on 28 th July 2016
Environment	<p>It is intended that the needs of the resident population as a whole socially, economically and environmentally will be met as far as possible within High Town by providing linked opportunities for affordable housing, access to services including leisure, shopping schools and employment, that people will be able to access via walking and cycling for more healthy lifestyles with local green infrastructure protected for leisure, exercise tranquillity and well-being.</p> <p>Being close to the town centre, station and interchange/busway services, High Town is in a unique position to enable the promotion of sustainable travel. This is reflected in the Masterplan and efforts will be made to maximise this approach as developments progress through the normal planning process.</p>	Rod Black Highway Development & Sustainable Travel Manager on 6 th September 2016
Health	<p>The High Town Masterplan will help secure much needed investment and development in a part of the town that is in urgent need of regeneration. The impact will be to improve the overall quality of living in the area for both existing residents and those people moving into the new housing which in-turn will have a positive impact on health And well-being.</p> <p>However, in taking forward the delivery of the Masterplan, the Delivery Group should be mindful of work carried out by the TCPA on the greening of development areas and good practice recommendations from a recent LGA report on tackling obesity through planning and development and maximising social connectivity. The Group should also consider whether the provision of pocket parks would be possible.</p>	Stephen Gunther Public Health, 1 August 2016
Community Safety	There are no community safety implications directly as a result of this report. Projects which come forward will need to consider any specific implications which could arise. Any opportunities to design out crime or anti-social behaviour should be taken accordingly at those times in line with the general duty under the Crime & Disorder Act 1998.	
Staffing	No direct staffing implications	

FOR EXECUTIVE ONLY - Options:

- a) To reject the recommendations
- b) To request further information

Luton High Town

MASTERPLAN



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1.0 INTRODUCTION

- BACKGROUND
- THE STUDY AREA
- THE OPPORTUNITY
- THE MASTERPLAN AND DELIVERY STRATEGY PROCESS

2.0 HIGH TOWN CONTEXT

- TRANSPORT AND ACCESS
- POLICY CONTEXT
- COMMERCIAL AND PROPERTY CONTEXT
- SOCIO-CULTURAL CONTEXT

3.0 UNDERSTANDING THE SITE

- SITE CONSTRAINTS AND OPPORTUNITIES
- LAND OWNERSHIPS
- DEVELOPMENTS IN PROGRESS
- KEY DEVELOPMENT SITES

4.0 DESIGN PRINCIPLES

- A VISION FOR HIGH TOWN
- DESIGN PRINCIPLES

5.0 ILLUSTRATIVE MASTERPLAN

- HOUSING TYPOLOGIES
- ILLUSTRATIVE MASTERPLAN
- SITE BREAKDOWN
- OVERALL AREA SCHEDULE
- CAR PARKING STRATEGY FOR NEW RESIDENTIAL DEVELOPMENTS
- CAR PARKING STRATEGY FOR HIGH TOWN
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- HIGH TOWN ROAD
- CAR PARKING STRATEGY
- CULTURAL REVITALISATION STRATEGY

6.0 DELIVERY STRATEGY

- INTRODUCTION
- VIABILITY
- SITE SPECIFIC DELIVERY MECHANISMS
- PHASING PLAN
- NEXT STEPS

The Masterplan has been brought forward within and builds upon the existing and current planning framework, specifically the High Town SPD (2007) including the East Village Design Codes (2009), the existing Local Plan 2001-2011 and the emerging Local Plan 2011-2031. The High Town Masterplan takes forward existing and emerging policy, providing guidance and evidence to support and assist in the delivery of the development plan.

Subject to responses following the publication of the Masterplan the Council will, in due course, consider if the document should be adopted as a Supplementary Planning Document.

INTRODUCTION

1.0

1.0 INTRODUCTION

1.1 Background and Status

Luton Borough Council (LBC) appointed BDP and a team of consultants including GL Hearn, Kevin Murray Associates, Odyssey Markides, John Montgomery and Richard Rees to prepare a Masterplan and Delivery Strategy for the central area of High Town in Luton (known as the “High Town Masterplan”). The project has been undertaken in two stages: stage one being the baseline analysis including identification of the key development sites and stage two outlining the overall Masterplan and Delivery Strategy. This report is the final output of the work undertaken.

The initial research and identification of the key issues, opportunities and constraints have informed the development of the overall Masterplan concept and design options for the specific sites. Public consultation has been integral to the preparation of the masterplan which is summarised in a separate annex.

The results of this initial baseline stage are summarised in the first chapters of this document which is also available as a separate report.

1.2 The Study Area

High Town is strategically located on the fringe of Luton Town Centre, to the north of the railway line and the town’s transport hub. The emerging Local Plan recognises High Town as an area with capacity to grow with further sustainable investment as well as an important neighbourhood centre at the heart of Luton’s diverse community.

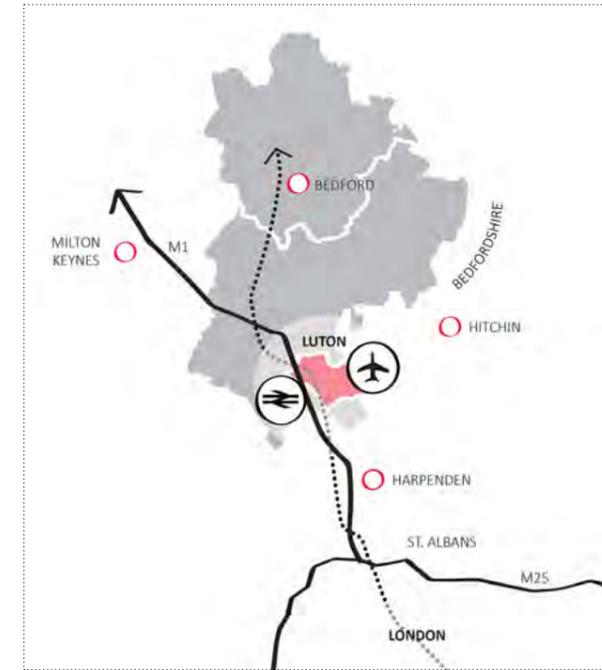


Figure 1
LUTON IN THE
CONTEXT OF
BEDFORDSHIRE

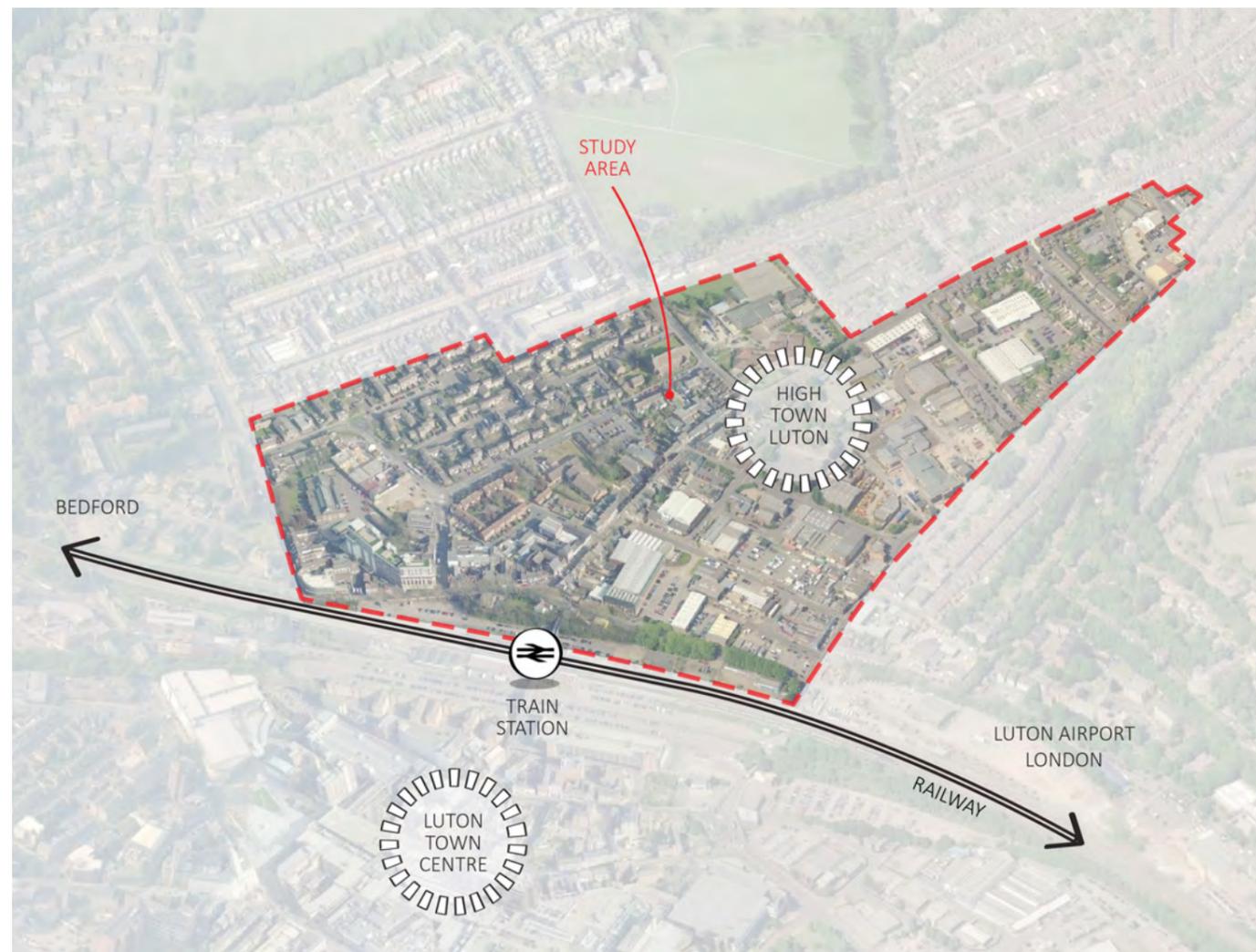


Figure 2
THE STUDY AREA

Site and Character Areas

High Town is located in the central area of Luton, adjacent to Luton railway station. It is conveniently located immediately to the north of Luton town centre, separated from it by the railway. A pedestrian bridge passing through the railway station is the main pedestrian connection between High Town and Luton town centre.

The High Town study area is approximately 27 hectares and includes the central area of High Town, High Town Road and a mix of residential, employment and community areas. The study area is very diverse in character and some of the key character areas have been defined below:

- 01. Old Bedford Road:** An area of mixed-use developments
- 02. Paths Estate:** A housing estate currently experiencing significant anti-social behavior problems
- 03. Back of High Town Road:** The area includes a mix of uses which support the High Street including car parking and servicing but also residential, surgery and elderly accommodation
- 04. Midland Road and High Town gateway:** This area is dominated by a recently completed multi-storey car park and railway footbridge connecting High Town to Luton station and the town centre
- 05. High Town Road:** High Town Road forms the spine of High Town Conservation Area and naturally acts as the centre of High Town

- 06. East Village:** This area of underused land is occupied predominantly by light industrial buildings and warehouses
- 07. Land North-East of High Town Road:** This area is characterised by light industrial uses and includes some preserved Victorian houses as well as educational and community facilities.

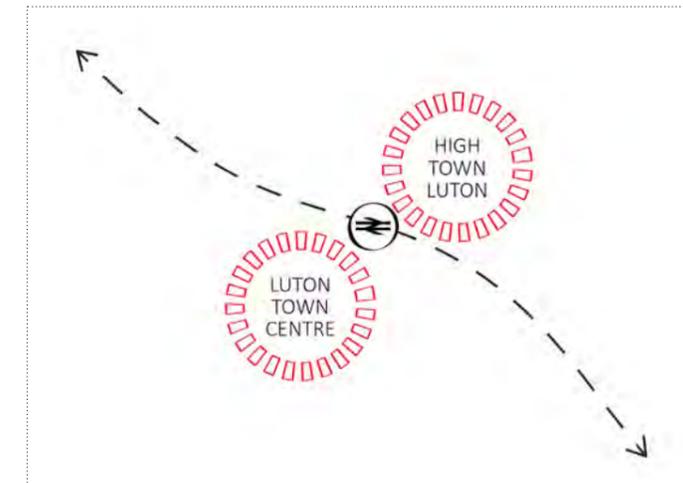


Figure 3
 LUTON STATION ACTS LIKE A PIVOT FOR THE TWO PARTS OF THE TOWN

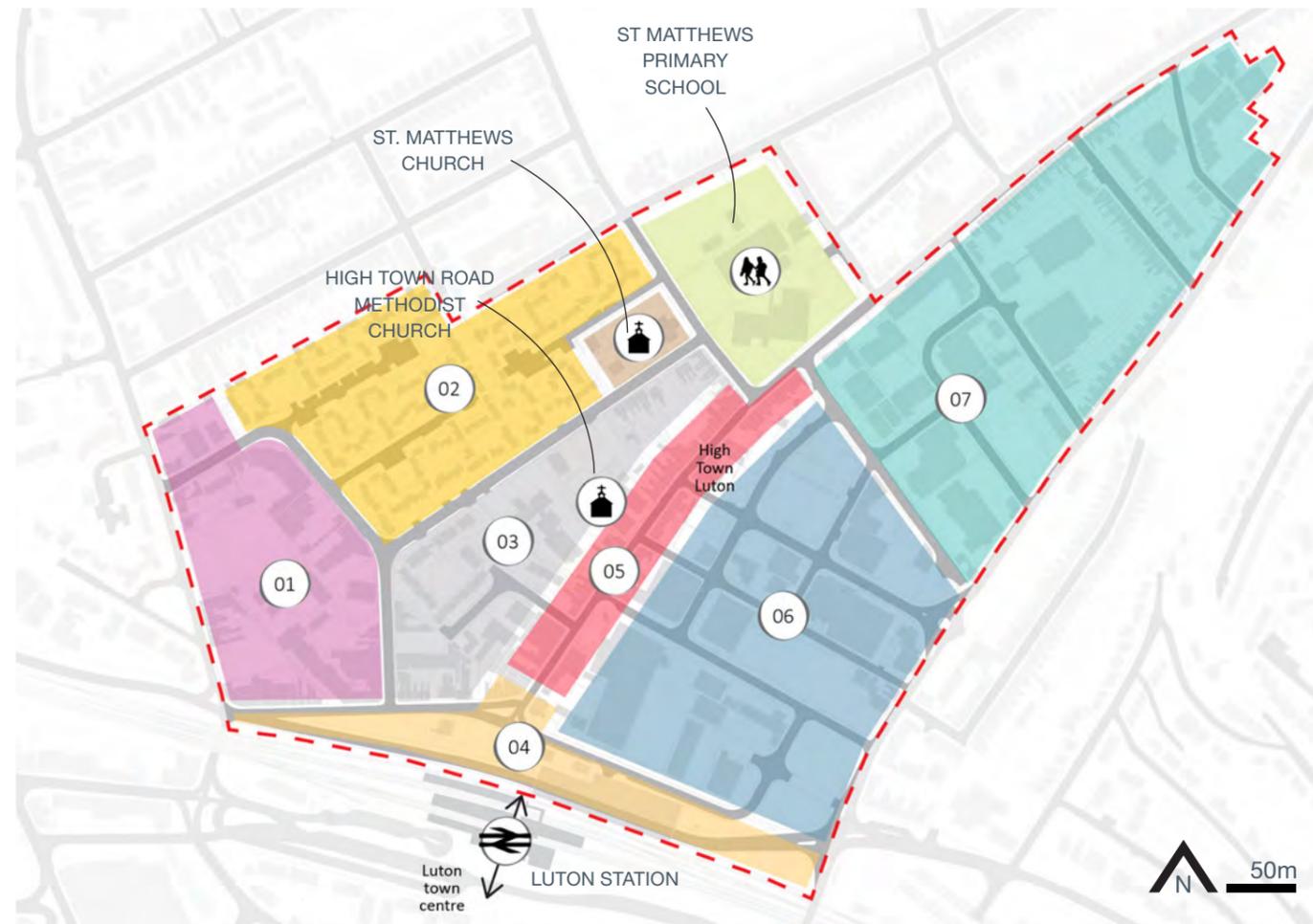


Figure 4
 PLAN OF HIGH TOWN SHOWING THE STUDY AREA AND EXISTING CHARACTER AREAS

1.0 INTRODUCTION

1.3 The Opportunity

The Masterplan and Delivery Strategy aims are to stimulate the regeneration of High Town through a combination of both private and public investment and will contribute to the achievement of the objectives of the Luton Local Plan including enhancement of the conservation area and other heritage assets.

The Masterplan delivers a set of development principles and parameters and policy approaches for the study area, which have been tested for viability and discussed with the local community members and stakeholders in three stages of consultation.

1.4 The Masterplan and Delivery Strategy Process

The Delivery Strategy comprises an overall strategy together with a number of development option appraisals setting out the parameters for key opportunity sites, viability considerations and illustrates the best delivery mechanism and options to achieve the objectives and visions for the wider area.

The key focus areas for the project have been:

- the marketability and viability, including appropriate densities of development;
- identifying requirements in terms of health, housing, education, job creation, retail offer, leisure and services
- the need to create a vibrant and safe neighbourhood, with a mix of residential, retail and commercial activities.

The Masterplan ideas, content and format have been developed in collaboration with a broad range of community organisations, stakeholder bodies, and local individuals, as well as with Council departments.

The community-facing engagement has involved three stages in High Town:

- 1) Scoping ideas and aspirations – July-August 2014
- 2) Review of emerging plan direction and content - November-December 2014
- 3) Review of draft Masterplan and understanding of key actions required to deliver it – January-February 2015

Details of the various events and feedback elements are provided in the separate Annex: Public Engagement.



Figure 5
PHOTO FROM THE
SECOND STAGE OF
CONSULTATION

HIGH TOWN CONTEXT

2.0

2.0 HIGH TOWN CONTEXT

Figure 6
LUTON CONTEXT AND
LINKAGES

2.1 Transport and Access

Context and Linkages

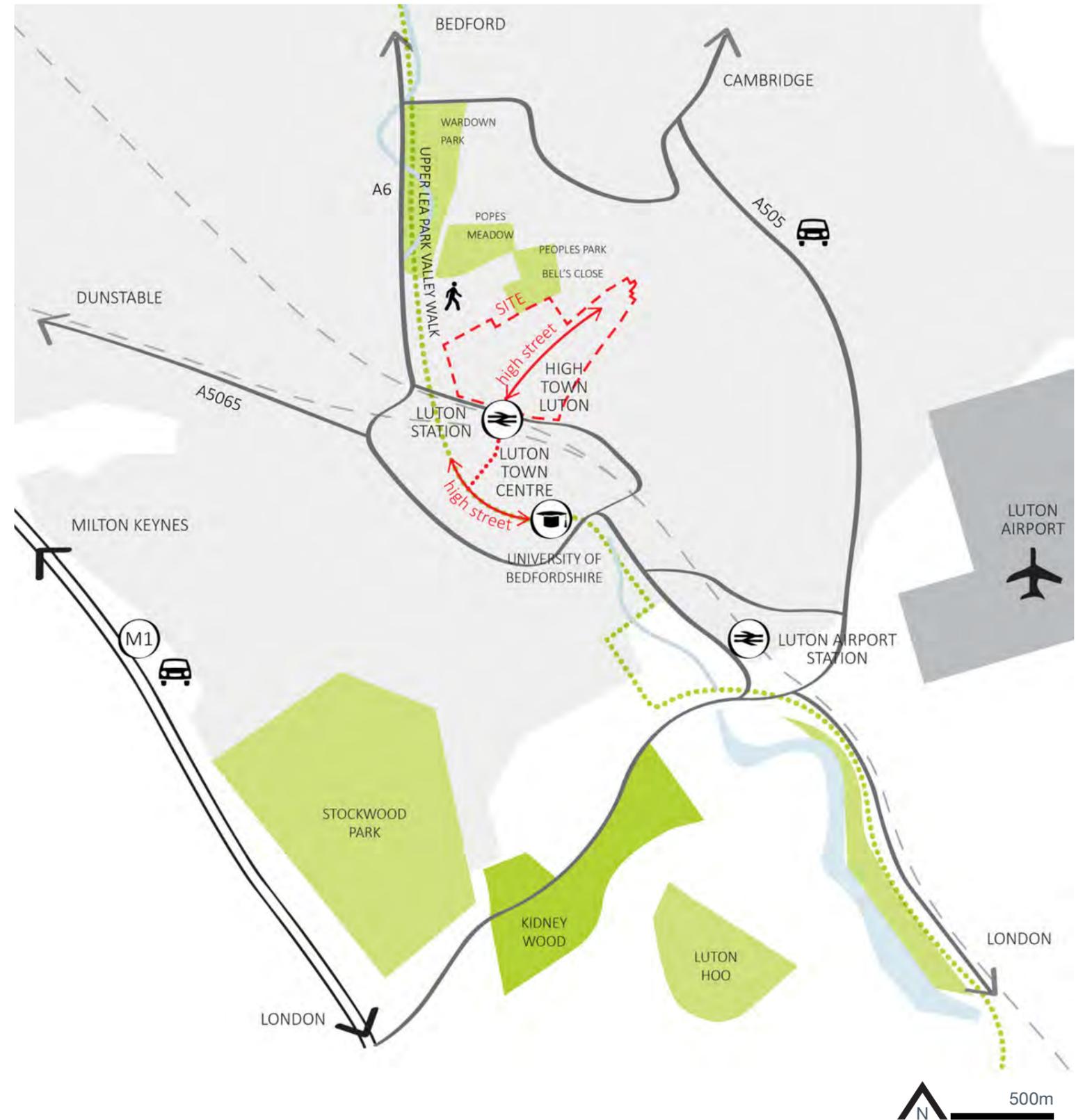
'Luton is recognized as a key growth area in the East of England and a priority area for economic regeneration. It is expected to be the focus for significant economic and housing growth in coming years that will be supported by existing and improved transport links'. (High Town SPD, 2007)

The town of Luton is strategically located in Bedfordshire, 30 miles North of London.

It benefits from exceptionally good connections to southern England by road and to other parts of the UK and abroad via London Luton Airport, one of England's major airports, located roughly 2.5 km east of the town centre.

Luton train station is operated by Govia Thameslink Railway (GTR). Trains go north to Bedford, Leicester, and Sheffield amongst other destinations, while southbound trains include destinations such as Luton Airport Parkway, St. Albans, London, Gatwick Airport and Brighton.

A fast train journey to London St. Pancras International is 37 minutes on a GTR service and only 23 minutes on the limited stop East Midlands train. The journey to Bedford is 15 minutes and St. Albans is 11 minutes away.



2.0

2.0 HIGH TOWN CONTEXT

Good connections with the City and other parts of the country are also represented by the motorway network: Luton is located 20 miles from Milton Keynes and 30 miles from London via the M1 (located roughly 2 km away from the town centre).

The Luton Town Centre Transport Scheme and the Relationship with the High Town Area

High Town is well connected to the public transport network and benefits from its proximity to the Inner Ring Road which has recently been completed.

The Luton Town Centre Transport Scheme (LTCTS) which was opened in September 2014 includes a new link road and improved traffic circulation on the north side of the town centre. This has many benefits for the High Town Area:

- Improves the pedestrian and cycle access into the town centre including the closure of Guildford Street to through traffic
- Increased connectivity between High Town, the bus and rail stations as well as the town centre
- Improvement of pedestrian road safety and reduction in accidents
- Eases traffic congestion on Midland Road and High Town Road as well as most other roads in the area with increased accessibility for residential and retail developments

Car Parking Facilities

Car parking facilities in the High Town area comprise a mixture of on-street spaces, public off-street and private off-street (residential and business use).

Overall, it is estimated that there are around 360 on-street spaces within the area. These comprise a mixture of pay and display, residents, loading and shared spaces. The hours of operation for the majority of the area are Mon-Fri, 9am to 5pm with the High Town Road area being Mon-Sat, 8am to 6pm. Outside of these hours, most of the streets are covered by single yellow lines that provide further opportunities for parking in the evenings and at weekends.

There are currently around 990 public off-street spaces within the area. However, the location of the station multi-storey car park at the southern boundary of the area (with 729 spaces) is unlikely to be attractive for the general parking requirements for the High Town area as a whole. The remaining spaces (264 in total) are accommodated on 7 sites at various locations.

Some initial surveys of usage have been undertaken for both on-street and off-street facilities and at various times of the day and week. The results of these are reported in more detail in section 5.5 but in general, there appears to be some spare capacity in both on-street and off-street facilities, although the extent varies depending on location, time of day and day of the week.

Public Transport

High Town is an extremely accessible location benefitting from good access to both rail and bus networks which reduces dependency on private cars.

Consequently it will be an attractive location for residential and retail development.

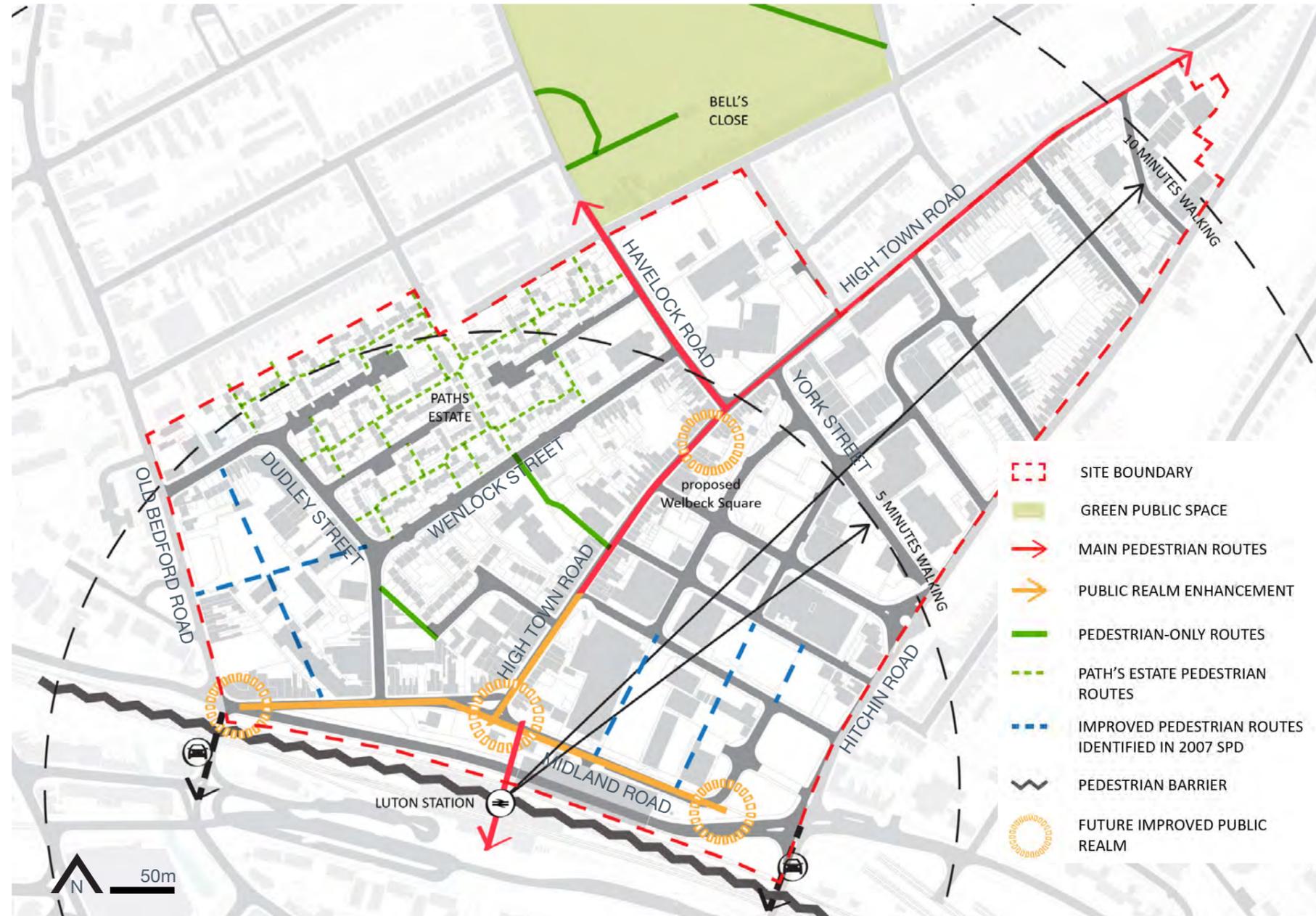
Regeneration projects such as the High Town Masterplan will have a positive effect on the Luton Dunstable Busway and other services as increased population will generate more trips, therefore contributing to the viability of the network and ensuring its future success.

2.0 HIGH TOWN CONTEXT

Pedestrian Movement

Currently pedestrian movement is concentrated along the High Town Road as the connecting streets generally lead to industrial buildings and car parks. In general there is a lack of surveillance along pedestrian routes; to the east there is a lack of footpaths and active street frontage while to the west, the Paths Estate has an abundance of footpaths but lacks many vehicular routes, contributing to a lack of permeability and adequate surveillance as well as issues associated with anti-social behaviour.

To the south, the gateway into High Town from the town centre fronts the pedestrian railway bridge and has attractive proportions and a positive sense of enclosure. However this area lacks adequate pedestrian connections, linked by two narrow footpaths alongside roads running underneath the railway at each end of Midland Road.



2.0

2.0 HIGH TOWN CONTEXT

2.2 Policy Context

Status of Planning Policy

The planning policy review provides a high-level overview of some of the key themes, which will influence the High Town Masterplan. The review does not form an exhaustive catalogue of policies but focuses on some of the policies most relevant to High Town.

The policy framework within LBC is currently in a transitional phase, between the saved policies contained within the Luton Local Plan 2001–2011 (March, 2006) and the emerging policies within the Luton Local Plan 2011–2031.

It is anticipated that the Luton Local Plan 2011–2031 will be adopted in late 2016, following approval from full council. Given that this masterplan is due to be published before the adoption of the Luton Local Plan 2011–2031, this policy review has considered both the saved policies from the Luton Local Plan 2001–2011 and the Luton Local Plan 2011–2031.

The adopted and emerging policy framework relevant to the High Town Masterplan is as follows:

National:

- National Planning Policy Framework (NPPF) (March, 2012) – while some reference is made to the NPPF, it is not covered in detail because the emerging policies in the Luton Local Plan 2011–2031 are in conformity with it.

- National Planning Policy Guidance (NPPG) (March 2014 and subsequent alterations)

Local:

- Luton Local Plan 2001–2011 (March, 2006)
- High Town, Luton Supplementary Planning Document (SPD, July, 2007)
- High Town East Village Design Codes (appendix to the High Town Luton SPD) (July, 2009)
- Shopfront Design Guide (1993)
- Designing for Sustainability – A Summary of Good Practice (2003)
- Designing for Community Safety in a Quality Environment (2003)
- Planning Obligations SPD (September, 2007)
- Emerging Luton Local Plan (LLP) 2011 – 2031

In addition to the above adopted or emerging policy, reference has also been made to the following strategies and technical evidence:

- Luton Town Centre Development Framework (2004)
- High Town Conservation Area Management Plan (2008)



Figure 8
PLANNING POLICIES
AFFECTING HIGH
TOWN

2.0 HIGH TOWN CONTEXT

2.0

Key Themes

A review of the planning policy framework identified a number of key themes.

A Complementary Neighbourhood Centre

Emerging local policy sees High Town redesignated from a District Centre to a Neighbourhood Centre (LP21 of the LLP 2011-2031) which is reflective of its location adjacent to the main town centre and the lack of a bank and/or post office or substantial retail offer. This redesignation will better suit the area's scale and size, especially around the train station while also complementing the retail offer of Luton Town Centre (SO4 and LP3 of the LLP 2011-2031).

Policy LP10 of the LLP 2011-2031 anticipates that High Town can accommodate around 750 new residential units and 350 new jobs and the plan sets out the following vision for High Town:

"The vision for the area is to create a more sustainable residential-led mixed use neighbourhood including small scale offices / workshops, live-work units (with opportunities for start-up business and creative activities) and increased retail provision which will enhance the area, with better pedestrian access and permeability, more public open space and an enhanced natural environment."

Significant private sector investment will be needed to capitalise on the opportunities for a vibrant historic mixed use neighbourhood with opportunities for start-up business and creative activities, acting as a complementary centre to Luton.

Delivering High Quality Homes

Delivering housing at an appropriate level to meet local requirements in terms of quantum, mix, size and tenures that offer local residents choice of where to live and address issues of affordability and overcrowding is important in the local area (SO3 of the LLP 2011-2031). There is a recognised need to provide 17,800 new homes borough wide. With a deficiency in land currently available to meet this need, High Town is identified as a key area in which these needs can be partly met.

Density and Mix

By increasing densities within the Masterplan area, High Town could assist in meeting the identified need across all tenures (High Town SPD (July 2007) and LP10 of the LLP (2011-2031). A mix of densities will be encouraged without resulting in the over-intensification of the area (LP15 of the LLP 2011-2031). A minimum density of 50 units/ha or more will be sought in order to ensure the viability of local

uses, services and the transport network (H3 of the LLP 2001-2011).

In addition a mix of housing size, type and tenure will be encouraged (LP15 of the LLP 2011-2031). The mix requirement for all tenures over the plan period is set out in the 2014 Luton and Central Bedfordshire SHMA Refresh and set out in figure 9 below.

Affordable Housing

The need for affordable housing both across the borough and within High Town will be met through compliance with emerging policy which prescribes that 20% affordable housing units or the equivalent contribution towards off-site provision will be required for all schemes that deliver a net gain of dwellings (LP16 of the LLP 2011-2031).

Luton Housing Mix (Luton & Central Bedfordshire SHMA Update 2015 (NB: totals may not add due to rounding))

	Market Housing		Affordable Housing		TOTALS	
	No	%	No	%	No	%
1 bedroom flat	160	1.5	260	3.6	320	1.8
2 bedroom flat	110	1	1,240	17.2	1,350	7.6
2 bedroom house	1,390	13.1	1,140	15.8	2,530	14.2
3 bedroom house	7,380	69.6	3,530	49	10,910	61.2
4 bedroom house	1,300	12.3	1,070	14.9	2,590	14.6
5 bedroom house	220	2.1				
	10,660	100	7,200	100	17,800	100

Figure 9
LUTON HOUSING
MIX LUTON
& CENTRAL
BEDFORDSHIRE
SHMA UPDATE
2015
(NB: TOTALS MAY
NOT ADD DUE TO
ROUNDING)

2.0 HIGH TOWN CONTEXT

2.0

Student Accommodation

Being within 1km of the university and close to established public transport routes connecting directly to sites of further education, High Town may be a suitable location for student housing. (LP17A, LLP 2011-2031).

Encouraging Local Economic Development

The Masterplan will build on the diverse business community that exists in the area, ensuring it is strengthened and protected to provide residents with a competitive offer of services and access to local employment. Employment provision will be achieved (within a projected capacity of 350 jobs) by developing small scale offices, workshops, live work units and retail ancillary to residential in the place of lower density, existing employment land (LP10, LLP 2011-2031).

Proximity to the Creative Quarter also presents an opportunity to accommodate a proportion of Luton's growth of cultural and creative industries (LP11, LLP 2011-2031). By introducing a mix of café culture and night-time economy with galleries, workshops and leisure facilities, the use of the area would increase beyond daylight hours creating a more vibrant and attractive place.

Supporting a Healthy Community and Environment

An important part of the Masterplan will be supporting the development of a healthy, cohesive and diverse community which endeavours where possible to ensure that resident's social needs are met locally by appropriate community infrastructure (paragraph 69 of the NPPF, Objective 7, LLP 2011-2031). In addition it should support health promoting behaviours.

Education

The emerging local plan identifies that there is a shortage of both primary and secondary school provision within the central area of Luton where considerable housing provision is likely to come forward. Given the expected increase in housing within High Town Masterplan area and its proximity to the central area of Luton, education provision for this area needs to be considered and addressed as part of the overall strategy for the central part of the borough. High Town has a primary school which has recently been expanded and so while local plan policy encourages the development and expansion of educational facilities (LP24, LLP 2011-2031), further strategic discussions are required which will cover areas throughout the central part of Luton to explore the potential to contribute towards school places within High Town.

Leisure

The Masterplan will seek to retain the existing leisure facilities located within the study area including fitness centres, childcare centres and dance theatre academies (LP24 of LLP 2011-2031). Luton's increasing population means that there is a need to ensure new leisure facilities are also provided as part of the Masterplan to adequately serve local residents, especially young people (LP10 of the LLP 2011-2031).

Open Space

The Masterplan area lies within the central area of Luton, which has a high population but the second-lowest provision of green spaces. There are access problems to areas of small amenity and larger, natural and semi-natural spaces. Access to allotments is also challenging as the nearest

(oversubscribed) plots are located at the top of surrounding hills. It is important that opportunities are realised to enhance provision, access and the quality of High Town's open spaces as well as local biodiversity (SO 10 of the LLP 2011-2031 and the High Town SPD, 2007).

New developments will also be required to ensure that they provide adequate green space to meet demand arising as a result of the development, either through on-site provision or off-site contributions (LP27 of the LLP 2011-2031).

Conservation and Design

Conservation Areas

The majority of the retail core of High Town falls within the High Town Conservation Area. The protection of historic features and buildings will be an important part of the Masterplan in order to protect and enhance the historic significance and character of the area (High Town Area Management Plan, 2008 and the High Town SPD, 2007) leading to the removal of the conservation area from being 'at risk'.



Figure 10
CHILDREN
PLAYING
FACILITIES AT
PEOPLES PARK
(ON HAVELOCK
ROAD)

2.0 HIGH TOWN CONTEXT

Listed Buildings

There are a number of statutorily and locally listed buildings within the masterplan area, specifically along High Town Road including the Grade II Listed Painters Arms and the Grade II Listed High Town Methodist Church and Hall. The setting and character of these buildings as well as those identified as important for their heritage value will need to be preserved and enhanced by promoting development of an appropriate scale and quality.

High Quality Design

Good planning is indivisible from good design and plays a pivotal role in creating healthy and inclusive communities (NPPF, 2012 and LP25 of the LLP 2011-2031). The Masterplan will promote design quality that enables this including but not limited to:

- Enhancing the character and distinctiveness of the area by responding positively to the townscape and site context;
- Creating a safe and uncluttered public realm which benefits from pedestrian priority and active edges for all ages;

- SITE BOUNDARY
- CONSERVATION AREA
- STATUTORY LISTED BUILDINGS
- LOCALLY LISTED BUILDINGS
- KEY UNLISTED BUILDINGS
- BUILDINGS MAKING A POSITIVE CONTRIBUTION TO THE AREAS CHARACTER
- BUILDINGS POTENTIALLY MAKING A POSITIVE CONTRIBUTION TO THE AREAS CHARACTER



Figure 11
PLAN SHOWING
LISTED BUILDINGS
AND CONSERVATION
AREA IN HIGH TOWN

2.0 HIGH TOWN CONTEXT



- Optimising the potential for higher densities where appropriate;
- Creating safe and secure public environments, which are sufficiently lit and overlooked at different times of the day; and
- Designing to support healthy lifestyles and improved mental wellbeing for residents.

Building Heights

Previous policy documents have highlighted the potential to incorporate taller buildings in certain locations within the Masterplan to support the intensification of the area and to accommodate a significant proportion of the identified housing need. These locations include:

- The potential for developing buildings in excess of six storeys at the eastern and western gateways of Midland Road (High Town SPD, 2007);
- The potential for buildings between four and six storeys at the southern end of High Town Road in order to demarcate the significant gateway formed by the entrance to Luton Station and High Town Road;
- The East Village is identified as being a suitable location for buildings of three and a half storeys, although taller buildings of four storeys would be acceptable along Midland Road and Hitchin Road (The East Village Design Codes, 2009).

Sustainability

The Masterplan will promote the development of a sustainable community through a range of

innovative approaches including the promotion of a mix of uses, public transport, cycling and walking, the use of low carbon technologies and encouraging waste efficiency and recycling.

All development will contribute to the mitigation of and adaptation to climate change (LP37 of the LLP 2011-2031) with the overarching goal being to reduce energy demand through the energy hierarchy, including passive design and meeting carbon reduction targets set out in Building Regulations Part L.

The Masterplan will also have consideration to emerging policies including LP37 of the LLP 2011-2031 that requires planning applications to explore opportunities to generate energy from low/zero carbon sources on site or connect to a decentralised energy network. Other policies which will have to be considered include LP28, LP31 and LP38.

Flood Risk

Surface water sources present the primary risk of flooding to the Masterplan area as a consequence

of the rapid increase in large areas of impermeable surfaces, without concurrent upgrading of the sewer systems. Future development within the study area should aim to reduce the overall flood risk, specifically through the design and layout of schemes that enhance natural forms of drainage and give priority to sustainable drainage systems (SuDS) (LP36 of the LLP 2011-2031).

The High Town Masterplan has brought forward within and builds upon the existing and current planning framework, specifically the High Town SPD (2007) including the East Village Design Codes (2009), the existing Local Plan 2001-2011 and the emerging Local Plan 2011-2031. The High Town Masterplan takes forward existing and emerging policy, providing guidance and evidence to support and assist in the delivery of the development plan.

Subject to responses following the publication of the Masterplan the Council will, in due course, consider if the document should be adopted as a Supplementary Planning Document.

2.0 HIGH TOWN CONTEXT

2.3 Commercial and Property Context

Commercial and Property Analysis

Long recognised as an area for potential growth and regeneration, the High Town area has remained unexploited for a number of reasons, including adverse property market conditions and fragmented ownership patterns. The Masterplan will be a key tool to promote and facilitate the delivery of new development through managed and phased development. Its implementation will result in significant change in the area and create a critical mass of new development opportunities, widening the attractiveness and adding to the vibrancy of the area.

Traditionally Luton's economy was focused on several different types of industry particularly automotive manufacturing, engineering and millinery. More recently there has been a move towards a service-based economy especially retail and the airport sectors. There is also a large student population in the area and includes one of two key campuses for the University of Bedfordshire.

Strategic Context

The town centre has undergone some recent regeneration including upgrades to the town's bus and rail stations as well as improvements to the town's urban environment including the redevelopment of St. George Square, town hall square and the Bute Street area. There are also a number of significant developments underway/ in the pipeline including the 55-acre mixed-use developments at Napier Park and expansion of the Butterfield Business and Technology Park.

Residential Commentary

Given the aspirations for High Town, the prevailing national and regional market conditions and GL Hearn's own local market research it is likely that residential typologies will form the predominant use in the area. Moreover new build residential is likely to be a key value driver and as such forms the focus of the following property market analysis. The following provides commentary on regional housing dynamics before focusing of the local market characteristic. This study was undertaken against a positive market residential sentiment with the national and local housing dynamics as follows.

Regional Residential Context

Pre-2007 the residential market was defined by a high identified need for new housing, constrained supply and forecasted continued growth in property prices. Development funding was more readily available and there was strong government policy support for urban living leading to a focus on high-density apartment schemes.

Following the property crash in 2008, the economy was slow to recover and developers generally minimised their risk by focusing on small to medium sized opportunities, principally around lower density housing schemes.

Since 2010 there has been a greater air of enthusiasm returning to the residential sector with growth being created by the improvement in the availability of cost credit supplemented by government schemes such as 'Funding for Lending' and 'Help to Buy'. The strongest growth has been seen in London and the South East with residential commentators revising their future forecast upwards on the back of the governments housing growth agenda.



2.0 HIGH TOWN CONTEXT

Property Type	Avg. Current Value	Avg. £ per sq ft.	Avg. Beds	Avg. £ Paid (last 12m)
Detached	£319,728	£234	3.7	£273,572
Semi-detached	£203,565	£224	3.0	£189,201
Terraced	£163,541	£206	2.6	£152,844
Flats	£115,782	£189	1.6	£101,516

Figure 12
TYPICAL HOUSE PRICES IN LUTON
(ZOOPLA)

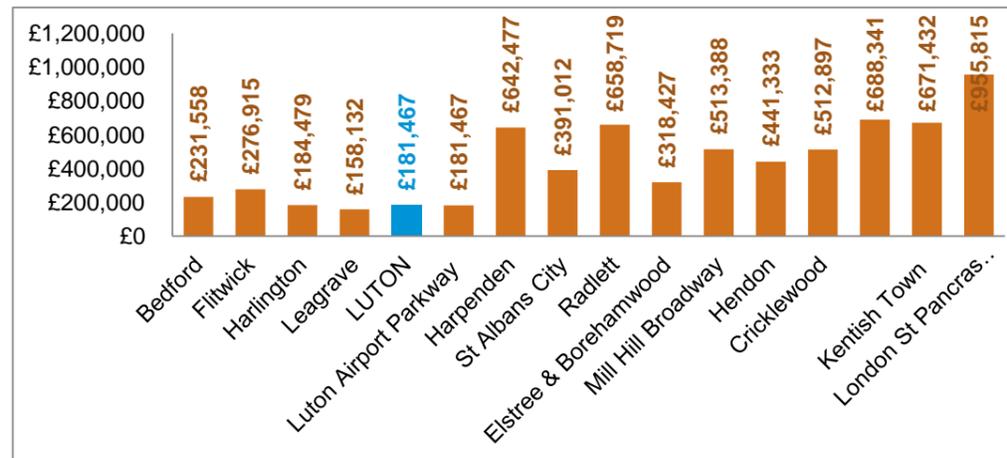


Figure 13
AVERAGE HOUSE PRICE ON BEDFORD
TO LONDON TRAIN LINE (2013 - 2014)

Town	Population (Approx.)	Train Times (Approx.)	London Train Station	Average House Price (2013-2014)
Hemel Hempstead	94,932	30 mins	Euston	£324,940
Harlow	82,059	30 mins	Liverpool Street	£187,603
High Wycombe	120,256	30 mins	Marylebone	£252,057
Maidenhead	63,580	30 mins	Paddington	£418,242
Slough	155,298	30 mins	Paddington	£238,254
Rochester	62,982	40 mins	St Pancras	£196,216
LUTON	211,228	30 mins	St Pancras	£181,467
Bromley	16,826	20 mins	Victoria	£343,971
Guildford	77,057	40 mins	Waterloo	£430,881
Kingston	43,013	30 mins	Waterloo	£418,242
Woking	105,367	30 mins	Waterloo	£368,912

Figure 14
HOUSE PRICES IN SETTLEMENTS C.
30 MINS BY TRAIN FROM LONDON
STATIONS (SOURCE: CITY POPULATION /
ZOOPLA / NATIONAL RAIL / ZOOPLA)

Local Market Context

The local residential market has been predominantly focused on flatted development in the town centre with houses delivered in outlying areas. Local agents indicated that there is strong demand for lower-end properties and the buy-to-let market has been boosted by commuter demands.

Over half of recent residential development has been outside of central Luton with only 30% being delivered in the central area while the predominance of development schemes of 10 units or less illustrates the infill nature of the market as well as the lack of availability of larger sites in the borough.

The main focus of activity in High Town has been around the Old Bedford Road area with a number of conversions of former factories and employment premises to apartments. There has also been a strong rental demand for apartments in this location. In the East Village there has been interest from Registered Providers in particular with a small housing scheme delivered just south of Charles Street.



2.0 HIGH TOWN CONTEXT

2.0

According to Nationwide House Price Index (Q1 2015) the average house price in Luton currently stands at circa £219,000, which represents an annual sales value increase of 9%. This compares to a UK average of 5.9% and in London 12.7% over the same period.

To put these prices into context research was undertaken to compare property prices along the Luton train line and in other towns within a similar travel time to London's main train stations. This analysis indicates that Luton property prices are at the lower end of the spectrum, indicating the town has the potential for good residential growth if the right product and environment could be created. A steady demand for apartments has been reported with particularly strong rental demand.

Affordable Housing

Given the value characteristics of Luton, development viability will be particularly sensitive to affordable housing levels.

LBC's policy on affordable housing is set out in the emerging local plan which, reflecting more recent viability analysis, identifies a policy objective of 20% affordable housing on qualifying sites.

The Council's housing viability study (2013) highlighted the challenge of delivering affordable housing with very low levels being secured on private sites and the majority delivered on public sector sites through the 'New Homes for Luton' initiative or where LBC and their development partners were lead landowners/developers.

Commercial Market Overview

Given the character and scale of the High Town study area, it is recognised that opportunities for non-residential uses will also be created. Whilst in overall terms the commercial uses will be ancillary to predominantly residential use, incorporating a mix of commercial opportunities as well as cultural and community space will be essential to extended hours of activity and creating vibrancy in the regeneration area.

Retail and Commercial Leisure Market

On a national basis the retail property market has experienced significant difficulties during the recession as consumer spending was reined in, internet retailing grew and competition increased. Retail vacancy rates also increased and are currently running at circa 14% nationally.

Some sub-sectors of the retail market have countered this general trend, particularly food and drink which has performed well and seen continued growth. In general centres that have been able to grow this offer have been more resistant to the downturn with shoppers increasingly combining retail and leisure activities.

The convenience sector has also continued to grow, meeting essential rather than discretionary shopping needs. In particular there has been a growth in small convenience stores with most of the main supermarket chains expanding aggressively. This trend is expected to continue for a few years.

In Luton, retail and service activity is concentrated along both sides of the pedestrianised St. George Street, the Mall Shopping Centre and the streets linking these two areas. In 2012 vacancy rates in the town centre were 18%, 4% higher than the national average while rental rates are broadly in line with comparable retail centres such as St. Albans. High Town's primary USP is its proximity to the Town Centre retail core. Within the study area retail provision is concentrated along High Town Road and comprises largely independent stores. Rental values are currently prohibitively low for new commercial development but reflective of the poor quality of the units available and the current nature of the area.

A critical mass of new residential development would create an environment that would appeal to a wider range of retailers/operators. This change will take time but as the area evolves it envisages a growth in demand for the area including a mix of retail, convenience food, cafes and restaurants which would be ancillary to residential provision and not compete with the town centre provision. Also, given the scale of the regeneration and the existing building stock, there is also a good opportunity to enhance the SME and creative industry sector within the area.

2.0 HIGH TOWN CONTEXT

2.0

Employment Market

Whilst Luton has traditionally been regarded as an industrial town, in recent years it has become home to a number of larger national and international companies, attracted by the excellent transport links and lower overheads. Take up rates have been inconsistent over the past decade and these are often skewed by large corporate deals, thus Luton is seen as a secondary office location, retaining its image as an industrial blue collar town.

Currently demand for office space is low to moderate and predominantly for smaller units by local firms. Supply is split between good quality, out-of-centre office parks and Luton Town Centre, with office space in the latter now obsolete but there is demand for more modern units. Reflective of this is the domination of out-of-town market take up in Luton largely due to the availability of land and space, with significant developments like Napier Park and Butterfield Park in the pipeline.

In terms of future provision, there are a number of better-connected sites in the town which are capable of accommodating any future B1 accommodation as the economic climate improves and therefore a large B1 offering is not expected within the Masterplan area.

With regard to industry, much of Luton's industrial stock is contained in small/medium-sized industrial estates in suburban and out-of-centre locations including Sundon Industrial Estate and those along Dallow Road. There is reasonably good demand for industrial space in Luton generally, but little available supply and no new space currently being built. It is also reported that the main shortages are for smaller industrial units as well as more modern industrial units within easy reach of the road network. LBC's employment land review (2013) identified very few obvious sites where such shortages could be met by providing new premises across a range of unit sizes.

Typically industrial rents in Luton are between £4.00 - £7.00 psf. There have been a number of recent industrial deals in Luton and these are consistent with these valuations including:

- London Car Parts Limited has taken 2,557 sq ft (237 sq m) of industrial space at Holly Street Trading Estate (LU1) £12,000 pa, equating to £4.69 psf (£50.52 psm).
- An undisclosed tenant has taken 27,493 sq ft (2,554 sq m) of ground and first floor industrial space at Luton Enterprise Park (LU3) an undisclosed landlord on confidential terms. Lambert Smith Hampton Ltd acted on behalf of the undisclosed landlord. The quoting rent was £108,597 pa, equating to £3.95 psf (£42.52 psm).

The East Village area is a mixed employment area including office, industrial, residential, educational and leisure uses. If the masterplan vision for the East Village is to be recognized this will involve the displacement of some poorly performing employment accommodation.



Figure 15
THE EAST VILLAGE AT
THE MOMENT, A MIXED
EMPLOYMENT AREA

2.0 HIGH TOWN CONTEXT

2.0

Conclusions

The Masterplan proposals are for a mixed-use approach with the key theme being a transition from an employment-led industrial landscape to a new residential-led mixed-use area, promoting the Council's Development Plan policy for comprehensive regeneration of the area. This major transition will require a phased approach within the overall confines of the comprehensive masterplan strategy.

With renewed activity in the property market in recent years, the South East and London residential development market is very strong, not only in 'international' quarters but also in the 'intensification' areas around key transport nodes suggesting Luton as an appropriate area for redevelopment.

With regard to values, existing use values and therefore site assembly costs are comparatively high. There will also be significant infrastructure requirements to facilitate the scale of change envisaged. New build values are still relatively low and as such development viability is of concern.

The High Town area, whilst in part underused and vacant, also contains a number of existing occupiers providing local employment. Some owners will seek unrealistically high values for their land, extinguishment payments for the closure of their business and others will fight redevelopment plans.

2.4 Socio-Cultural Context

Cultural Analysis

High Town is emerging as a cultural destination with growing numbers of artists and creative businesses taking up residence there, having spread northward from Luton's Creative Quarter which is located north of the town centre in an area around Bute Street. This area is home to many cultural venues and facilities including Bedfordshire University's school of art and design and the Hat Factory which is occupied by almost 30 creative businesses, this area is developing closer links with High Town as a place for artists to live and work.

Further developing these links, the Masterplan suggests the use of ground floor units as live/work spaces, studios and offices while the vacant and underused sheds and workshop buildings to the east might be redeveloped to include housing and facilities such as showrooms, galleries and workshops.

The property market baseline has confirmed this as feasible, identifying the High Town area as an appropriate location for a new high quality residential living environment that could include a complementary mix of employment, retail and commercial leisure uses.

Figure 16
THE HAT INDUSTRY
REPRESENTS A
SIGNIFICANT PART OF
LUTON'S CULTURAL
HERITAGE



UNDERSTANDING HIGH TOWN

3.0

3.0 UNDERSTANDING HIGH TOWN

3.1 Constraints and Opportunities

The urban design and transport analysis highlighted a series of opportunities and constraints for the study area that are summarised in the following list and illustrated on the next page.

Opportunities

-  Opportunity areas for potential organic developments
-  The presence of large and well-used green public spaces (Bell's Close, People's Park) representing a positive asset for High Town
-  A series of 'soft sites', where land assembly would potentially be easier in terms of ownerships than for other sites
-  Uniqueness and strong identity of the place defined by the distinct historic character of the High Street within the Conservation Area; the presence of several landmark listed buildings; and a vibrant artistic environment (art manufacture etc.)
-  Potential for creating some 'gateway areas' marking the start and the end of the High Street and the new downgraded Midland Road, the main gateway to High Town being the square in front of the station entrance connecting many of the pedestrian routes
-  Proximity to the train station as many of the sites are located within 5 minutes walking distance from the station
-  Main pedestrian movement links, intersecting at the station entrance
-  A series of existing views from High Town Road towards the surrounding hills, defining the visual structure of High Town and supporting the legibility of the place

-  Potential to improve the permeability of the land west of the High Street and the Paths Estate, opening up new routes
-  Approved/under construction new residential developments positively contributing to growth of High Town
-  Approved new foodstore on the High Street, acting as an anchor on High Town Road and enriching the shopping offer of the area

Constraints

-  The Paths Estate, a largely permeable residential block experiencing anti-social behaviour issues
-  Barriers to pedestrian movement, such as the railway and the new Inner Ring Road
-  Single pedestrian link to Luton Town Centre via the railway bridge at the station
-  Land ownership largely fragmented around the site

3.0 UNDERSTANDING HIGH TOWN

Figure 17
OPPORTUNITIES AND
CONSTRAINTS HIGHLIGHTED
BY THE URBAN DESIGN AND
TRANSPORT ANALYSIS



3.0

3.0 UNDERSTANDING HIGH TOWN

3.2 Land Ownership

Even though Luton Borough Council owns large parts of the study area, land ownership is largely fragmented in the area, especially in the East Village.

A closer investigation of the single properties and their current status identified some 'soft sites', in which the land plots for redevelopment would potentially be easier to assemble than in other areas. Figure 18 identifies these sites and how they could be assembled to start triggering the development process.

- SITE BOUNDARY
- LBC OWNERSHIP
- LBC LEASED LAND
- PRIVATE OWNERSHIP
- THIRD PARTY OWNERSHIP
- ADJACENT SITES
SAME OWNERSHIP)
- POTENTIAL LAND ASSEMBLY
- SUB-STATION
- SHORT LEASE (<20 years)



Figure 18
PLAN SHOWING BUILDING
OWNERSHIPS IN THE STUDY
AREA

3.0 UNDERSTANDING HIGH TOWN

3.3 Developments in Progress

The diagram to the right shows the status of some on-going / approved / waiting for approval developments within the study area boundary. The analysis shows that the majority of the new development is planned in the west side of High Town, in particular around the Old Bedford Road.

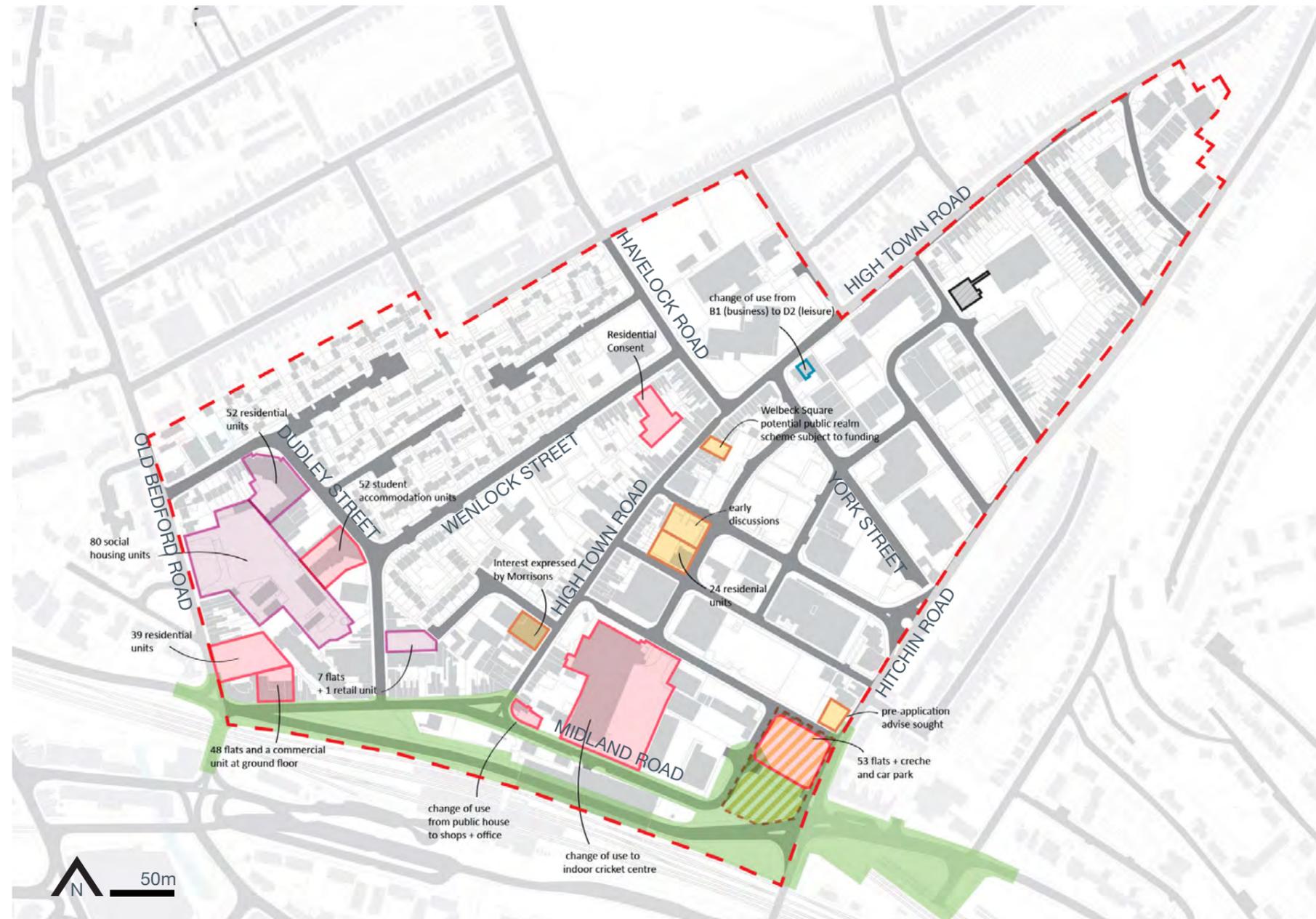
The approved change of use of the Comau building (warehouse and car park on Midland Road) also represents a significant constraint against the organic development of East Village, given that it is envisaged that redevelopment of this site would deliver a new through route from the station to the rest of High Town.

Another key area, the plot at the southern end of High Town Road, is largely under-used and derelict. In particular the ex-Railway Tavern (on the east side), right in front of the railway station bridge, has been through a complicated ownership history and after a recent fire, has been listed as a community asset, with the right for a community group to buy.

Welbeck Square, an under-used plot of land adjacent to High Town Road, has been designated as a new public square and is in the council's 2015/16 capital programme.

- SITE BOUNDARY
- DEVELOPMENT APPROVED
- INNER RING ROAD RECENTLY COMPLETED
- CONSENT NOT YET BEEN GRANTED
- EARLY STAGES OF INTEREST
- DEMOLITION APPROVED
- APPLICATION REFUSED

Figure 19
PLAN SHOWING NEW DEVELOPMENTS IN PROGRESS OR IN THE PROCESS OF BEING APPROVED



3.0 UNDERSTANDING HIGH TOWN

3.4 Key development sites

The analysis of land ownership and developments in progress enabled the identification of key development sites that form the basis of the Masterplan.

These sites have been identified as potentially easier to assemble, enabling quicker delivery of development because they are under the same ownership or owned by the Council. They are also not located where developments have already been approved and are not subject to specific delivery issues.

The majority of these sites are located within the East Village on existing industrial areas with none of the chosen sites containing existing residential developments.

-  SITE BOUNDARY
-  KEY DEVELOPMENT SITES
-  AREAS WITH SAME OWNERSHIP
-  HIGH TOWN ROAD AS A KEY DEVELOPMENT SITE



Figure 20
PLAN SHOWING THE IDENTIFIED
KEY DEVELOPMENT SITES

DESIGN PRINCIPLES

4.0

4.0 DESIGN PRINCIPLES

4.1 A Vision for High Town

The Masterplan is based on a series of key actions to contribute to making High Town a more vibrant neighbourhood, improving the overall image, perception and wellbeing of residents within the area.

The area has a strong identity of place that the Masterplan aims to build upon while also strengthening the mix and viability of employment, residential, live/work and creative industries in the area.

The Masterplan aims to provide for additional housing which will increase the population locally, supporting and making viable local services that would serve the community, not only within High Town but the wider Luton area as a whole. Consequently, the Masterplan will support the enhancement of both the physical and social

environment, helping to improve people's quality of life, now and in the future. This will include building on community identity and cohesion by creating good links to health promoting facilities, retail and facilities such as GP surgeries and gyms. It will also enhance walking and cycling routes, create opportunities to improve physical activity and instill confidence amongst residents to interact socially.



Figure 21
CONCEPT SKETCH OF
THE VISION FOR HIGH
TOWN

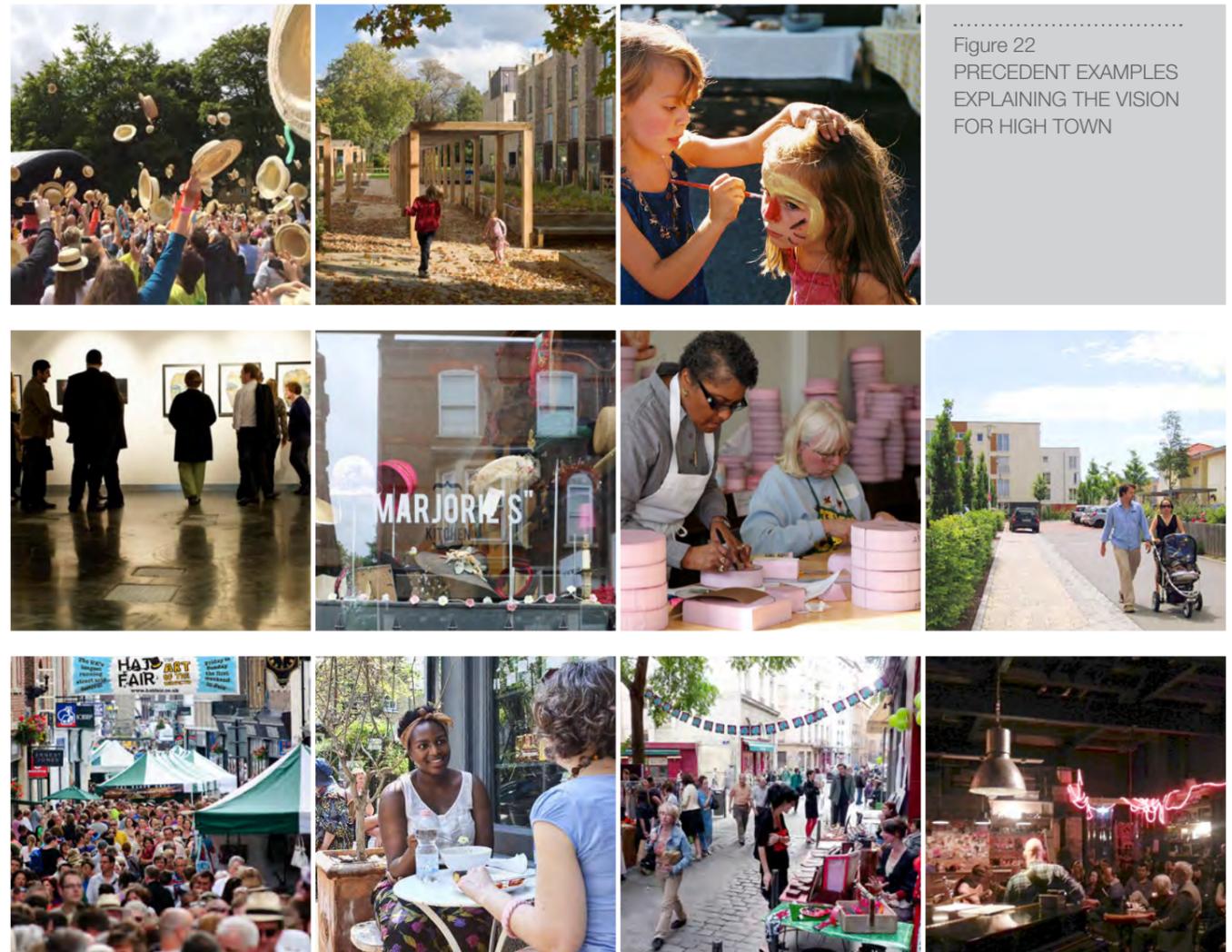
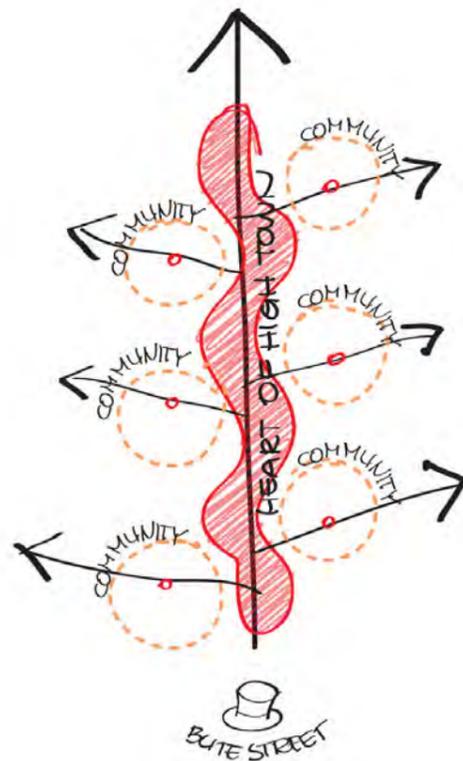


Figure 22
PRECEDENT EXAMPLES
EXPLAINING THE VISION
FOR HIGH TOWN

4.0 DESIGN PRINCIPLES



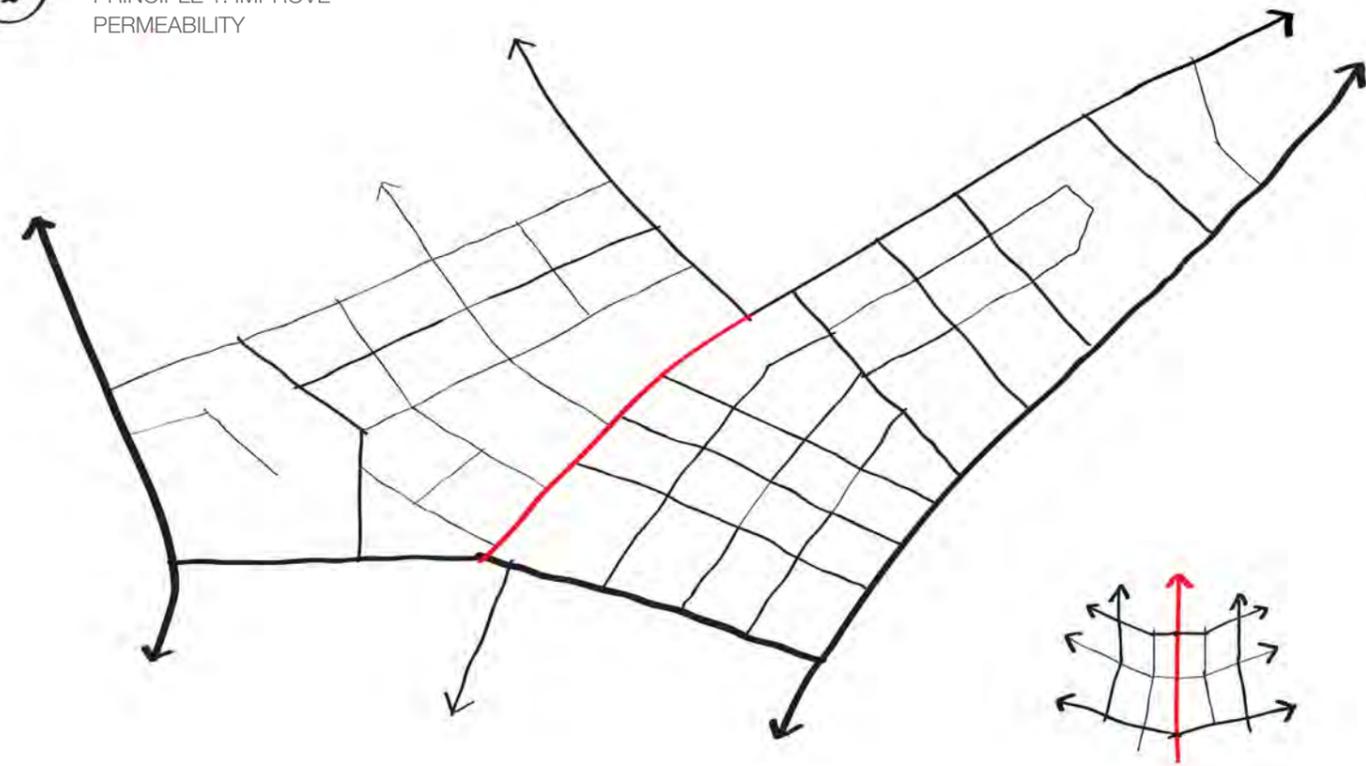
4.2 Design Principles

The Design Principles underpin the Masterplan and Delivery Strategy and seek to address the challenges currently faced by High Town while also embracing the opportunities for progression and betterment of the area (identified in Section 3.1). These diagrams illustrate the Design Principles as concepts that seek to:

- 1) Improve permeability and legibility throughout the Masterplan area, creating a grid-like pattern of streets and spaces.
- 2) Create a defined hierarchy of streets to improve legibility of the study area.

①

Figure 25
PRINCIPLE 1: IMPROVE PERMEABILITY



②

Figure 26
PRINCIPLE 2: CREATE A HIERARCHY OF STREETS

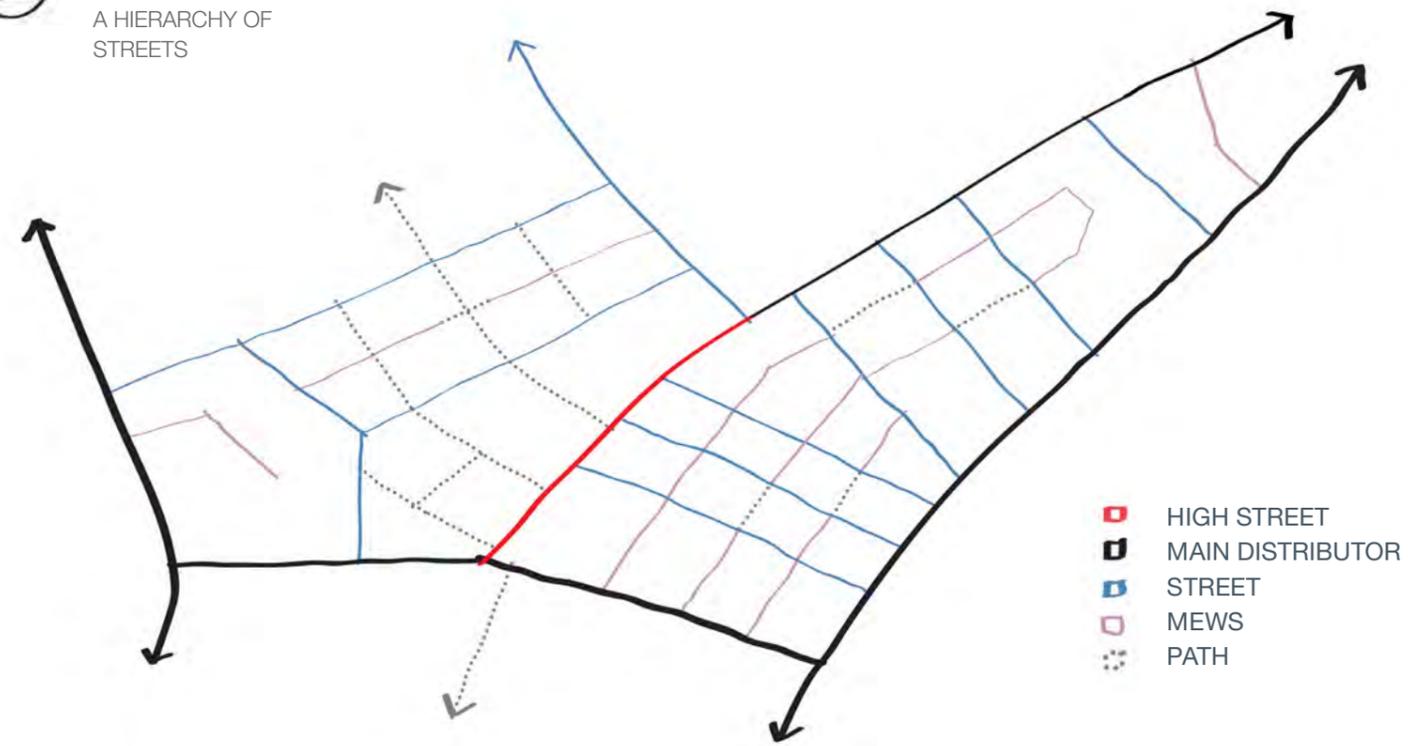


Figure 23
HIGH TOWN ROAD
TODAY



Figure 24
EXAMPLE OF A LIVELY
STREET WITH THE
SAME SENSE OF
ENCLOSURE AND
SCALE AS HIGH TOWN
ROAD



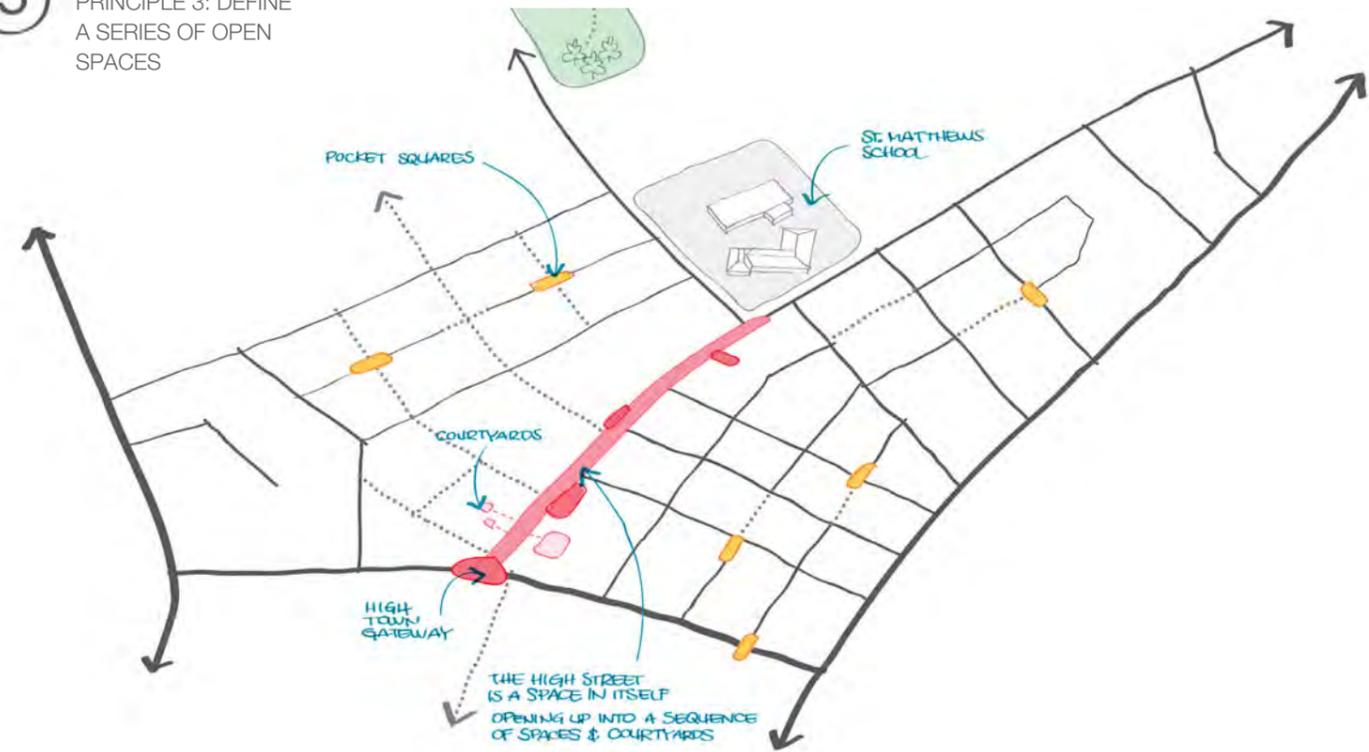
4.0 DESIGN PRINCIPLES

4.0

3) Define a series of open spaces, squares and courtyards throughout the study area, the series of spaces along High Street being most crucial to the Masterplan especially the gateway space by the train station.

4) Create new and improved sets of street frontages and landmarks along the improved street pattern, further enhancing the character and attractiveness of the area.

3) Figure 29
PRINCIPLE 3: DEFINE
A SERIES OF OPEN
SPACES



4) Figure 30
PRINCIPLE 4: DEFINE
NEW AND IMPROVED
SETS OF STREET
FRONTAGES

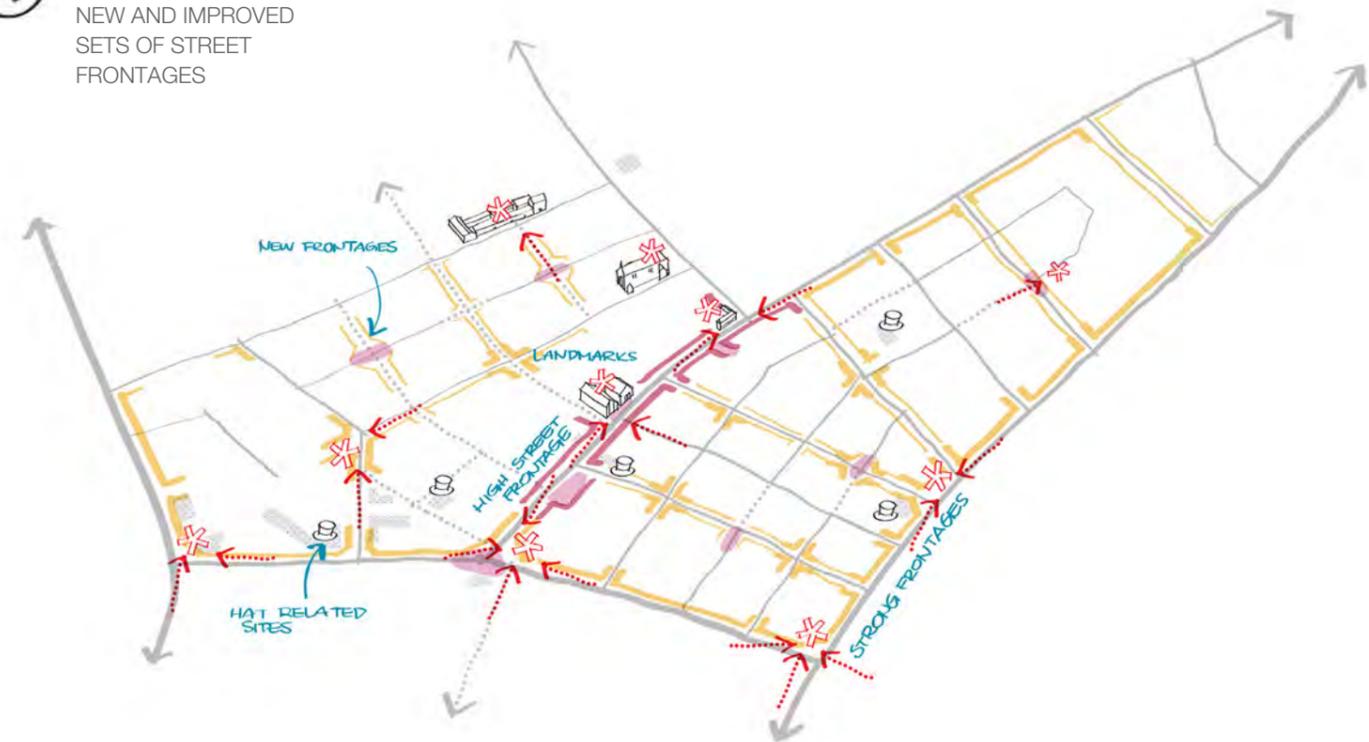


Figure 27
INDOOR COMMUNITY
ACTIVITIES IN HIGH
TOWN (CHRISTMAS
FESTIVAL 2014)



Figure 28
EXAMPLE SHOWING
THE POTENTIAL FOR
OUTDOOR ACTIVITIES
THAT WOULD SUIT
THE SCALE AND
CHARACTER OF HIGH
TOWN



4.0 DESIGN PRINCIPLES

4.0

5) Define a range of activity zones from areas of higher activity (i.e. commercial) to lower activity (i.e. residential) within the Masterplan area. Each zone would have a different character and concentration of activities, in order to create a coherent vision for High Town.

6) Create an overall environment that promotes good health and wellbeing, through encouraging active lifestyles and promoting opportunities for social interaction for all ages.

5

Figure 31
PRINCIPLE 5: DEFINE
A RANGE OF ACTIVITY
ZONES

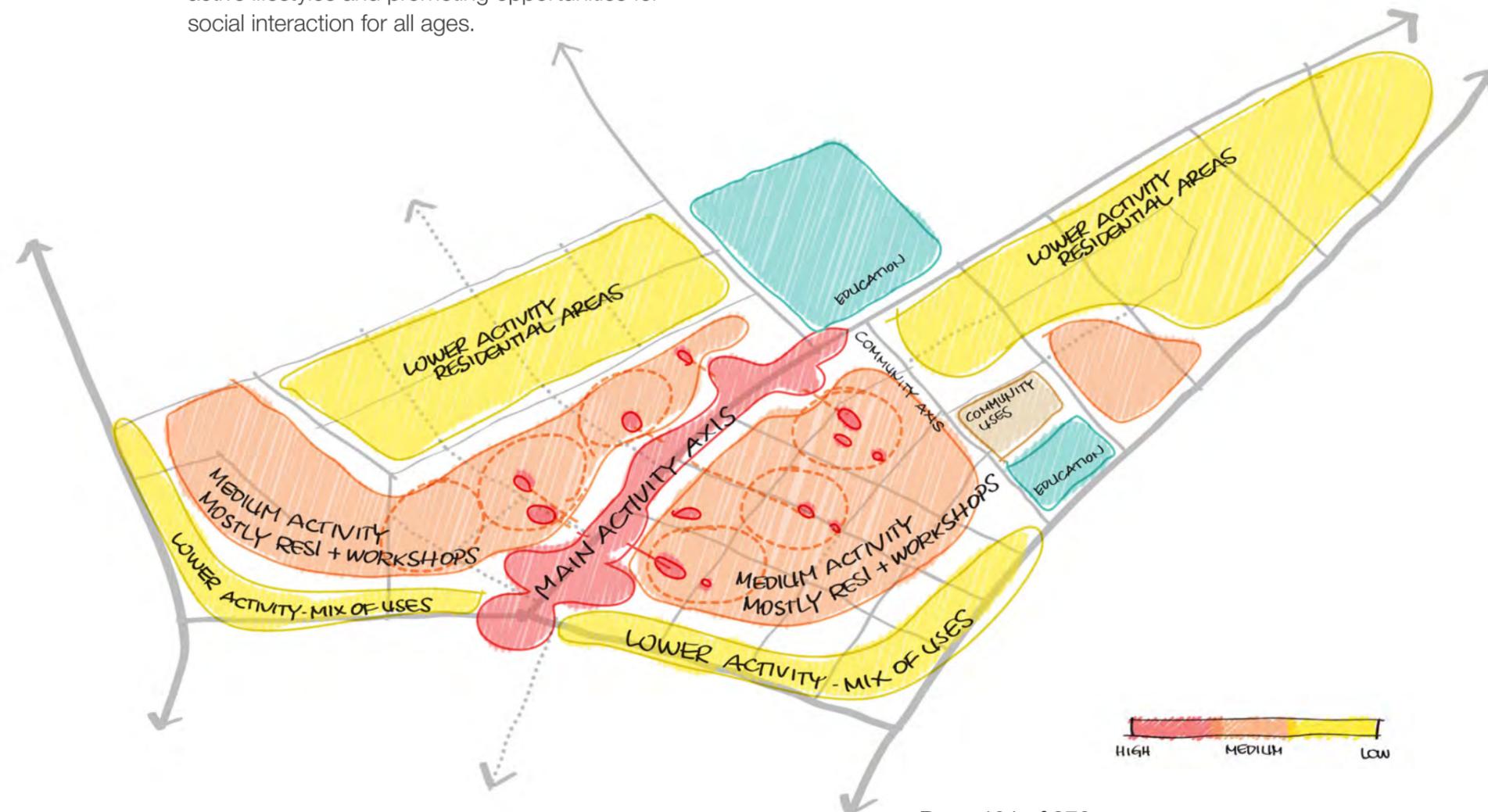


Figure 32
EXAMPLE OF ACTIVE HIGH
STREET (CORK)



**ILLUSTRATIVE
MASTERPLAN**

5.0

5.0 ILLUSTRATIVE MASTERPLAN

5.1 Residential Typologies

Houses Mix

A wide variety of housing typologies has been investigated as part of the Masterplan. Those typologies deemed most viable and most complementary to the existing scale and character of High Town are traditional 3/4 bed townhouses to more modern hybrids including courtyard houses and maisonettes.

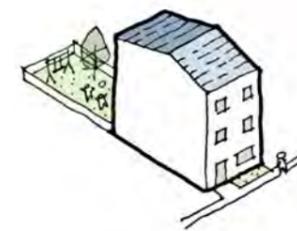
The townhouses benefit from a private back garden while the courtyard houses are self-contained with their own private amenity space incorporated within a courtyard and terrace.

The maisonettes have a smaller building volume, sized more like apartments rather than large family houses. Accommodated within an independent building, the maisonettes have no garden but do incorporate a private terrace at upper floor level.

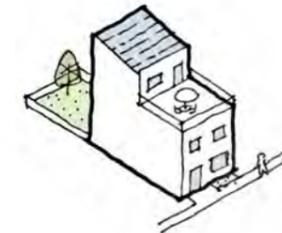
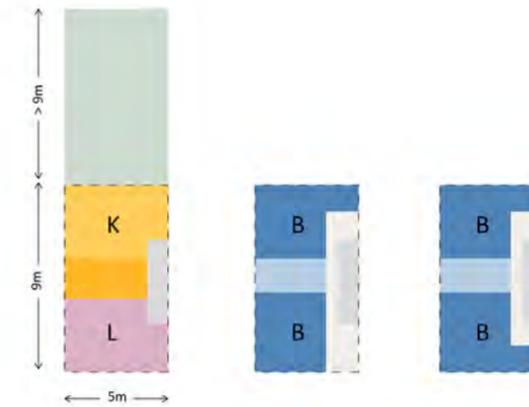
With the exception of the courtyard typology that integrates off-street parking within a private garage located within the building footprint, all parking spaces are located within the curtilage of the development.

5.0

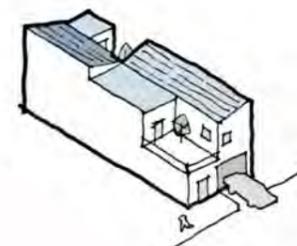
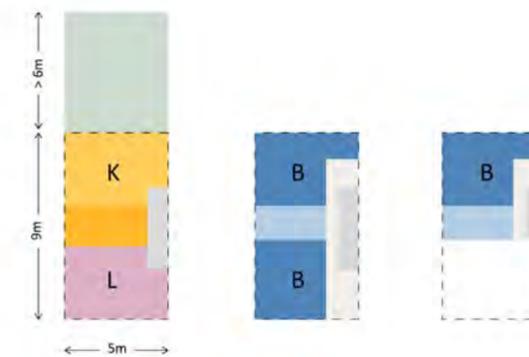
Figure 33
COURTYARD HOUSE
TYPOLOGY USED
IN ACCORDIA,
CAMBRIDGE



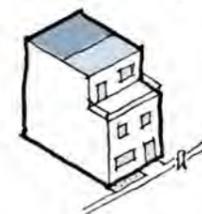
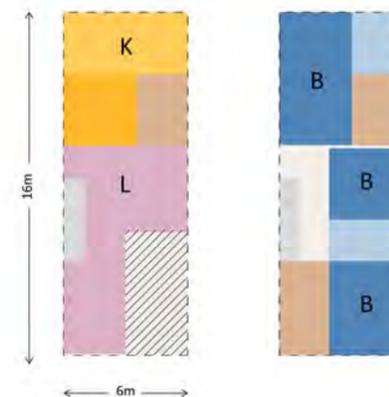
4 bed townhouse
Size $\geq 135m^2$ - 3 storeys
Car park provision: on street
Amenity: back garden



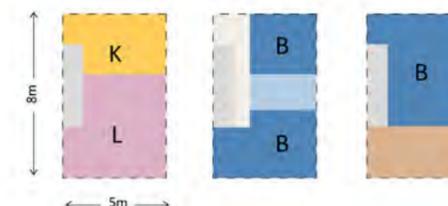
3 bed townhouse
Size $\geq 125m^2$ - 2.5 storeys
Car park provision: on street
Amenity: back garden, terrace



3 bed courtyard house
Size $\geq 150m^2$ - 2 storeys
Car park provision: own garage
Amenity: courtyard, terrace



3 bed maisonette
Size $\geq 93m^2$ - 2.5 storeys
Car park provision: on street
Amenity: terrace



- LIVING ROOM
- DINING ROOM
- KITCHEN
- BEDROOM
- WC
- TERRACE / COURTYARD
- GARDEN
- CAR PARK SPACE

Figure 34
HOUSING TYPOLOGIES
MIX FOR HIGH TOWN
MASTERPLAN

5.0 ILLUSTRATIVE MASTERPLAN

Apartment Mix

The mix of apartment size considered to be most viable and appropriate for High Town, varies from one to three bedroom units.

This mix allows for a diverse range of occupants which would attract a wide variety of people; from single professionals to young couples and families.

The apartment blocks range from two storeys to five storeys with the taller elements occurring in appropriate locations such as at corner plots facing onto busier traffic routes.

The properties are orientated to maximise the availability of natural light throughout the day and they are sized to meet the requirements of the 2009 Design Code for the East Village Masterplan.

In order to facilitate the delivery of the Masterplan, thereby making High Town a more attractive place to live and work or commute, it is key that the quality of new housing is of a very high standard in terms of its architectural form and detailing as well as how it complements the existing built environment.



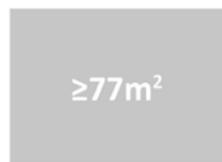
Figure 35
APARTMENT MIX FOR HIGH TOWN
MASTERPLAN: SIZES AND BLOCK
ORIENTATION

apartments

- 1 bed apartment: size $\geq 51m^2$
- 2 bed apartment: size $\geq 77m^2$
- 3 bed apartment: size $\geq 93m^2$



1 bed flat



2 bed flat



3 bed flat



W-E block



N-S block



Figure 36
EXAMPLES OF GOOD
QUALITY NEW HOUSING
DEVELOPMENTS



5.0 ILLUSTRATIVE MASTERPLAN

5.2 Illustrative Masterplan

The Masterplan illustrates how the accommodation typologies described previously would help to shape the new residential areas within the key development sites identified just east of the High Street, highlighted in light blue on the Masterplan, in figure 37.

It also illustrates the new residential developments either permitted or under construction (in pink) that would complement the Masterplan allocation of new housing in order to contribute to the achievement of the housing targets contained within the draft local plan.

Despite being residential-led, the success of the Masterplan also depends on the additional urban design interventions shown on the plan namely the improvements to the High Street, the creation of new public spaces as well as newly improved links to the land west of the High Street and the Paths Estate.

The final design of the Masterplan is the culmination of an extended series of iterations considering economic, ownership, delivery and design factors.

KEY

- | | |
|--|--|
| 01. Proposed gateway space at the station entrance | 11. Paths Estate planned improvements |
| 02. Proposed High Town public square + 5 car parking spaces retained | 12. Proposed Welbeck Square |
| 03. Improved settings in front of Methodist Church | 13. Proposed gateway public space complementing Welbeck Square |
| 04. Widespread improvements to the public realm along High Town Road | 14. St. Matthew's Primary School |
| 05. Additional car parking spaces along Burr Street (approximately 10) | 15. Proposed residential quarter (mix of houses and apartments) |
| 06. Improved links between High Street and Wenlock Street | 16. New streets opened up to improve permeability |
| 07. Wenlock Surgery retained at ground floor | 17. Overlooked green links |
| 08. New developments (in pink) under construction/ approved | 18. Proposed pocket square at the end of Midland Road |
| 09. Midland Road new improved frontage | 19. Proposed residential development allowing access to Irish Forum building |
| 10. New street connecting Midland Road and Burr Street | 20. Proposed residential development off Charles Street |
| | 21. Community Centre |
| | 22. Barnfield College |

5.0 ILLUSTRATIVE MASTERPLAN

- EXISTING BUILDINGS
- NEW BUILDINGS
- DEVELOPMENTS APPROVED/
UNDER CONSTRUCTION



Figure 37
ILLUSTRATIVE
MASTERPLAN FOR HIGH
TOWN

5.0 ILLUSTRATIVE MASTERPLAN

5.3 Site Breakdown

The Masterplan aims not only to bring forward the required amount of residential units targeted in the Local Plan but also to maintain the scale and character which exists in High Town.

Whilst previous policy has offered the potential for some taller buildings the Masterplan does not propose any buildings which exceed four storeys except for a few five storey buildings in appropriate locations, for example within corner plots facing onto busier trafficked roads.

The key development sites are identified below and the details of each individual site are discussed further in the following pages.

Figure 38
AREA SCHEDULE
OF THE KEY
DEVELOPMENT SITES

	SITE	SITE AREA (m ²)
1	Midland Road	16350
2	Burr Street	6840
3	Duke Street	2960
4	Charles Street	6820
5	Wenlock Street	3360
6	Brunswick Street	9320
7	Dudley Street	1500
8	Concorde Street	2810
9	Hitchin Road	1590
	TOT	51550



Figure 39
AERIAL SKETCH OF THE
MASTERPLAN HIGHLIGHTING
THE KEY DEVELOPMENT SITES

5.0 ILLUSTRATIVE MASTERPLAN

Midland Road (Site 1)

This site is prominently located in a key location at the entrance from the station into High Town. It is also visible from the railway line itself.

Sub-site 1A faces onto the existing Burr Street car park which is proposed as a new public square as part of the Masterplan. The new blocks facing this space would have retail uses at street level, creating an active street frontage (see figure 45 for illustration).

A diverse range of residential typologies is proposed for this site comprising mostly apartments (80%) with some housing (20%) at a density of 144 units/ha that is acceptable due to the proximity of the train station.

The apartments would face onto Midland Road, set back from the street to avoid overshadowing issues from the multistorey carpark. The housing will be located in the internal areas. Some of the units at ground floor level could be live/ work units, possibly accommodating some art related businesses

The buildings respond to the terrain with the height of the buildings stepping down towards the east to match the slope of the terrain.

Two new routes are proposed, connecting Midland Road to Burr Street, improving permeability through the site with all routes benefitting from active frontages, which

Figure 40
DIAGRAM SHOWING
BUILDING HEIGHTS



01 MIDLAND ROAD		TOWN HOUSES			COURTYARD HOUSES		MAISONETTE		HOUSES	APARTMENTS			APTMENTS	UNITS
PLOT AREA (m ²)		3 BEDROOM	4 BEDROOM	TOTAL	3 BEDROOM	TOTAL	3 BEDROOM	TOTAL	TOTAL	1 BEDROOM	2 BEDROOM	3 BEDROOM	TOTAL	TOTAL
		PLOT A	6820	9	0	9	7	7	0	0	16	20	19	20
PLOT B	2810	2	6	8	4	4	0	0	12	7	7	9	23	35
PLOT C	1590	0	4	4	0	0	1	1	5	14	0	0	14	19
PLOT D	1550	4	5	9	0	0	0	0	9	4	4	10	18	27
PLOT E	1820	3	0	3	0	0	0	0	3	18	13	13	44	47
PLOT F	1760	2	0	2	0	0	0	0	2	8	14	9	31	33
TOT	16350	20	15	35	11	11	1	1	47	71	57	61	189	236

Figure 41
TABLE SHOWING
UNIT NUMBERS AND
TYPOLOGIES

5.0 ILLUSTRATIVE MASTERPLAN

5.0

Figure 42
DIAGRAM SHOWING
BUILDING TYPOLOGIES



- 3BED COURTYARD HOUSE
- 4BED TOWNHOUSE
- 3BED TOWNHOUSE
- 3BED MAISONETTE
- 3BED APARTMENT
- 2BED APARTMENT
- 1BED APARTMENT

Figure 43
TABLE OF CAR PARK
RATIO IN THE SITE

01 MIDLAND ROAD CAR PARK RATIO					
PLOT	ALLOCATED PARKING SPACES	UNDERCROFT PARKING SPACES	COURTYARD HOUSE SPACE	TOTAL	PARKING RATIO
PLOT A	37	0	7	44	0.59
PLOT B	12	12	4	28	0.80
PLOT C	4	0	0	4	0.21
PLOT D	6	18	0	24	0.89
PLOT E	15	23	0	38	0.81
PLOT F	9	0	0	9	0.27
TOT	83	53	11	147	0.62

promotes surveillance and avoids possible security issues. These will also provide alternative routes creating the opportunity for High Town Road to be closed for special events.

A planning application for plots E and F has now been submitted and approved.

Car Park Strategy (see also section on Car Parking Facilities in Chapter 2)

Car parking spaces are mainly provided within courtyards.

Some apartment blocks exploit the difference in level of the terrain by incorporating undercroft car parks, maximising the usable floor area of the buildings as well as the need for parking within the curtilage of the development.

The courtyard houses incorporate off-street parking within the building footprint.

The Masterplan provides for an overall car parking ratio of 0.55 allocated spaces/unit which is considered acceptable given the proximity of the train station and bus interchange. Priority for parking within the curtilage of the development should be given to the 3/4 bedroom units as it is most sensible for them to have a parking provision.

5.0 ILLUSTRATIVE MASTERPLAN

5.0



Figure 44
VIEW OF THE BURR
STREET CAR PARK
BEFORE



Figure 45
VIEW OF THE NEW
SQUARE AT THE BURR
STREET CAR PARK
AFTER

5.0 ILLUSTRATIVE MASTERPLAN

5.0

Burr Street (Site 2) and Duke Street (Site 3)

These sites are located at the heart of the East Village where a number of new residential developments have already been completed, specifically those adjacent to Sub-Site 2B along Hitchin Road.

These sites are located further away from the train and bus stations and therefore the densities, mix of heights and typologies changes accordingly.

The overall mix of houses and apartments is more even, with 50% proposed for each. The overall densities of Sites 02 and 03 are 115 and 105 units/ha respectively. This reduction in density from Site 01 is proportionate to the increasing distance away from the train station.

In general, the blocks are three storeys tall with one apartment block which fronts onto Hitchin Road reaching 4 storeys. Some of the units at street level could be live/work units, accommodating some art related businesses (see figure 51 for illustration).

Figure 46
DIAGRAM SHOWING
BUILDING HEIGHTS



02 BURR STREET		TOWN HOUSES			COURTYARD HOUSES		MAISONETTE		HOUSES	APARTMENTS			APTMENTS	UNITS
	PLOT AREA (m ²)	3 BEDROOM	4 BEDROOM	TOTAL	3 BEDROOM	TOTAL	3 BEDROOM	TOTAL	TOTAL	1 BEDROOM	2 BEDROOM	3 BEDROOM	TOTAL	TOTAL
PLOT A	1110	0	0	0	0	0	0	0	0	8	4	4	16	16
PLOT B	5730	7	24	31	0	0	5	5	36	15	6	6	27	63
TOT	6840	7	24	31	0	0	5	5	36	23	10	10	43	79

03 DUKE STREET (L&S)		TOWN HOUSES			COURTYARD HOUSES		MAISONETTE		HOUSES	APARTMENTS			APTMENTS	UNITS
	PLOT AREA (m ²)	3 BEDROOM	4 BEDROOM	TOTAL	3 BEDROOM	TOTAL	3 BEDROOM	TOTAL	TOTAL	1 BEDROOM	2 BEDROOM	3 BEDROOM	TOTAL	TOTAL
TOT	2960	6	11	17	0	0	2	2	19	6	6	0	12	31

Figure 47
TABLE SHOWING
UNIT NUMBERS AND
TYPOLOGIES

5.0 ILLUSTRATIVE MASTERPLAN

Figure 48
DIAGRAM SHOWING
BUILDING TYPOLOGIES



The site also incorporates a new pedestrian route, connecting Burr Street and Duke Street, improving permeability through the site and increasing linkages to the surrounding area.

This route is overlooked by the surrounding houses, the configurations for which are rotated to front onto it. This route and all others benefit from active frontage of the surrounding buildings, avoiding possible security and anti-social behavioural issues.

Car Park Strategy

Car parking spaces are mainly provided within courtyards.

The Masterplan provides for an overall car parking ratio of 0.55 allocated spaces/unit which is considered acceptable given the proximity of the train station and bus interchange. Priority for parking within the curtilage of the development should be given to the 3/4 bedroom units as it is most sensible for them to have a parking provision.



02 BURR STREET CAR PARK RATIO					
PLOT	ALLOCATED PARKING SPACES	UNDERCROFT PARKING SPACES	COURTYARD HOUSE SPACE	TOTAL	PARKING RATIO
PLOT A	8	0	0	8	0.50
PLOT B	11	0	0	11	0.17
TOT	19	0	0	19	0.24

03 DUKE STREET (L&S) CAR PARK RATIO					
	ALLOCATED PARKING SPACES	UNDERCROFT PARKING SPACES	COURTYARD HOUSE SPACE	TOTAL	PARKING RATIO
TOT	14	0	0	14	0.45

Figure 49
TABLE OF CAR PARK
RATIO IN THE SITE

5.0 ILLUSTRATIVE MASTERPLAN

5.0



.....
Figure 50
VIEW OF THE EAST
VILLAGE BEFORE



.....
Figure 51
VIEW OF THE EAST
VILLAGE AFTER

5.0 ILLUSTRATIVE MASTERPLAN

Charles Street (Site 4)

Site 04 is located to the north of the study area in a much quieter, suburban area of High Town Road and is characterised by low-rise residential housing.

The housing typologies proposed within the site are a mix of three and four bedroom townhouses at a density of 59 units/ha in order to complement the surrounding context.

The proposed layout of the development is a looping cluster of houses with parking located in designated areas at the corners of the site.

The looping configuration of the houses promotes a high level of natural surveillance, facilitating the access and minimising the likelihood of security issues.

The properties also benefit from larger gardens compared to those houses located closer to the train and bus stations.

Figure 52
DIAGRAM SHOWING
BUILDING HEIGHTS



5.0

04 CHARLES STREET		TOWN HOUSES			COURTYARD HOUSES		MAISONETTE		HOUSES	APARTMENTS			APTMENTS	UNITS
	PLOT AREA (m ²)	3 BEDROOM	4 BEDROOM	TOTAL	3 BEDROOM	TOTAL	3 BEDROOM	TOTAL	TOTAL	1 BEDROOM	2 BEDROOM	3 BEDROOM	TOTAL	TOTAL
TOT	6820	20	20	40	0	0	0	0	40	0	0	0	0	40

Figure 53
TABLE SHOWING
UNIT NUMBERS AND
TYPOLOGIES

5.0 ILLUSTRATIVE MASTERPLAN

5.0

Figure 54
DIAGRAM SHOWING
BUILDING TYPOLOGIES



- 3BED COURTYARD HOUSE
- 4BED TOWNHOUSE
- 3BED TOWNHOUSE
- 3BED MAISONETTE
- 3BED APARTMENT
- 2BED APARTMENT
- 1BED APARTMENT

Car Park Strategy

All townhouses within the site have one allocated parking space, located within the courtyards at the corners of the development site.

Overall the ratio of car parking is 1 space/unit which is higher than those sites located closer to the station.

04 CHARLES STREET CAR PARK RATIO					
	ALLOCATED PARKING SPACES	UNDERCROFT PARKING SPACES	COURTYARD HOUSE SPACE	TOTAL	PARKING RATIO
TOT	40	0	0	40	1.00

Figure 55
TABLE OF CAR PARK
RATIO IN THE SITE

5.0 ILLUSTRATIVE MASTERPLAN

Wenlock Street (Site 5)

Site 05 is located to the west of the High Street and is formed of two small sub-sites (5A and 5B) whose redevelopment would address issues regarding the lack of surveillance from inactive building frontages along existing routes, connecting High Town Road and Wenlock Street by improving safety and security, especially after daylight hours.

The mix of housing typologies ranges from 84% apartments situated along Wenlock Street and 16% houses along Albion Road. The overall density is 71 units/ha, which is appropriate considering the densities of surrounding properties.

The proposed apartment block within sub-site 5B on Wenlock Street will retain the existing surgery facility at ground floor level.

The houses proposed within sub-site 5A will front onto Albion Road, providing much needed surveillance over the street which leads to the Walter Wright Hat Factory and is currently characterised by the backs of residential gardens and high fences.

Figure 56
DIAGRAM SHOWING
BUILDING HEIGHTS



05 WENLOCK STREET		TOWN HOUSES			COURTYARD HOUSES		MAISONETTE		HOUSES	APARTMENTS			APTMENTS	UNITS
	PLOT AREA (m ²)	3 BEDROOM	4 BEDROOM	TOTAL	3 BEDROOM	TOTAL	3 BEDROOM	TOTAL	TOTAL	1 BEDROOM	2 BEDROOM	3 BEDROOM	TOTAL	TOTAL
PLOT A	660	0	3	3	0	0	0	0	3	0	0	0	0	3
PLOT B	2700	0	1	1	0	0	0	0	1	9	8	3	20	21
TOT	3360	0	4	4	0	0	0	0	4	9	8	3	20	24

Figure 57
TABLE SHOWING
UNIT NUMBERS AND
TYPOLOGIES

5.0 ILLUSTRATIVE MASTERPLAN

5.0

Figure 58
DIAGRAM SHOWING
BUILDING TYPOLOGIES



- 3BED COURTYARD HOUSE
- 4BED TOWNHOUSE
- 3BED TOWNHOUSE
- 3BED MAISONETTE
- 3BED APARTMENT
- 2BED APARTMENT
- 1BED APARTMENT

Car Park Strategy

Car parking spaces are mainly provided within courtyards.

The Masterplan provides for an overall car parking ratio of 0.57 allocated spaces/unit which is considered acceptable given the proximity of the train station and bus interchange. Priority for parking within the curtilage of the development should be given to the 3/4 bedroom units as it is most sensible for them to have a parking provision.

05 WENLOCK STREET CAR PARK RATIO					
PLOT	ALLOCATED PARKING SPACES	UNDERCROFT PARKING SPACES	COURTYARD HOUSE SPACE	TOTAL	PARKING RATIO
PLOT A	0	0	0	0	0.00
PLOT B	10	0	0	10	0.48
TOT	10	0	0	10	0.42

Figure 59
TABLE OF CAR PARK
RATIO IN THE SITE

5.0 ILLUSTRATIVE MASTERPLAN

5.0



.....
Figure 61
ROUTE CONNECTING
HIGH TOWN ROAD AND
WENLOCK STREET BEFORE



.....
Figure 60
VIEW OF THE LINK
BETWEEN THE HIGH
STREET AND WENLOCK
STREET AFTER

5.0 ILLUSTRATIVE MASTERPLAN

Brunswick Street (Site 6)

The site is located on the northern edge of the East Village, adjacent to Barnfield College and the local Community Centre.

5.0

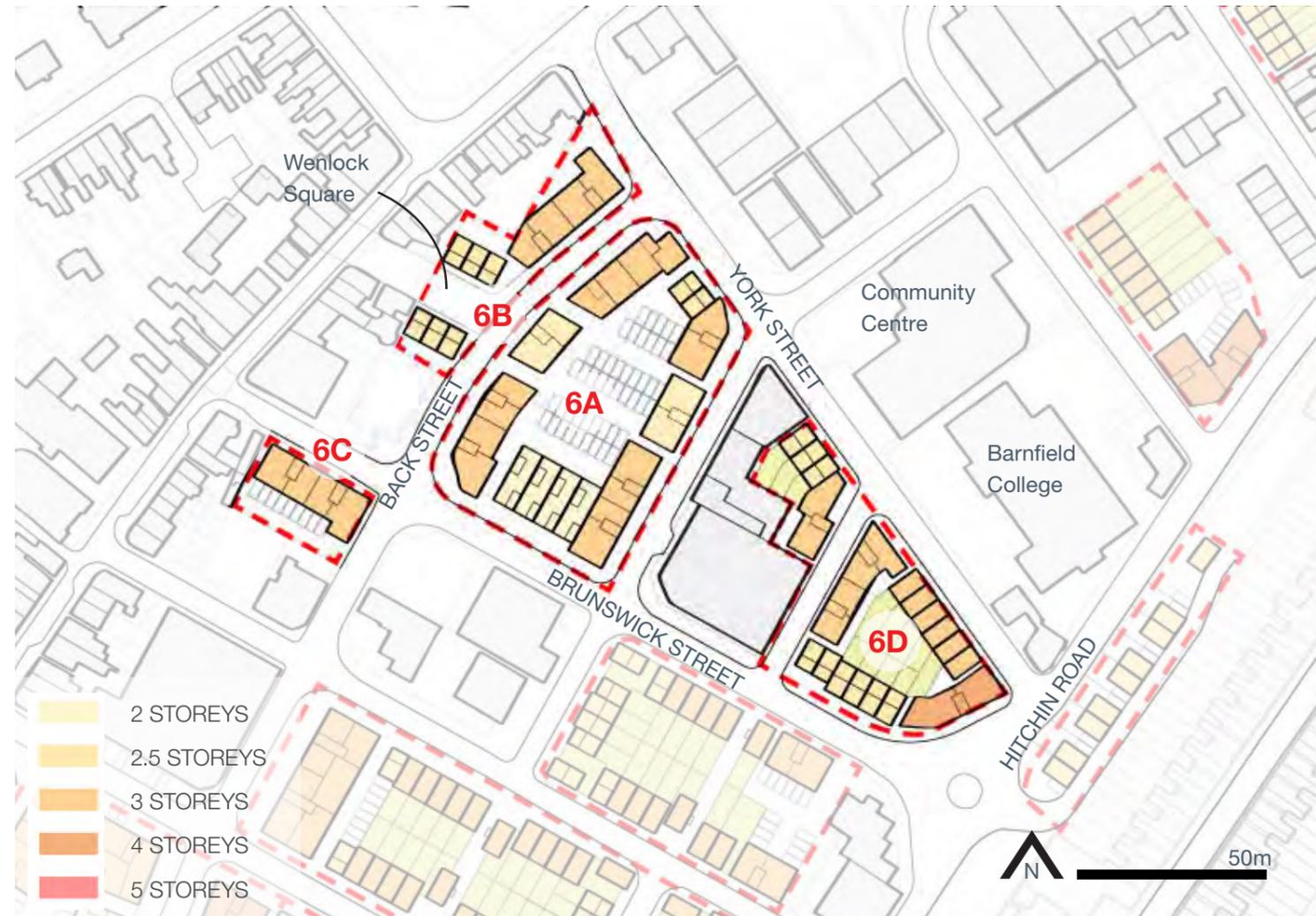
A range of residential typologies are proposed for Site 06, comprising a mix of apartments (80%) and houses (20%) facing York Street, Back Street and Brunswick Street. The overall density is 130 units/ha, efficiently exploiting a number of brownfield sub-sites.

The high percentage of apartments compared to houses is due to the fact that the site is largely fragmented and therefore the development of townhouses has been limited. In terms of heights though the site layout shows lower heights (mostly two and three storey buildings with a four storey exception) in accordance with its location further away from the train and bus stations.

Sub-site 6A has a large footprint and therefore allows for a generous perimeter block development with designated car parking located centrally in the courtyard.

Sub-site 6B proposes a pair of maisonette terraces, framing the new public space within Wenlock Square.

Figure 62
DIAGRAM SHOWING
BUILDING HEIGHTS



06 BRUNSWICK STREET		TOWN HOUSES			COURTYARD HOUSES		MAISONETTE		HOUSES	APARTMENTS			APTMENTS	UNITS
PLOT	PLOT AREA (m ²)	3 BEDROOM	4 BEDROOM	TOTAL	3 BEDROOM	TOTAL	3 BEDROOM	TOTAL	TOTAL	1 BEDROOM	2 BEDROOM	3 BEDROOM	TOTAL	TOTAL
PLOT A	4600	0	0	0	4	4	2	2	6	22	18	14	54	60
PLOT B	1400	0	0	0	0	0	6	6	6	3	6	3	12	18
PLOT C	700	0	0	0	0	0	0	0	0	6	3	3	12	12
PLOT D	3200	9	4	13	0	0	0	0	13	3	6	17	26	39
TOT	9900	9	4	13	4	4	8	8	25	34	33	37	104	129

Figure 63
TABLE SHOWING
UNIT NUMBERS AND
TYPOLOGIES

5.0 ILLUSTRATIVE MASTERPLAN

5.0

Figure 64
DIAGRAM SHOWING
BUILDING TYPOLOGIES



The apartment blocks are predominantly three storeys high with some four storey blocks located at plot corners. Some of the units proposed at ground floor level could be live/work units, accommodating some art related businesses.

All surrounding routes benefit from increased levels of building frontage and therefore are adequately overlooked to minimise any potential security issues.

Car Park Strategy

Car parking spaces are mainly provided within courtyards.

The courtyard houses incorporate off-street parking within the building footprint.

The Masterplan provides for an overall car parking ratio of 0.55 allocated spaces/unit which is considered acceptable given the proximity of the train station and bus interchange. Priority for parking within the curtilage of the development should be given to the 3/4 bedroom units as it is most sensible for them to have a parking provision.

06 BRUNSWICK STREET CAR PARK RATIO					
PLOT	ALLOCATED PARKING SPACES	UNDERCROFT PARKING SPACES	COURTYARD HOUSE SPACE	TOTAL	PARKING RATIO
PLOT A	48	0	4	48	0.80
PLOT B	0	0	0	0	0.00
PLOT C	9	0	0	9	0.75
PLOT D	0	0	0	0	0.00
TOT	57	0	4	57	0.44

Figure 65
TABLE OF CAR PARK
RATIO IN THE SITE

5.0 ILLUSTRATIVE MASTERPLAN

Dudley Street (Site 7)

This site is located in the Old Bedford Road block, an area in which the majority of proposals for new apartment blocks have already been approved.

5.0

In keeping with the surrounding context, the housing typologies comprise 100% apartments. The density is 180 units/ha which is characteristic of the average densities of the surrounding residential developments on the block.

The proposed development within Site 07 is four storeys high on the north side which faces onto Dudley Street while the rest of the development is three storeys tall, all surrounding and internal parking court. These heights are less than the surrounding developments which have an average height of five storeys.

As well as facilitating access directly from the street, some of the apartment cores are accessed via the central parking court that is overlooked by the surrounding residences, promoting a sense of surveillance and security.

Figure 66
DIAGRAM SHOWING
BUILDING HEIGHTS



07 DUDLEY STREET		TOWN HOUSES			COURTYARD HOUSES		MAISONETTE		HOUSES	APARTMENTS			APTMENTS	UNITS
	PLOT AREA (m ²)	3 BEDROOM	4 BEDROOM	TOTAL	3 BEDROOM	TOTAL	3 BEDROOM	TOTAL	TOTAL	1 BEDROOM	2 BEDROOM	3 BEDROOM	TOTAL	TOTAL
TOT	1500	0	0	0	0	0	0	0	0	11	10	6	27	27

Figure 67
TABLE SHOWING
UNIT NUMBERS AND
TYPOLOGIES

5.0 ILLUSTRATIVE MASTERPLAN

Figure 68
DIAGRAM SHOWING
BUILDING TYPOLOGIES



- 3BED COURTYARD HOUSE
- 4BED TOWNHOUSE
- 3BED TOWNHOUSE
- 3BED MAISONETTE
- 3BED APARTMENT
- 2BED APARTMENT
- 1BED APARTMENT

Car Park Strategy

Car parking spaces are mainly provided within courtyards.

The Masterplan provides for an overall car parking ratio of 0.55 allocated spaces/unit which is considered acceptable given the proximity of the train station and bus interchange. Priority for parking within the curtilage of the development should be given to the 3/4 bedroom units as it is most sensible for them to have a parking provision.

5.0

07 DUDLEY STREET CAR PARK RATIO					
	ALLOCATED PARKING SPACES	UNDERCROFT PARKING SPACES	COURTYARD HOUSE SPACE	TOTAL	PARKING RATIO
TOT	20	0	0	20	0.74

Figure 69
TABLE OF CAR PARK
RATIO IN THE SITE

5.0 ILLUSTRATIVE MASTERPLAN

Concorde Street (Site 8) and Hitchin Road (Site 9)

These two sites are located on the edge of the East Village, both fronting onto Hitchin Road which is one of the primary north-south axes of High Town.

5.0

Sites 8 and 9 are more distant from the local public transport stations than many of the other potential development sites. This distance is reflected in the chosen mix of accommodation typologies which is 50% apartments and 50% housing.

Similarly, this has an effect on the housing densities which are 82 units/ha for Site 08 and 57 units/ha for Site 09. This lower density is reflective of the increased distance away from the bus and train stations.

The layout of plot 9 incorporates the existing access route to the Irish Forum site.

Figure 70
DIAGRAM SHOWING
BUILDING HEIGHTS



08 CONCORDE STREET		TOWN HOUSES			COURTYARD HOUSES		MAISONETTE		HOUSES	APARTMENTS			APTMENTS	UNITS
	PLOT AREA (m ²)	3 BEDROOM	4 BEDROOM	TOTAL	3 BEDROOM	TOTAL	3 BEDROOM	TOTAL	TOTAL	1 BEDROOM	2 BEDROOM	3 BEDROOM	TOTAL	TOTAL
TOT	2810	0	6	6	0	0	1	1	7	4	8	4	16	23

09 HITCHIN ROAD		TOWN HOUSES			COURTYARD HOUSES		MAISONETTE		HOUSES	APARTMENTS			APTMENTS	UNITS
	PLOT AREA (m ²)	3 BEDROOM	4 BEDROOM	TOTAL	3 BEDROOM	TOTAL	3 BEDROOM	TOTAL	TOTAL	1 BEDROOM	2 BEDROOM	3 BEDROOM	TOTAL	TOTAL
TOT	1590	0	0	0	0	0	9	9	9	0	0	0	0	9

Figure 71
TABLE SHOWING
UNIT NUMBERS AND
TYPOLOGIES

5.0 ILLUSTRATIVE MASTERPLAN

Figure 72
DIAGRAM SHOWING
BUILDING TYPOLOGIES



- 3BED COURTYARD HOUSE
- 4BED TOWNHOUSE
- 3BED TOWNHOUSE
- 3BED MAISONETTE
- 3BED APARTMENT
- 2BED APARTMENT
- 1BED APARTMENT

Car Park Strategy

Car parking spaces are mainly provided within courtyards.

The Masterplan provides for an overall car parking ratio of 0.55 allocated spaces/unit which is considered acceptable given the proximity of the train station and bus interchange. Priority for parking within the curtilage of the development should be given to the 3/4 bedroom units as it is most sensible for them to have a parking provision.

5.0

08 CONCORDE STREET CAR PARK RATIO					
	ALLOCATED PARKING SPACES	UNDERCROFT PARKING SPACES	COURTYARD HOUSE SPACE	TOTAL	PARKING RATIO
TOT	12	0	0	12	0.52

09 HITCHIN ROAD CAR PARK RATIO					
	ALLOCATED PARKING SPACES	UNDERCROFT PARKING SPACES	COURTYARD HOUSE SPACE	TOTAL	PARKING RATIO
TOT	9	0	0	9	1.00

Figure 73
TABLE OF CAR PARK
RATIO IN THE SITE

5.0 ILLUSTRATIVE MASTERPLAN

5.0

5.4 Overall area schedule

The total number of residential units achieved when the Masterplan is fully implemented is about 600 (598). In addition, over 200 additional new units are already under construction/approved within the Masterplan boundary. This total is in line with Policy LP10 of the LLP 2011-2031 which prescribes that High Town can accommodate around 750 new residential units.

The overall density of the Masterplan is 115 units/ha, which is slightly higher than the existing Victorian block density of approximately 75-80 units/ha and the density of the Masterplan in the Design Codes for the East Village of between 80-90 units/ha.

This increase in density is allowed by the introduction of a better mix of residential typologies that makes a more efficient use of the development sites without compromising the scale and character of High Town.

Figure 74
RESIDENTIAL
DEVELOPMENTS
APPROVED/ UNDER
CONSTRUCTION NOT
INCLUDED IN THE
MASTERPLAN

DEVELOPMENTS APPROVED / IN CONSTRUCTION	no. of storeys	no. of apartments
1 Duke Street (built)	4	4
19 Hitchin Road (built)	3	12
Walters Yard (Wenlock St)	2	8
144 Midland Road	9	48
6 Old Bedford Road	3	39
Drill Hall (Old Bedford Rd)	5	80
61 Dudley Street	5	52
41 Dudley Street (stu. accom.)	5	33

Figure 75
TOTAL NUMBER OF
UNITS AND BREAKDOWN
OF RESIDENTIAL
TYPOLOGIES

TOT AREA	3 BED TH	4BED TH	TOT TOWNHOUSES	3 BED CH	TOT COURTYARDS	TOT MAISONETTES	TOT HOUSES	1 BEDS	2 BEDS	3 BEDS	TOT FLATS	TOT
52130	62	84	146	15	15	26	187	158	132	121	411	598
							31	0	32	29	69	
							%	%	%	%	%	

5.5 Car parking strategy for new residential developments

The Local Plan sets maximum levels of car parking for broad classes of development as part of a package of measures to promote sustainable travel choices. For residential developments the standards are as follows:

- 1 bedroom – 1 space per dwelling
- 2/3 bedrooms – 2 spaces per dwelling
- 4+ bedrooms – 3 spaces per dwelling

In highly accessible areas, particularly town centres where services are readily accessible by walking, cycling or public transport, the amount of car parking can be restricted to levels below the maximum standards. This can even extend to car free developments for the most accessible sites and where appropriate travel planning measures are adopted.

Based on the location, type of unit and above standards, an assessment has been made of the preferred parking standards for the nine development sites. These are summarised in Figure 76.

The average ratio of 0.55 is considered to be low but acceptable as a starting point due to the proximity of the town centre, rail station and bus interchange. The allocation of spaces will need

to be assessed for each site as the details of development emerge but priority should be given to the 3 or 4 bedroom units. However, the situation will need to be monitored and reviewed on a regular basis to ensure the basic objectives are being met. In general, the expectation for the future would be that as many residents as possible choose not to own a car, but much will depend on the adoption of appropriate and robust travel planning principles. In particular, the adoption of a car club for the High Town area should be seen as a high priority building on the current scheme operated in the town centre. It could then grow in scale and location in line with the development of the key sites.

House Block	Houses	Apartments	Total Units	Car Parks	Parking to Unit (PU) ratio
1 MIDLAND ROAD	47	189	236	147	0.62
2 BURR STREET	36	43	79	19	0.24
3 DUKE STREET	19	12	31	14	0.45
4 CHARLES STREET	40	0	40	40	1.00
5 WENLOCK STREET	4	20	24	10	0.42
6 BRUNSWICK STREET	25	104	129	57	0.44
07 DUDLEY STREET	0	27	27	20	0.74
08 CONCORDE STREET	7	16	23	12	0.52
09 HITCHIN ROAD	9	0	9	9	1.00
Total	187	411	598	328	0.55

Figure 76
RESIDENTIAL CAR PARK
RATIO FOR EACH BLOCK

5.0 ILLUSTRATIVE MASTERPLAN

5.6 Car Parking Strategy for High Town

The focus of the above section of the Masterplan is related to the parking needs of new developments. However, this is only part of the overall supply of facilities in High Town that comprises a mixture of on-street spaces, public off-street and private off-street (residential and business use). Decisions regarding any of these facilities are likely to have an impact on the others.

Any shortfall in parking facilities for new residential developments is likely to place demands on the on-street and public off-street facilities. An assessment has, therefore, been made on the current supply and demand for both these facilities using a combination of parking tickets sold and observations on site at various times of the day and week. This assessment has included some surveys of current usage of the facilities and these are referred to in the following paragraphs.

On-street parking

Overall, it is estimated that there are around 360 on-street spaces within the High Town area. These comprise a mix of pay and display, residents, loading and shared spaces.

The hours of operation for the majority of the area are Mon-Fri, 9am-5pm with the High Town Road area being Mon-Sat, 8am-6pm. Outside of these hours, most of the streets are covered by single yellow lines which provide further opportunities for parking in the evenings and at weekends.

It is clear from the above, therefore, that the capacity of the on-street spaces varies between times of the day, day of the week and type of space/user. It is also clear from the surveys undertaken in February 2015 that there is a wide variation in the demand for spaces between different areas and different times of the day and days of the week.

Nevertheless, in overall terms the results indicate the following:

- Monday 23rd February (2pm to 330pm) – 125 spaces occupied (35% of the total available)
- Tuesday 24th February (7pm to 830pm) – 239 spaces occupied (67% of the total available)
- Saturday 28th February (930am to 11am) – 241 space occupied (68% of the total)

In some areas (e.g. North Street/Cobden Road) there is plenty of spare capacity during the day on a weekday but very little in the evenings or weekends. In other areas (e.g. Brunswick Street/Taylor Street) there is spare capacity in the evenings and at weekends due to it being made up of predominantly commercial uses.

Off-street parking

It is considered that the multi-storey car park at the station is unlikely to be an option for the general parking requirements of the High Town and it has, therefore, been excluded from the assessment. For the remaining car parks there are currently around 264 spaces available in a total of seven sites.

Two of these (Hitchin Road and Taylor Street) are used by LBC staff that are allocated permits, 18 spaces in Hitchin Road and 58 spaces in Taylor Street. Taylor Street is also used as an overflow car park for some staff that have permits for Crawley Road and Vicarage Street car parks.



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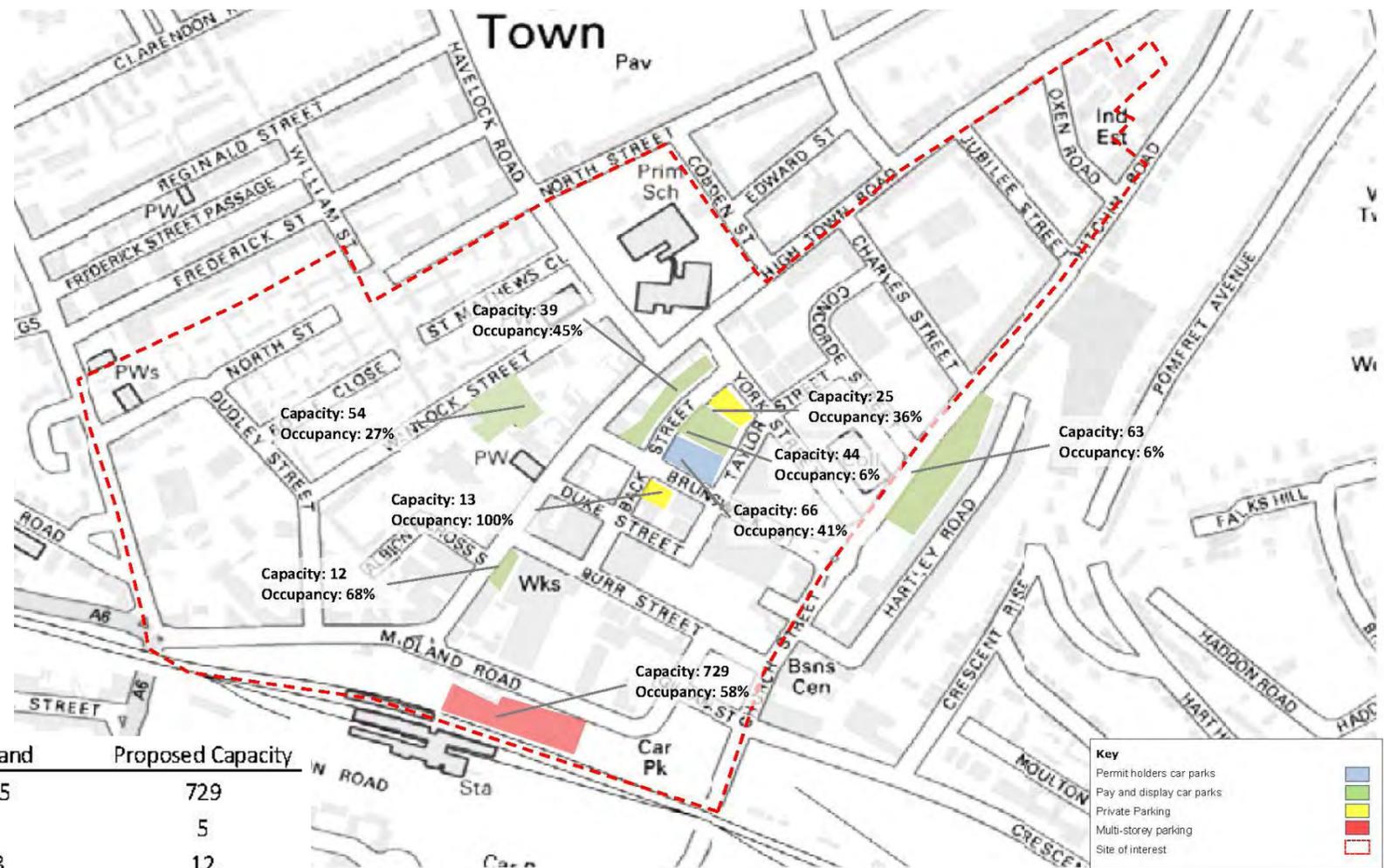
5.0 ILLUSTRATIVE MASTERPLAN

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The seven car parks were included in our recent survey and the results indicate the following:

- Monday 23rd February (2pm to 330pm) – 100 spaces occupied (38% of the total available)
- Tuesday 24th February (7pm to 830pm) – 22 spaces occupied (8% of the total available)
- Saturday 28th February (930am to 11am) – 34 spaces occupied (13% of the total available)

From the above, it's clear that the off-street car parks display a very different pattern of usage from the on-street spaces due primarily to their use for commuter/commercial parking. Those closest to the High Town Road shopping area are well used during the day but those in the commercial area are virtually empty in the evenings or weekends.



Car Park	Capacity	Demand	Proposed Capacity
1. Multi-storey Car park	729	575	729
2. High Town Burr Street	13	8	5
3. Wenlock Street	39	18	12
4. Back Street	39	18	39
5. Taylor Street	44	3	0
6. Brunswick Street	66	27	0
7. Hitchin Road	63	4	0
8. Burr Street	0	0	10
9. Back Street South	0	0	10
Total	993	653	805

Figure 77
DEMAND AND CAPACITIES OF HIGH TOWN CAR PARKS

Figure 78
PARKING CAPACITIES AND OCCUPANCIES

5.0 ILLUSTRATIVE MASTERPLAN

Figure 79
CAR PARKS RETAINED,
REMOVED OR ADDED



Overall summary

Again in very broad terms, taking the combined capacities (621 spaces) and survey results for both on-street and off-street facilities, the results indicate the following:

- Monday 23rd February (2pm to 330pm) – 225 spaces occupied (36% of the total available)
- Tuesday 24th February (7pm to 830pm) – 261 spaces occupied (42% of the total available)
- Saturday 28th February (930am to 11am) – 275 spaces occupied (44% of the total available)

While the above would appear to suggest that there is spare capacity, the situation can vary significantly between areas and at different times of the day and week. As a result, a degree of caution needs to be applied in drawing any firm conclusions without further detailed assessment.

Furthermore, there is likely to be a loss of some of the off-street car parks to new developments with a predicted loss of some 208 spaces resulting in a future capacity of only 56 spaces. Some additional on-street spaces can be accommodated in the High Town area but these are unlikely to amount to much more than 50 spaces. The future overall capacity, therefore, becomes 463 spaces.

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5.0 ILLUSTRATIVE MASTERPLAN

The adoption of an average parking to unit ratio of 0.55 is acceptable as a starting point but the situation should be subject to regular review. It is hoped that as many residents as possible choose not to own a car but much will depend on the adoption of appropriate and robust travel planning principles, in particular the adoption of a car club for the High Town area with incentives for residents at certain times of the day.

The provision of additional permits for residents and extensions to the zone is supported in principle but past experience suggests that not all residents sign up to such schemes. It would be necessary to consult before any schemes were introduced so the results are unpredictable.

Future development

Development will take place over a number of years so there will be opportunities to monitor conditions and review the strategy in light of conditions on the ground. However, sites are already being actively progressed (e.g. Hitchin Road/Gillam Street and Duke Street) where no car parking is being proposed. It will be necessary to keep a close watch on the impact of such developments as they are implemented, both in terms of car parking demand and car ownership.

As a result, it is recommended that in all future developments, a contribution is sought towards the following:

- Undertaking regular reviews of parking demand and supply (including surveys of car ownership)
- Implementing changes to the parking controls (including possible extensions to the residents permit scheme)
- Setting up and coordinating a framework Travel Plan for the area (including the introduction of a car club for the area)

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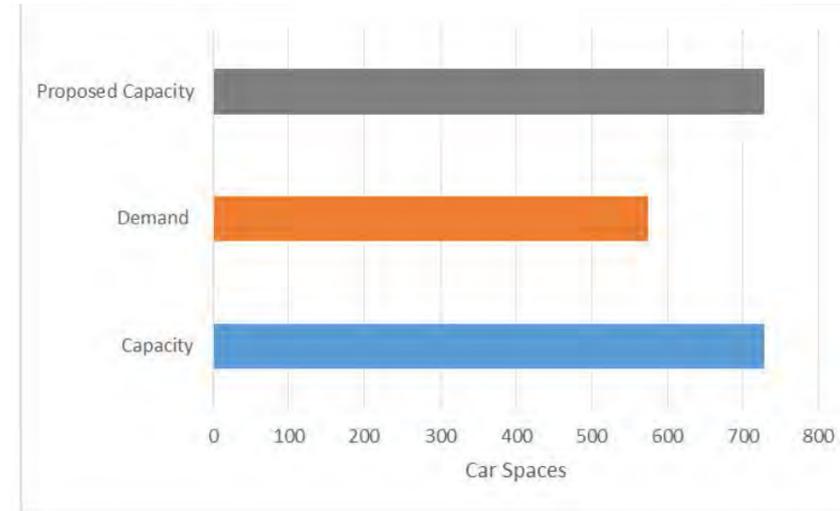


Figure 81
DEMAND AND CAPACITIES
OF MULTI-STOREY CAR
PARK

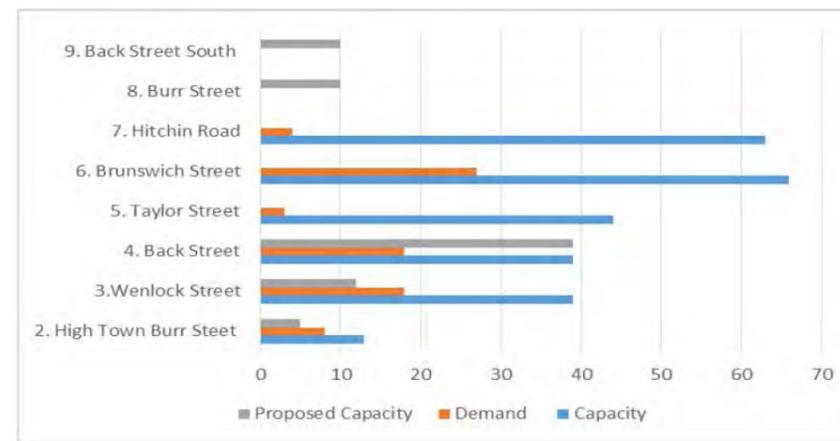
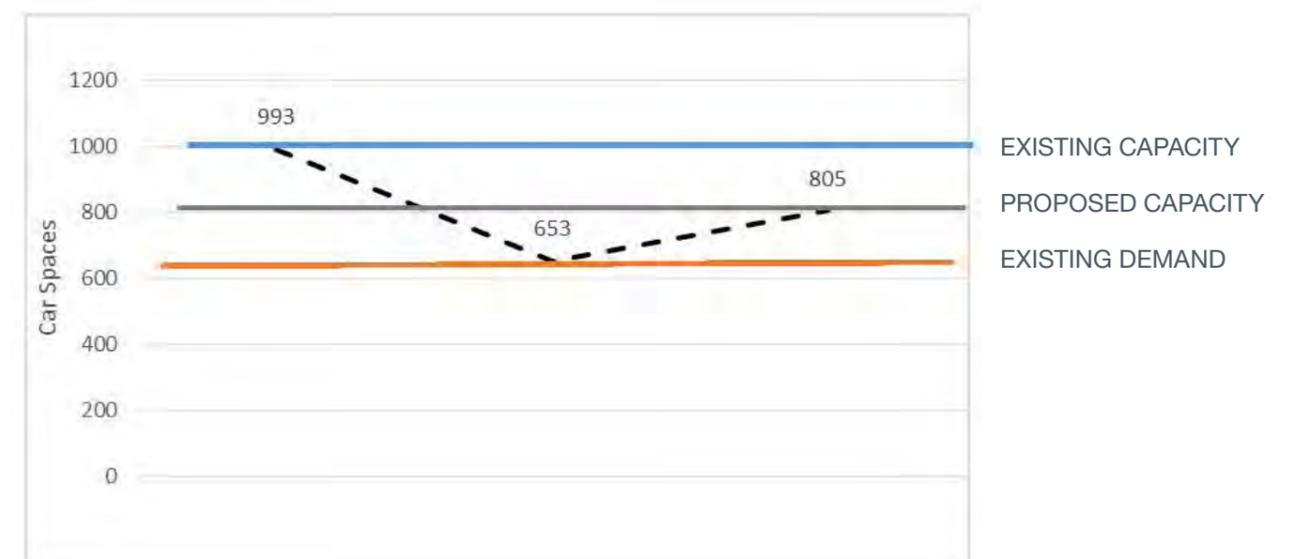


Figure 82
DEMAND AND CAPACITIES
OF SMALLER CAR PARKS

Figure 80
TOTAL DEMAND AND
CAPACITIES OF OFF-
STREET CAR PARKS



5.0 ILLUSTRATIVE MASTERPLAN

5.7 The Paths Estate

The Paths Estate was subject to a regeneration study by HTA in early 2014, which generated options for a minimum, medium and maximum intervention.

The masterplan principles and proposals acknowledge the initiatives and ideas promoted by the HTA report.

It was felt that the minimum intervention was appropriate at this time and a number of initiatives are being implemented, including improvements to the lighting (using LED which will be brighter and more cost efficient) in Berkeley Path.

Other improvements will follow as a programme is agreed with residents.

Amounting to around £1.4 million in total, the improvements include:

- CCTV installation at the entrances of the residential courts
- Residents to take ownership of neglected bits of land where appropriate
- Better signage
- Review access points and close up unnecessary gates
- Consider options to improve parking for residents
- Review use of square and other shared areas

Figure 84
HTA STUDY ON THE PATHS
ESTATE REGENERATION



Figure 83
IMAGES OF PATHS ESTATE
FROM WALKABOUT WITH
RESIDENTS ON NOVEMBER 2014



5.0 ILLUSTRATIVE MASTERPLAN

5.8 High Town Road

The approach to the design and improvements of key streets and spaces, but especially of High Town Road, is to help make the place more attractive and comfortable for users, but also retain its sense of vitality with a range of activities for the community and beyond.

High Town Spine:

Activity within the existing Masterplan area is naturally concentrated along High Town Road and there is potential to build on this to create a central hub of activity that would serve the local community and complement Luton Town Centre.

The street has many positive attributes including:

- Excellent transport connections due to the proximity of the bus and train stations;

- Rich architectural heritage with many high quality, listed and locally important buildings of historic importance.
- Large proportion of specialist and independent retailers offering more than the generic shopping experience

The Masterplan aims to build on these attributes by showcasing the character of the street, acting as a fitting central spine to the surrounding Conservation Area and building on the retail offer in order to create an accessible, vibrant and attractive place to live, work and visit.

A Place for People:

High Town Road is the main pedestrian gateway into the masterplan area and there is the potential to maximise the pedestrianised quality of the street by further encouraging traffic to use Hitchin Road to the east now that the inner ring road is open.

The location of the train station to the south of High Town Road means that the area benefits from excellent transport links and there is an opportunity to increase the attractiveness of High Town for potential visitors by improving the sense of arrival through the Masterplan development.

The smaller streets which branch off to the east and west would benefit from improved street frontage and improved surveillance as a result of the Masterplan while ensuring good links and safe access to the High Street for shoppers.

Through the use of shared space principles and the development of 'squares' along the length of the street, emphasis will be placed more on the experience of the pedestrian, minimising conflict with vehicles and promoting a safer place for people.

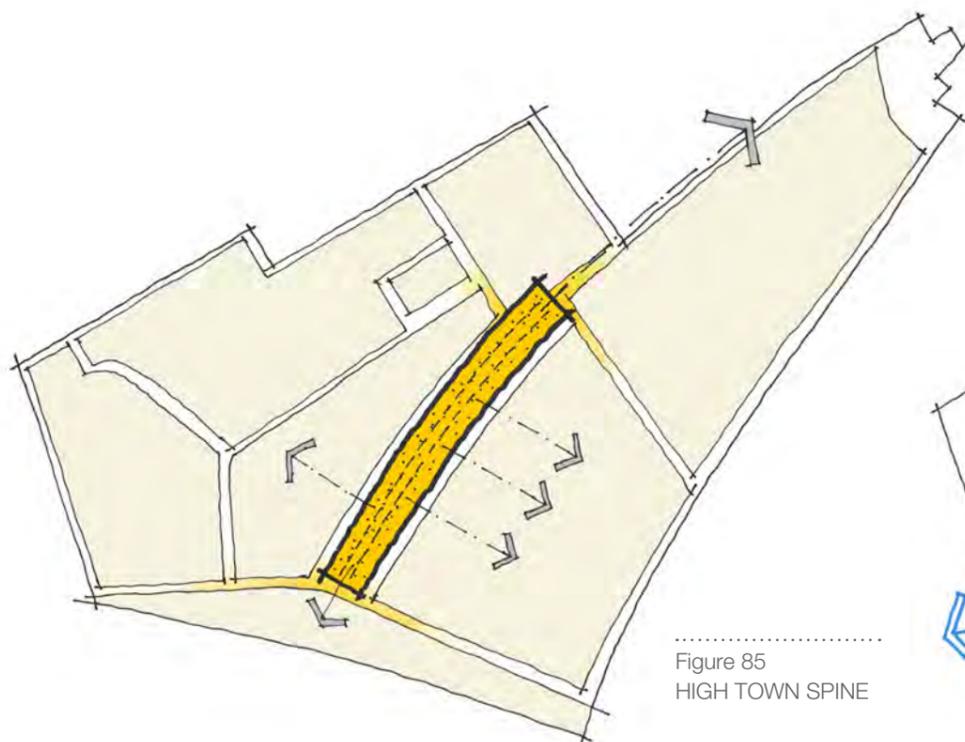


Figure 85
HIGH TOWN SPINE

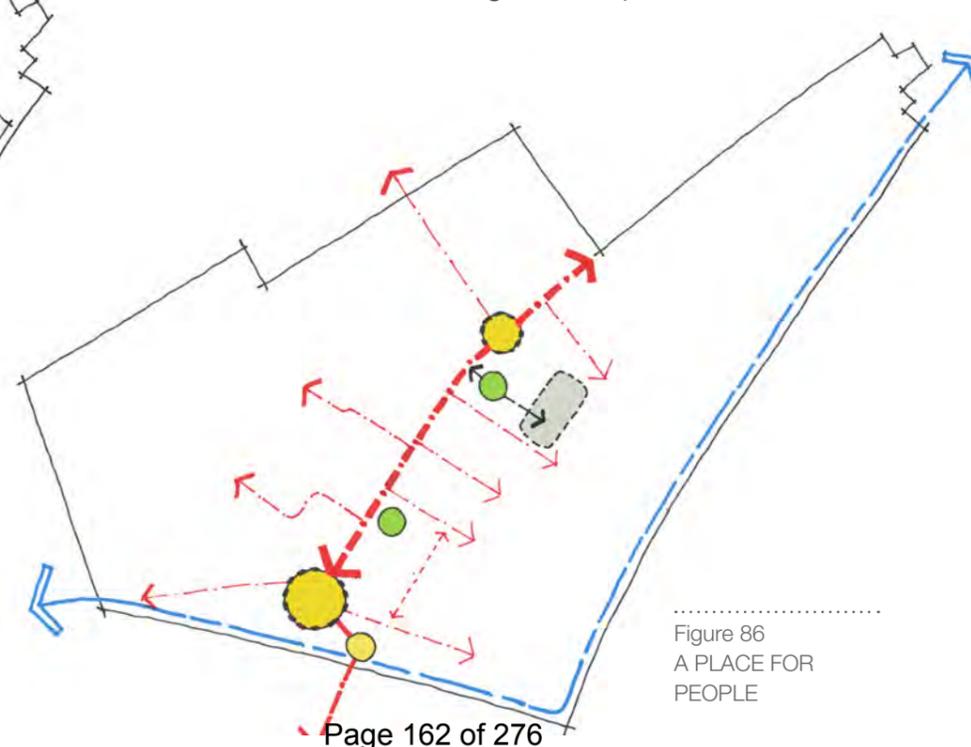


Figure 86
A PLACE FOR PEOPLE

Figure 87
VIEW ALONG HIGH TOWN ROAD LOOKING SOUTH



5.0 ILLUSTRATIVE MASTERPLAN

Character and Charm:

The area is rich in character and charm specifically because of the great deal of heritage that exists as well as the strong architectural quality of the buildings. Some are listed or noted as buildings of importance including the Methodist Church and The Painters Arms, both of which contribute positively to the townscape and character of the street.

While many of these buildings are in need of care the Masterplan offers the opportunity for future development to build on this character and contribute to the historic setting while also increasing the retail offer of the street, offering new retail units with larger footprints, attractive to current food and retail needs and more inviting building facades.

By building on the bespoke and independent retail offer which currently exists as well as improving the public realm to support trader activity, the Masterplan will promote increased footfall into the area and the creation of a complementary offer to that available in Luton Town Centre.

Connections and Variety:

The Masterplan proposes a series of 'off street' spaces which offer variety and breaks along the long, linear High Street. With connections to a series of courtyards and small public spaces located along the length of High Town Road, the Masterplan enhances the existing street, supporting the new retail offer and encouraging people to move through the street using the proposed off street spaces as areas in which to rest and even congregate.

Links to new developments along the side-streets on either side of High Town Road are also facilitated with the new spaces located in such a manner as to reflect this pattern of connectivity, indicating safe and well overlooked spaces to transition from these areas to the main pedestrian friendly street.

A Green Place:

Despite the urbanity of the surroundings, High Town Road has good access to numerous areas of open space, especially the Peoples Park, located to the north of the High Town Road.

Along the side streets there are good views from High Town Road of Hart Hill to the east while Midland Road to the south benefits from the views of linear strands of mature London Plane trees.

Despite these positive attributes, High Town Road itself currently lacks the same greenness as its surroundings. The Masterplan will increase the number of trees and vegetation along the High Town Road, complementing the visual connections to the surrounding green spaces:

- People's Park
- Views east to Hart Hill
- Mature London Planes on Midland Road



Figure 88
CHARACTER AND
CHARM



Figure 89
CONNECTIONS
AND VARIETY

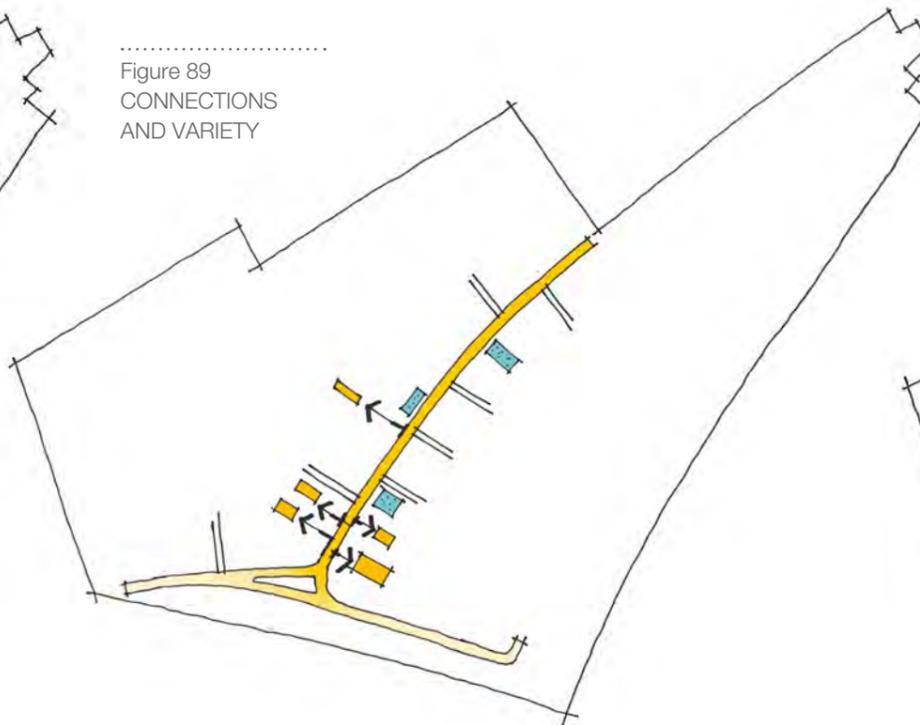


Figure 90
A GREEN PLACE



5.0 ILLUSTRATIVE MASTERPLAN

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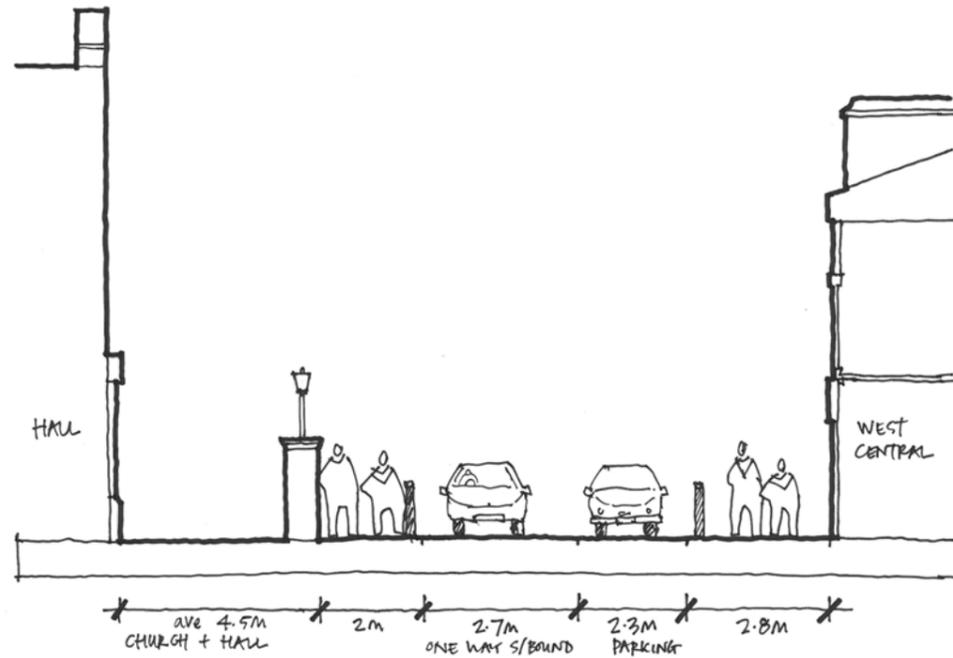


Figure 91
EXISTING SECTION AA AT
THE NORTHERN END OF
HIGH TOWN ROAD

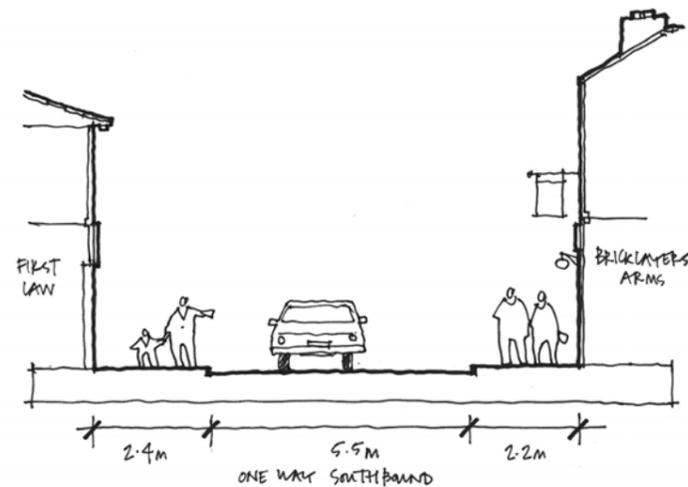


Figure 92
EXISTING SECTION BB AT
THE SOUTHERN END OF
HIGH TOWN ROAD



Existing Sections

Within the Masterplan area, the northern end of High Town Road is approximately 9-10m wide but appears wider due to the Church and Hall forecourt that runs along the edge of the street. There are also zones for on-street parking and loading bays.

The street surface and the footpaths are flush with poor delineation between pedestrian and vehicular areas other than bollards which line the street in some parts and lead to the existence of footway pinchpoints which is further aggravated by a plethora of street signage and wheelie bins along footways.



The southern end of the street is typically 10m wide with footpaths of reasonable width for the current volume of pedestrian movement. The carriageway is wide enough to support a single lane for traffic and a parking or loading bay as there is no on-street parking in this area. The bay could be designed as a shared footway box thereby increasing the area of footway when there are no vehicles present.

The appearance of the street is inconsistent and lacks uniformity, a feeling that is exacerbated by numerous drop kerbs and material changes along the length of the street.

5.0 ILLUSTRATIVE MASTERPLAN

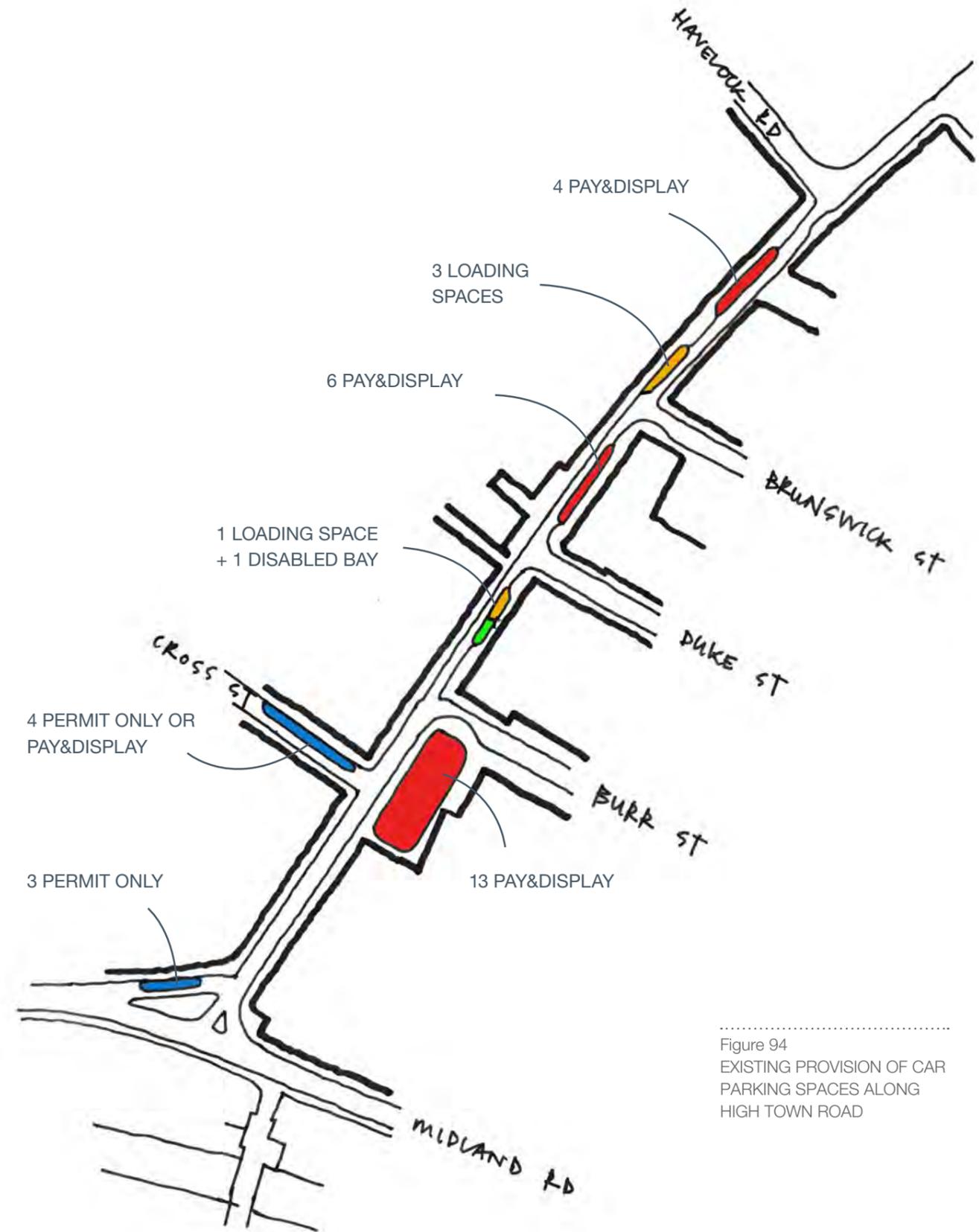
Figure 93
CAR PARKING SPACES
ON HIGH TOWN ROAD



Existing Parking

The on-street car parking provision currently available along High Town Road comprises:

- 10 pay & display spaces (30 mins availability)
- 3 spaces which double as loading bays
- 1 dedicated loading bay
- 1 disabled parking space
- 3 permit only parking spaces
- 4 permit only or pay & display parking spaces



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Figure 94
EXISTING PROVISION OF CAR
PARKING SPACES ALONG
HIGH TOWN ROAD

5.0 ILLUSTRATIVE MASTERPLAN

Design Principles

The main design principle for the regeneration of High Town Road is to create a 'working street' yet 'cultural street' by optimising the retail offer of independent, niche businesses that builds on the rich heritage that currently exists in the area.

By maintaining one-way southbound traffic as well as a limited amount of short term on-street parking and loading bays together with the creation of the 'squares', High Town Road will remain accessible to vehicles but will in turn become a much more pedestrian friendly area.

The sequence of shared spaces and public courtyards along the length of the street will allow for a flexible phased approach to the implementation of the improvements while minimising the overall effect on users of the street and maintaining and indeed improving connectivity to the rest of the masterplan area whilst simultaneously improving the opportunities for meeting places.

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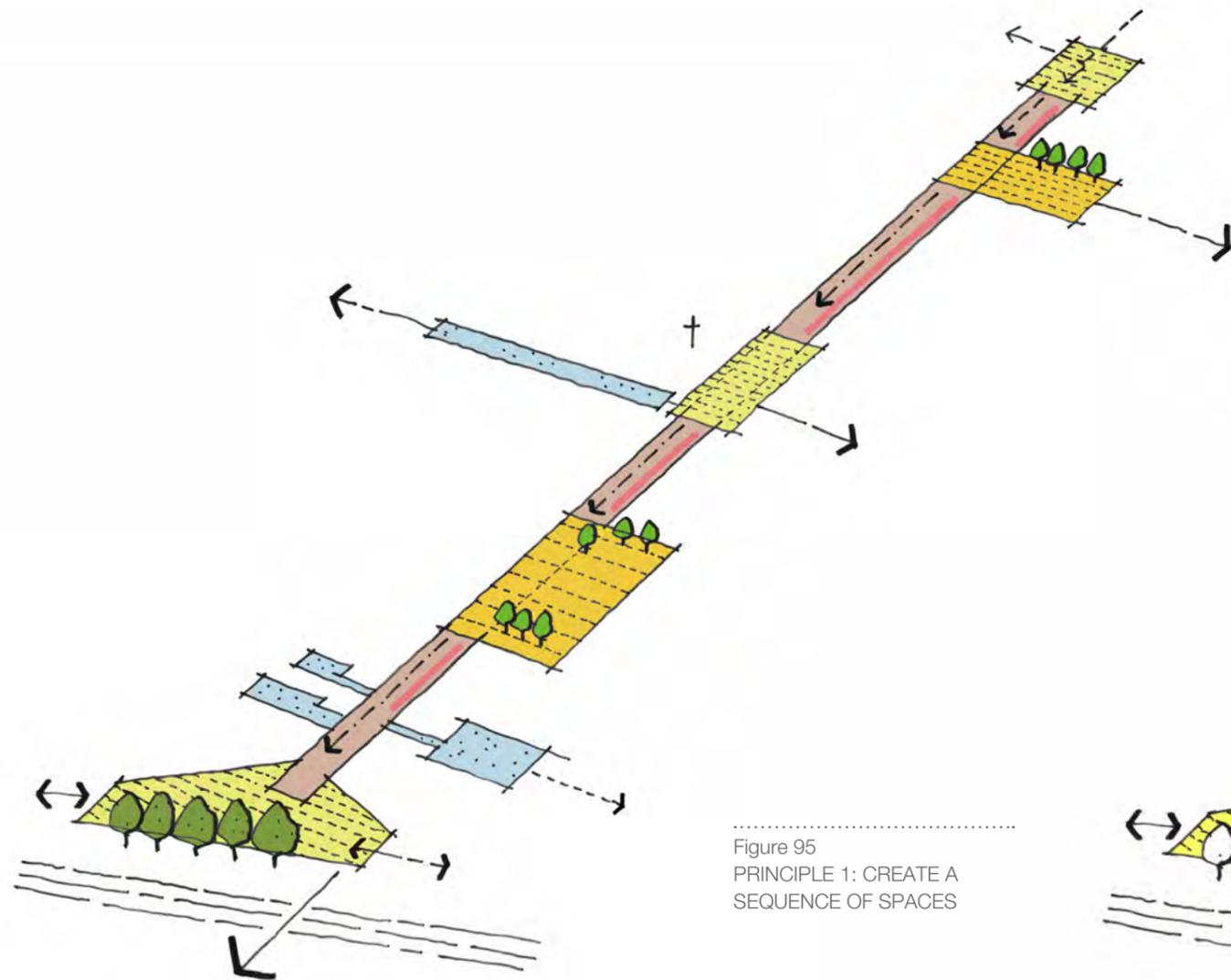


Figure 95
PRINCIPLE 1: CREATE A SEQUENCE OF SPACES

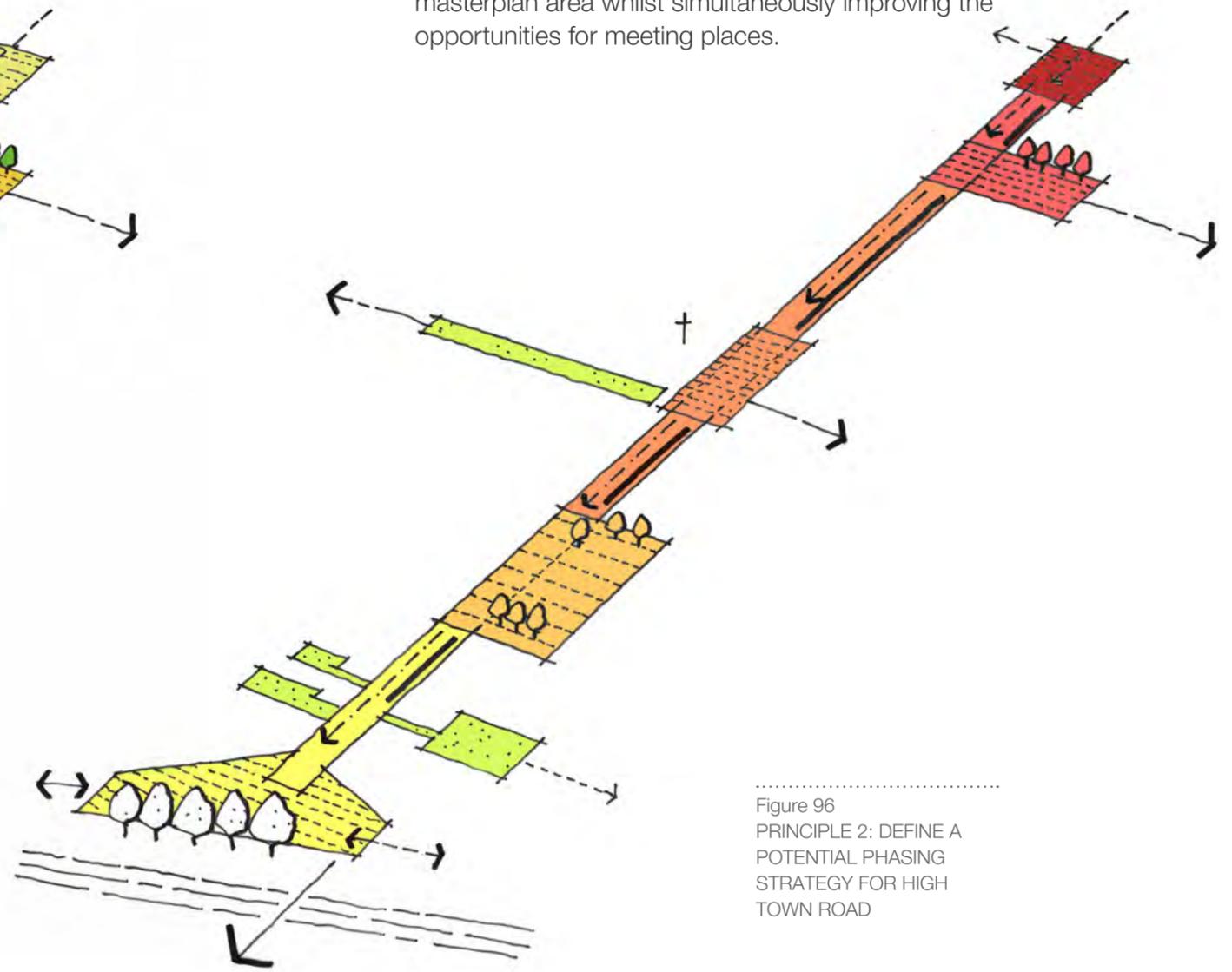


Figure 96
PRINCIPLE 2: DEFINE A POTENTIAL PHASING STRATEGY FOR HIGH TOWN ROAD

5.0 ILLUSTRATIVE MASTERPLAN

These improvements place a greater emphasis on the public realm, improving the overall experience and drawing pedestrians through the sequence of spaces along the length of the High Street.

These spaces also signal gateways from surrounding car parks and other areas of the Masterplan, providing a fitting arrival space to the heart of the masterplan area. Also, the opportunity for a new public square to the south of the High Street would complement plans for Wellbeck Square.

These spaces as well as an increase in soft landscaping and tree planting would increase the overall attractiveness of the street and improve the setting of the numerous significant historic buildings.

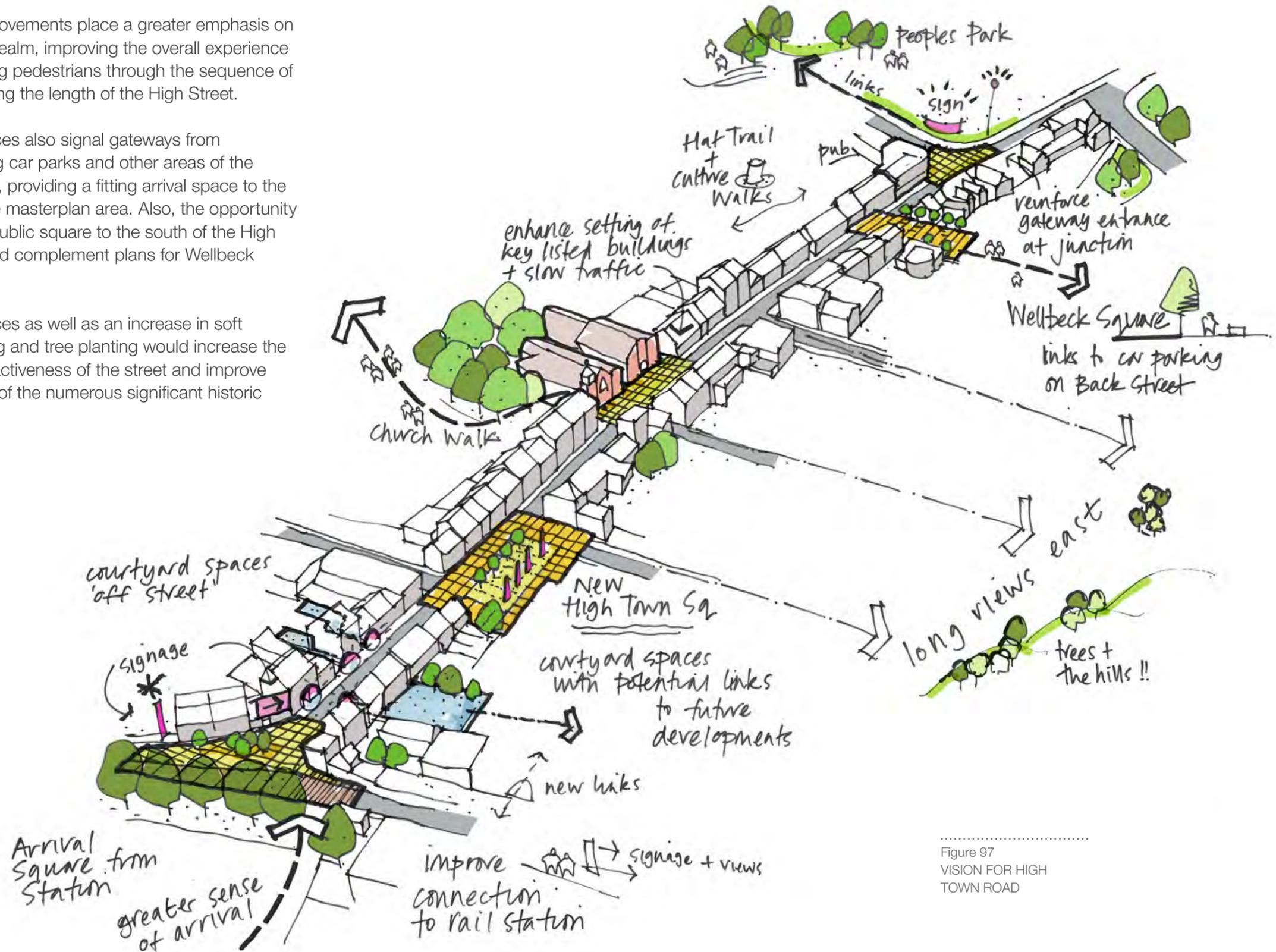


Figure 97
VISION FOR HIGH
TOWN ROAD

5.0 ILLUSTRATIVE MASTERPLAN

A series of design options for High Town Road, from minimum to maximum intervention, are illustrated in the following pages.

Design Option 01: Re-Surface

This is a low intervention option that would entail retaining the existing kerb layout and resurfacing both the carriageway and footpaths with new, consistent materials. The existing traffic flow and parking layout would be retained.

De-cluttering of the footpaths would also be promoted including relocation of bins and removal of excessive signage. Wayfinding material and directional signage would also be improved and there would be minimal adjustments to existing street lighting. This will aid movement throughout the area but also support older people by promoting a dementia friendly environment.

Design Option 02: Rationalise the Carriageway

Building on the improvements contained in Option 01, build-outs of the footpaths would be provided to create a uniform carriageway width and widening of the footpath south of Burr Street would have the same effect.

Junctions would be rationalised to improve pedestrian safety with the existing traffic flow and on-street parking allocations retained. The extent of sett usage could be reviewed to provide a more uniform, even surface for pedestrian.

Figure 98
HIGH TOWN ROAD
OPTION 01



Figure 99
HIGH TOWN ROAD
OPTION 02

5.0 ILLUSTRATIVE MASTERPLAN

Design Option 03: Establish Gateways

This option builds on Options 1 and 2 by reorganising access arrangements to facilitate the creation of a new square at Midland Road. Changes are also proposed to create a public space in the vicinity of Duke Street that would provide an appropriate setting to the Church and Hall.

Parking and loading bay arrangements would also be rationalised and reorganised along the southern side of the street with an additional seven car parking spaces provided, compared to the existing situation.

These could be constructed in the form of 'shared' footway loading/parking bays giving more space back to pedestrians when not being used by vehicles.

Design Option 04: Establish Squares

This option is the most comprehensive and includes the improvements contained in the other three options, as well as the retention of southbound vehicular movements. In addition, Burr Street car park would be removed and replaced with a shared public space to be known as High Town Square.

This option strongly reinforces the principles contained within the Masterplan proposals to support local retail while placing an increased focus on the pedestrian experience and maintaining sufficient vehicular access to the street and car parks. Loading provision would be increased and the loss of parking would be mitigated on adjacent streets.

The effect on parking would be:

- 15 Pay & Display spaces available
- Two loading bays
- One disabled parking space
- Three Pay & Display / shared loading spaces
- Removal of seven P&D spaces (could be reduced to 5)
- Loss of three permit only spaces

Figure 100
HIGH TOWN ROAD
OPTION 03



Figure 101
HIGH TOWN ROAD
OPTION 04



5.0 ILLUSTRATIVE MASTERPLAN

5.0

High Town Square

This key space at the southern end of High Town Road is currently occupied by a car park that contains 13 spaces. As a currently under-utilised facility, it would become a new public square as part of the Masterplan, surrounded by retail units including a proposed convenience store. The existing public toilet facility could also be converted to a kiosk for cafe or retail uses.

This space would be large enough to host local events such as festivals, markets, pop-up retailing, exhibitions, cultural events and activities. Some of the car parking spaces would be retained along the High Street, with approximately 10 spaces relocated along Burr Street.

Figure 102
HIGH TOWN SQUARE

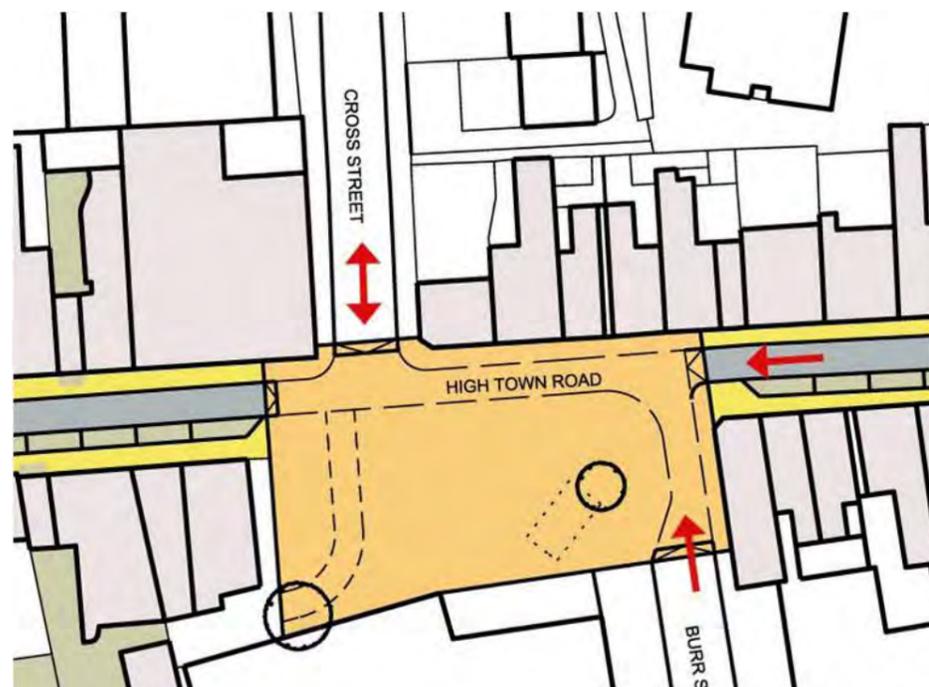


Figure 103
CONCEPT FOR HIGH TOWN SQUARE

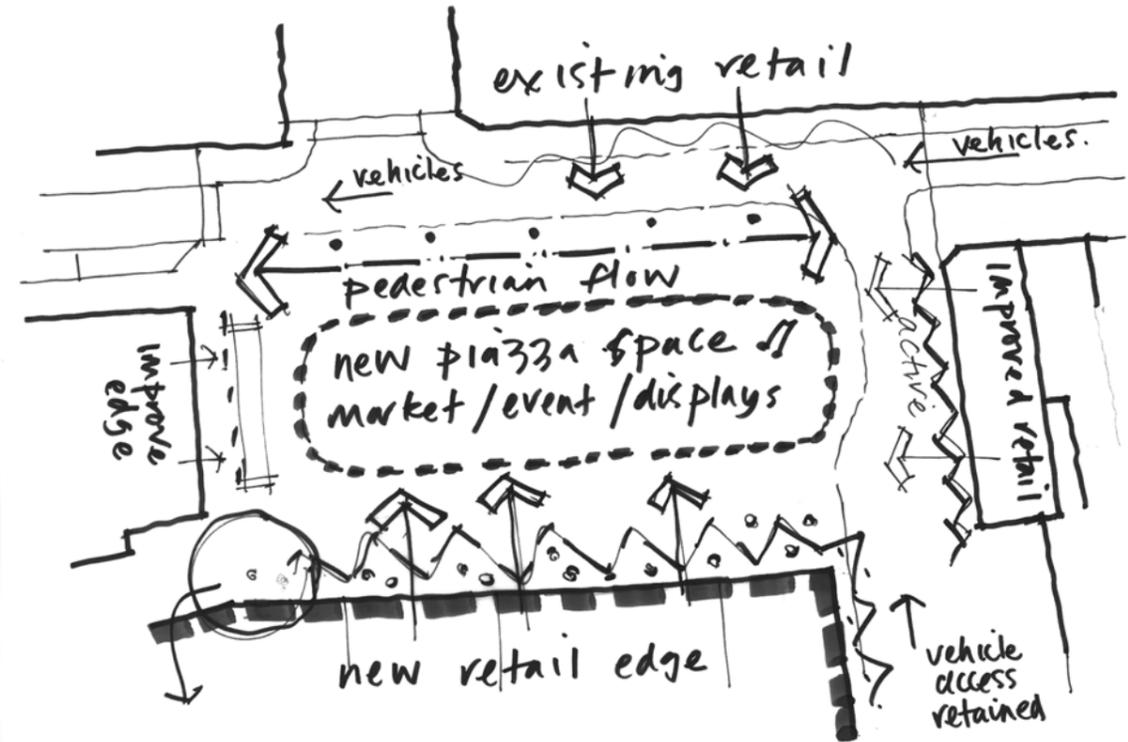


Figure 104
THE EXISTING SPACE
OCCUPIED BY THE CAR
PARK



5.0 ILLUSTRATIVE MASTERPLAN

5.0

Figure 108
INDICATIVE DESIGN FOR THE
NEW SQUARE BASED ON HAT-
MAKING INSPIRATION



Figure 105
A PLACE FOR CULTURAL
EVENTS, PERFORMANCES
AND ACTIVITIES



Figure 106
A PLACE FOR MARKETS AND
POP UP RETAILING



Figure 107
HAT-MAKING RELATED
INSPIRATION: HAT BLOCKS,
FABRIC DYES, HAT STITCHING

5.0 ILLUSTRATIVE MASTERPLAN

Midland Road Square

This key space, located at the entrance to High Town from the train station is currently home to a simple junction and its redevelopment would signal the beginning of the regeneration of the area.

The redevelopment of the burnt-out Railway Tavern building which fronts onto the space would be key to the success of this new gateway space.

The key design principles that underpin the square are:

- Unification of the surface treatment to create a more visual coherent space
- Creation of a shared space so vehicles feel secondary within the area, which could also be extended to include a section of Midland Road to link with the station
- Support business use by creating an active space, fronted onto by surrounding commercial units
- Simplify vehicle access onto Midland Road
- Provide a central green lawn with seated walls as an informal gathering space
- Increase the provision of soft landscaping, to complement the green character of Midland Road and improve urban biodiversity
- Create an opportunity for art and wayfinding signage to mark the entrance to High Town Road
- There is also the opportunity to extend the 'shared surface' treatment to include a section of Midland Road incorporating the existing zebra crossing opposite the station.

Figure 109
MIDLAND ROAD
SQUARE

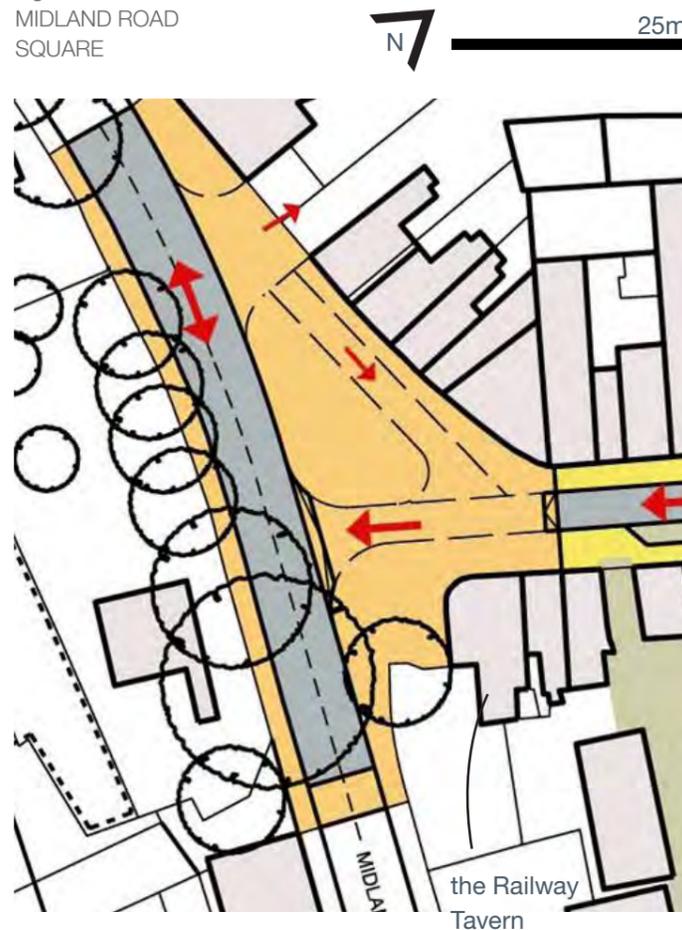


Figure 110
MIDLAND ROAD
DESIGN OPTION 01



Figure 111
MIDLAND ROAD
DESIGN OPTION 02

5.0 ILLUSTRATIVE MASTERPLAN

Figure 113
VIEW OF THE ENTRANCE
TO HIGH TOWN FROM THE
TRAIN STATION BEFORE



5.0

Figure 112
VIEW OF HOW MIDLAND
SQUARE AFTER



5.0 ILLUSTRATIVE MASTERPLAN

5.9 Cultural Revitalisation Strategy

High Town has a thriving community with an emerging but strong cultural scene, which represents an opportunity and a starting point to elaborate a strategy for the revitalisation of the area. This could involve seven inter-locking strands of work:

- The mix of land uses and activities, including the evening economy and artistic uses
- Cultural and artistic activities and events
- The public realm – spaces, pavements and links to adjoining areas
- Lighting
- Marketing and cultural tourism
- Connections to Bute Street cultural quarter
- The Hat industry heritage

Land Uses and Activities: Art, Design, Cuisine

New Uses

The Masterplan seeks to promote the diversification of the range of ground floor uses along High Town Road, and to achieve a mix of opening hours across the day and evening. Uses and activities should include one or two additional restaurants and cafes which are in keeping with the culture and identity of High Town - and also arts-based businesses - but also a few more antique shops, boutiques and shops selling design objects. This would blend with the

staple businesses along High Town Road, notably the grocery stores and hairdressers. A cue might be taken from successful high streets in culturally important areas such as Temple Bar in Dublin, Darby Street in Newcastle NSW or Spitalfields.

Evening Economy – pavements and spaces

Where restaurants and cafes are encouraged, serious consideration should be given to widening pavements and where feasible the creation of small urban spaces to facilitate the setting out of tables and chairs and active use of the street space.

The evening environment should be addressed, as it is currently unsettling and badly lit. Lighting should be improved with perceptions of pedestrian safety in mind. Locations of the evening economy should be well-lit but not overly bright to prevent light pollution. Side streets and passageways should also benefit from improved lighting schemes. There is also scope for artistic lighting by way of installations, use of colour and shop-front design.

Shopfront Improvements

A desirable initiative will be to replace solid steel shop shuttering with more attractive see-through fittings. This should be accompanied by a programme to upgrade shop frontages, improve the design of window displays, and promote the lighting of shop windows at night.

Arts and Cultural Activity

Galleries and Flexible Spaces

Some of the new activity to be seeded on High Town Road should include private sector or third sector galleries. If possible these should include flexible display areas that can be used for performance events such as lectures, recitals, book readings and poetry readings. Marjorie's Café currently performs this role as does the Freeholder public house. Two or three additional spaces would suffice.

In this way, empty shop units could become pop-up venues for use as private galleries, arts retailing and possibly small live music concerts. A programme could be set up to help artists and would-be business-owners take out leases on such spaces by means of rent guarantees and short-term licences.



Figure 114
THE JAZZ CLUB IN HIGH
TOWN

5.0 ILLUSTRATIVE MASTERPLAN



Artist Workspaces

There would appear to be growing demand for artists' studios in Luton. Part of this could be met by the use of the upper floors along High Town Road and its immediate environs for artists' live-work units.

In addition, vacant industrial sheds within the High Town area could be used, at least on a temporary basis, for low costs artist studios and workshops. This might, for example, include activities such as print-making, screen printing, pottery kilns and so on.

Creative Industries – Adjacent Sites

There would appear to be an opportunity to include mixed-use elements as part of the larger redevelopment sites that are intended for new housing. These would preferably be quiet activities such as galleries and showrooms, or suites of digital media offices.

Animation

It would be desirable to continue support of the High Town Festival, and to increase its scope and reach within the locality. The appointment or secondment of an animateur or curator for High Town is a possibility, although this role could be performed by Luton Culture. Early identification of suitable small-scale outdoor venues and exhibition areas, for example Burr Street Car Park and other pocket urban spaces should also be considered.

Public Realm – Spaces, Paths and Meaning

The public realm, comprising streets, spaces, pathways and meeting places, should be seen as a cultural entity and not just a collection of physical linkages. A key means by which this can be achieved is by delivering a coordinated strategy for public art and environmental improvements for the High Town area and also for the Town centre. This would help to project meaning into the built environment by using it to tell the story of High Town, public/installation art and places to gather. New small spaces should be created, certainly at the entry point to High Town from Luton Railway Station. There might also be one or two pocket parks or squares (High Town Square, Midland Road Square, Welbeck Square as described in section 5.8), and the selective widening of footpaths. In addition, and where appropriate, street furniture may play a dual function of promoting spontaneous play for young people.

New and improved links to adjoining area and new development sites will also be important, particularly in relation to back courtyards and the new developments to the east.

Lighting

Coordinated improvement of street lighting along High Town Road and in rear courtyards and alleyways is important for a number of reasons:

Safety – Prostitution.

A consolidated campaign to remove street prostitution for the area would be aided by improved lighting of alleyways.

Ambient – evening economy

Street lighting needs to support the evening economy, that is to provide warm white light and better illumination.

Artistic and Architectural

One or two light sculptures should be considered.

Shop-window lighting

Much can be achieved by having well-lit window displays at night.

5.0 ILLUSTRATIVE MASTERPLAN

Marketing and Cultural Tourism

High Town should be promoted as a distinct destination within Luton, appealing to alternative art enthusiast, people interested in design, evening economy customers and those interested in the hat industry.

To facilitate this, a marketing campaign over a period of 2-3 years would be desirable. This should include a digital portal for High Town and would provide a unique selling point (USP) for High Town within a wider Cultural Tourism Plan for Luton. This should identify High Town's existing and probable cultural assets, and establish a High Town brand and marketing plan

The aim would be to attract more overnight visitors to Luton.

A key component would be using the Hats Trail to promote Luton, especially Bute Street and High Town, as a heritage destination. The existing Hat Trail document provides a good basis for a marketing and cultural tourism focus within High Town.

Figure 115
LOCAL ARTIST'S
LUTON INSPIRED
ILLUSTRATIONS



Connections to Bute Street Cultural Quarter

Links between High Town and the Bute Street area are already established as many artists and creatives live and/or work in both areas. Despite this not being evident from the built form, an exciting opportunity exists to project High Town's identity as a creative place by devising a space and/or large public art work between the Railway Station and Bute Street, the Hat Factory and other creative managed workspaces.

There is potential to exploit the hat theme through public art, street furniture and branding/interpretation.

The Hat Industry Showroom

The Hat Industry is a central part of Luton's history, but it is also a living industry that operates mainly from premises in and around High Town. We would encourage a concept study into the setting up of a Live Hat Industry Showcase. This might be a showcase for local products but also for the imagination of young designers in Luton. As such it would be a collaboration between manufacturers, makers and designers and the university.

Such an initiative could be backed by the establishment of a managed workspace for graduate milliners, aimed at enabling more of them to set up businesses in Luton.

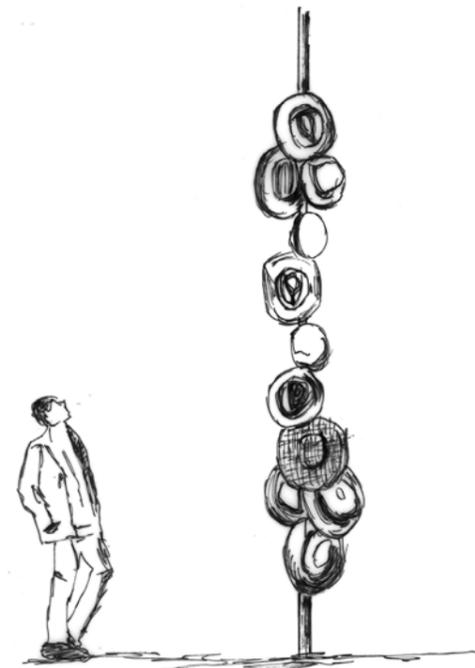
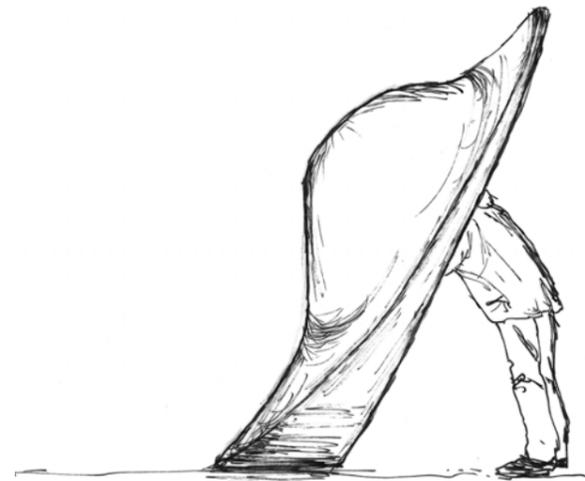


Figure 116
SOME INITIAL SKETCHES
OF THE BUTE STREET-
HIGH TOWN ART
PROJECT

DELIVERY STRATEGY

6.0

6.0 DELIVERY STRATEGY

6.1 Introduction

The following section outlines how the Council will oversee the implementation of the High Town Masterplan.

The Masterplan and delivery strategy, which builds upon and works within the existing policies of the SPD and the Local Plan, seeks to build on the recent town centre regeneration initiatives including ongoing upgrades to the town's bus and railway stations as well as improvements to the town's urban environment including the redevelopment of St George Square adjoining the Mall shopping centre. More widely High Town is seen as one of a series of priority projects that will make Luton a more sustainable and attractive place to do business, visit and live.

Key initiatives include:

- Napier Park - a 55 acre mixed-use development on the former Vauxhall Motors car plant
- Butterfield Park – a major Business and Technology Park set in 85 acres parkland
- Marsh Farm – a comprehensive Estate Renewal Project including a new District Centre
- Luton Airport – continued growth aspirations
- Power Court – mixed-use scheme to the south east of the town centre adjacent to University of Bedfordshire

The regeneration of High Town is an ambitious and challenging project. It requires significant issues to be addressed, including the re-location of a number of businesses, the assembly of financially viable development parcels, delivery of new public realm and infrastructure and the development of new residential linking into a reinvigorated High Town Road.

The overarching purpose of the Masterplan is to set out a clear and coherent vision for the development of the High Town area, to enable development to come forward on a phased basis while ultimately delivering a comprehensive enhancement of the area. This will give investors/developers confidence there is planning support and commitment to deliver the identified opportunities.

Set out in Section 5 is an illustration of how each of the Key Development Sites may come together. It is recognised that the timescale for delivery of individual projects will be influenced by a range of factors including funding, ownership and availability of sites and alternative solutions may arise through discussions with particular landowners.

Whilst many sites are expected to come forward over the next 5 years or so, the Masterplan as a whole is likely to be delivered over a 10 -15 year period given the complexities which are likely to be present in some locations. Accordingly it focuses on key objectives and principles to guide future development rather than setting out a fixed and prescriptive vision.



Figure 117
CONSTRUCTION SITE IN
THE EAST VILLAGE

6.0 DELIVERY STRATEGY

Why High Town?

The Masterplan has been produced against a backdrop of a positive market sentiment, especially in respect of the residential development sector. That said, Luton has a particular set of economic challenges, most notably the town's comparatively low-end sales values compared to many of its neighbouring towns.

This can be perceived as a threat or an opportunity for the Masterplan area (and Luton in general) in that London and the more affluent areas of Bedfordshire and neighbouring Hertfordshire are now considered by many to be increasingly unaffordable. As a result, it is expected that potential housebuyers will widen their search areas and locations like Luton which benefit from strong transport links into London, are likely to see increased demand and ultimately some upward pressure on values. This also makes a location like High Town more attractive to developers given that in the short term at least, land is more affordable and subject to less competition.

Given High Town's existing historic fabric, its established community, excellent accessibility located next to Luton train station and its close proximity to the extensive retail and leisure amenities of the town centre, High Town is well positioned to capitalise and to this end the Masterplan provides a framework and illustration of how the area could come forward.

Successful delivery of the Masterplan will provide:

- Around 750 new homes for families, the young and elderly, including private sale and affordable housing
- Significant public realm improvements along High Town Road, which will help to re-inforce its position and help to bring back into use underutilised properties
- Creation of a range of new employment, retail and cultural uses along High Town Road
- The creation of two new public squares improving community cohesion and reducing social isolation
- High quality environment – buildings and landscape; and
- Improved accessibility and connectivity to local shops, community services and amenities

6.2 Viability

It is recognised that viability for new development in High Town is challenging and is likely to remain so in the short to medium term. This is as a result not only of the historically lower values referred to above but also due to the fact that large areas of it are already intensively developed.

Even in higher value locations, existing use value of standing buildings can act as a disincentive to development and this situation is exacerbated where residential values are lower. However, the viability equation can be expected to improve over time as residential values grow, particularly given that there is unlikely to be a similar upward pressure on values of existing buildings, much of which can be considered secondary stock at best.

It must also be acknowledged that the reasons for holding land will differ from one landowner to another and by the same token, the attractiveness of bringing land forward for development will also vary. Within the Masterplan area there are examples of landholdings with high values arising from existing income streams that are unlikely to be viable for development even in the longer term. Others may present difficulties in securing vacant possession due to the length of existing leasehold interests.

There will also be sites purchased at high historic values which may represent a significant disincentive to bring forward development regardless of current value, albeit that development may become more attractive over time as it becomes clear that existing use values are unlikely to rise.



6.0 DELIVERY STRATEGY

6.0

However, there are also some 'softer' sites within the masterplan area that do not have the same physical or financial constraints on development and might be expected to come forward in the shorter term.

One of the key advantages of the masterplan approach is that development can be delivered on a piecemeal basis within the context of a clear framework that will ensure they will ultimately be knitted into a coherent whole. Early delivery of sites will also start to change the tone of the area and establish it as a residential location that will attract interest from buyers and developers. This in turn can be expected to feed into value growth and enhanced viability for some of the more marginal sites.

During the preparation of the Masterplan, there has been an on-going assessment of viability and individual development appraisals have been undertaken on each of the sub plots which have helped shape the final proposals. The appraisals provide only an indication of viability and are subject to change due to a number of factors, including changing market conditions, refinement of proposals, detailed infrastructure and cost information, as well as phasing and the approach to implementation. However, the appraisals have helped provide proposals for High Town that over the masterplan period can realistically be expected to be deliverable albeit subject to realistic levels of value growth in some cases.

Partnership Working

Achieving the vision for High Town will be challenging. Whilst the Masterplan does provide a framework to enable individual landowners to bring forward piecemeal development which will contribute to the overall vision, the prospects of delivery can be expected to be enhanced and accelerated through a partnership approach with a higher quality outcome also being achieved.

The Masterplan will provide the basis for partnership working in bringing forward opportunities and for the co-ordination of public and private sector investment. Such an approach will ensure that the efforts exerted by individual partners and stakeholders in progressing their individual agendas will be consistent with and supportive of the vision, aims and guidance of the Masterplan.

In this sense the Masterplan provides a key tool in promoting and facilitating development and regeneration of the town centre.

During the evolution of the Masterplan, the Council has engaged with a number of the private landowners to understand their future operational business needs and aspirations. High Town already has a strong, active community that has been involved in the development of these and previous proposals and will need to continue to be involved in the delivery of projects

The Council is committed to ongoing and meaningful engagement with all stakeholders, including landowners, public sector partners, local traders, utility providers and voluntary and community sectors to ensure that the vision for High Town is implemented.



Figure 118
WORKSHOP ON HIGH
TOWN MASTERPLAN
DURING CONSULTATION
STAGE 3

6.0 DELIVERY STRATEGY

6.0

Council's Role

The public sector controls a relatively small number of sites within the masterplan area, with the larger proportion of the area remaining in private ownership. It will use this to have a direct influence over the development process and delivery to help to establish the masterplan vision.

Compulsory purchase is one of the tools open to a local authority in the delivery of area-wide regeneration proposals. Whilst it would not rule this out as one of a number of delivery mechanisms, the Council's preference is to take a more collaborative approach, playing a role of 'project champion' and acting as a co-ordinator to ensure that as far as is possible all stakeholders are pulling in the same direction whilst still acknowledging their need to reflect their own circumstances and requirements, both financial and operational.

In particular, the Council will need to:

- Ensure that the masterplan proposals are brought forward in a holistic and progressive manner through its planning, economic and social roles;
- Proactively encourage developers to embrace the quality agenda required by the Masterplan;
- Promote the need for co-ordinated public sector funding support to deliver key infrastructure and public realm projects required early on to facilitate private sector funding;

- Actively seek out sources of grant funding which can assist in delivery;
- Champion the complex projects which will initiate wider change within High Town;
- Prepare projects which can then be taken on by private and public sector partners;
- Assist parties in ensuring that development and public realm proposals are of the highest design quality and
- Use its own landholdings to deliver exemplar new development which will assist in establishing the area as an attractive place to live and work.

The Council will work with investors/developers to establish a clear indication of how each project fits into the overall vision for High Town. The Council will seek to ensure, through the use of conditions and/or planning obligations, that new development provides for the planning benefits that are necessary to support and serve proposed new development in High Town.

It will also act as 'honest broker' where required to assist in individual landowners forming partnerships to deliver wider land parcels where there is scope to secure marriage value and enhance development viability and deliverability.

There are other related areas in which the Council can assist landowners in bringing forward development. Where relocation of existing landowners is required, the Council may be able to offer or source alternative premises to aid in securing vacant possession.

It can also provide a source of expertise to support development, procurement and delivery to assist parties contemplating bringing land forward for development.

Where infrastructure or public realm improvements will enhance prospects of viable development, it will investigate sources of funding that would enable early delivery.

As well as scheme specific infrastructure, this will also include consideration of improvements to High Town Road and particularly the delivery of the proposed new public squares.

6.0 DELIVERY STRATEGY

6.3 Site Specific Delivery Mechanisms

As has been explained above, the masterplan area is in a multitude of individual ownerships, each of which will be subject to differing physical, occupational and financial issues.

The Council has therefore not sought to put forward a fixed and overly prescriptive phasing plan – the Masterplan should allow individual building plots to come forward in a number of permutations and sequences whilst still contributing to the envisaged end position.

Having said that, there are clearly some sites for which early delivery will contribute more to the successful overall delivery of the Masterplan either through scale or location.

In particular, Site 1 – Midland Road – is a large site located directly adjacent to the station and early delivery of this will significantly enhance the juxtaposition between the core town centre and the masterplan area and add to its attractiveness as a residential community, building on the established

retail location of High Town Road. This site is a priority for the Council.

The Council is proposing to take a bespoke approach to each of the development sites and the various subplots, using the full range of tools at its disposal to assist parties in bringing forward development. The tables below set out its current thinking on each site, both in terms of likely content, timing of delivery and the role that the Council may play. However it needs to be recognized that these timescales have an element of aspiration about them reflecting the hoped for impetus delivered by this Masterplan and do not in all cases accord with the estimated phasing of sites as set out in the Council’s wider local plan evidence base.

The site specific measures should be read alongside the more general elements of the Council’s role which have been outlined above.

The Council will also give consideration to the purchase of land where this will assist early delivery.

Residential Summary		
Timescales	Years	Total Residential Units
Short Term	1 - 3	259
Medium Term	3 - 5	262
Long Term	5+	77
Total		598

Figure 119
SUMMARY OF RESIDENTIAL
DELIVERY TIMESCALES

Figure 120
LOCATION PLAN



6.0 DELIVERY STRATEGY



Site 1 – Midland Road	
Total Site Area ha (acre)	1.64 (4.04)
Proposed Masterplan Content	236 Dwellings
Ownership	Plot A – Private Plot B – Private Plot C/D – Private Plot E/F – Public / Private
Current Use	<p>The Midland Road opportunity area comprises 6 sub plots and 4 development opportunities. Below is overview of current use on each of the sub-plots.</p> <p>Plot A – is a privately owned large site extending to approximately 1.64 hectares. The site comprises a single large warehouse building (with ancillary office space) covering approximately 50% of the site. The remainder of the site is utilised for car parking. The building is currently used for a range of community uses / short term commercial lettings.</p> <p>Plot B – is a privately owned medium sized site extending to approximately 0.28 hectares. The site fronts onto Burr Street and is currently vacant following the relocation of Travis Perkins. The site comprises a series of industrial buildings which are in general are of poor quality.</p> <p>Plot C/D – are owner occupied by Pact Engineering. The site is a medium sized site which extends to approximately 0.32 hectares. The site comprises two buildings utilised as office and manufacturing space and also has loading areas and dedicated staff car parking. We understand that Pact Engineering is a 24 hour operation.</p> <p>Plot E/F – is a large corner site extending to approximately 0.36 hectares. The site is currently within a mix of ownerships with the Council owning a proportion of the site, which was acquired to facilitate road improvements. The site is currently cleared and a planning application has now been submitted.</p>

Timescales	Plot A – Medium Term (Years 3 – 5) Plot B – Medium Term (Years 3 – 5) Plot C/D – Longer Term (Years 5 +) Plot E/F – Short Term (Years 1 – 3)
Council’s Role / Key Actions	<p>Plot A</p> <ul style="list-style-type: none"> • Site is a strategically important site and has been the subject to recent discussion between the landowner and the Council • The Council’s role will be primarily as facilitator • Enter into dialogue with the landowner using the Masterplan as a consultation tool • Assist landowner with identifying possible alternative premise for existing tenants • Assist landowner to promote site in line with the principles set out in Masterplan <p>Plot B</p> <ul style="list-style-type: none"> • Council role is primarily as facilitator • Enter into dialogue with the landowner and occupational leaseholders using the Masterplan as a consultation tool • Assist landowner to promote site in line with the principles set out in Masterplan <p>Plot C/D</p> <ul style="list-style-type: none"> • Existing operational business • Periodically review (every 12 months) the landowner’s / business intention • Enter into dialogue with the landowner using the Masterplan as a consultation tool <p>Plot E/F</p> <ul style="list-style-type: none"> • Part owned by the Council • Determine current planning application for the site • Facilitate partnership to promote high quality scheme for combined ownership

6.0 DELIVERY STRATEGY

6.0

Figure 121
LOCATION PLAN

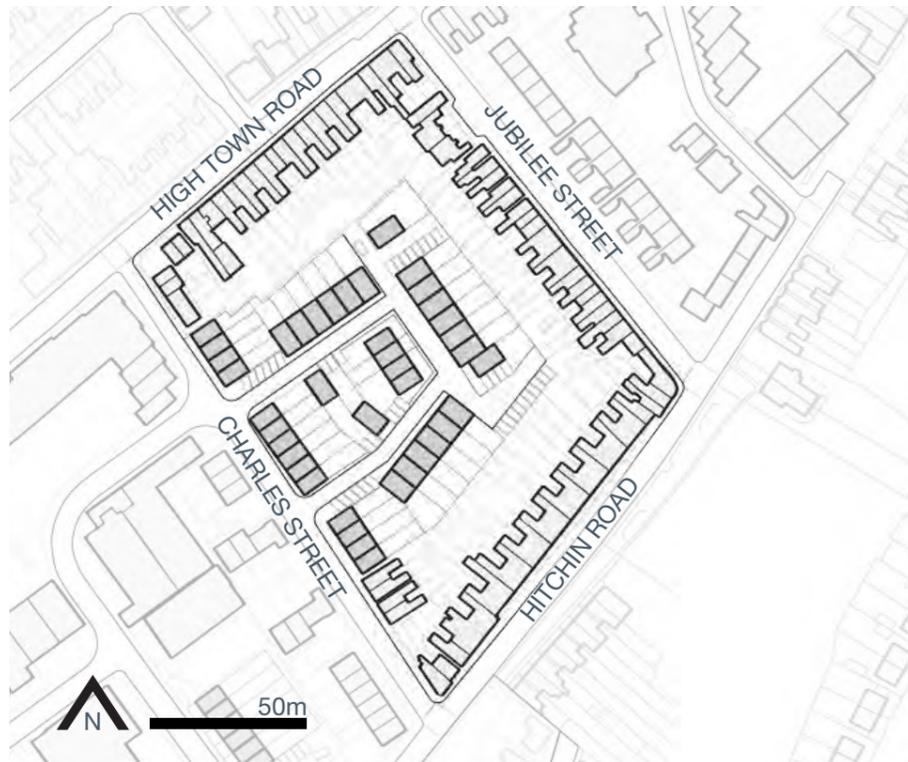


Site 2 – Burr Street	
Total Site Area ha (acre)	0.68 (1.69)
Proposed Masterplan Content	79 Dwelling
Ownership	Private
Current Use	Site 2 consists of 2 sub plots under single ownership. Site 2 is a large site extending to 0.68 hectares. The Site comprises largely surface car parking area and yard area. This includes an office building and MOT centre, which are located fronting Back Street. We understand the office building is currently occupied by the Bedfordian Business School.
Timescales	Medium Term (Years 3 – 5)
Council's Role / Key Actions	<ul style="list-style-type: none"> • Council role is primarily as facilitator • Enter into dialogue with the landowner using the Masterplan as a consultation tool • On behalf of the landowner undertake further capacity and viability testing to establish likely capital receipt and extent of private sector interest • Assist landowner to promote site in line with the principles set out in Masterplan

Site 3 – Duke Street	
Total Site Area ha (acre)	0.30 (0.73)
Proposed Masterplan Content	31 Dwelling
Ownership	Private
Current Use	Site 3 is a large strategically located site on the corner of Hitchin Road and Brunswick Street. The site extends to approximately 0.3 hectares and operates as the Lok and Store Storage facility. The site has a high building coverage.
Timescales	Longer Term (Years 5 +)
Council's Role / Key Actions	<ul style="list-style-type: none"> • Council role is primarily as facilitator • Enter into dialogue with the landowner using the Masterplan as a consultation tool • Assist landowner with identifying possible alternative premises for existing business • Assist landowner to promote site in line with the principles set out in Masterplan

6.0 DELIVERY STRATEGY

Figure 122
LOCATION PLAN



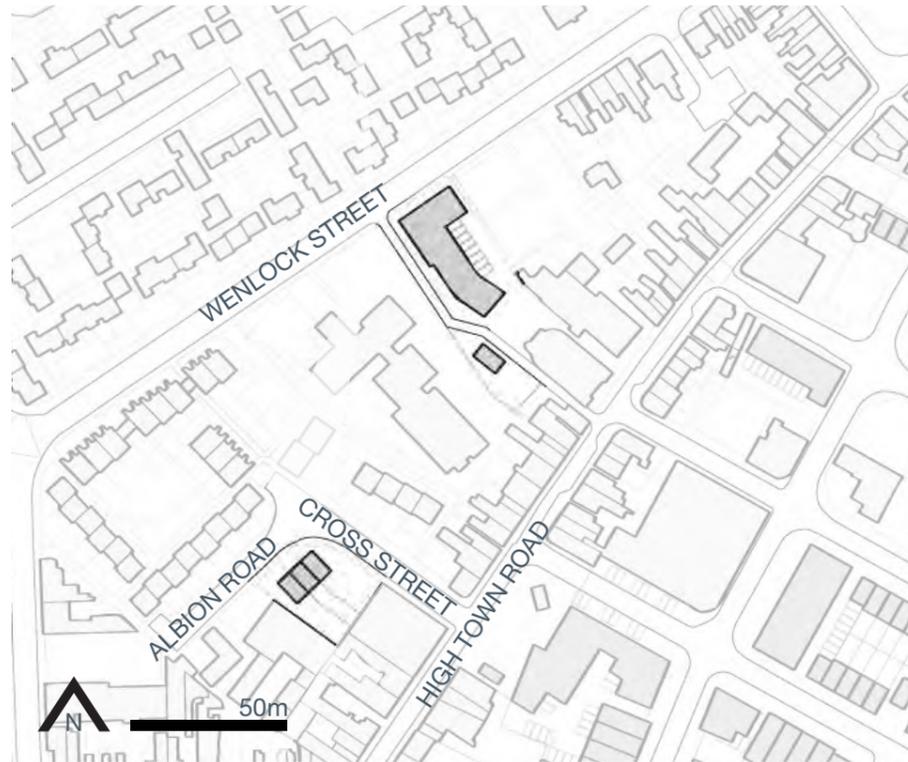
Site 4 – Charles Street	
Total Site Area ha (acre)	0.68 (1.69)
Proposed Masterplan Content	40 Dwellings
Ownership	Private
Current Use	Site 4 is located on the fringe of the Masterplan area fronting Charles Street. Site 4 is a large regular shaped site extending to 0.68 hectares and surrounded on three sides by terraced houses. The site, which is known as the Charles Street Business Park comprises two buildings, a warehouse and a single storey multipurpose business unit currently fitted out for office use as well as circa 110 car parking spaces.
Timescales	Short Term (Years 1 – 3)
Council’s Role / Key Actions	<ul style="list-style-type: none"> • Council role is primarily as facilitator • Enter into dialogue with the landowner using the Masterplan as a consultation tool • Assist landowner with identifying possible alternative premises for existing tenants • Assist landowner to promote site in line with the principles set out in Masterplan



6.0 DELIVERY STRATEGY

6.0

Figure 123
LOCATION PLAN



Site 5 – Wenlock Street	
Total Site Area ha (acre)	0.34 (0.83)
Proposed Masterplan Content	24 Dwellings
Ownership	Plot A - Private Plot B - Public
Current Use	<p>Site 5 comprises two sub plots. Plot A is situated at the corner of Cross Street and Albion Road a short distance from High Town Road. The site has a 3 storey building which comprises part office park workspace. The site backs onto a Council owned property which formerly housed the Noah Enterprise but has recently been sold to Morrisons for an M Local format convenience store.</p> <p>Plot B is a small linear site accessed off Wenlock Street and extends to 0.27 hectares. The site is public owned but is currently utilised as a doctors surgery (Wenlock Surgery). The existing property is single storey and of relatively poor quality. The site also adjoins the Wenlock Street pay and display public car park.</p>
Timescales	Plot A – Medium Term (Years 3 – 5) Plot B – Medium Term (Years 3 – 5)
Council's Role / Key Actions	<p>Plot A</p> <ul style="list-style-type: none"> • Council role is primarily as facilitator • Enter into dialogue with the landowner using the masterplan as a consultation tool • Assist landowner to promote site in line with the principles set out in Masterplan <p>Plot B</p> <ul style="list-style-type: none"> • The site is with public sector freehold but operated as Doctors Surgery • Identify future operational needs of the Doctors surgery and assist with relocation • Subject to identification of suitable alternative premises identify procurement and disposal strategy • Implement development proposals in line with the Masterplan principles

6.0 DELIVERY STRATEGY

6.0

Figure 124
LOCATION PLAN



Site 6 – Brunswick Street	
Total Site Area ha (acre)	0.93 (2.30)
Proposed Masterplan Content	129 Dwellings
Ownership	Plot A/B - Public Plot C – Private Plot D - Private
Current Use	Plot A / B – is large publically owned sites comprising a mix of public and private surface car parking. Combined the sites extend to 0.6 hectares. Plot A/ B are located a short distance from High Town Road accessed via Brunswick Street Plot C – is a small site accessed of Brunswick Street and situated behind the properties fronting onto High Town Road. The site is currently used for surface car parking but has been subject to residential development proposals. Plot D – is a strategically located site located at the corner of Hitchin Road and Brunswick Street. The site is owner occupied and with the site is utilised for sales and storage of plant machinery. The site comprises a mix of industrial building and open storage.
Timescales	Plot A/B – Medium Term (Years 3 – 5) Plot C – Short Term (Years 1 – 3) Plot D – Longer Term (Years 5+)
Council's Role / Key Actions	<p>Plot A/B</p> <ul style="list-style-type: none"> • Large publicly owned site • Undertake further assessment of car parking requirements for High Town in the context of the Masterplan proposals • Undertake further capacity and viability testing to establish and potentially soft market testing to establish extent of developer interest • Develop procurement and marketing strategy to maximise private sector interest • Produce a marketing and disposal brief • Progress with a marketing and disposal exercise <p>Plot C</p> <ul style="list-style-type: none"> • Council role is primarily as facilitator • Enter into dialogue with the landowner using the Masterplan as a consultation tool • Assist landowner to promote site in line with the principles set out in Masterplan <p>Plot D</p> <ul style="list-style-type: none"> • Council role is primarily as facilitator • Enter into dialogue with the landowner using the Masterplan as a consultation tool • Assist landowner with identifying possible alternative premise for existing tenants • Assist landowner to promote site in line with the principles set out in Masterplan

6.0 DELIVERY STRATEGY

6.0

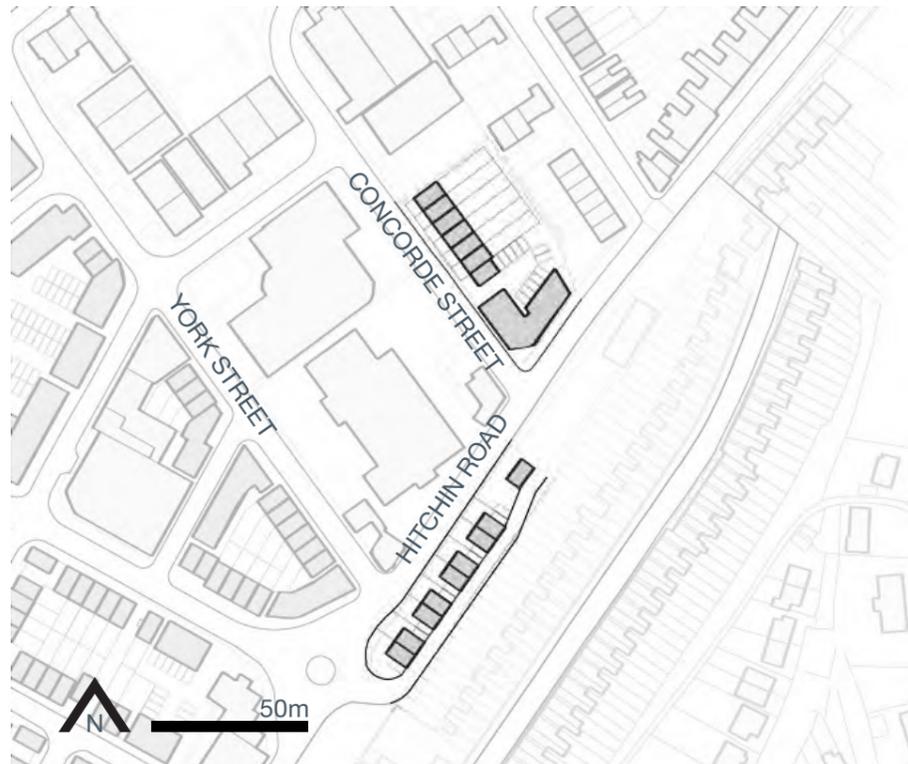
Figure 125
LOCATION PLAN



Site 7 – Dudley Street	
Total Site Area ha (acre)	0.15 (0.37)
Proposed Masterplan Content	27 Dwellings
Ownership	Private
Current Use	Site 7 is privately owned and extends to approximately 0.15 hectares. The site is located directly opposite Boyle Close which runs through the Paths Estate. The immediate surrounding will shortly be subject to significant change. The Council owned former Drill Hall site is the subject to well advanced proposals for the development of 80 dwellings within two apartment blocks. We understand that the legal agreement will shortly be signed with a development partner with start on site later in 2015. There are a number other sites which benefit from a mix of residential and student housing planning permissions. The subject site currently comprises a single storey industrial unit with parking and storage to the front.
Timescales	Short Term (Years 1 – 3)
Council's Role / Key Actions	<ul style="list-style-type: none"> • Council role is primarily as facilitator • Enter into dialogue with the landowner using the Masterplan as a consultation tool • Assist landowner to promote site in line with the principles set out in Masterplan

6.0 DELIVERY STRATEGY

Figure 126
LOCATION PLAN



Site 8 – Concorde Street	
Total Site Area ha (acre)	0.28 (0.69)
Proposed Masterplan Content	23 Dwellings
Ownership	Public
Current Use	Site 8 is a publically owned site leased to Barnfield College and used for college parking. The Site is located on the corner of Hitchin Road and Concorde Street. The site is of regular shape and extends to 0.28 hectares.
Timescales	Medium Term (Years 3 – 5)
Council's Role / Key Actions	<ul style="list-style-type: none"> Continue to monitor future operational needs of the College. Possibility to consider alongside future of Hitchin Road Car Park in terms of car parking provision On the assumption site was no longer required for college parking identify procurement and disposal strategy Implement development proposals in line with the Masterplan principles

6.0

Site 9 – Hitchin Road	
Total Site Area ha (acre)	0.16 (0.39)
Proposed Masterplan Content	9 Dwellings
Ownership	Public
Current Use	Site 9 is a surface car park extending to 0.16 hectares. The car park is linear in nature and located adjacent to Hitch Road although there is a level change between the car park and Hitchin Road (in part).
Landownership	Public
Timescales	Short Term (Years 1 – 3)
Council's Role / Key Actions	<ul style="list-style-type: none"> A publicly owned site in a non-strategic location Undertake further capacity and viability testing to establish and potentially soft market testing to establish extent of private sector interest Develop procurement and marketing strategy to maximise private sector interest Produce a marketing and disposal brief Progress with a marketing and disposal exercise

6.0 DELIVERY STRATEGY

6.4 Indicative Phasing Plan

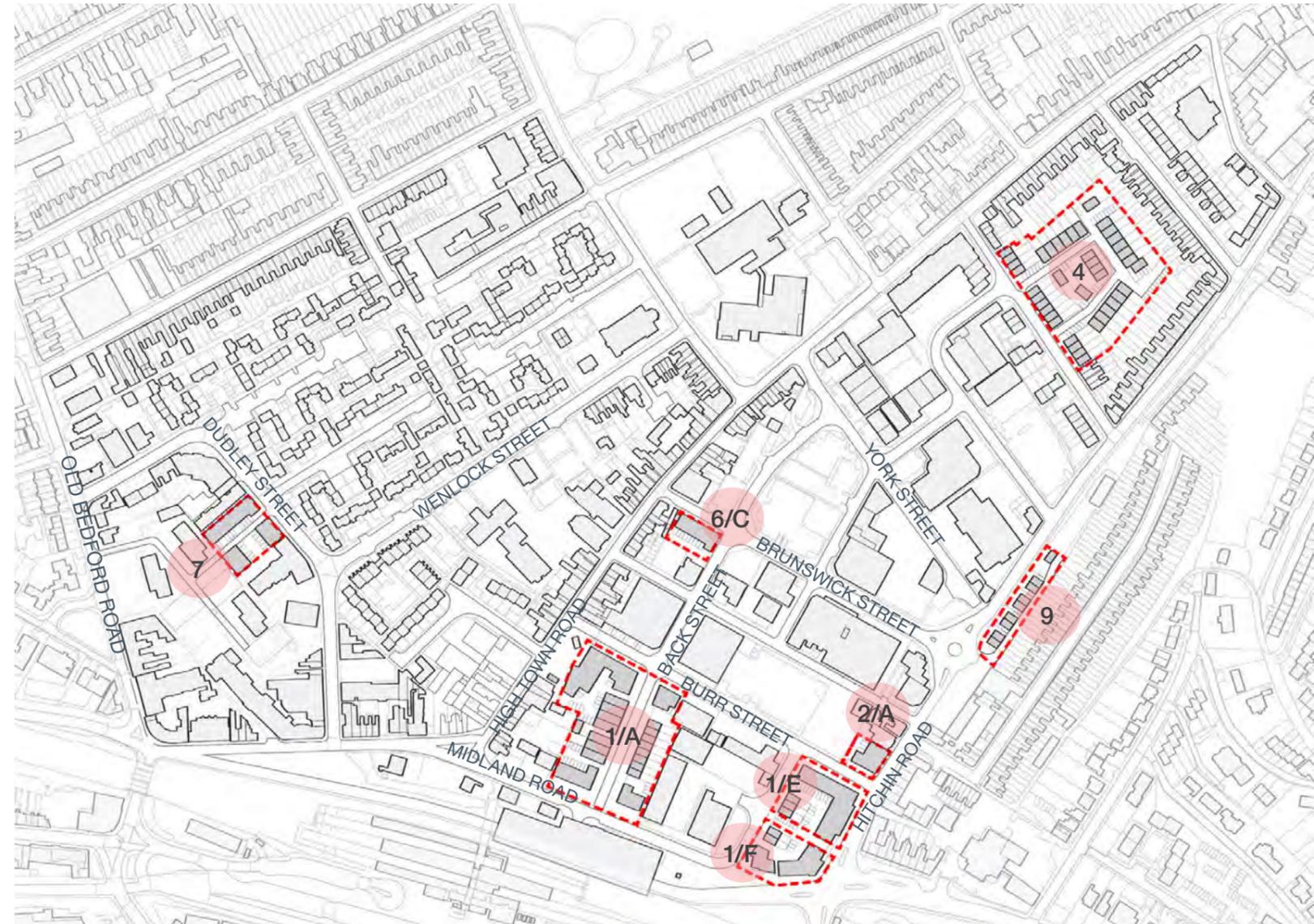
The site delivery timescales described in the previous sections are summarised in the following tables.

The indicative programme and phasing strategy for the High Town Masterplan is also outlined.

Phase 1 - Short Term - 1-3 years

Site Name / Area	Plot Number	Short Term 1 - 3 years
1) Midland Road	Plot A	X
	Plot B	
	Plot C	
	Plot D	
	Plot E	X
	Plot F	X
2) Burr Street	Plot A	X
	Plot B	
3) Duke Street		
4) Charles Street		X
5) Wenlock Street	Plot A	
	Plot B	
6) Brunswick Street	Plot A / B	
	Plot C	X
	Plot D	
7) Dudley Street		X
8) Concorde Street		
9) Hitchin Road		X

Figure 127
SITES MORE LIKELY TO
COME FORWARD IN PHASE
1: SHORT TERM (1-2 YEARS)

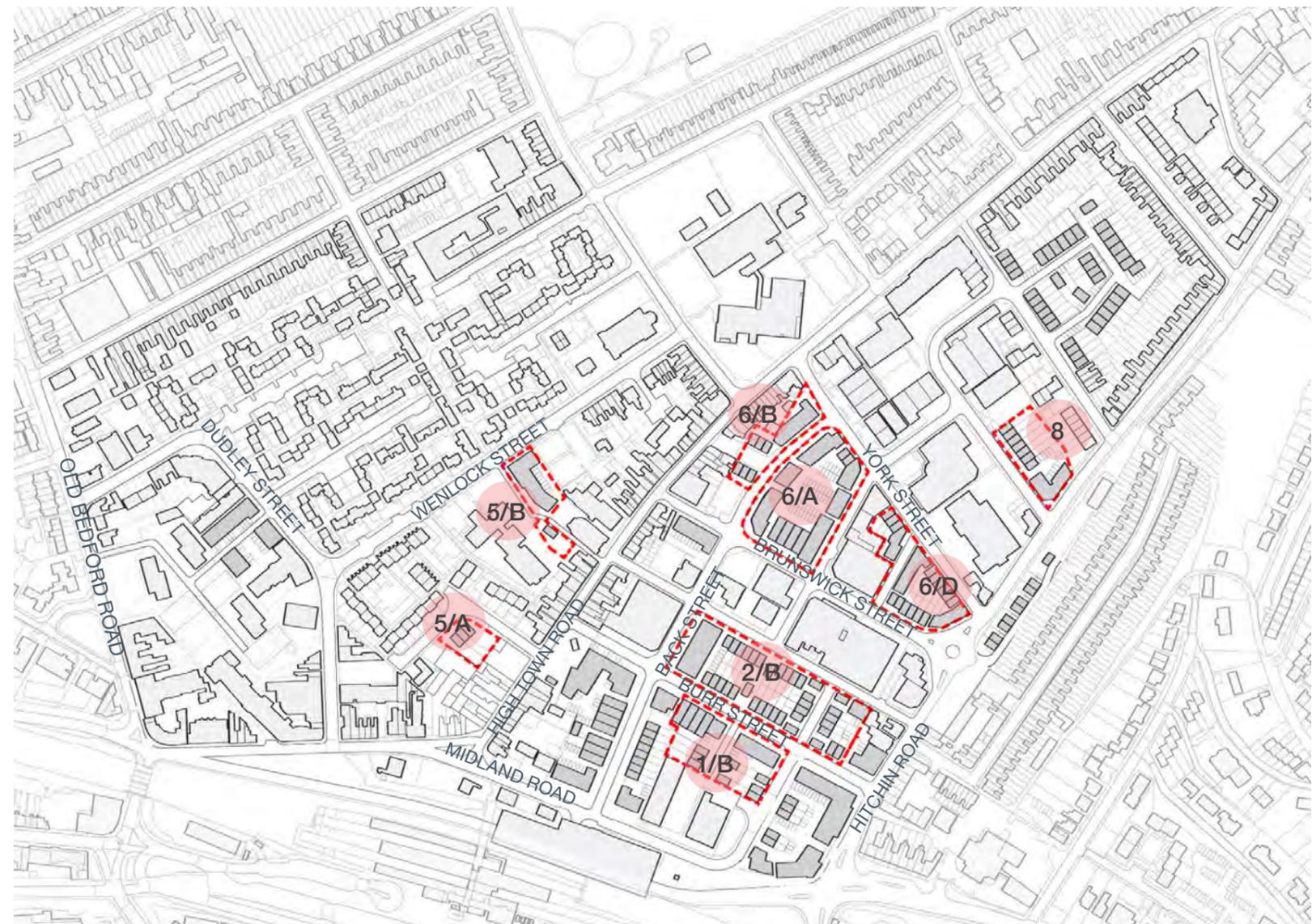


6.0 DELIVERY STRATEGY

Figure 128
SITES MORE LIKELY TO
COME FORWARD IN PHASE 2
MEDIUM TERM (3-5 YEARS)

Phase 2 - Medium Term - 3-5 years

Site Name / Area	Plot Number	Medium Term 3 - 5 years
1) Midland Road	Plot A	
	Plot B	X
	Plot C	
	Plot D	
	Plot E	
	Plot F	
2) Burr Street	Plot A	
	Plot B	X
3) Duke Street		
4) Charles Street		
5) Wenlock Street	Plot A	X
	Plot B	X
6) Brunswick Street	Plot A / B	X
	Plot C	
	Plot D	X
7) Dudley Street		
8) Concorde Street		X
9) Hitchin Road		



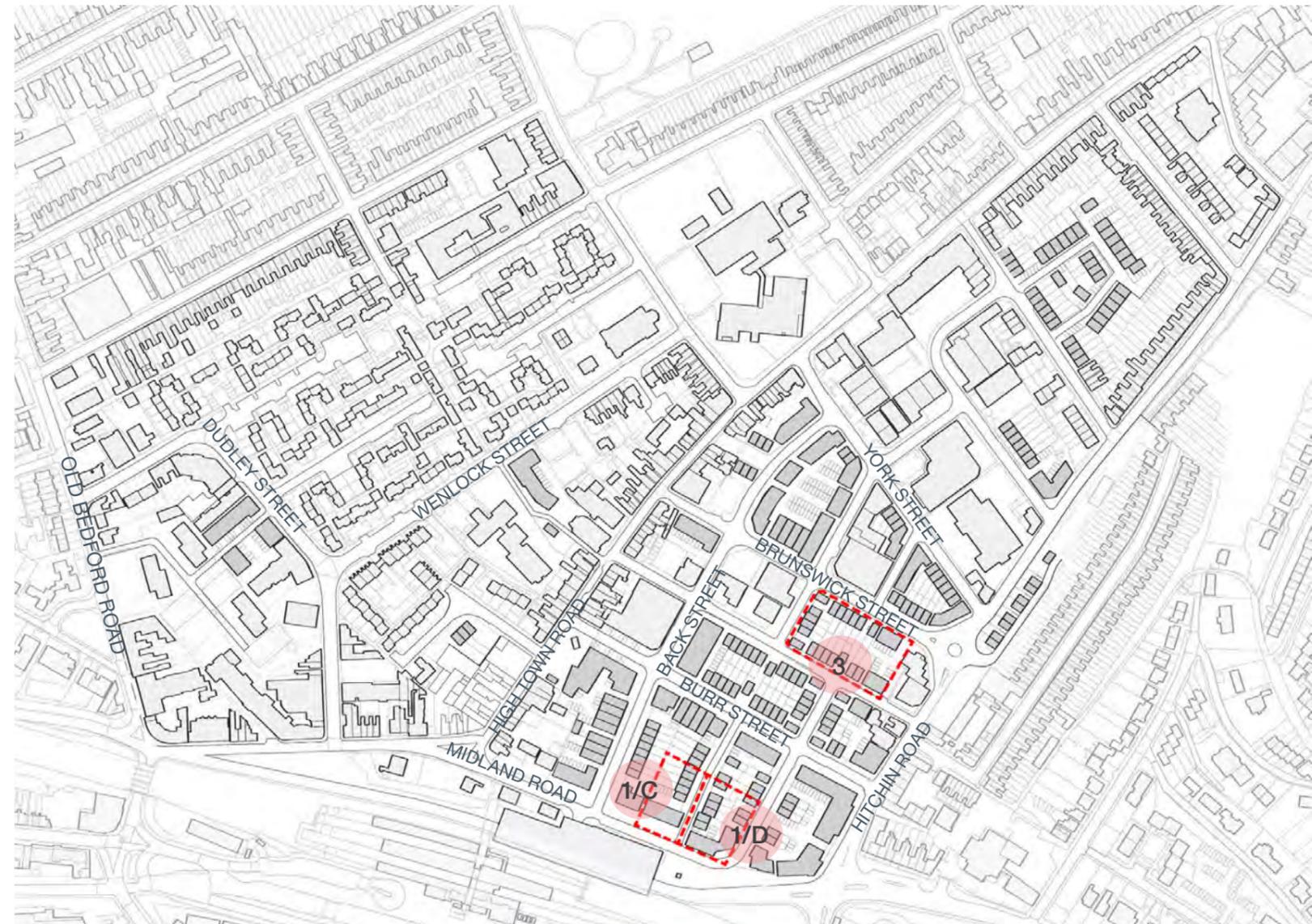
6.0 DELIVERY STRATEGY

6.0

Phase 3 - Long Term - 5+ years

Site Name / Area	Plot Number	Long Term 5 + years
1) Midland Road	Plot A	
	Plot B	
	Plot C	X
	Plot D	X
	Plot E	
	Plot F	
2) Burr Street	Plot A	
	Plot B	
3) Duke Street		X
4) Charles Street		
5) Wenlock Street	Plot A	
	Plot B	
6) Brunswick Street	Plot A / B	
	Plot C	
	Plot D	
7) Dudley Street		
8) Concorde Street		
9) Hitchin Road		

Figure 129
SITES MORE LIKELY TO
COME FORWARD IN PHASE 3
LONG TERM (+5 YEARS)



6.0 DELIVERY STRATEGY

6.5 Next Steps

Recommended Future Action

1) Design Guidance

To ensure the quality of the specific housing sites meets the emerging urban village type aspirations, and is co-ordinated between sites to offer a strong sense of place, to consider a review to consolidate and update design guidance to set the appropriate quality placemaking for the whole area. This would inform design development, especially for housing and mixed-use activity, on matters such as scale, frontage activity, materials and parking. Until such a review is carried out existing guidance set out in the High Town SPD (2007) and the East Village Design Codes SPD (2009) will be retained. Policy LP25 of the Luton Local Plan 2011-31 includes a proposal for a Design Review Panel which could assist in the future provision of design guidance.

There is also a need for a review of parking supply and demand for the High Town area together with a programme for monitoring on a regular basis as sites are developed.

2) Streetscape Design Coordination

To complement the focus on sites and buildings, there is an equivalent need to determine clear place quality standards in the provision of street design including for shared surfaces, parking and loading areas, pedestrian and cycle routes and surfaces. This should also include street furniture, signing, lighting and planting.

3) Formation of High Town Vision Delivery Group

To co-ordinate and take forward the various elements of the masterplan, both within and beyond the Council, we recommend the formulation of a cross community partnership, focused on delivery of the component parts of the plan. This would team up the various delivery arms of the Council, with heritage, community, education, arts and housing bodies. Involvement in the group would be based on role and ability to deliver on the projects in the plan. However it is recognized that this will require considerable input from a wide-range of bodies and so this recommendation is dependent upon the availability of resources.

4) High Town Vision Delivery Workshop event

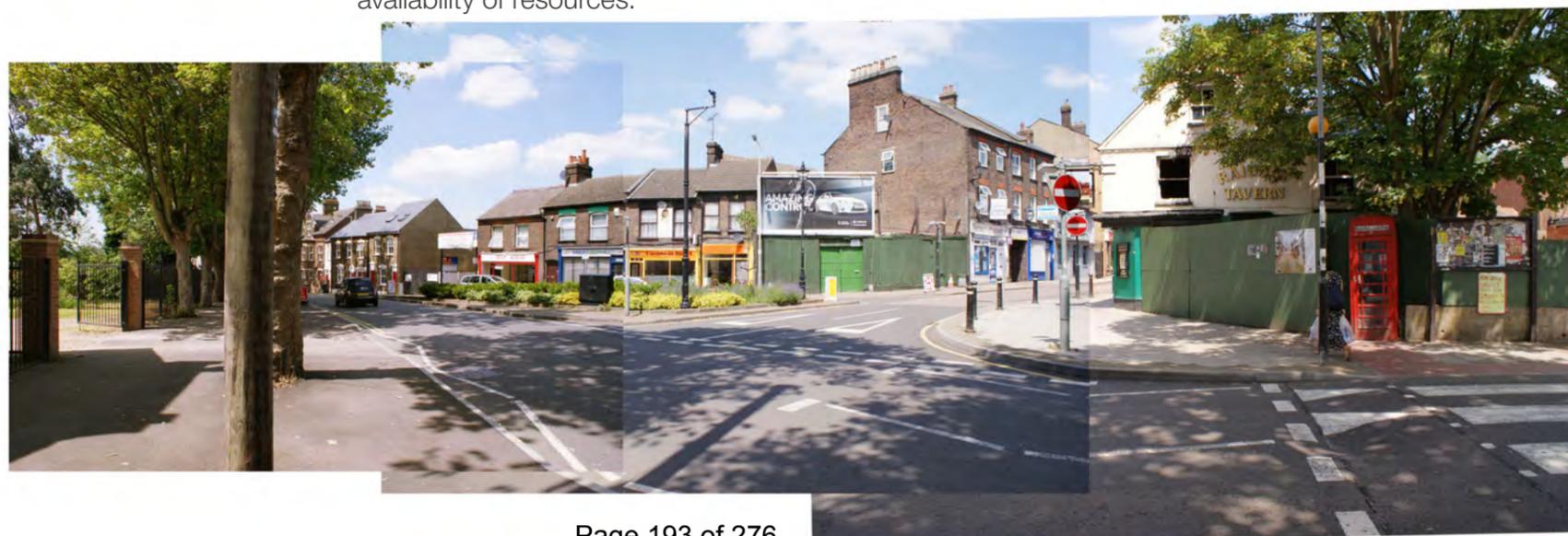
A 'carry forward' event for a range of local stakeholders, after finalisation and publication of the Masterplan, as a basis to build institutional and organisational capacity around the way forward. This would:

- Present and explain the strategy
- Identify the specific projects and programmes
- Explore strategies and options for delivery
- Consider the linkages between the town centre and High Town
- Promote the implementation of the heritage/ cultural trail in High Town and
- Encourage the local community to promote their local area through continued events and access to funding.

The output would be a delivery strategy with clarity on the roles of different organisations and groups.

6.0

Figure 130
THE MAIN GATEWAY AT THE END OF
THE PEDESTRIAN BRIDGE.
THE REHABILITATION OF THE RAILWAY
TAVERN (ON THE RIGHT) IN ACTIVE
USES AT GROUND FLOOR WOULD BE
ONE OF THE QUICK WINS FOR HIGH
TOWN



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High Town Masterplan – Summary of the response to public consultation held April to May 2016

Reference in the Masterplan	Representor	Summary of representation point	LBC response	Action proposed
General comment	National Grid	No comments		None
General comment	Anglian Water	No comments, falls outside their area.		None
General comment	The Chilterns Conservation Board	The Chilterns Conservation Board supports the regeneration of brownfield land within Luton; it recycles and revitalises urban land to accommodate growth and can help reduce pressure on greenfield land.	Comment noted	No change required.
General comment	The Chilterns Conservation Board	Luton’s location provides an unusual opportunity which could be tapped by designing in links to the countryside and investing in connections for people and urban wildlife with the outstanding habitats and places on Luton’s doorstep. There are panoramic views of Luton from the hills at places like Galley Hill, Warden Hill and Stopsley Common	Response noted. The High Town Masterplan is framed in the context of the Luton Local Plan which does provide such contextual references. Additional references in the masterplan are therefore not considered to be necessary.	No change required.
General comment	The Chilterns Conservation Board	Planning for development within the setting of the AONB means that care is needed to safeguard important views (such as from viewpoints like Galley Hill and Warden Hill and along public rights of way like the Chiltern Way). The setting of the AONB is the area within which development and land management proposals, by virtue of their nature, size, scale, siting, materials or design could have an impact on the natural beauty and special qualities of the AONB. For example, high buildings that break the skyline, roof-mounted solar panels or large areas of glazing facing the AONB causing glint and glare, floodlights and streetlights harming dark skies, large pale flat roofs on employment	Response noted. These concerns apply more generally and are covered by the Luton Local Plan. There is no need for duplication in the masterplan. These matters will be addressed through the development management process. The likelihood of any visibility of any part of the AONB from High Town or vice versa is extremely small, owing to the topography, the distance between them and the height of buildings proposed in the Masterplan.	No change required.

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		buildings and warehouses.		
General comment	Gavin Shuker MP	Recognising the importance of nurturing diverse and creative businesses, and ensuring that there is a place for them in Luton, is welcome. The Hat Factory, Business Improvement District and associated creative industries are playing a leading role in rejuvenating the town centre and South ward; plans for High Town should seek to complement that parallel process, including through providing desirable and attractive accommodation for young professional individuals and couples that will help drive this transformation.	Support welcomed.	No change required.
General comment	Gavin Shuker MP	Has misgivings about the provision of student accommodation within High Town. This can displace property that is better designated for less transient populations. High Town has the potential to be a major driver of Luton's regeneration and assist in retaining its reputation as a family friendly community; and drive associated improvements to help provide accommodation and facilities that help us retain talented young people in our town who would otherwise look further afield to competing housing markets.	Comments noted and welcomed.	No change required.
General comment	Highways England	Highways England would not wish to make specific comment on the structure of Luton High Town Masterplan -2016 other than note Luton Town has announced the Power Court site as their preferred location for a new stadium which is designated in the plan for – <i>mixed use scheme to the south east of the town adjacent to University of Bedfordshire.</i> Highways England would seek to engage and work with the local authority to ensure there is	Comments noted. The matters identified will be considered in the context of the Luton Local Plan.	No change required.

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		sufficient capacity for M1 Junction 10 to accommodate development traffic and mitigation provided where identified. A Transport Assessment supporting planned development should address traffic impact on M1 Junction 10 which is the first point of contact on the Strategic Road Network.		
Overall Strategy	Historic England	In accordance with NPPF para 126 it is important that this Supplementary Planning Document adopts a positive strategy for the historic environment.	Contextual comment noted.	No change required
Chapter 2	The Chilterns Conservation Board	The masterplan currently does not recognise that Luton sits surrounded on two sides by the Chilterns Area of Outstanding Natural Beauty. As a protected landscape of equal planning status to National Parks, great weight should be given to conserving the landscape and scenic beauty of AONBs (National Planning Policy Framework para 115). Section 2 High Town Context could usefully refer to the proximity of the AONB. Figure 6: Luton Context could show the AONB boundary.	Response noted. The High Town Masterplan is framed in the context of the Luton Local Plan which does provide such contextual references. Additional references in the masterplan are therefore not considered to be necessary.	No change required.
Chapter 2 – High Town Context 2.1 Transport and access	The Chilterns Conservation Board	The Chiltern Way, North Chiltern Trail and Chilterns Cycleway provide long-distance leisure opportunities and fitness training. Opportunities could be taken to improve the health, wellbeing and quality of life of current and future residents by linking out to this accessible countryside and a number of examples are suggested such as footpath and cycle links from High Town to the AONB to promote sustainable and healthy lifestyles and connecting High Town to the AONB via the green finger of common land, AGLV and county wildlife site in the north east of Luton.	Response welcomed. LBC considers that these principles are built into the Luton Local Plan which sets the framework for the High Town masterplan. More detailed connectivity from the masterplan area into surrounding areas is included in section 2.1.	No change required.
Chapter 2 -	Ms Kornelia Deppe	Why re-designate/downgrade High Town to a	The Masterplan reflects the	No change required.

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A Complementary Neighbourhood Centre		<p>'Neighbourhood Centre'?</p> <ul style="list-style-type: none"> • What are the implications of that? • Will there be less spending on infrastructure? • Will retail and business be discouraged to set up shop? <p>The masterplan should be about invigorating and growing High Town, rather than downgrading?</p>	<p>designation of High Town as a Neighbourhood Centre in the local plan. This is a reflection of the proximity of High Town to the town centre. The Masterplan envisages that High Town will flourish as a Neighbourhood Centre serving the day-to-day needs of the local community and visitors.</p>	
Chapter 2 - Affordable Housing	David Landau	<p>20% adhered to, especially as close to station, town centre, Vauxhall and Luton Airport. It is important that people who cannot afford their own car can access shops, facilities, public transport and jobs.</p>	<p>Support welcomed</p>	<p>No change required.</p>
Chapter 2 - Local Economic Development	David Landau	<p>No serious mention of the retention of hat-making industries, some of which are located within the areas designated for housing development.</p>	<p>Comment noted. None of the housing sites identified in the Masterplan affect properties that were identified as currently active in the hat industry in the English Heritage publication, The Hat Industry of Luton and its Building (2013). See suggested addition paragraph in response to a comment from Historic England below which will refer specifically to the Hat Industry.</p>	<p>No change required (see related change re The Hat Industry).</p>
Chapter 2 – Education	David Landau	<p>The report covers provision of school places outside of High Town, but serious consideration should be given to doubling the height of St Matthew’s Primary School as one way to solve the shortage. Another possibility is to take over the now former Barnfield College site, which would also place the school next to the High Town Community Sports &</p>	<p>Comments noted, refer to the Corporate Director of Children and Learning.</p>	<p>No change required.</p>

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		Arts Centre, where the children have their PE lessons.		
Chapter 2 – Conservation Area & Listed Buildings	Historic England	<p>HE are encouraged to see a section in Chapter 2 concerning Conservation and Design. This identifies the High Town Conservation Area, together with a number of statutorily and locally listed buildings with specific mention of the grade II listed Painters Arms and High Town Methodist Church and Hall. Suggests specific mention should also be made of the Church of St Matthew on Wenlock Street which is again grade II listed.</p> <p>Figure 11 plots the conservation area, listed buildings as well as unlisted buildings, buildings making a positive contribution to the character of the area and also those buildings with the potential to do so. This is helpful in identifying some of the key opportunities and constraints for the development of the area.</p>	Welcome response. Figure 11 shows all statutorily and locally listed buildings. It is not necessary for the text to list them all.	No change required.
Chapter 2 – Conservation Area	David Landau	The Delivery Group should include an officer designated to lead on securing grants for works to improve buildings in the High Town Conservation Area.	Comment noted, refer to Delivery Group for consideration.	No change required, refer observation to the Delivery Group.
Chapter 2 – The Hat Industry	Historic England	HE comment that Chapter 2 could be strengthened by reference to the historic importance of the High Town Area to the Hat making Industry in Luton where nearly 60 buildings have been associated with the Hat Industry as outlined in the Historic England publication, The Hat Industry of Luton and Its Buildings (2013) which provides considerable detail on what makes Luton distinctive.	Comment welcomed. The hat industry is mentioned at a number of places in the masterplan but a contextual reference in section 2 is appropriate.	<p>Suggest the addition of the following text following the sub section on Listed Buildings in section 2:</p> <p>The Hat Industry</p> <p><u>The High Town Area was central to the hat making Industry in Luton. where nearly 60 buildings have been identified as associated with the Hat Industry. These are outlined in</u></p>

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				<u>the Historic England publication, The Hat Industry of Luton and Its Buildings (2013) which provides considerable detail on what makes Luton distinctive.</u>
Chapter 2 – High Buildings	Historic England	<p>In relation to taller buildings HE highlight the need to ensure that views from High Town Road towards the hills and town centre are maintained and enhanced to support the legibility of the place. HE also caution against taller buildings in the vicinity of Listed buildings, most notably the setting of the Grade II Methodist Church - therefore careful consideration should be given to the building height at plot 5B on Wenlock Street.</p> <p>HE also refer you to the guidance published by Historic England relating to Tall Buildings https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/ In addition Historic England has published guidance relating to settings of historic assets which is of relevance Good Practice Advice in Planning 3 - the setting of heritage assets: https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/</p>	Comments welcomed. HE's advice re the importance of long views is reflected in the masterplan.	No change
Chapter 2 - Sustainability	David Landau	Pre-planning application discussions should emphasise that applicants need to provide alternative energy sources.	Comment noted. This should be the case in accordance with requirements of the local plan. Refer comment to Development Management.	No change required. Refer comment to Development Management.
Chapter 2 - Sustainability	David Landau	Planning should stipulate secure, covered cycling spaces, to encourage cycling and to avoid balconies and corridors being cluttered with bikes. Cycle routes are only mentioned	Comment noted. The section on sustainability does include a commitment to, "The Masterplan will promote the	No change required, refer comment to Delivery Group.

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		once in this document – a heavier emphasis should be placed on separate paths and on well-signed routes.	development of a sustainable community through a range of innovative approaches including the promotion of a mix of uses, public transport, cycling and walking, ...". Refer comment to the Delivery Group to take into account during project development.	
Chapter 3 – Understanding High Town – Figure 19	Optimis Consulting	Figure 19 ‘Plan showing new developments in progress or in the process of being approved’ does not indicate early discussions are underway for Site 1B although a pre-app has been submitted to Luton Borough Council for this site. In addition, it does not demonstrate that any progress has been made regarding the Council’s land within Site 1B; which surely is not the case given that this is identified as a ‘soft site’ within the Masterplan.	Comment noted. An area such as High Town is subject to constant change and Figure 19 represents a snapshot in-time.	No change required.
Chapter 5 – Building Typologies	David Landau	It is to be welcomed that 3 and 4 bedroom ‘family’ homes play an important role in the Masterplan and that buildings should be typically 3 or 4 storey, with 5 a maximum. This is a good balance between the scale of existing buildings and the need for new homes.	Comment noted.	No change required.
Chapter 5 – Development Sites	Central Bedfordshire Council	In view of the proximity of the High Town masterplan to Luton Railway Station and Luton town centre and in the context of a significant shortfall in the level of housing provision vs housing needs in the local plan Central Bedfordshire Council (CBC) consider that higher housing densities should be considered on all development sites within a 10 minute walk of the railway station. CBC consider that to make the most efficient use of this very sustainable location, the	LBC notes and in principle agrees with the thrust of CBC’s observations. The overall density of the housing sites proposed is 115 dwellings per hectare which is consistent with CABE’s advice on urban village densities. A higher overall density is not considered to be appropriate given the conservation and heritage value of High Town and the need for this to be protected	No change required.

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		absolute minimum density of any individual land parcel within the High Town area should be at least 75dph. Furthermore, we would encourage you to consider the areas potential to deliver densities at or in excess of 200dph as we believe that the High Town masterplan and area provides an opportunity to deliver more of the objectively assessed need for housing for Luton closer to where that need arises.	and enhanced. It should also be noted that higher densities would almost certainly mean a greater number of small apartments, probably fuelling the buy-to-let market. This is not the sort of development we wish to encourage in High Town where the focus needs to be towards larger family accommodation. This is in the context of likely proposals for a large number of apartments to be built at Power Court.	
Chapter 5 – Illustrative Master Plan – Site 1 Midland Road	Historic England	The western end of the site abuts the Conservation Area and to this end, it is recommended that the text includes reference to the conservation area and the need to protect and enhance the setting through any development including the height of the buildings. Building heights shown are three storeys which is deemed acceptable in this location.	Comment welcomed. Add reference to the proximity of the Conservation Area to the text.	Add at the end of the introductory paragraph under the heading Midland Road (Site 1). <u>“The western end of this site abuts the Conservation Area and any development will need to protect and enhance its setting.”</u>
Chapter 5 – Illustrative Master Plan – redevelopment of commercial premises for housing	Gavin Shuker MP	While not ultimately opposed to the displacement of warehouse commercial premises from High Town, would urge the local authority to provide practical support for displaced businesses in ensuring that they find adequate facilities elsewhere within the boundary of the Borough.	Comments noted. The Council is sensitive to these matters and recognises that redevelopment should not be progressed until the future of existing businesses have been fully addressed. The Delivery Group will ensure that project implementation reflects this approach.	No change required. Delivery Group to oversee business displacement and relocation.
Chapter 5 – Illustrative Master Plan – Site 1 Midland Road	Iceni Projects	The Masterplan, which is currently the subject of public consultation, proposes a total number of 236 dwellings for the site and 75 for 10 Midland Road (Site 1A). This fails to	Comments noted but not accepted. Viability work undertaken as part of the local plan suggests this development	No change required.

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		<p>recognise the opportunity to maximise development on what is an extremely sustainable site given its excellent public transport accessibility and central location within the town. The current approach for the site is not viable and will render it undeliverable as it fails the test of 'achievability', a requirement of the NPPF. Site 1A alone needs to deliver around 330 dwellings in order to be viable. There is clearly a high demand for higher density development such as this, based on some of the successful developments of this type that have been undertaken locally.</p>	<p>would be viable. The representor has not produced any financial information to back up the assertion on viability.</p> <p>The densities proposed in the Masterplan (at 144 dph) reflect its location by the Railway Station balance with important heritage considerations.</p>	
<p>Chapter 5 – Illustrative Master Plan – Site 1B Midland Road (Burr Street)</p>	<p>Optimis Consulting</p>	<p>The extension of Taylor Street was seen as desired within the High Town SPD 2007 but its achievement was by no means accepted as certain as at paragraph 4.3 it states "if the Taylor Street extension is achieved". In addition, the Taylor Street extension has been downgraded to a pedestrian only route within Site 2A within the 2016 Masterplan.</p> <p>There is no historical basis for the extension of Taylor Street through Site 1B and the alteration to Midland Road has already improved the link through to the station. Whilst the extension of Taylor Street could be included as a desire it should not be a requirement as it has specific implications in terms of the viability and deliverability of Site 1B.</p> <p>Therefore, there is no real justification to require the extension of Taylor Street through Site 1B.</p>	<p>Comments noted. The extension to Taylor Street is an aspiration to improve permeability throughout the area and there is no reason to doubt this could feature as part of the redevelopment without detriment to the design. Notwithstanding this the Masterplan proposals are illustrative and there has to be a degree of flexibility where this can lead to added improvements. It is clearly desirable that there is close liaison with the prospective developers of adjoining land parcels.</p>	<p>No change required.</p>
<p>Chapter 5 – Illustrative Master Plan – Site 1B Midland Road</p>	<p>Optimis Consulting</p>	<p>As identified at Section 2.3 of the Masterplan, local agents indicate that there is a strong</p>	<p>Comments noted. There is a focus on the provision of family</p>	<p>No change required.</p>

<p>(Burr Street)</p>		<p>demand for lower-end properties and a steady demand for apartments. Evidence from local agents is that there is a clear demand for 1 and 2 bed flats in this area due to its close proximity to the town centre and station. The mix of houses and apartments for Site 1B within the Illustrative Masterplan therefore fails to take into account local market conditions.</p> <p>Given that the Council seeks to sterilise the central portion of this site with an extension to Taylor Street and also expects much lower density on this site compared to the rest of the Midland Road block with a mix of properties that is contrary to the local market conditions, the Illustrative Masterplan is likely to be unviable for Site 1B.</p>	<p>accommodation on Site 1B yet it still achieves an average density in excess of 124 dph.</p> <p>Given the scale of apartment schemes in the near vicinity of this site – including Power Court – an especially strong case would be needed to reduce the level of family accommodation. Notwithstanding this the Masterplan is illustrative and and there has to be a degree of flexibility if this can lead to an improved scheme.</p>	
<p>Chapter 5 – Illustrative Master Plan – Site 1B Midland Road (Burr Street)</p>	<p>Optimis Consulting</p>	<p>The text accompanying the Illustrative Masterplan for the Midland Road (Site 1) development block states that the development of the site will comprise mostly apartments at 80% with a density of 144 units per hectare. The diagram showing building heights shows a range of 2 to 5-storeys across the block and shows 2 to 4-storeys for Site 1B. The redevelopment of Sites 1E and 1F does not comply with the illustrative masterplan diagram but can be said to meet the aims of delivering apartments at a high density close to the railway station. Sites 1E and 1F deliver housing at a density of 262 dwellings per hectare whilst site 1B is unnecessarily restricted to 124 dwellings per hectare. In addition, Sites 1E and 1F have been delivered at 4-storeys across the site, rather than a range of 2 to 5-storeys shown within the Masterplan, and should be seen as setting a context in which development on the adjacent sites</p>	<p>Comments noted. There is a focus on the provision of family accommodation on Site 1B yet it still achieves an average density in excess of 124 dph.</p> <p>Given the scale of apartment schemes in the near vicinity of this site – including Power Court – an especially strong case would be needed to reduce the level of family accommodation. Notwithstanding this the Masterplan is illustrative and and there has to be a degree of flexibility if this can lead to an improved scheme.</p>	<p>No change required.</p>

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		should be considered.		
Chapter 5 – Illustrative Master Plan – Site 2 Burr Street and Site 3 Duke Street	Historic England	These sites are set back away from the Conservation Area and do not include any listed buildings (Statutory or locally listed) or buildings making a positive contribution to the areas character. Given that building height is limited to three storeys, with the exception of the plot on the corner of Hitchin Road and Burr Street, it is considered that the proposals are acceptable.	Comments noted	No change required.
Chapter 5 – Illustrative Master Plan – Site 4 Charles Street	Historic England	A maximum height of three storeys on this site is considered acceptable.	Comments noted	No change required.
Chapter 5 – Illustrative Master Plan – Site 5 Wenlock Street	Historic England	Both of these sites abut the Conservation Area. Site 5A adjoins a key unlisted building whilst 5B adjoins a grade II Listed building (High Town Methodist Church and Hall). HE strongly advise that reference is made to these designations within the text of the masterplan at this point, highlighting the need for any development to protect and enhance the setting of the Conservation Area and Listed Buildings. The relative heights of the proposed development at site 5B and the Methodist Church are considered particularly important. The large Baroque cupola is an important feature on the skyline, and views of this should not be obscured by the proposed development. We note the presence of large mature trees behind the church...wherever possible these should be retained.	Comments welcomed. Add references on the lines suggested by HE.	Add a new second paragraph under this sub section: <u>“Both of these sites abut the Conservation Area. Site 5A adjoins a key unlisted building whilst 5B adjoins a grade II Listed building (High Town Methodist Church and Hall). Any development should protect and enhance the setting of the Conservation Area and Listed Buildings. The relative heights of the proposed development at site 5B and the Methodist Church are particularly important. The large Baroque cupola is an important feature on the skyline, and views of this should not be obscured by the proposed development. Mature trees to the rear of the church should be retained wherever possible.”</u>

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Chapter 5 – Illustrative Master Plan – Site 5 Wenlock Street	David Landau	These seem like sensible solutions to the housing and surveillance needs here, as well as potentially providing a more attractive GP surgery.	Comments noted.	No action required.
Chapter 5 – Illustrative Master Plan – Site 6 Brunswick Street	Historic England	Plots 6B and 6C abut the conservation area, a key unlisted building as well as a number of buildings making or potentially making a positive contribution to the area’s character. HE advise that reference is made to the need for any development to protect and enhance the setting of the Conservation Area and non-statutory historic assets. The proposed building heights are considered acceptable in this location. HE welcome the inclusion of some live/work units, accommodating some art related businesses, drawing upon the cultural heritage of the area.	Comments welcomed. Add references on the lines suggested by HE.	Add a new second paragraph under this sub section: <u>“Plots 6B and 6C abut the conservation area, a key unlisted building as well as a number of buildings making or potentially making a positive contribution to the area’s character. Any development will need to protect and enhance the setting of the Conservation Area and non-statutory historic assets.”</u>
Chapter 5 – Illustrative Master Plan – Site 6 Brunswick Street	David Landau	Could the Barnfield College land be included in a ‘land swap’ with the Burr Street car park to facilitate the consolidation of the Federation sites in the town centre, and provide a new area for housing and a green space in High Town?	Comments noted, refer observation to the Delivery Group for consideration.	No change required, refer observation to Delivery Group.
Chapter 5 – Illustrative Master Plan – Site 7 Dudley Street, Site 8 Concorde Street and Site 9 Hitchin Road	Historic England	Sites 7, 8 and 9 are located some distance from the conservation area and any listed buildings. To that end, HE are satisfied with the proposals in these locations.	Comments noted	No change required.
Chapter 5 – Illustrative Master Plan – Car parking	David Landau	It is very pleasing to see parking options in undercrofts and courtyards, to remove the cars from street frontages, which can cause congestion and add to visual clutter.	Comment noted.	No change required.
Chapter 5 5.7 Paths Estate	Gavin Shuker MP	Welcomes the long-planned development of Paths Estate and hope that the changes will improve living environment of the many	Support welcomed.	No change required.

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		residents that live there.		
Chapter 5 5.8 High Town Road	Historic England	HE welcomes the identification of a number of positive attributes of High Town Road including its 'Rich architectural heritage with many high quality, listed and locally important buildings of historic importance' and a 'Large proportion of specialist and independent retailers offering more than the generic shopping experience'. HE also welcome the aim to build on the attributes by showcasing the character of the street acting as a fitting central spine to the surrounding Conservation Area and building on the retail offer in order to create an accessible, vibrant and attractive place to live, work and visit.	Comments noted	No change required.
Chapter 5 5.8	Mrs Lesley Shrosbee	Mention is made of encouraging traffic to use Hitchin Road. However, since the installation of the traffic lights at the junction with the Inner Ring Road, traffic often queues all the way up Hitchin Road during the morning rush hour. Many drivers are using the side roads through High Town to cut through this traffic. With the proposed changes to residential use and the changes to road layouts closer to Midland Road, the representor foresees more traffic taking this approach.	Comment noted. Refer to Delivery Group for consideration.	Refer these observations to the High Town Delivery Group.
Chapter 5 Character and Charm	Historic England	The section on Character and Charm on p63 is particularly helpful in emphasising the heritage and strong architectural quality of the buildings. Reference is made to the Methodist Church and Painters Arms. We would advise that reference should also be made to the Methodist Church Hall (list entry 1114628), Gates, wall and railings of the Methodist Church (list entry 1146501) and also the Church of St Matthew (list entry 1114643) which although not located on the main High	Comments noted. LBC does not agree with the suggested change since the comments do not apply to High Town Road.	No change required.

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		Road, never-the-less makes an important contribution of the historic environment and the masterplan area as a whole.		
Chapter 5 Character and Charm – retail offer	Historic England	<p>HE welcome the desire to build upon the bespoke and independent retail offer. HE considered that the masterplan should emphasise the importance of retaining or restoring historic shop front features both in terms of the positive contribution historic shop fronts make to the character of an area but also the economic benefit of providing traditional and bespoke shopping units to shop owners.</p> <p>HE cite a case study where Derby City Council teamed up with English Heritage (now Historic England) to help restore an area of Victorian and Edwardian shops, the Strand.</p>	Comments noted. No change is required since HE’s sentiments are already reflected in the Masterplan.	No change required.
Chapter 5 A Green Place	David Landau	The East Village plans made provision for a community orchard, but this and other public green spaces are missing from the Masterplan. As identified, allotment spaces are on the edges of High Town and oversubscribed, so a new central allotment space would be ideal.	Comments noted. Improvements to the public realm through the creation of new and improved public squares are integral to the plan. The East Village Design Code document will remain as SPD until such time as it is replaced. See comments in relation to 7.5.	No change required.
Chapter 5 Shared spaces	Historic England	Pages 66 and 67 outline a series of shared spaces and public courtyards along the length of the High Town Road. Figure 97 sets out an exciting vision for the street, referencing the enhanced setting of key listed buildings in front of the Methodist church, the hat trail, Church Walk, and signage. However, there is a lack of clear explanation as to what this means in practice. It is recommended that the text of the masterplan should set out what is	Comments noted. It is not considered that any changes to the masterplan are needed but these are matters for the Delivery Group to take on-board during implementation.	Refer these observations to the High Town Delivery Group.

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		<p>proposed and how this will be achieved in more detail.</p> <p>HE note the design four options for High Town Road set out on pages 68 and 69. HE broadly welcome these proposals , including de-cluttering of footpaths, improvements to directional signage and junction rationalisation to improve safety. We especially welcome options 3 and 4 which propose changes in the vicinity of Duke Street to provide an appropriate setting to the Church and Hall. The proposals for new squares at Midland Road and High Town Square are also welcomed. However, as outlined elsewhere in HE’s response, the design details and quality of finish will be key in ensuring a successful scheme.</p>		
Chapter 5 High Town Square	Historic England	HE welcome the proposals for High Town Square and suggest an interpretation sign should be included as part of the design proposals to assist in connecting the public with the rationale of the design.	Comments noted. Refer suggestion for the interpretation sign to the Delivery Group to take on-board during implementation.	Refer these observations to the High Town Delivery Group.
Chapter 5 Midland Road Square	Historic England	It is imperative to make improvements to the important gateway to High Town at the junction of Midland Road High Town Road. The proposals for this area are broadly welcomed. The redevelopment of the burnt out Railway Tavern is indeed key - and recommend that reference should be made in the text to the status of the Railway Tavern as a Locally Listed Building. The provision of a central green lawn with seating areas is welcomed together with proposals to create an opportunity for art and wayfinding signage to mark the entrance to High Town Road. This signage should include reference to the important historic role of this area in relation	Welcome comments. Suggest amendment to the text to refer to the status of the Railway Tavern and refer other detailed comments to the Delivery Group.	<p>1. Amend the second paragraph under this sub section to read, “The redevelopment of the burnt-out Railway Tavern building which is a Locally Listed Building which fronts onto.... (addition highlighted).</p> <p>2. Refer detailed comments re design of the square to the Delivery Group.</p>

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		to the hat making industry of the town.		
Chapter 5 5.9 Cultural Revitalisation Strategy	Historic England	<p>HE welcome the proposals outlined.</p> <p>HE consider the suggestion of a Hat Industry Showroom promises to be an exciting opportunity as collaboration between manufacturers, designers and the university, serving to showcase the industry and provide managed workspace for graduate milliners. The proposed concept study should explore the viability of this proposal further but it is broadly welcomed by Historic England as a very tangible way of drawing upon the heritage of the area.</p>	Comments noted. Refer detailed comments to the Delivery Group to take on-board during implementation.	Refer these observations to the High Town Delivery Group.
Chapter 5 Figure 79	Mrs Lesley Shrosbee	This figure does not take into account the loss of the private car park currently used by the High Town Community Centre users and shown to be converted to residential use. What impact will the loss of this car park have on parking in the area, and will this have a negative impact on usage & viability of the community centre?	The parking strategy for the High Town area has been developed following surveys of on and off street facilities and demand which have indicated that there is currently spare capacity. It is also recognised that development will take place over a number of years so there will be opportunities to monitor conditions and review the strategy in light conditions on the ground. Parking requirements for new developments will, of course, be reviewed at the appropriate stages in the planning process and the impacts considered at that time.	Refer these observations to the High Town Delivery Group.
Chapter 6 – Delivery Strategy	Historic England	Section 6.1 lists the key components that the masterplan would provide. To this list, Historic England would suggest that reference is also made to the historic environment and cultural	Comments welcome and suggested amendment to the penultimate bullet agreed.	Amend penultimate bullet under 6.1 to read, ‘High quality environment - buildings and landscape, <u>drawing upon the</u>

APPENDIX 2

		heritage of the area. The penultimate bullet point should be amended to read, 'High quality environment - buildings and landscape, drawing upon the historic environment and cultural heritage of the area; and'		historic environment and cultural heritage of the area; and ...' (addition highlighted)
Chapter 6 – Delivery Strategy	The Chilterns Conservation Board	To promote sustainable and healthy lifestyles, off-site green infrastructure and AONB net gain should be added to the infrastructure requirements for developers through policies for on-site provision and via the Community Infrastructure Levy.	Response noted. The importance of improvements to the public realm through improvements to streets and squares and better connectivity is already reflected in the masterplan. Opportunities to secure such funding will be taken as they arise through the development management process with co-ordination of a project programme through the Delivery Group.	No change required. Delivery Group to consider potential for the most effective use of S106 receipts.
Chapter 6 – Delivery Strategy	Gavin Shuker MP	With considerable development planned for the area, I would urge that this Masterplan help leverage funding to facilitate the improvement of Luton railway station. I believe that improvements to the access and accessibility of the station would be a good use of resource from Section 106 payments from developers as the station effectively acts as the gateway to High Town from the south of the town. In the short term, access to the car park at the north entrance to the station would benefit from improved signage.	Comments noted. Refer suggestions re potential use of S106 receipts to the Delivery Group along with the request for improved signage.	No change required. Delivery Group to consider potential for the most effective use of S106 receipts and suggestion regarding improved signage.
Chapter 6 – Delivery Strategy Para 6.2 Viability	Optimis Consulting	Section 6.2 'Viability': Recognises that viability for new development in High Town is challenging. However, much weight is given to increasing residential values making development more viable; whilst this may be true it does not necessary follow that development therefore becomes viable if additional policy burdens are placed on that	Comments noted. Viability is subject to constant change and discussions regarding this and its impact on development schemes are likely to feature as individual development proposals emerge. In the event that a significant	No change required.

		land. Detailed viability work on a site-by-site and case-by-case basis needs to be undertaken taking into account all costs (including for example abnormal costs for ground remediation, foundations, securing vacant possession, substation relocation, etc). Failing to take into account the real viability of sites will result in the Masterplan becoming a burden on development rather than supporting deliverability on the ground.	challenge is made to the aspirations in achieving the aspirations in the plan then developers would be expected to demonstrate the impact on development viability through an 'open book' approach.	
Section 7.5 – Next Steps	Historic England	<p>Historic England welcomes the recommended future actions.</p> <p>In particular HE would see the development of up-to-date design guidance for both the built form and streetscape as imperative to ensuring a co-ordinated, consistent approach with high quality design and a cohesive use of materials.</p> <p>Historic England would be keen to input into any future consultations and partnerships such as the High Town Vision Delivery Group (subject to capacity constraints) to help to ensure that the High Town area of Luton develops in a way that respects and builds upon the historic assets and cultural heritage of the area.</p>	<p>Support welcomed.</p> <p>In relation to a consolidation of design guidance there is a choice between retaining those aspect of existing SPD (High Town SPD (2007) and the East Village Design Codes SPD (2009) or the commissioning of new guidance. In view of financial constraints LBC favours the former approach.</p> <p>HE's offer for future involvement is welcome and will be referred to the Delivery Group.</p>	Refer HE's offer for further engagement to the Delivery Group.

High Town Masterplan – Schedule of Changes to the High Town Masterplan (version as published in January 2016)

NB: This contents of this schedule are provisional pending consideration by Executive.

Ref No	Reference in Jan 2016 version	Change (highlighting additions and deletions)	Reason
001	Cover page and footer throughout the document	January <u>September</u> 2016	Update
002	Cover page	<u>Adopted as Supplementary Planning Guidance August or September 2016</u>	To reflect the status of the Masterplan as a Supplementary Planning Document.
003	Page 2	The Masterplan <u>was adopted as a Supplementary Planning Document in August or September 2016. It</u> has been brought forward within and builds upon the existing and current planning framework, specifically the High Town SPD (2007) including the East Village Design Codes (2009) <u>which remains in-place as a Supplementary Planning Document*</u> , the existing <u>Luton</u> Local Plan 2001-2011 and the emerging <u>Luton</u> Local Plan 2011-2031. The High Town Masterplan takes forward existing and emerging policy, providing guidance and evidence to support and assist in the delivery of the development plan. <u>Subject to responses following the publication of the Masterplan the Council will, in due course, consider if the document should be adopted as a Supplementary Planning Document.</u> <u>* NB: In the event of a conflict between the 2009 Design Codes and the 2016 Masterplan the latter will take precedence.</u>	To reflect the status of the Masterplan as a Supplementary Planning Document.
004	Page 6, after the end of the current text	<u>Prior to adoption as a Supplementary Planning Document the Masterplan was also subject to a further six-week period of public consultation in April/May 2016.</u>	To reflect the latest period of public consultation.
005	Page 11	<u>Local:</u>	Amendment notes the

		<p>Luton Local Plan 2001–2011 (March, 2006) High Town, Luton Supplementary Planning Document (SPD, July, 2007), <u>NB: this document is superceded by the 2016 High Town Masterplan</u> High Town East Village Design Codes (appendix to the retained as SPD High Town Luton SPD) (July, 2009) Shopfront Design Guide (1993) Designing for Sustainability – A Summary of Good Practice (2003) Designing for Community Safety in a Quality Environment (2003) Planning Obligations SPD (September, 2007) Emerging Luton Local Plan (LLP) 2011 – 2031</p> <p>In addition to the above adopted or emerging policy, reference has also been made to the following strategies and technical evidence: Luton Town Centre Development Framework (2004) High Town Conservation Area Management Plan (2008)</p>	<p>consequential of revocation of the 2007 version of the High Town Masterplan upon adoption of the High Town Masterplan (2016) as a SPD. The East Village Design Codes retained as adopted SPD.</p>
006	Page 14 – add new sub-section following the sub section on Listed Buildings in section 2:	<p><u>The Hat Industry</u></p> <p><u>The High Town Area was central to the hat making Industry in Luton. where nearly 60 buildings have been identified as associated with the Hat Industry. These are outlined in the Historic England publication, The Hat Industry of Luton and Its Buildings (2013) which provides considerable detail on what makes Luton distinctive.</u></p>	<p>In response to a representation by Historic England.</p>
007	Page 15 - Box	<p>The High Town Masterplan has brought forward within and builds upon the existing and current planning framework, specifically the High Town SPD (2007) <u>which the Masterplan replaces and</u> including</p>	<p>Bring the text up-to-date, in-line with the text setting out the status of the document set out in MOD 003.'</p>

		<p>the East Village Design Codes (2009) <u>which is retained as an SPD</u>, the existing Local Plan 2001-2011 and the emerging Local Plan 2011-2031. The High Town Masterplan takes forward existing and emerging policy, providing guidance and evidence to support and assist in the delivery of the development plan.</p> <p><u>Subject to responses following the publication of the Masterplan the Council will, in due course, consider if the document should be adopted as a Supplementary Planning Document</u>)</p>	
008	Section 5, page 39, section on Midland Road (Site 1), add at the end of the introductory paragraph.	<p><u>“The western end of this site abuts the Conservation Area and any development will need to protect and enhance its setting.”</u></p>	In response to a representation by Historic England.
009	Section 5, page 47, section on Wenlock Street (Site 5), add a new second paragraph.	<p><u>Both of these sites abut the Conservation Area. Site 5A adjoins a key unlisted building whilst 5B adjoins a grade II Listed building (High Town Methodist Church and Hall). Any development should protect and enhance the setting of the Conservation Area and Listed Buildings. The relative heights of the proposed development at site 5B and the Methodist Church are particularly important. The large Baroque cupola is an important feature on the skyline, and views of this should not be obscured by the proposed development. Mature trees to the rear of the church should be retained wherever possible.</u></p>	In response to a representation by Historic England.
010	Section 5, page 47, section on Brunswick Street (Site 6), add a new second paragraph.	<p><u>Plots 6B and 6C abut the conservation area, a key unlisted building as well as a number of buildings making or potentially making a positive contribution to the area’s character. Any development will need to protect and enhance the setting of the Conservation Area and non-</u></p>	In response to a representation by Historic England.

		<u>statutory historic assets.</u>	
011	Section 5, Midlands Road Square, page 72, amend second paragraph.	The redevelopment of the burnt-out Railway Tavern building which <u>is a Locally Listed Building which</u> fronts onto....	In response to a representation by Historic England.
012	Section 6, page 79, amend penultimate bullet point.	'High quality environment - buildings and landscape, <u>drawing upon the historic environment and cultural heritage of the area;</u> and ...'	In response to a representation by Historic England.
013	Section 6, page 93, amend 1) Design Guidance	1) Design Guidance To ensure the quality of the specific housing sites meets the emerging urban village type aspirations, and is co-ordinated between sites to offer a strong sense of place, to consider a review to consolidate and update design guidance to set the appropriate quality placemaking for the whole area. This would inform design development, especially for housing and mixed-use activity, on matters such as scale, frontage activity, materials and parking. Until such a review is carried out existing guidance set out in the High Town SPD (2007) and the East Village Design Codes SPD (2009) will be retained. Policy LP25 of the Luton Local Plan 2011-31 includes a proposal for a Design Review Panel which could assist in the future provision of design guidance.	The 2007 SPD is superceded by the 2016 Masterplan.
014	Section 6, page 93 add a new paragraph at the end of this section.	<u>A High Town Masterplan Delivery Group has been formed which will be responsible for the review and updating of the above recommendations on a continuing basis.</u>	To reflect the establishment of the High Town Delivery Group.

Integrated Impact Assessment Form (IIA) from June 2013



This form replaces the previous Integrated Impact Assessment form used by LBC.

The key aim of an impact assessment is to ensure that all Council policies, plans and strategies support the corporate mission statement that

'The needs of Luton's people will be first in everything we do'.

1. Why do I need to do an IIA?

The aim of this impact assessment process is to:

- Ensure adherence to the legal duties contained within the Equality Act 2010 and associated Public Sector Duty to analyse the impact of decisions to be undertaken by Council.
- Ensure the Council has **due regard** to equality taking a proportionate and timely approach to analysing the impact on citizens
- Minimise duplication of initial impact assessments with regards to Environment and Health and maximise consideration of other key Council priorities of Inclusion and Community Cohesion
- Ensure that the Council has been able to consider the social, health, environmental and economic impacts in its decision making in a single document and, where necessary enable the production of a comprehensive action plan to mitigate any potential negative impacts identified

2. When do I need to do an IIA?

An IIA must be started at the beginning of any project, policy or strategy, and cannot be finalised until such time as all consultations, as required, are undertaken.

- The Impact Table will help you to make early consideration of the potential impacts of your proposal and should be used from the point at which preliminary report is taken to Corporate Leadership and Management Team (CLMT) where appropriate. By using this table at your earliest point in the project, potential impacts can be highlighted and it will also be clear whether you need to carry out a full IIA.
- If you complete this table and *all* impacts identified are neutral, i.e. there is no noticeable impact on characteristics and priorities listed *and* you are fully confident of this, please contact the SJU by email setting out how you have reached this judgement as it is *unlikely* you will need to carry out a full IIA.
- An IIA must at all times identify those who will be affected by the decision, policy or strategy.
- At a time of economic austerity IIA authors are minded to consider the whole range of decisions, both locally and nationally when analysing the impact on citizens
- Your first early draft is to be sent to the Social Justice Unit for comments and guidance
- Once consultation has ended, the IIA must be updated with results of the consultation and returned to Executive, where required, for further consideration and approval – at this stage it will be signed off as completed by the Social Justice Unit

If at anytime you need further guidance please contact the Social Justice Unit.

For your convenience, please see links at the end of this document to key Corporate and Partnership documents that may help you complete this IIA.

Proposal Title: High Town Masterplan

Date of IIA: initially 10/03/16 for consultation on Draft SPD, reviewed 21/07/16.

Lead Officer Name: David Carter

Early draft Seen by:¹

Finalised IIA Signed and seen by SJU :

Name:

Date:

Please include the names of all other contributors and stakeholders involved in the preparing of this proposal who have been consulted with and **agreed** this assessment. *(Please note the IIA must not be carried out by one person):*

Maureen Drummond

If there is any potential impact on staffing please include the name/s of the trade union representative/s involved in the preparation of this assessment or any supporting evidence of request to participate:

N/A

Please provide an outline of your proposal:

The Luton Local Plan (2011-31) identifies High Town as one of eight Strategic Allocations within the town where the bulk of investment and development is likely to be concentrated over the next 15 years. The vision for High Town is succinctly set out in the Local Plan policy which sets out “to create a sustainable vibrant, historic neighbourhood destination delivered through residential-led mixed use development whilst protecting the historical environment and assets including small scale offices / workshops, live work units and increased retail provision which will enhance the area including increased footfall, better pedestrian access and permeability, more public open space and an enhanced natural environment”.

The High Town Masterplan commissioned from consultants BDP provides a more detailed plan to deliver this vision.

Information supporting the proposal (**who, what, where, how**²)

¹ Please send an early draft of your IIA to the SJU to ensure all impacts are being considered at the appropriate time

² Breakdown of present users by ethnicity, age, gender, disability, religion/belief, sexuality (if recorded)

Also, show areas in the town with the biggest and lowest needs.

Greater emphasis is required at the start of the IIA on the service, how it is delivered now and how the new service will be delivered

The High Town Masterplan has already been subject to focussed consultation with the local community but, as yet, the January 2016 report has not been published. The response to the Local Plan consultation which ended in December 2015 suggests that there is a need for wider consultation. In particular Historic England wish to be involved not least in the context of the High Town Conservation Area being identified on their 'at risk' register.

The most appropriate way forward, therefore, was for the Masterplan and supporting material to be published for a six week period of public consultation. This consultation took place during April/ May 2016.

IMPACT TABLE

The purpose of this table is to consider the potential impact of your proposal against the Equality Act 2010 'protected characteristics' and the Council's Social, Environmental and Economic priorities.

Once you have completed this process you should have a clearer picture of any potential significant impacts³, **positive**, **negative** or **neutral**, on the community and/or staff as a result of your proposal. The rest of the questions on this form will help you clarify impacts and identify an appropriate action plan.

Protected Groups	Citizens/Community			Staff (for HR related issues)		
	Positive	Negative	Neutral	Positive	Negative	Neutral
Race			X			X
Gender			X			X
Disability	X					X
Sexual Orientation			X			X
Age			X			X
Religion/Belief			X			X
Gender Reassignment			X			X
Pregnancy/Maternity			X			X
Marriage/Civil Partnership <i>(HR issues only)</i>			X			X
Care Responsibilities ⁴ <i>(HR issues only)</i>			X			X
Social & Health⁵						

³ "Significant impact" means that the proposal is likely to have a noticeable effect on specific section(s) of the community greater than on the general community at large.

⁴ This is a Luton specific priority added to the 9 protected characteristics covered under the Equality Act and takes into account discrimination by association.

⁵ Full definitions can be found in section 3

Impact on community cohesion	X			
Impact on tackling poverty	X			
Impact on health and wellbeing	X			
Environment				
Impact on the quality of the natural and built environment	X			
Impact on the low carbon agenda	X			
Impact on the waste hierarchy	X			
Economic/Business				
Impact on Luton's economy and/or businesses	X			
Impact on jobs			X	
Impact on skills	X			

Please answer the following questions

1. Research and Consultation

1.1 Have you made use of existing recent research, evidence and/or consultation to inform your proposal? Please insert links to documents as appropriate.

A baseline report was produced in July 2014. [Link to be added when the papers go online]

In addition the evidence base for the Luton Local Plan is also relevant. This is available on the following link:

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

1.2 Have you carried out any specific consultation with people likely to be affected by the proposal? (if yes, please insert details, links to documents as appropriate).

Yes, there has been a series of consultation phases thus far. The nature and results from these are recorded in the Public Engagement report.

[Link to be added when the papers go online]

The Local Plan policy for High Town has been subject to consultation and this is also available online [link below].

The full version of the January 2016 draft Masterplan was subject to public consultation in May/ June 2016.

Guidance Notes: If you have not yet undertaken any consultation you may wish to speak to the Consultation Team first as a lack of sufficient consultation could place the Council at risk of legal challenge.

[Click here Luton Observatory](#)
For local demographics and information

[Click here for LBC Consultation Portal](#)
To access available relevant research already carried out

1.1. Insert any links to references including websites below

[See links above](#)

1.2. Consultation – insert any links to consultation documents

<http://consult.luton.gov.uk/portal/lbc/environmentandplanning/policy/llp2031/>

The High Town Masterplan was published for consultation on the Council's website and consultation portal
<http://www.luton.gov.uk/Environment/Planning/Regional%20and%20local%20planning/hightown-masterplan/Pages/default.aspx>

[For advice and support from Consultation Team click here](#)

1.3 Have you carried out any specific consultation with citizens likely to be affected by the proposal? If yes, please insert details, links to documents, as appropriate above. Please show clearly who you consulted with, when you consulted and the outcomes from the consultation. Mitigations from consultation should be clearly shown in Action Plan at end of document.

Consultations carried out thus far explained above.

2. Impacts Identified

2.1 Where you have identified a **positive*** impact, for **communities or staff**, please outline how these can be enhanced and maintained **against each group identified**. Specific actions to be detailed in action plan below.

**By positive impact we mean, is there likely to be a noticeable improvement experienced by people sharing a characteristic?*

The High Town Masterplan sets out detailed proposals for the regeneration of this important and historic part of Luton. In particular it sets out proposals for a significant amount of new housing which will be constructed over the next 15 years. The Masterplan shows how much and where housing (and what type and how much affordable housing) and employment and supporting infrastructure will be provided in the area as well as the need to protect and enhance its historic core and valuable green infrastructure which is important for health and wellbeing.

The approach in the Masterplan will encourage development to be suited to a range of needs:-

- Elderly (access to affordable housing and sheltered housing)
- Young (access to affordable housing and starter homes, Primary and Secondary schools)
- And gender (access to traditional manufacturing, service based jobs and highly skilled engineering and professional jobs)

via a well-designed neighbourhood based in an historic part of the town. The proposals and growth in the local resident population will help support High Town as an important Neighbourhood Centre providing opportunities for shared services including leisure, shopping schools and employment, that people will be able to access locally through fewer and shorter linked trips and via walking and cycling. The proximity of High Town to the railway station and bus interchange gives a superb level of service nearby and, for example, an ability to access employment opportunities across a very wide area. It is recognised that significant investment and development in the area may have an impact through some gentrification.

[For advice & support from the Social Justice Unit click here](#)

2.2 Where you have identified a **negative*** impact please explain the nature of this impact and why you feel the proposal may be negative. Outline what the consequences will be **against each group identified**. You will need to identify whether mitigation is available, what it is and how it could be implemented. Specific actions to be detailed in action plan below.

**By negative impact we mean is there likely to be a noticeable detrimental effect on people sharing a characteristic?*

N/A

2.3 Where you have identified a **neutral*** impact for any group, please explain why you have made this judgement.

You need to be confident that you have provided a sufficient explanation to justify this judgement.

**By neutral impact we mean that there will be no noticeable impact on people sharing a characteristic*

Example statement:

There is no evidence currently available to suggest that the Policy will have a noticeable impact in most respects, either positive or negative, on the groups identified above. A neutral impact has been identified in respect of employment since the redevelopment of some sites will see a change from former employment use as part of the comprehensive regeneration of the area.

N/A

[For advice & support from the Social Justice Unit click here](#)
[For advice and support from the Public Health team click here](#)

3. Social & Health Impacts

If you have identified an impact on community cohesion⁶, tackling poverty⁷ or health and wellbeing⁸, please describe here what this may be and who or where you believe could be affected, **Please also ensure that you consider any possible impacts on Looked After Children.**

⁶ is the proposal likely to have a noticeable effect on relations within and between specific section(s) of the community, neighbourhoods or areas.

⁷ is the proposal likely to have a noticeable effect on households that are vulnerable to exclusion, e.g. due to poverty, low income and/or in areas of high deprivation

⁸ Is the proposal likely to have a positive or negative impact on health inequalities, the physical or mental health and wellbeing of an individual or group, or on access to health and wellbeing services?

Guidance Notes:

Please use this section to describe the social and health impacts and detail any specific actions or mitigations in the action plan below.

It is intended that the needs of the resident population as a whole socially, economically and environmentally will be met as far as possible within High Town by providing affordable housing, access to services including leisure, shopping, schools and employment, that people will be able to access via walking and cycling for more healthy lifestyles with local green infrastructure protected for leisure, exercise, tranquillity and wellbeing

4. Impacts on the natural & built environment

Environment Impacts

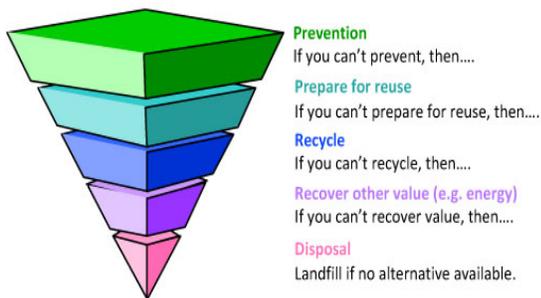
If you have identified any impacts related to the built and natural environment⁹, low carbon¹⁰ and waste minimisation please describe here what this may be and who or where you believe could be affected (please see footnote below)

It is intended that the needs of the resident population as a whole socially, economically and environmentally will be met as far as possible within High Town by providing affordable housing, access to services including leisure, shopping, schools and employment, that people will be able to access via walking and cycling for more healthy lifestyles with local green infrastructure protected for leisure, exercise tranquillity and well-being. LBC's policies also seek design of housing and commercial development that includes sustainable energy, efficient use of resources such as water and soils, recycling of brownfield land and waste minimisation.

The consultation response from Historic England has enabled changes to the report to be proposed to strengthen the approach towards protection of the historic environment, including the conservation area and important buildings.

Is the proposal likely to impact on the waste hierarchy which includes issues shown in the table below:

Waste Hierarchy



5. Economic Impacts

If you have identified any impacts related to Luton's economy and businesses¹¹, creating jobs¹² or improving skill levels¹³,

⁹ Is the proposal likely to impact on the built and natural environment covers issues such as heritage, parks and open space, cleanliness, design, biodiversity and pollution.

¹⁰ Is the proposal likely to impact on low carbon includes issues such as use of energy, fuel and transport.

¹¹ Is the proposal likely to impact on Luton's economy and businesses for example by creating an opportunity to trade with the Council, support new business opportunities?

please describe here what this may be and who or where you believe could be affected (– please see footnote below)

It is intended that the needs of the resident population as a whole socially, economically and environmentally will be met as far as possible within High Town by providing affordable housing, access to services including leisure, shopping, schools and employment, that people will be able to access via walking and cycling for more healthy lifestyles with local green infrastructure protected for leisure, exercise tranquillity and wellbeing. The Council's approach to employment will help maintain a range of job opportunities to suit skilled and unskilled workers.

Guidance Notes:

Please use this section to describe the social impacts and detail any specific actions or mitigations in the action plan below.

Please detail all actions that will be taken to enhance and maintain positive impacts and to mitigate any negative impacts relating to this proposal in the table below:

Action	Deadline	Responsible Officer	Intended Outcome	Date Completed/ Ongoing
Maintain and regular monitoring and review of development plans and its impacts via the monitoring framework	December 2017 and annually via the AMR	Graeme Markland	To ensure that policies are having the desired impact and to identify any amendments any refinements in further plan reviews.	2015 AMR to be published March 2016

A review of the action plan will be prompted 6 months after the date of completion of this IIA

Key Contacts:
David Carter

¹² Is the proposal likely to impact on the creation of new jobs in the local economy? This will also link to health and well-being and the reduction of poverty in the social box.

¹³ There are significant skills gaps in Luton's economy. Is the proposal likely to create opportunities for up skilling the workforce or to create apprenticeships?

Next Steps

- All Executive Reports, where relevant, must have an IIA attached
- All report authors must complete the IIA section of Executive Reports (equalities, cohesion, inclusion, health, economic, business and environment)
- All reports are to be forwarded to the Social Justice Unit, Public Health and Strategy & Sustainability Unit for sign off in time for Executive deadline
- On the rare occasion that the Social Justice Unit are unable to sign off the report, e.g. recommendations are in breach of legislation, a statement will be submitted by Social Justice Unit Manager or Equality and Diversity Policy Manager

Completed and signed IIA's will be published on the internet once the democratic process is complete

Corporate Plan

<http://intranet/SupportServices/Document%20library/Corporate%20plan%2011th%20July%202011.doc>

Equality Charter

<http://intranet/SupportServices/socialjustice/Document%20library/Equality%20charter.pdf>

Social Justice Framework

http://www.luton.gov.uk/Community_and_living/Lists/LutonDocuments/PDF/Social%20Justice/Social%20Justice%20Framework%202012%20-2026.pdf

Family Poverty Strategy

http://www.lutonforum.org/Forum/Documents/Family-Poverty-Strategy-Final-October2011_001.pdf

Joint Strategic Needs Assessment (JSNA)

http://www.luton.gov.uk/Council_government_and_democracy/Lists/LutonDocuments/PDF/Consultation/Reports/Final%20JSNA%202011.pdf

Community Involvement Strategy

http://www.luton.gov.uk/Community_and_living/Lists/LutonDocuments/PDF/Community%20involvement%20strategy.pdf

<p>For: (x)</p> <table border="1" style="width: 100%;"> <tr> <td style="width: 80%;">Executive</td> <td style="width: 20%; text-align: center;"><input checked="" type="checkbox"/></td> </tr> <tr> <td>CLMT</td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table> <p>Meeting Date: 19 September 2016</p> <p>Report of: Service Director (Business and Consumer Services)</p> <p>Report author: Paul Adams</p>	Executive	<input checked="" type="checkbox"/>	CLMT	<input type="checkbox"/>	<h2 style="margin: 0;">Agenda Item Number: 13</h2>
Executive	<input checked="" type="checkbox"/>				
CLMT	<input type="checkbox"/>				

<p>Subject: Luton Skills and Employability Strategy 2016-2020 (For Executive Only)</p> <p>Lead Executive Member(s): Councillor Sian Timoney</p> <p>Wards Affected: ALL</p>	<p><u>Consultations:</u></p> <p>Councillors <input checked="" type="checkbox"/></p> <p>Scrutiny <input checked="" type="checkbox"/></p> <p>Stakeholders <input checked="" type="checkbox"/></p> <p>Others <input type="checkbox"/></p>	<p>(x)</p>
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Recommendations

1. **Executive is recommended to approve the Luton Skills and Employability Strategy 2016-2020, as set out in Appendix A to this report.**

Background

2. Luton is committed to the development of a skilled workforce, creating better opportunities for its residents and supporting a vibrant and thriving business economy.
3. The Luton Investment Framework sets out an approach to improved health and wellbeing and to improve the prosperity of the town, with an ambition to attract over £1.5bn of inward investment leading to the creation of an additional 18,500 jobs, 5,700 new homes and 2 new schools. Central to this growth is a need to develop skills in Luton’s residents to match the anticipated jobs pipeline.
4. The Strategy directly contributes to at least 2 of the new strategic priorities for the Council approved on 27 June 2016: (a) Enhancing skills and education, and (b) Building economic growth and prosperity.

The current position

5. Executive approved the original Skills and Employability Strategy in 2012. However, with the launch of the Investment Framework and the emphasis on skills and opportunities for new jobs, it was considered the right time to review priorities and approach, resulting in a refreshed strategy (Appendix A)
6. The draft strategy has 5 strategic priorities:
 - a) To improve young people’s transition from education to employment and to provide a more comprehensive vocational offer for young people aged up to 24 years old.
 - b) To increase the range and take up of vocational training offered, including the number of apprenticeships being created and taken up, for all ages and at all levels.
 - c) To improve opportunities for learning, self development and employment progression for all, but particularly for the low paid and the low skilled.
 - d) To remove barriers and improve pathways into work for the unemployed
 - e) To facilitate work with employers and training providers to ensure Luton’s residents are equipped to meet the skills needs of local businesses now and in the future and to provide

good quality jobs for local people.

7. The Strategy sets out issues and actions in the following areas:

- Luton's young people (focusing on strategic priorities 1 and 2)
- Adult residents and social mobility (focusing on strategic priorities 2,3 and 4)
- Skills for Luton's economic growth (focusing on strategic priority 5)

8. High level actions are included in the Strategy and these will be supplemented by a detailed action plan agreed and regularly reviewed by partners and accountable through appropriate governance arrangements.

9. Working in partnership with other organisations will be critical to the strategy having a positive impact. Key external partners with whom the council closely works include Job Centre Plus, University of Bedfordshire, SEMLEP and post 16 education providers such as Luton Sixth Form College and Barnfield College.

10. The Skills and Employability Strategy dovetails with the council's [Apprenticeship Strategy](#), the welfare reform agenda, Stronger Families programme and the Council's ambition to attract European funding to help unemployed people move closer to the job market.

Goals and Objectives

11. To set out the strategic objectives and priorities to assist the Council and its partners to deliver actions that improve skills, qualifications and employability of Luton's residents, creating an environment that gives maximum opportunity for Luton residents to get a job, a better job or a career.

Proposal

12. To approve the Luton Skills and Employability Strategy 2016-2020:

Key Risks

Risk	Mitigation
<p>13. The Policy quickly becomes out of date and does not reflect the emerging opportunities presented by coordinated investment framework activities, the views and priorities of partners or a new economic landscape emerging from the referendum decision to leave the EU.</p>	<p>The Policy has been informed by detailed research and has been widely consulted upon. The strategic priorities are considered to be fit for purpose at least for the next 4 years. The Policy and actions will be kept under review through partnership meetings and accountability through the Strategy's governance arrangements.</p> <p>A focus on attracting European funding to support investment in skills is continuing and, whilst the Chancellor has indicated that funding to 2020 will be honoured if agreements can be signed before the Autumn Statement, at the time of writing this report there is still uncertainty about the level and duration of funding.</p>
<p>14. Pressure on resources affect the delivery of the action plan</p>	<p>LBC will work with partners and stakeholders across the town to deliver the action plan. The Policy and actions will be kept under review through partnership meetings and accountability through the Strategy's governance arrangements.</p>

	A growth proposal is being considered which will invest new resources to invest in delivering a step change in the Council's approach to the skills agenda.
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Consultations

15. Consultation was carried out with key partners and residents and a summary report is set out in Appendix B.
16. The draft Strategy was presented to the Overview and Scrutiny Board on 7 June 2016. The Board were supportive and requested an update on the detailed action plan at a future meeting.
17. An Integrated Impact Assessment is attached at Appendix C.

Appendices attached:

Appendix A : Luton Skills and Employability Strategy 2016-2020

Appendix B : Consultation summary report

Appendix C : Integrated Impact Assessment

Background Papers:

None

IMPLICATIONS

For Executive reports

- grey boxes must be completed
- all statements must be cleared by an appropriate officer

For CLMT Reports

Clearance is not required

		Clearance – agreed by:
Legal	Clearance Given - no comments	Graham Cole – Solicitor, Legal Services – on 6.9.16.
Finance	There are no direct financial implications associated with the strategy itself. However, in order to accelerate the action plan, investment would be required as part of the Council's overall medium term financial planning.	Darren Lambert, Finance Manager for Place & Infrastructure, on 5 th September 2016.

Integrated Impact Assessment (IIA) – Key Points

Equalities/ Cohesion/Inclusion (Social Justice)	An IIA has been completed and has identified positive impacts for race, disability, age, pregnancy and maternity	Maureen Drummond, Cohesion and Equalities Adviser, 6 September 2016.
Environment	The council has been successful in attracting grant from the DfT for promoting sustainable travel and efforts will continue to be made to remove any transport barriers to employment by promoting sustainable transport and giving greater choice of access by train, bus, walking and cycling.	Rod Black, Highway Development & Sustainable Travel Manager 6 th September 2016

Health	<p>Consider making reference to JSNA 9.2 Adult mental health and wellbeing.</p> <p>Priority 3: Introduce Individual Placement and Support (IPS) to support people with mental health into employment and to stay in employment. Also consider the benefits this strategy will make to young parents. It has the opportunity to enable young people to gain some of the key skills required to actively compete for local employment opportunities.</p>	<p>Stephen Gunther, Service Director, Public Health</p> <p>Sept 16</p>
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FOR EXECUTIVE ONLY - Options:

The options available to Executive are to :

- a) Agree to the recommendation
- b) Request further information, or
- c) Reject the recommendation.

Luton's Skills and Employability Strategy

2016 - 2020

Introduction by Sian Timoney Portfolio Holder for Place and Infrastructure

Luton is committed to the development of a skilled workforce, creating better opportunities for its residents and supporting a vibrant and thriving business economy. Updating our all-ages Skills and Employability Strategy gives a strong partnership platform to work with employers, training providers and education settings to create a culture of learning, aspiration and high achievement that provides the skills employers are seeking and which will support the goal of sustained growth in Luton's economy.

Luton has a significant part to play in the national and regional growth agenda. It has the capacity, opportunity and responsibility to harness its economic impact, mobilise its community and improve the health and ambition of Luton's residents and businesses to meet the highest levels of economic growth.

Proximity to London, the South and the South-East creates an opportunity to support the development of Luton as a place that is connected to all of the benefits of London (22 minutes by train and 31 miles from the very heart of central London) and the South, with the added advantage of available affordable land and housing values, affordable commercial rents and commercial property, an increasingly skilled workforce, superb broadband connectivity and proximity to the European and Asian international markets through London Luton Airport.

Over the next 10 years we have opportunities to grow our airport and its European business links and to create over 15,000 jobs. We will dedicate additional resources to work with employers and businesses in the town to match the skills pipeline and identify and develop emerging skills necessary to meet employers' needs.

Luton will continue to grow, both in jobs and in population. With strategic investment in Luton's assets and its people, we can begin to offset some of the effects of current economic pressures, and with an expanding, fast-growing airport we will over the next 20 years continue to deliver jobs, prosperity and economic opportunity.

Luton has a track record of success and is ambitious for its future. We will continue to work with our partners to establish Luton as a destination for success, with increased aspirations and a culture of life long learning for all.

Executive Summary

The refreshed Skills and Employability Strategy for Luton takes an honest look at our success and strengths, as well as some of the challenges and barriers to growth and development that some of our young people, our adult residents and our businesses are facing. This strategy links to the Council's Prospectus, Luton's Investment Framework, the Flying Start Initiative, the Apprenticeship Strategy, the work of Luton's Stronger Families team, the Family Poverty Strategy, Health Inequalities Strategy and the Welfare Reform agenda.

It clearly sets out our plans to overcome each barrier to progression, the outcomes we expect to have achieved by 2020 and how we will measure our success. None of this will be possible without joint working with our partners.

Working with the Progression and Transition Board we will increase qualifications and skills levels for all pupils, in the relevant areas that match employers' emerging needs; link business partners to schools, colleges and higher education providers to shape and prepare tomorrow's workforce and meet employer demand; and develop innovative curriculum solutions to meet employer and learner skills needs.

Collaboration between employers and Luton's schools, academies and further and higher education providers will enable the development of work-based teaching in emerging employment areas and we will work to secure extra funding for training for Luton residents and employers through initiatives such as traineeships and all age and higher level apprenticeships.

We will develop employability and training networks to identify training opportunities for residents and to connect candidates from Luton postcodes with Luton jobs. We will align sources of funding, including European Social Funds, to match-fund proposals to close the skills gap and to support development of small business and enterprise. We will use labour market intelligence to develop high quality, informed careers guidance to enable Luton residents to aim high and enter appropriate career pathways.

We will work with our colleges and training providers to develop a tailored and flexible approach to learning with an awareness of skills requirements and the specific needs of different people and communities, with 750 community volunteers (between 2016-20) in training and development opportunities that will improve their employment chances.

The town has some land for development, including a new Enterprise Zone, and we focus very carefully on what our priorities are for land use and resources, and ensure that we adopt only those policies that work well together to promote the ambition for Luton's residents and businesses and for the region, socially, economically and educationally.

Methodology

The Skills and Employability strategic review began with partners and stakeholders coming together in a series of workshop settings in 2015 to consider how to measure achievements of the 2012 Skills and Employability Strategy and action plan. The delivery of the action plan was overseen by the Skills and Employability Steering Group, with partners taking responsibility for delivering projects and reporting progress on a quarterly basis. All projects were delivered successfully and some are still ongoing.

With the emergence of the Luton Investment Framework, it was agreed to refresh the 2012 strategy, examining the current barriers to progression and social mobility for Luton residents, and the opportunities for, and constraints to, growth for the local economy and local business. It was agreed that the vision and strategic priorities should stay the same but new outcomes and an action plan that would allow for more specific measurement in terms of success and achievements be developed.

A small working group comprising officers from Luton Borough Council's Economic Development Service, Business Intelligence, Children and Learning's Support Challenge and Intervention 16-19 team, Social Justice Unit, Luton Adult Learning and the Princes Trust undertook the research and re-writing of the strategy.

The strategy began its journey of consultation in February 2016. Suggestions and feedback from the consultation have been taken into consideration and a new detailed action plan to allow for measurement of success. This will sit alongside the strategy and be delivered by the Skills and Employability steering group and other multi agency partnerships.

A Spotlight on Progress and Success

The launching of the 2012 Skills and Employability Strategy enabled a town wide group of partners to work together for the first time to share information and resources and use a co-ordinated approach to tackle skills and employability. Skills have become one of Luton Borough Council's priorities. Below are just a few of the successes in Luton over the last three years.

The Progression and Transition Board comprising 16-19 provision, including secondary Head Teachers, and FE college principals are working to improve careers education and guidance and focus on employability and future skills needs, with a view to bringing about curriculum change.

A Business Engagement Pilot with three schools facilitated by Luton Borough Council's Economic Development Service, 16-19 Team and local employers to encourage young people in to the Engineering Sector, where skills shortages are acute. Further work is planned with employers having 'open days' for school visits

'Tokko' a £4.75million youth facility, opened its doors in June 2013. TOKKO has provided services and activities to more than 2,000 young people who have come to learn and develop new skills and talents, get training, advice, information and guidance and have fun and relax together. TOKKO work with a range of partners including the Princes Trust whose Fair-bridge Programme is currently running at TOKKO, helping 100 young people a year to progress their skills, confidence and gain qualifications.

European Social Fund : Since 2008 Luton Borough Council has attracted and match funded £5m of ESF funding that has been spent in providing support and training to help residents develop new skills, gain qualifications and move into or progress within employment. Over forty projects have been supported helping 575 people in to employment, 935 in to education and 205 to gain level 2 or 3 qualifications.

The biannual Luton Employment Training and Skills Fair began as a direct result of the 2012 strategy and is a highly successful partnership between Department of Work and Pensions, Luton Borough Council's Economic Development Service and Luton Community Interest Company. The LETS Fair continues to grow in size with over 50 stands of employers and training providers. Nearly 1000 people attended the fair in September 2015.

A highly successful Annual Apprenticeship Event is organised by a partnership of the National Apprenticeship Service, Luton Borough Councils 16-19 Team and Economic Development Service alongside other ongoing work with schools and colleges. The 2015 event had over forty stands providing information about apprenticeship programmes.

Since 2012, Luton Adult Learning (LAL) has provided ESOL training to over 2400 learners and, through their work with the Community Learning Trust, has supported an additional 8000 learners via 24 local organisations. In addition they have delivered apprenticeships to Luton Borough Council and external employers. Their apprenticeship success rates are 14.2% above the national rate. They hold a National Career Service contract which has worked with over 5000 people.

Part 1 – Luton’s Vision for Skills and Employability 2016 – 2020

Luton will have a skilled and qualified workforce that will support a vibrant business economy and meet the requirements of its employers, specialist sectors and high growth businesses.

There will be a culture of lifelong learning, aspiration, participation and high achievement that will help to provide opportunities to improve the life chances for residents and the sustained development of the town’s economy.

The Luton Skills & Employability Strategy is made up of representatives from the following organisation:

Skills Development and Employment

- Luton Borough Council Economic Development
- Luton Borough Council 16-19 Team
- Luton Borough Council Youth Advice
- University of Bedfordshire
- Luton Adult Learning (LBC)
- The Learning Partnership
- The Princes Trust
- Luton Sixth Form College
- Barnfield College
- LBC Community Development
- LBC Planning
- LBC Social Justice Unit
- LBC Business Intelligence Team
- Bedfordshire Chamber of Commerce
- Federation of Small Business

Worklessness and Employment

- Department of Work and Pension/Jobcentre Plus
- National Apprenticeship Service

Skills Funding

- National Careers Service
- Skills Funding Agency

The partnership will ensure the development of a cohesive action plan to improve learning, skills and employment outcomes and inward investment in the Borough. It will be accountable for improving outcomes for residents, communities and the local economy.

The Strategic Priorities

These priorities are focussed on the local population and will be delivered through a number of workstreams and overseen by the Skills and Employability Steering Group.

1. To improve young people’s transition from education to employment and to provide a more comprehensive vocational offer for young people aged up to 24 years old.
2. To increase the range and take up of vocational training offered, including the number of apprenticeships being created and taken up, for all ages and at all levels.
3. To improve opportunities for learning, self development and employment progression for all, but particularly for the low paid and the low skilled.
4. To remove barriers and improve pathways into work for the unemployed.
5. To facilitate work with employers and training providers to ensure Luton’s residents are equipped to meet the skills needs of local businesses now and in the future and to provide good quality jobs for local people.

The high level outcomes will be supplemented by a detailed action plan, agreed and regularly reviewed by partners, and through the appropriate governance arrangements. The Progression and Transition Board will continue to oversee initiatives to improve opportunities for the development of young people in the town. The Welfare Reform Board will oversee the work to be carried out to remove barriers to progression for the unemployed, the low skilled and the low waged. The Skills and Employability Steering Group will continue to oversee the work carried out to encourage business growth and economic development.



This version dated 02/09/16

Part 2: Our priorities

The Strategy sets the key priorities in the following areas:

- 2.1 Luton's young people (focusing on strategic priorities 1 and 2)
- 2.2 Adult residents and social mobility (focusing on strategic priorities 2 and 3)
- 2.3 Unemployment and social mobility (focusing on strategic priority 4)
- 2.4 Skills for Luton's economic growth (focusing on strategic priority 5)

2.1 Luton's Young People

Strategic Priority 1

To improve young people's transition from education to employment and to provide a more comprehensive vocational offer for young people aged up to 24 years old.

Strategic Priority 2

To increase the range and take up of vocational training offered, including the number of apprenticeships being created and taken up, for all ages and at all levels.

It is important that all young people (not just high or low achievers) are supported in school to achieve their full potential. This includes helping young people to prepare for their transition from school to work. This can be achieved by continuing to support aspiration and achievement and by enhancing young people's preparation for the world of work, including quality careers advice, comprehensive information about the full range of post 16 options, including apprenticeships at advanced and higher levels, employability training and work experience.

Baseline Data

For May 2016, the numbers of young people not in employment, education or training (NEET), aged 16-19 within Luton remained consistently low at 3.9%. This figure remained favourable in comparison to the Council's statistical and regional neighbours and the national percentage (4.2%, 4.4% and 4.4% respectively).^[1]

There has been a decrease in the percentage of young people aged 16-19 who are not in education, employment or training (NEET). Taking the month of May as a snapshot, NEET figures within Luton for the last three years have been: May 2016 (3.9%); May 2015 (4.8%) and May 2014 (6.5%) ^[2]. This trend is supported by DfE data that shows 'End of Year' NEET figures for 16 to 18 year olds as 2015 (4%); 2014 (4.7%) and 2013 (5.6%) ^[3]. Having a small,

¹ Luton Borough Council Youth Advice. Performance on a Page (2016/17)

² Luton Borough Council Youth Advice. Performance on a Page (2015/16)

³ <https://www.gov.uk/government/publications/neet-data-by-local-authority-2012-16-to-18-year-olds-not-in-education-employment-or-training>

designated 'statutory' team of YAS (Youth Advice Service) advisers has helped to support these reductions.

The number of young people who are recorded using the 'adjusted NEET' formula differs in each neighbourhood and these numbers can change each month. However some neighbourhoods remain higher than others. Most recent figures from May 2016 show that the three wards with percentages of 7 % and above were South, Northwell and Farley. These findings shows similar results from one year previously (May 2015) when South and Farley (South wards) had the highest percentage of young people recorded as NEET. [1] [2]

The number of young people in Luton aged 16-19 and recorded as not having a current destination (Not Knowns) for May 2016 was 3.7%. This figure out-performed the percentage results from Luton's statistical neighbours (8.6%); regional neighbours (5.2%); and the national % (6.6%). These figures confirm that having a small, dedicated tracking team helps to reduce young people whose destinations are unknown and thus supports tracking young people who are potentially missing. [1]

Data from May 2016 shows that in terms of ethnicity, 54.5% of NEET young people are White which represents the largest cohort percentage In terms of gender, for the same period 57% are male and 43% are female (source footnote 1).

The proportion of the workforce with GCSE A Level qualifications has increased from 18.8% in 2009 to 21.3%. This brings Luton closer to the regional and GB average of 23.5% and 23.3% respectively. [4]

The 2015/2016 Ofsted Inspections data for Luton schools show that 91.5% of Luton secondary pupils now attend a school that is good or better. Luton is 3rd in the Eastern Region authorities (82.2%) and well above the England average of 80%. It ranks Luton 34th out of 162 LAs nationally.[5]

In 2015 Luton Schools have achieved 60.3% of young people gaining five or more GCSE exam results at A* – C (the national average figure is 64.9%)

A year 10 Career goal survey was carried out by Luton Borough Council in 2015. The survey was designed to seek information about young people's aspirations around employment, education or training. There were 1574 individual responses to the survey.

Outlined below are some of the key headlines:

- Work Experience has the most responses of careers/vocational activities that students would like to experience, with 4 out of 5 students responding positively to it. This was the single biggest response to any question in the survey.

⁴ Annual Population Survey 2015, Office for National Statistics

⁵ <http://www.watchsted.com/> (latest Ofsted Inspections)

- Less than 1 in 10 students sees an Apprenticeship as their preferred post-16 option (8.8%) although almost a third (494 students / 31.4%) of students would like more information on Apprenticeships.
- Understanding of employability skills may be an issue to explore further.
- ‘Universities and Colleges’ (44.5%) and ‘Interview Skills’ (43.1%) were the two most popular areas that students felt they needed more help with.
- Two-thirds (66.8%) of students see college as their intended destination post-16, with 53% intending to do A-Levels, and 13.8% doing another course there.
- Medicine (17.4%), ‘Sport, Leisure & Tourism’ (16.1%) and ‘Education & Training’ (15.6%) are the leading three occupational areas that students can imagine themselves working in.

The Rationale for intervention

- Some young people making the transition from education to employment are not receiving adequate careers education, information, advice and guidance (CEIAG) in schools and colleges. This could lead to young people making inappropriate choices on their career pathways.
- An audit of CEIAG provision in May 2015 of Luton Educational Establishments found that, although there may be some good (although often uncoordinated) work taking place, very few institutions reviewed, monitored or evaluated their CEIAG in a systematic way and the majority are not embedding CEIAG into curriculum areas. Therefore institutions are sometimes missing opportunities to develop young people’s knowledge of career pathways within subject areas.
- The offer of CEIAG varies considerably in each institution. Some have invested time and resources internally and externally, however other institutions are making slower progress. The new Ofsted requirements have imposed a duty on schools, to secure independent careers guidance for all year 8-13 pupils, although in Luton we think there is a need for CEIAG for year 7 onwards (when children start considering their options). Some professionals believe that CEIAG should be embedded into subject areas from primary school age.
- Employability training is part of ongoing ‘careers education’, and is often delivered as part of Personal, Health and Social Education (PSHE). Employers in Luton tell us that many young people leaving school, college and even university are unprepared for the world of work. They are lacking in ‘employability skills’ e.g. basic communication skills and right attitude, initiative, self reliance and self discipline.
- Employers in the engineering sector say that young people’s physics and maths skills combined with a lack of ‘hand skills’ are not adequate to prepare them for in-house or sector training in engineering. Further work needs to be carried out with other business growth sectors to ascertain their skills needs.
- Further work needs to be done to develop opportunities for work experience for under 16s, which is in short supply. Schools say some employers engage well, but reliance on personal contacts is a model that does not help schools overcome social mobility barriers.

- More support is needed for young people to continue to participate in learning since the 'Raising of the Participation Age', but this does not have to be in school. Alternative and vocational provision is needed, but there is concern that young people are attending courses run by independent training providers who are delivering lots of similar low level courses in a limited number of core subjects with no progression route.
- In spite of the growth in apprenticeships remaining a national priority and high profile promotion of apprenticeships locally, there is still a lack of enthusiasm shown by parents, schools and young people themselves, with many preferring the traditional academic route of college and university into employment.
- Many employers are not aware how Higher Level Apprenticeships (at Level 4 and above) could work in their business. Low salaries are also an issue for apprentices, with many paid the minimum, rather than a living wage.

In the next 4 years, Luton will:

1. Strive to improve performance and raise the standards of achievement at least to the level of the national rate especially in core curriculum subjects.
2. Continue to engage with schools through the Luton Careers Network, to develop their relationship with the Careers Enterprise Company, employers and training providers to offer vital local and national Labour Market Information and Continuing Personal Development opportunities for teaching staff; and to raise their understanding of the needs of industry particularly in the growth sectors in Luton. Through the PTB Luton Borough Council will provide Labour Market Information to schools, training providers and the community particularly about new opportunities arising e.g. from growth at the Airport and to inform the 2016/17 Area Based Review of Post 16 education.
3. Be bringing employers and schools together to ensure that young people have the skills that employers need and to provide tomorrow's workforce with the skills required locally and nationally. Consultation feedback endorses this approach.
4. Continue to provide through Luton Borough Council's Advice Service, an effective careers advice, guidance and support provision to young people who become NEET and offer careers advice via its traded service. They also continue to track Luton's young people's destinations up to age nineteen.
5. Continue to work with partners to develop work experience placements and community enrichment programmes in schools and colleges. The National Citizen Service currently runs volunteering programmes for year 11 students. In Luton 400 young people are already signed up and the target is 1800 volunteers per year by 2021.
6. Prioritise the creation and promotion of apprenticeships for young people with employers, especially Higher Apprenticeships, those in the growth sector and the new developments in and around the town.
7. Encourage a perception of a 'Pathway to Professionalism' rather than 'low cost labour'.

Luton will have succeeded if, by 2020:

- a) All Luton businesses in growth sectors understand the new GCSE grading scales being introduced by the Government in 2016/17.
- b) Our schools attainment figures have improved and are in line with national and regional average.
- c) All young people benefit from more progression opportunities both in school and through independent training providers.
- d) All young people are better informed and supported to make choices about career pathways.
- e) All young people have raised aspirations and are better prepared for the world of work.
- f) More young people are self aware, self confident and contribute to community life and volunteering.
- g) All young people under 21 access employment, apprenticeships or work experience within four months of leaving a job, education or training.
- h) The percentage of 16-19 year olds with no qualifications is inline with the national average. In 2015 this is 16.2%, which is higher than the national (12.6%) and regional averages (12.3%) (*ONS Annual Population Survey 2015*).
- i) There is a closing of the gap between high and low achievers at Key Stage 4.
- j) The unemployment rate for young people aged 16-24 years is in line with the national average. In 2015, this is 19.1% compared to 14.4% nationally and 11.2% in the East of England. (*ONS Annual Populations Survey 2015*).
- k) The percentage of Luton young people who are not in education, employment or training are inline with the national average.
- l) All Luton schools have a strategy on CEIAG and provide an 'agreed minimum standard' for all pupils, including the option of vocational training leading to apprenticeships, employability training and careers education embedded into subject areas.
- m) More employers are in productive and ongoing relationships with Luton schools.
- n) The percentage of young people taking up apprenticeships, especially Higher Apprenticeships and in the growth sectors, has increased and is in line with national average.
- o) The percentage of educational establishments offering enrichment programmes and take up by young people has increased.
- p) The attainment and destination reports are reviewed and applied. This should assist in investigating trends that can inform the curriculum and compare young people's backgrounds and end destinations in different areas of the town.

2.2 Adult Residents and Social Mobility

Strategic Priority 2

To increase the range and take up of vocational training offered, including the number of apprenticeships being created and taken up, for all ages and at all levels.

Strategic Priority 3

To improve opportunities for learning, self development and employment progression for all, but particularly for the low paid and the low skilled.

Social mobility is about progression in society irrespective of social background. It means that an individual's ability and effort can determine their social success. Those who are furthest away from the labour market need the most support and are less able to help themselves. Luton's ambition is to provide people with progression and life long learning opportunities to be able to update basic and advanced level skills in order to achieve their full potential.

Baseline Data

Luton has a lower proportion of residents with degrees (22.9%) than GB (27.5%) However this figure has increased from 14.9% in 2009. The figures do however remain below those of the eastern region and GB. (*ONS Annual Population Survey, 2015*).

Luton's population has a higher proportion of people without qualifications; however the proportion of people in Luton without qualifications has been falling. The proportion of 16-19 year olds in Luton with no qualifications is 16.2% and is higher than the national (12.6%) and regional averages (12.3%). (*ONS Annual Population Survey, 2015*).

The ONS Annual Population Survey 2015 shows that Luton residents were on average more likely to be in lower level occupations than the Luton workforce as a whole, suggesting that either Luton residents are less able, via skills, competences or experience, to gain higher level occupations than non-residents or that there is perception that this is the case.

Research by Luton Borough Council's Business Intelligence Team on Child Poverty Jan 2015 shows that the population of Luton is becoming more skilled. All ethnic groups are obtaining more qualifications with the biggest increases in the level of education in black and minority ethnic groups. However, Luton has a higher proportion of people without any qualifications than the national average and a lower proportion of people with degree level and above qualifications.

The Rationale for Intervention

- With the reduction in Skills Funding Agency (SFA) funding, the range of non-apprenticeship vocational learning opportunities has reduced. Available resources are directed more towards lower level qualifications in core subjects with no progression route.
- Apprenticeships are open to adults, but take-up is low. There may be two reasons for this: (i) National advertising for apprenticeships is aimed at young people and therefore adults do not see this as a viable route to employment for them; and (ii) The average hourly rate for an apprentice is not sufficient for an adult with a family and higher accommodation expenses.
- Other work-based learning has fallen by 57% in Luton in 2014; contributing factors could be cost, employer contributions or the impact of Advanced Learner Loans.⁶
- Partners and service providers tell us that there are people who are employed who cannot progress because they lack the right skills and qualifications, e.g. older workers who lack IT skills, or people who don't speak English or whose qualifications are not recognised.
- Not enough is known about how many people apply for jobs or are employed locally, who do not speak English, or are without recognised qualifications.
- According to the 2011 census, the percentage of people with 'other qualifications' in England is 5.7% compared to Luton where the figure is 10.65% indicating high numbers of people with qualifications that are not recognised in the UK.
- Data from the Annual Population survey (2015) shows that 13% of people across the UK were born abroad, compared to 32% of people living in Luton who were born outside of the UK.
- Not enough is known about how many employers support their staff with training, either by providing in house, or part-funding external courses and allowing staff time off to train or study.
- Even though there are some strong links between some employers and the main training providers, partners are concerned that funding is only available for smaller independent training providers to deliver low level courses in a limited number of subjects with no funded progression route.
- There is also a need for retraining for those being made redundant, or looking for a career change.
- Reductions in adult learning budgets mean there is less provision. Those willing to contribute to their own progression will find there are limited opportunities for evening and part time study with IT skills and other vocational training and general educational qualifications at A Level/ Level 3 and above in short supply. Progression pathways are difficult to identify.
- Learners are required to take out an Advanced Learner Loan to cover tuition fees (on eligible courses). However the number of loans being taken out is falling.
- Approximately 16,000 children are living in families facing poverty in Luton. Child Poverty in Luton has increased by nearly 3% since 2010. Affordable child care is an issue for every working parent.

⁶ <https://www.gov.uk/advanced-learner-loan/overview>

- In 2013/14 there were over double the amount of 'in work' families claiming benefits than those out of work compared to national average. People are coming off the unemployment register, but can still be victims of the poverty trap in low skilled, low paid jobs or zero hours contracts.
- Funding issues for colleges and training providers regarding installation of new infrastructure. For example, it is expensive to provide machinery in a college for Science, Technology, Engineering and Maths (STEM) teaching. In comparison it costs much less to provide a hairdressing course and hair and beauty courses are also popular with students.
- Whilst apprenticeships for those aged 16-18 years are fully funded, this is reduced by 50% for those over age 19 years and further still for those aged 24 and over making it less attractive to employers.

In the next 4 years, Luton will:

1. Work with employers and training providers to develop more apprenticeships opportunities for adults.
2. Develop a Careers Information web site (Jobs4Luton) for residents that will provide material and links on careers progression routes and pathways, qualifications and skills required, local training, volunteering and job opportunities.
3. Develop employability and training networks to identify training opportunities for residents and to connect candidates from Luton postcodes to Luton jobs.
4. Work with employers, educational and training providers to encourage and facilitate take up of funding opportunities to provide courses that ensure a tailored and flexible approach to learning and progression pathways. This in turn will close the skills gaps and provide accessible progression routes for learners of all ages and abilities.
5. Encourage take up of ESOL and qualification conversion programmes in the town and work together to explore how to create a culture of lifelong learning in Luton.
6. Work with the child care providers to encourage a network of local, affordable and accessible provision for working parents across Luton and for those looking for work.
7. Improve social mobility in the town with Luton residents accessing better paid jobs, affordable child care and re-training and self development opportunities.

Luton will have succeeded if, by 2020:

- a) More residents are in vocational and work based learning.
- b) More apprenticeships are being taken up by adult residents especially at higher levels and in the growth sectors.
- c) More residents are more aware of and accessing learning, re-training and self development opportunities.

- d) Increased number of residents gain new skills, becoming better educated and more qualified.
- e) Decreased numbers requires ESOL and qualification conversions.
- f) Increased numbers of affordable childcare places are available.
- g) More good quality jobs are available in Luton – to be measured by local salary levels.
- h) Earnings for Luton residents increase in line with people from outside of the town who work in Luton.

Part 2: Our priorities

2.3 Unemployment and social mobility

Strategic Priority 4

To remove barriers and improve pathways into work for the unemployed.

Those who are furthest away from the labour market and those who are unemployed often have multiple, complex and holistic needs that require more in depth help and support as they are less able to help themselves.

Baseline Data

Unemployment in Luton has fallen by nearly 2% over the last two years from 9.1% in December 2013 to 6.1% in December 2015.

The claimant count unemployment rate in Luton is 1.8%, which is higher than the national average of 1.5% and the regional average of 1%. Unemployment is highest in Northwell (3.0%), and South (2.8%) wards, whilst unemployment is lowest in Bramingham (0.4%) and Barnfield (0.5%) wards. (*ONS Unemployment Claimant Count May 2016*).

The economic activity rate in Luton is 72.1% of the workforce (aged 16 to 64). This is below the eastern regional figure of 80.6% and the GB figure of 77.7%.

There has been targeted work funded by Luton Borough Council's ESF programme and Jobcentre Plus for those aged 50+ but unemployed people aged 45+ who are willing to make career changes are a new and increasing group for whom there is little or no support. Lack of IT skills for older residents is an issue, coupled with lack of this kind of vocational training being available due to SFA funding cuts.

There are also people who are "hidden" from the unemployment register, either relying on the support of family and friends, crime or the 'black economy' This is often used by the poorest and hardest to reach, is illegal and often fed through street lending or online lenders with incredibly high lending rates. It also undermines the local economy with no rates or taxes being paid.

Over one hundred vulnerable people have been helped to move off benefits and into work by Luton Borough Council's Stronger Families programme, including some people involved in crime or anti social behaviour; and those affected by domestic violence and abuse. Jobcentre Plus Outreach Work Coaches work with Probation Officers to identify the skills needs of ex-offenders.

It is estimated that 20.6% of jobs in Luton pay below the living wage, compared to neighbouring Central Bedfordshire at 27%. (*Office of National Statistics, 2015*).

The Rationale for intervention

- It has been identified that those who are long term unemployed have multiple, complex and holistic needs that require more in-depth help and support.
- A lack of basic communication and IT skills are identified by training providers and some employers as particular barriers.
- Jobcentre Plus has identified lack of English and lack of ESOL provision as one of the main barriers to work.
- Affordable child care is another key barrier to work.
- Qualifications that are not recognised in the UK are both barriers to entering employment and progression within employment.
- People with ill health or disabilities but who are able to work also experience barriers to employment.
- There are also people who are 'hidden' from the unemployment register, either relying on the support of family and friends, crime or the 'black economy'.

In the next 4 years, Luton will:

1. Ensure that training providers work with Adult Social Care, Children's Services, Luton Access and Welfare Reform partners to enable carers to participate in training and return to work opportunities.
2. Support and promote volunteering activities as a route to employment.
3. Look into what further preparatory training is needed for those with multiple barriers to employment and encourage use of employment support services that include access to free IT provision and other support.
4. Ensure there is adequate provision and awareness of ESOL and qualification conversion programmes in the town.
5. Promote take up of short and intense courses including higher level ESOL.
6. Encourage more currently unemployed 45+ Luton residents in employment.

7. In line with recommendations from Luton's Investment Framework, initiate a coordinated multi-agency skills programme to maximise opportunities for Luton's residents to secure a job in the town. (skills programme - appendix 1)
8. Work with partners to resource and deliver the said skills programme, aimed at addressing the skills challenges in the town. This will include pre-employment training, self employment, raising aspirations and bespoke training to support vulnerable people.
9. Work with employers to develop apprenticeships for adults, particularly at higher levels.
10. Build on Luton's strong social enterprise network and charitable sector to encourage volunteering, self development, raised aspirations, self employment and business start-ups.
11. Continue dialogue with SEMLEP and funders to raise awareness about the barriers and issues raised in the strategy with a view to influencing spend in skills gaps areas.

Luton will have succeeded if, by 2020:

- a) The European Social Investment Fund (2014-2020) and other external funding take up by Luton community & training organisations increases and results in more people moving closer to the job market or in to sustainable employment.
- b) The Building Better Opportunities programme of £2m (across the SEMLEP area) is spent to work on many of the objectives identified in this strategy.
- c) Potential delivery of the Community Led Local Development Fund bid, (successful in the first stage) removes barriers to work for people living in the most deprived areas of Luton.
- d) Take up of information, advice and support services for business start-ups has resulted in more residents moving into self-employment.
- e) More adult residents are in employment or becoming entrepreneurs' including those furthest from the labour market.
- f) The percentage of working age people in employment increases, resulting in narrowing the gap in Luton and national average.
- g) The percentage of residents with no qualifications decrease on an annual basis.
- h) The percentage of residents with qualifications at all levels is in line with national average.
- i) The percentage of residents requiring ESOL training and qualification conversions is in line with national average.
- j) The percentage of vocational learning places and apprenticeships being created and taken up particularly in the growth sectors increases.
- k) The percentage of 45+, vulnerable people and people with complex and multiple needs are in sustainable employment, aligned with national average. Stakeholders report that affordable childcare is no longer a barrier to employment.
- l) More good quality jobs are available in Luton – to be measured by local salary levels.
- m) Earning for Luton residents increases in line with people from outside of the town who work in Luton.
- n) Fewer numbers are using Foodbank and Crisis Support Loans.

2.4 Skills for Luton's economic growth

Strategic Priority 5

To facilitate work with employers and training providers, to ensure Luton's residents are equipped to meet the skills needs of local business now and in the future, and to provide good quality jobs for local people.

Residents of Luton need to have the necessary skills and qualifications to ensure that they can access and sustain employment opportunities now and in the future. This will enable them to benefit from and contribute to increased economic success in the town. The town also needs to continue to attract and sustain new commercial and existing employer investment.

Baseline Data

Over the next 20 years Luton will have opportunities to create over 18,000 jobs, with over 15,000 in the next 10 years.^[7]

Average weekly earnings of people living in Luton are £479 per week which is less than the national average of £518 per week. Those living outside of Luton but working in Luton have slightly higher earnings than Luton residents (£486 per week). (*Annual Survey of Hours & Earnings published by the Office for National Statistics.*)

In 2013 Luton's Gross Disposable Income per Head was £13,337 which fell by 3.6 per cent between 2012 and 2013. Luton's GDHI per head is 24% lower than the UK average. Luton has the lowest GDHI per head in the East region. Luton is ranked 165th out of 173 local areas in the UK. (*Source: Office for National Statistics.*)

Luton is home to one of the UK's fastest growing airports. Currently, 40% of Airport employees live in Luton. London Luton Airport could need 1,145 workers in the three highest-skilled occupational groups, which include roles such as aeronautical engineers, aircraft pilots and flight engineers. An additional of 2,487 workers will be needed for unskilled roles such as customer advisors, baggage handler and storage workers. ^[8]

London Luton Airport (LLA) is the UK's fifth busiest airport transporting over 14 million passengers a year. LLA currently employs around 8,500 people, making it the largest private sector employer in the town. A significant proportion of the new jobs are expected to be derived from the airport growth and from town centre sites. Many of these jobs will be in business services, land transport/distribution, healthcare, retail, construction and arts/entertainment.

⁷ Luton's Investment Framework. 2015-2035, Draft

⁸ Oxford Economics. The Economic Impact of London Luton Airport, 2015

In July 2014 the airport was granted planning permission for a £100 million redevelopment that will increase passenger capacity to 18 million, generate up to 5,000 new jobs and bring £218 million a year into the county's economy by 2026.

Luton's economy has performed positively in terms of jobs growth, and its future economic growth prospects are good, supported by planned infrastructure improvements, Airport growth and the granting of an Enterprise Zone. This multi-million pound development comprises three linked sites surrounding London Luton Airport totalling over 300 acres. These sites have the potential to accommodate major aerospace and associated manufacturing and engineering businesses, together with a wide range of service industries supporting the airport, all of which will generate significant growth in new jobs.

Luton has four key business growth sectors which include Airport & Aerospace, Engineering & manufacturing, ICT and Creative Industries.

The assessment of future employment space requirements in Luton using the East of England Forecasting Model predicted 17,825 jobs between 2011-31. This could underplay Luton's economic growth potential although it is one that it is likely to be able to achieve. The 10,000 jobs to be created will be service/commercial jobs and 8,000 B1 – B8 jobs which include office, industry and warehousing.

The Rationale for intervention

- The 2015 SEMLEP Business Survey for Luton found that around two in five Luton businesses report skill gaps within their existing workforce (39%; 41% in 2014). This is a higher proportion than the South East Midlands average (33%; 38% in 2014).
- Just fewer than half the businesses in the survey had a workforce development plan. Skills lacking within existing workforces are most likely to be job specific skills (17%) and technical or practical skills (15%).
- Skills in IT, sales and marketing, and planning and organisation are mentioned by fewer businesses in 2015 compared with 2014, suggesting some success in addressing them.
- Poor quality staff is most frequently cited as a reason for skill gaps (13% of those with skill gaps), in addition to a lack of investment in staff training and development (12%) and a lack of job specific skills (11%).
- The Business Survey further found that more than half the businesses (58%) that had vacancies in the last year experienced difficulties filling them, compared to 41% in 2014.
- Skilled trade occupations are those in which businesses are most likely to have experienced hard-to-fill vacancies (23%) followed by elementary administration and service occupations (19%) and associate professional and technical occupations (16%).
- The predominant reason for recruitment difficulties has been the low number of applicants with the required skills (46%), while 16% cited a lack of applicants with the required attitude, motivation or personality and slightly fewer cited lack of people interested in doing this type of job (14%).

- Job specific and technical or practical skills are the two most frequently mentioned skills that have been difficult to obtain amongst all businesses that have had vacancies in the last 12 months (cited by 47% and 45% respectively).
- Advanced manufacturing, engineering and aerospace companies have flagged the difficulty in recruiting people with the right skills, coupled with an ageing highly-skilled workforce.
- 90% of the businesses at a London Luton Airport Transformation Event in June 2015 said they require better skills from school leavers and college students.
- Evidence points to a need to raise the aspiration within local people and provide the opportunities to gain the necessary skills. If this does not happen then this the likelihood is that existing businesses will suffer, slow airport growth and create congestion on key highways as employers 'import the necessary skills' from outside of the town.
- Employers from all sectors report that there is a reluctance and inflexibility amongst older workers to retrain for new roles and many older workers lack IT skills.
- In SEMLEP's research (July 2015) on skills needs, employers in the Cultural and Creative sector were concerned about retention of key staff, finding and keeping staff with management and leadership skills and finding the right training for workforce development.

In the next 4 years, Luton will:

1. Work with the Airport and other major developments within the town, to link the jobs/skills pipeline, and provide work experience and employment opportunities for local people.
2. Ensure residents are better qualified, upskilled and prepared to take up employment opportunities provided by the airport growth and other major developments.
3. Improve relationships and more joint working between employers, the council, education and training providers to address the skills needs of businesses.
4. Better understand the skills requirements of businesses, to match the skills and jobs pipeline, identify emerging needs and to influence the curriculum and local training provision.
5. Ensure more businesses of all sizes including self employed trades people, are taking on more all age apprenticeships particularly at higher levels and in the business growth sectors.
6. Secure more inward investment, including major employers relocating to the town, providing 'better quality' employment opportunities. (Luton's Investment Framework 2015-2035 sets the aspirations) including bespoke relocation support.

7. Work with partners; continue to promote an improved image of Luton in the media as a competitive place to invest and concentrate resources into making Luton cleaner, more attractive and a safer place for businesses and residents.
8. Increase local business growth and development through business engagement, inward investment and support activities.
9. Support more new enterprises starting up, and less business closure or business re-locating elsewhere.
10. Increase numbers of new/existing employers recruiting locally and investing in work based learning programmes, training and development and career progression for their employees.
11. Continue to work with the University of Bedfordshire to engage and support businesses in their research, development and training needs and to promote and increase take up of short and intense courses for company employees, particularly at a higher level, including higher level ESOL.
12. Continue to facilitate the work being carried out by the council to bring employers together through the Luton Technology Network and replicate this across all the business growth sectors to identify and address skills gaps and other constraints to growth.
13. Continue dialogue with SEMLEP and funders to raise awareness about the barriers and issues raised in the strategy with a view to influencing spend in skills gaps areas and work with SEMLEP.
14. Set up a coordinated multi-agency skills programme as a central focus to access provision to improve experience and develop skills of current and future workforce. (Luton's Investment Framework 2015-2035).
15. Encourage staff relations and skills transference through mentoring schemes which can make a tangible difference, raise staff morale and increase profits.
16. Encourage employer investment in training, including giving existing staff the opportunity to mentor apprentices.

Luton will have succeeded if, by 2020:

- a) The skills needs of local employers are being addressed by local educational and training providers.
- b) The expected growth of 5 new hotels increases the number of available hotel beds in line with the demand for provision of conference facilities and provides jobs in hospitality, catering and hotel management (Luton Investment Framework 2015-2035).
- c) The expected targets outlined in the Investment Framework can attract 10 new large businesses to the town by 2024. This will increase revenue from growth in business rates

by 17.5 percent and increase economic output by nearly £10 for every £1 invested in Luton.

- d) The substantial inward investment joins up skills and careers activities and delivers the projects within the Framework including Luton Skills and Jobs4Luton.
- e) The Investment Framework delivers the target of building 2225 new homes. This includes initial developments of 400 homes at Marsh Farm and 625 at Napier Park and 350-400 at High Town.
- f) Achieve the planned maintenance and improvement of council's housing stock to energy efficiency and build a new Day Centre in Stopsley, creating job opportunities in construction and related industries.
- g) A greater proportion of local people are able to access local jobs (across the range of jobs).
- h) The future business survey results show reduction in skills and qualifications gap reported by local employers.

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Report on the Consultation on the Skills and Employability Strategy 2016 - 2020

1 The Skill and Employability Strategy Review

The 2015 Skills and Employability Strategic Review began with partners and stakeholders coming together in a series of workshop settings to update and refresh the 2012 strategy, examining the current barriers to progression and social mobility for Luton residents, and the opportunities for, and constraints to, growth for the local economy and local business.

A small working group comprising officers from Luton Borough Council's Economic Development Service, Research and Geospatial Information, Children and Learning's Support Challenge and Intervention 16-19 team, Social Justice Unit and Luton Adult Learning and the Princes Trust undertook the research and re-writing of the strategy.

Partners and Key Stakeholders involved in the development of the strategy.

Luton Borough Council Economic Development
Luton Borough Council 16 – 19 Team
Luton Borough Council Youth Advice
Dept of Work and Pensions/Jobcentre Plus
University of Bedfordshire
Luton Adult Learning (LBC)
The Learning Partnership
The Princes Trust
National Apprenticeship Service
National Careers Service
Luton 6 th Form College
Barnfield College
Skills Funding Agency
Luton Borough Council Community Development
Luton Borough Council Planning
Luton Borough Council Social Justice Unit
Luton Borough Council Research & Geospatial Information
Bedfordshire Chamber of Commerce
Federation of Small Business

2 Consultation on the Strategy

Consultation ran from 16 February to 11 March 2016. Two survey questionnaires were developed with the LBC Communications and Engagement Team and hosted on the LBC

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Consultation portal. Questions in the surveys were for residents and for partners and stakeholders.

1. Do you think that the strategy has captured all the issues regarding skills and employability in Luton?
2. Is there anything that you think we have missed?
3. Do you agree with the actions for YP – Residents and Luton
4. Suggestions on how else the strategic priorities could be met
5. Do you have any views that you would like us to take into consideration?
6. How could local Businesses/orgs could help achieve the outcomes
7. Any other comments?

3 Who Was Consulted

The link to the consultation portal and surveys was circulated widely through, and to the following networks

- Businesses - through the Chamber of Commerce and Federation of Small Business.
- LBC Corporate Directors and Heads of Services
- LBC Communications and Engagement Team
- Members of the Skills and Employability Steering Group
- Members of Health Inequalities Delivery Board
- All LBC Councillors
- LBC Community Development
- LBC Stronger Families Team
- LBC Carers Team
- Public Health
- Police
- Fire and Rescue Service
- Luton Clinical Commissioning Group
- Live Well Luton
- TOKKO – and all their youth networks
- Luton Advice and Youth Services
- Think Luton website
- LBC website
- LBC Intranet
- Press Release to newspapers
- Voluntary and Community Sector
- Progression and Transition Board – Heads of Schools and Colleges
- All Luton schools
- Luton Careers Network
- Post 16 Training Providers
- London Luton Airport
- Luton Action Against Poverty
- Apprenticeship Employers via Luton Adult Learning

4 Who Responded To the Consultation

The response rate was low with a total of 15 responses to the residents questionnaire, nine were from residents including a LBC Councillor, 2 LBC employees, 2 schools, a training provider and an employer.

There were 10 responses to the partners questionnaire, with representation from training providers, public and private sector organisations representing education, communities, business and disabilities.

The majority of those who responded to both questionnaires were in agreement with the findings of the strategy, its outcomes, proposed actions and measures of success.

Where additional comments were supplied and themes have arisen they are discussed below. The feedback received mostly related to the Young People's section of the strategy.

5 Barriers to Progression for Adults and Young People

Most of those who responded, agreed with the barriers identified. There was an additional suggestion that resources be found to provide free English classes.

A further barrier not identified clearly enough in the strategy, is now dealt with under the section on NEETS (pg 7) and was about young people who are currently 'Out of Borough' by virtue of being in prison, secure accommodation, secure welfare placements, and also 'Looked After Children' who are still the responsibility of the Local Authority or who are likely to return to the area. It is recognised that many of these young people will join the 'hidden unemployed' and further work to find out more about this should be undertaken. Proposals for more research into this area are linked to Outcome 4 under the Adult Residents section of the strategy.

The OPCC have offered support, where possible, in to investigations into the 'black economy' and how this links with illegitimate incomes and employment, vulnerability and exploitation. Specific actions and measures for this piece of partnership working will be worked up when the action plan is further developed by the Skills and Employability Steering Group. The OPCC will join the group for the first time in June 2016.

6 Achievement in Educational Establishments

Three suggestions were received about improving educational attainment:

i Targeting improvements in the curriculum to the attainment of maths and English qualifications, the gateway to successful employment and entry requirements for progression routes into apprenticeships.

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ii When targeting the NEET group or under achievement there is a tendency to rely too much on 'online resources' These young people either do not have access to internet at home or lack the self-confidence and motivation to be pro-active. Online tends to only work for those who already have the drive and ambition

iii There was a suggestion to develop more green technologies and cutting edge software in the education system so that barriers to learning can be identified at an early stage and also nurturing of talent. Eg developing aptitudes that someone with dyslexia may have, rather than trying to get them to fit into the mainstream education system by overcoming their "disability".

As a result of these suggestions further actions have been added under Young People's Outcome 1.

- 'Continue to raise the standards of achievement in core curriculum subjects'.
- Target resources to identify talent and barriers to learning at an early age and provide appropriate learning resources to suit needs.

7 Careers Education, Information, Advice and Guidance in Educational Establishments

This area of the strategy had the most feedback from those consulted. A number of suggestions and comments were received that where possible have been acknowledged and added in to the strategy under the Young People's Outcomes 2 and 3.

Suggestions received;

- There is a need for CEIAG from a much earlier age, as early as at primary school. (YP Outcome 3)
- The importance of raising aspiration levels (YPO3)
- Schools are under pressure and do not have the time, or the funding to organise activities against increasing content in curriculum
- Lack of a central, dedicated co-ordination of CEIAG means lack of systematic, planned and quality work experience and employer training and school interface opportunities.
- Need a regular calendar of local events that happen at suitable and same time every academic year to allow planning.
- CEIAG requirements not currently being met and the proposed 'minimum standard' for schools needs to be monitored to be effective (YP02)
- Luton Careers network and Progress & Transition Board meetings need to continue (with more employer engagement)
- Need an LBC Careers Co-ordinator and an Apprenticeship champion/co-ordinator
- Schools need Labour Market Information. LBC offers minimal guidance on local LMI through corporate publications. None of this is useful for using with parents or students and, whenever it has been raised, LBC always says that any requests for LMI will be

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charged for. Compared to the Youth Hertfordshire Connexions offer which has local LMI info, LBC's track record with this is awful. (YP02)

- Suggest a CEIAG Facebook page that is VERY interactive A Web site is one thing but it needs PERSONAL intervention (CHAT) otherwise young people will soon 'switch off' (YP02)

The call for central dedicated co-ordination of CEIAG would mean a reversal of the current system. With new government proposals to make all schools academies, the role of the Progression and Transition Board (PTB) to develop a strong education and training system is crucial.

The PTB operates across and within organisations in the borough, to support growth in the economy and to give young people the opportunity to progress to further and higher study, to access productive employment and to meet the economic and civic needs of the area

There is a shared ambition to develop Luton into a 'Learning Town' and to break the cycle of poverty of aspiration and low skill levels which currently exist. Membership of the board includes the principals of all secondary schools and FE colleges in the area as well as the CEO's of each the two academy trusts. Therefore the recommendations falling out of the Careers Audit have been agreed by all schools. There is a working group looking at the implementation of the action plan for CEIAG, with representatives drawn from both LA maintained each of the academy trusts.

The consultation feedback will be passed to the PTB who are leading on CEIAG in Luton for their consideration.

8 Linking Educational Establishments and Business for CEIAG, Work Experience and Volunteering

The following suggestions were received;

Educational Establishments

Formal collaboration groups needed. All secondary schools meeting in certain areas, e.g. business studies, STEM, to share practice and link with employers. This needs to be at middle management level for the engagement to happen and help is needed from LBC with employer engagement. (Covered in YP Outcome 2)

Work Experience for schools

Further work needs to be done to develop opportunities for work experience for under 16s, which are in short supply. Some employers engage well but reliance on personal contacts is a model that does not help schools overcome social mobility barriers. The NHS, the L&D, many of the brand retailers do not offer placements. This needs concerted action to change attitudes. (Covered in YPO6)

Work Experience for Ex/ Offenders

More emphasis on working with Probation Service and offending teams to ensure that programs such as community service provide more stimulating community programmes with opportunities for further education and employment if an interest or aptitude is shown in the type of work. (This has been added as an action under YP Outcome 4)

Volunteering

Volunteering with training is seen as more helpful for young people than one or two weeks work experience and should be encouraged from school in year 11. This is something that can be continued throughout their studies or alongside apprenticeships. Volunteering is also a key route to employment and employers can give young people the skills they really need to get into the careers that they would like. (This has been added as an action under YP04)

Employers

Companies could be asked to sign a protocol or memorandum of understanding to undertake one work experience or fixed placement per year (more for bigger companies). To include: take on one young person for work experience, one young apprentice, one individual returning to work after ill health, one person returning to work after a long period of unemployment or a homeless person for work experience or fixed placement. (Now an action under Luton Outcome 2)

Employers need to engage with schools in manner that reflects what students and schools are looking for. There are many opportunities to engage from short term, quicker methods such as attendance at careers fairs, through to more sustained involvement in talks, meet and greet sessions and mock interviews. Even greater is work experience placements. (Covered in YP outcome2)

9 Vocational Training and Apprenticeships

There is a view that for some years the town has a weakening vocational Post 16 offer. 'Many of our students now apply to FE providers such as Oaklands, North Herts College or Central Beds College because of the poor reputation of Barnfield. With Post 16 area reviews happening soon and other FE providers opening services in the town, there is concern that Luton's dedicated vocational FE offer is consolidated into other providers'

There was a request from members to improve the perception of vocational education and show that it is valuable in it's own right and not seen solely as an option for those deemed less academic. (Now included as an action under YP outcome 5)

A further barrier identified is the new 'Progress 8' where schools are judged on young peoples progress against eight subjects . English and Maths (Double points) a further three qualifications from academic subjects such as (science, computer science, geography,

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history and a language) and then a further three, either academic or vocational. It will be more beneficial for less able students to take fewer than eight qualifications at GCSE so they can concentrate on gaining good grades in English and maths as these qualifications are double pointed. Students could well be dissuaded from taking vocational qualifications..

A suggestion for developing manufacturing businesses within the borough that could make use of local resources (e.g. waste materials suitable for recycling) and which could utilise a variety of skills from engineering graduates capable of designing and building manufacturing concerns (e.g. furniture and fittings from woods, energy from combustibles, metal foundries for metal products and processing plants to extract marketable commodities from recycling) to persons who have no skills.

Promotion of apprenticeships was supported especially for young people and an understanding by employers that it is not just cheap labour. (Covered in YP outcome 7)

10 Strategy Targets – Outcomes – Actions and Measures

Criticism of the presentation of the strategy included comments that the outcomes, actions and targets are too high level, not specific or detailed enough. However a decision had been taken to purposely keep the outcomes high level, not giving too much detail because the rate that change is happening could leave a ‘detailed’ strategy and action plan out of date very quickly.

The action plan will be developed further with the Skills and Employability Steering group and more detailed actions and measures of success will be worked up. Particular consideration will be given to young people’s outcome number 3, which is difficult to measure and has been noted.

Other concerns include making sure that lessons are learnt from the last strategy and this is discussed further in the methodology section of the strategy. That this strategy is sustainable and that schools, training providers and other stakeholders remain committed to achieving the outcomes.

11 Disabilities

There was an endorsement of the actions relating to people with disabilities and long term health conditions and a strong feeling that businesses as well as driving the need for a more skilled workforce, should be giving individuals with disabilities the opportunity to experience life in the workplace.

There was a suggestion that local businesses could be given more incentives to employ those who are traditionally difficult to employ such as those with severe disabilities. For example arrangements where a carer and a disabled person could be employed side by side or employers could pick up some of the care arrangements whilst a disabled person is at work.

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Other suggestions included the Council offering a kite mark for outstanding training providers and employers (Included as an action in Adult Residents outcome 6)

It was also noted that access to preparatory training for those with multiple barriers to employment is important, with some barriers needing to be addressed before progressing on employment support programmes and moving closer to the labour market. (Included as an action in Adult Residents outcome 3)

Integrated Impact Assessment Form (IIA) from June 2013



This form replaces the previous Integrated Impact Assessment form used by LBC.

The key aim of an impact assessment is to ensure that all Council policies, plans and strategies support the corporate mission statement that

'The needs of Luton's people will be first in everything we do'.

1. Why do I need to do an IIA?

The aim of this impact assessment process is to:

- Ensure adherence to the legal duties contained within the Equality Act 2010 and associated Public Sector Duty to analyse the impact of decisions to be undertaken by Council.
- Ensure the Council has **due regard** to equality taking a proportionate and timely approach to analysing the impact on citizens
- Minimise duplication of initial impact assessments with regards to Environment and Health and maximise consideration of other key Council priorities of Inclusion and Community Cohesion
- Ensure that the Council has been able to consider the social, health, environmental and economic impacts in its decision making in a single document and, where necessary enable the production of a comprehensive action plan to mitigate any potential negative impacts identified

2. When do I need to do an IIA?

An IIA must be started at the beginning of any project, policy or strategy, and cannot be finalised until such time as all consultations, as required, are undertaken.

- The Impact Table will help you to make early consideration of the potential impacts of your proposal and should be used from the point at which preliminary report is taken to Corporate Leadership and Management Team (CLMT) where appropriate. By using this table at your earliest point in the project, potential impacts can be highlighted and it will also be clear whether you need to carry out a full IIA.
- If you complete this table and *all* impacts identified are neutral, i.e. there is no noticeable impact on characteristics and priorities listed *and* you are fully confident of this, please contact the SJU by email setting out how you have reached this judgement as it is *unlikely* you will need to carry out a full IIA.
- An IIA must at all times identify those who will be affected by the decision, policy or strategy.
- At a time of economic austerity IIA authors are minded to consider the whole range of decisions, both locally and nationally when analysing the impact on citizens
- Your first early draft is to be sent to the Social Justice Unit for comments and guidance
- Once consultation has ended, the IIA must be updated with results of the consultation and returned to Executive, where required, for further consideration and approval – at this stage it will be signed off as completed by the Social Justice Unit

If at anytime you need further guidance please contact the Social Justice Unit.

For your convenience, please see links at the end of this document to key Corporate and Partnership documents that may help you complete this IIA.

Proposal Title: Skills and Employability Strategy

Date of IIA: 10 December 2015 (updated 19 July 2016 and 30 Aug 2016)

Updated after consultation -

Lead Officer Name: Paul Adams / Lesley Nicholls

Early draft Seen by:¹ Maureen Drummond, Cohesion and Equalities Adviser, 27 January 2016

Finalised IIA Signed and seen by SJU :

Name: Maureen Drummond, Cohesion and Equalities Adviser

Date: 6 September 2016

Please include the names of all other contributors and stakeholders involved in the preparing of this proposal who have been consulted with and **agreed** this assessment. *(Please note the IIA must not be carried out by one person):*

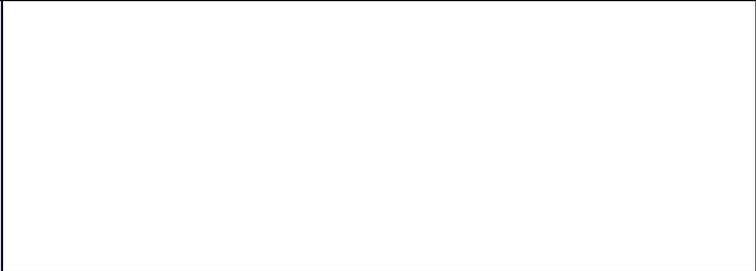
Laura Church Interim Corporate Director of Environment and Regeneration
Paul Adams Public Protection and Economic Growth LBC
Lesley Nicholls Economic Development
Attia Nazir Economic Development
Angela Rowney Economic Development
Craig Smith 16-19 Strategic Lead C&L LBC
Stephanie Underwood LBC 16-19 Team C&L
Shajda Rauf Careers Consultant
Lindy Lloyd Luton Adult Learning
Angela Roberts Jobcentre+
Kevin Owen Regional Planning Team Leader LBC
Paul Barton Business Intelligence Team LBC
Eamonn Keenan University of Bedfordshire
Vanda Bailey Voluntaryworks
Clare Francis The Princes Trust
Shohir Uddin Community Development Project Officer LBC
Sandra Legate Equality & Diversity Policy manager Social Justice Unit LBC
Lee McCree Youth Advice

If there is any potential impact on staffing please include the name/s of the trade union representative/s involved in the preparation of this assessment or any supporting evidence of request to participate:

None

¹ Please send an early draft of your IIA to the SJU to ensure all impacts are being considered at the appropriate time

Natasha Vaughan Senior Personal Adviser
 Denise Pointer 6th Form College
 Ian Cording Federation of Small Business
 Melissa Wait National Apprenticeship Service
 Shagufta S hahin Barnfield College
 Tas Bushra Futures Advice
 Anna Clarke Skills Funding Agency



Please provide an outline of your proposal:

It has been 4 years since the town wide Skills and Employability Steering Group launched the Luton Skills and Employability Strategy in 2012. Since the launch partners have continued to deliver projects identified in the Skills and Employability action plan to improve skills and employability in Luton. Many of those projects came to fruition in 2015 and it was decided that now was a good time to take stock of progress and to review and refresh the strategy.

The steering group agreed that the original vision and priorities from 2012 should remain the same. What has changed is the focus on the barriers to progression and social mobility that are being faced by some Luton residents and what will be doing to remove those barriers to facilitate growth and development of both individuals and companies.

The strategy explores the barriers involved in the transition for young people from education to employment. It moves on to the opportunities for self development for adults, both for those in work and out of work. Finally It investigates the skills gaps that create barriers for some of Luton’s businesses to growth and development. Each section identifies the barriers, some actions to overcome them, the longer term outcomes that we want to achieve, and how we will measure our success. The duration of this strategy will be until 2020.

IMPACT TABLE

The purpose of this table is to consider the potential impact of your proposal against the Equality Act 2010 ‘protected characteristics’ and the Council’s Social, Environmental and Economic priorities.

Once you have completed this process you should have a clearer picture of any potential significant impacts², **positive**, **negative** or **neutral**, on the community and/or staff as a result of your proposal. The rest of the questions on this form will help you clarify impacts and identify an appropriate action plan.

Protected Groups	Citizens/Community			Staff (for HR related issues)		
	Positive	Negative	Neutral	Positive	Negative	Neutral
Race	X					
Gender			x			
Disability	x					

² “Significant impact” means that the proposal is likely to have a noticeable effect on specific section(s) of the community greater than on the general community at large.

Sexual Orientation			X			
Age	x					
Religion/Belief			X			
Gender Reassignment			X			
Pregnancy/Maternity	X					
Marriage/Civil Partnership (HR issues only)						
Care Responsibilities ³ (HR issues only)						
Social & Health⁴						
Impact on community cohesion	X					
Impact on tackling poverty	X					
Impact on health and wellbeing	X					
Environment						
Impact on the quality of the natural and built environment			X			
Impact on the low carbon agenda			X			
Impact on the waste hierarchy			X			
Economic/Business						
Impact on Luton's economy and/or businesses	X					
Impact on jobs	X					
Impact on skills	X					

Please answer the following questions

1. Research and Consultation

1.1 Have you made use of existing recent research, evidence and/or consultation to inform your proposal?

Please insert links to documents as appropriate. **Yes – see below**

1.2 Have you carried out any specific consultation with people likely to be affected by the proposal? (if yes, please insert details, links to documents as appropriate). **Consultation has been planned with Consultation Team and is ready to be started.**

Guidance Notes: If you have not yet undertaken any consultation you may wish to speak to the Consultation Team first as a lack of sufficient consultation could place the Council at risk of legal challenge.

[Click here Luton Observatory](#)

[Click here for LBC Consultation Portal](#)

³ This is a Luton specific priority added to the 9 protected characteristics covered under the Equality Act and takes into account discrimination by association.

⁴ Full definitions can be found in section 3

For local demographics and information

To access available relevant research already carried out

1.1. Insert any links to references including websites below

- Luton's Family Poverty Strategy 2011-2014
- Luton's Apprenticeship Strategy 2012
- Luton's Economic Assessment 2014
- Major Employers in Luton Research and Geospatial Information Team Department of Environment and Regeneration
- SEMLEP Business Survey 2014 and 2015
- SEMLEP ESIF Investment Strategy 2014-2020
- Destination Reports School Leavers in Luton 2014
- Luton's Local Plan
- London Luton Airport Community Funding Policy
- Luton's Health and Wellbeing Strategy
- 2011 Census, Office for National Statistics
- Luton Borough Council Prospectus 2013-2016
- Luton's Investment Framework 2015 -2035
- Luton's Ofsted Report 2015
- Luton Borough Council's Corporate Plan 2014-2017
- Luton Forum's Sustainable Community Strategy 2008 – 2026
- Luton Borough Council Social Justice Framework 2012-2026
- A Healthier Future Improving Health and Wellbeing in Luton 2012 – 2017 Luton Borough Council and NHS Luton Clinical Commissioning Group
- Joint Strategic Needs Assessment
- Chamber of Commerce Report on Skills
- Further Education Learners: Average Earnings Post Study – 2010/11 to 2012/13
- Further Education for Benefit Claimants England 2012/13 final statistics
- A guide to schools in England January 2015 Comparison of different types of school leaders and school staff April 2014
- Careers guidance and inspiration in schools Departmental advice for governing bodies, school leaders and school staff April 2014
- Bedfordshire Quarterly Economic Survey Results Q2 2015 Based on data collected 25 May to 15 June 2015 Bedfordshire Chamber of Commerce

1.2. Consultation – insert any links to consultation documents

We have consulted with two groups 1) general public through the LBC consultation portal 2) town wide stakeholders involved in skills and employability.

The report will be published with this IIA.

- Luton Borough Council Summary report: Understanding levels of poverty locally across Luton May 2011
- Research Study SEMLEP Arts, Heritage, Sports, Visitor Economy, Cultural and Creative Sector July 2015
- 2013 Mid Year Population Estimate, Office for National Statistics 2014
- The Growth and Changing Complexion of Luton's Population, Mayhew Harper Associates, 2011
- 2010 Indices of Multiple Deprivation, Communities & Local Government 2011
- Child Poverty Local Indicators 2014 Update, Centre for Research in Social Policy, Loughborough University
- Business Register & Employment Survey 2013, Office for National Statistics 2014
- Unemployment Claimant Count, November 2014, Office for National Statistics via NOMIS
- Annual Population Survey data, Office for National Statistics
- Annual Population Survey, Office for National Statistics.
- Oxford Economics. The Economic Impact of London Luton Airport, 2015

<https://www.gov.uk/government/publications/careers-guidance-provision-for-young-people-in-schools>

<http://www.nomisweb.co.uk/reports/lmp/la/1946157201/report.aspx>

<https://www.gov.uk/government/collections/raising-the-participation-age>

<https://www.gov.uk/government/consultations/apprenticeship-funding-reform-in-england-payment->

[mechanisms-and-funding-principles](#)

<http://www.poverty.ac.uk/editorial/working-poverty-%E2%80%93-commission-report>

<http://www.watchsted.com/> (latest Ofsted Inspections)

<https://www.gov.uk/advanced-learner-loan/overview>

[For advice and support from Consultation Team click here](#)

1.3 Have you carried out any specific consultation with citizens likely to be affected by the proposal? If yes, please insert details, links to documents, as appropriate above. Please show clearly who you consulted with, when you consulted and the outcomes from the consultation. Mitigations from consultation should be clearly shown in Action Plan at end of document.

The consultation exercise has been undertaken with support from the Consultation Team, the consultation ran from 16 February to 11 March 2016.

2. Impacts Identified

2.1 Where you have identified a **positive*** impact, for **communities or staff**, please outline how these can be enhanced and maintained **against each group identified**. Specific actions to be detailed in action plan below.

**By positive impact we mean, is there likely to be a noticeable improvement experienced by people sharing a characteristic?*

Actions Identified in the Skills and Employability Strategy

Race

1. Prioritise activities to find out more about why particular groups of young people are under achieving in education and in their adult working life and how to close that gap between them and the wide majority.
2. Ensure there is adequate provision, awareness and take-up of ESOL and qualification conversion programmes in the town

Disability

3. Prioritise activities to find out more about why particular groups of young people are under achieving in education and in their adult working life and how to close that gap between them and the wide majority.

4. Work with our colleges, university and training providers to provide a tailored and flexible approach to learning. There should be an awareness of local provision, skills requirements nationally and locally along with an awareness of the specific needs of different communities, older people, vulnerable people and those furthest away from the work place including those with learning difficulties and disabilities.
5. Understand and promote the employment support services available for local people with health, including mental health, sensory physical or learning disabilities
- 7 Work with employers to encourage the employment of people with disabilities who want to work and can do with some reasonable adjustments in the work place, including for older people and vulnerable people with complex needs

Age

- 8 Prioritise activities to find out more about why particular groups of young people are under achieving in education and in their adult working life and how to close that gap between them and the wider majority
- 9 Work to bring schools, training providers and employers together, working with the new Careers and Enterprise Company and their Employment Advisors to develop sustainable relationships to assist teaching staff to raise their understanding of the needs of industries, particularly in the growth sectors.
- 10 An agreed 'minimum standard' for implementation of CEIAG to be delivered by all Luton Schools and monitored effectively.
- 11 Ensure that skills training being provided, including preparation for the world of work adequately prepares young people for local and national employers needs and careers information is embedded into subjects areas from primary school age.
- 12 Schools, colleges and university encouraged to provide programmes of enrichment activity that can lead to extra qualifications or awards, such as Citizenship, Youth Work Awards or The Duke of Edinburgh's Award. Encouragement of volunteering with training, alongside studies in the local community as an alternative to work experience and a route to employment.
- 13 Schools and training providers to see how funding can be used to ensure the 14-16 curriculum provides progression routes for young people in a wide range of subjects, with provision at all levels and including vocational options, that will lead to higher qualifications and better progression to post 16 vocational learning and training
- 14 Schools and colleges to continue in the promotion of traineeships, apprenticeships and careers events and include targeting parents.
- 15 Developing the provision of work experience placements by working with the National Careers Service and SEMLEP who can provide brokerage with employers
- 16 Priorities activities to promote the creation of apprenticeships for young people with employers, especially Higher Apprenticeships and in the growth sector
- 17 Work with our colleges, university and training providers to provide a tailored and flexible approach to learning. There should be an awareness of local provision, skills requirements nationally and locally along with an awareness of the specific needs of different people and communities. Unemployed, older people, people with ill health, vulnerable people and those with multiple and complex needs, including those with learning difficulties and disabilities and those furthest from the job market
- 18 Understand and promote the employment support services available for local people with health, including mental health, sensory physical or learning disabilities, older residents and vulnerable people with complex needs
- 19 Work with employers to encourage the employment of people with disabilities who want to work and can do with some reasonable adjustments in the work place, including older people and vulnerable people with complex

needs

Pregnancy/Maternity

20 Work with child care providers to understand the range and cost of child care in the town and to encourage a network of local, affordable and accessible provision for working parents across Luton and those looking for work

Care Responsibilities

21 Work with child care providers to understand the range and cost of child care in the town and to encourage a network of local, affordable and accessible provision for working parents across Luton

22 Training providers to work with Adult Social Care and Children's Services to enable carers of elderly relatives or disabled children to participate in training and take up return to work opportunities if they wish

[For advice & support from the Social Justice Unit click here](#)

2.2 Where you have identified a **negative*** impact please explain the nature of this impact and why you feel the proposal may be negative. Outline what the consequences will be **against each group identified**. You will need to identify whether mitigation is available, what it is and how it could be implemented. Specific actions to be detailed in action plan below.

**By negative impact we mean is there likely to be a noticeable detrimental effect on people sharing a characteristic?*

2.3 Where you have identified a **neutral*** impact for any group, please explain why you have made this judgement.

You need to be confident that you have provided a sufficient explanation to justify this judgement.

**By neutral impact we mean that there will be no noticeable impact on people sharing a characteristic*

There is no evidence currently available to suggest that the Skills and Employability Strategy will have a noticeable impact, either positive or negative, on the groups identified below;

Sexual Orientation

Religion/Belief

Gender

Gender Reassignment

Marriage Civil Partnerships

Impact on Community Cohesion

Impact on the quality of the natural and built environment

Impact on the low carbon agenda

Impact on the waste hierarchy

[For advice & support from the Social Justice Unit click here](#)
[For advice and support from the Public Health team click here](#)

3. Social & Health Impacts

If you have identified an impact on community cohesion⁵, tackling poverty⁶ or health and wellbeing⁷, please describe here what this may be and who or where you believe could be affected, **Please also ensure that you consider any possible impacts on Looked After Children.**

Guidance Notes:

Please use this section to describe the social and health impacts and detail any specific actions or mitigations in the action plan below.

Impact on tackling poverty

- 23 Priorities activities to find out more about why particular groups of young people are under achieving in education and in their adult working life and how to close that gap between them and the wide majority.
- 24 Work with employers, colleges, university and training providers to provide progression pathways for employees and unemployed learners of all ages and abilities including the low paid, low skilled, unemployed, parents, lone parents, homeless and those furthest from the job market
- 25 Understand and promote the financial advice, planning and support services in the town
- 26 Priorities activities to find out more about the 'hidden unemployed' and the black economy.

Impact on health and wellbeing

- 27 Priorities activities to find out more about why particular groups of young people are under achieving in education and in their adult working life and how to close that gap between them and the wide majority.
- 28 Work with our colleges, university and training providers to provide a tailored and flexible approach to learning. There should be an awareness of local provision, skills requirements nationally and locally along with an awareness of the specific needs of different communities, older people, vulnerable people and those furthest away from the work place including those with learning difficulties and disabilities.
- 29 Understand and promote the employment support services available for local people with health, including mental health, sensory physical or learning disabilities
- 30 Work with employers to encourage the employment of people with disabilities who want to work and can do with some reasonable adjustments in the work place

[For advice and support from the Strategy & Sustainability Team click here](#)

4. Impacts on the natural & built environment

Environment Impacts

If you have identified any impacts related to the built and natural environment⁸, low carbon⁹ and waste minimisation please describe here what this may be and who or where you believe could be affected

⁵ is the proposal likely to have a noticeable effect on relations within and between specific section(s) of the community, neighbourhoods or areas.

⁶ is the proposal likely to have a noticeable effect on households that are vulnerable to exclusion, e.g. due to poverty, low income and/or in areas of high deprivation

⁷ Is the proposal likely to have a positive or negative impact on health inequalities, the physical or mental health and wellbeing of an individual or group, or on access to health and wellbeing services?

⁸ Is the proposal likely to impact on the built and natural environment covers issues such as heritage, parks and open space, cleanliness, design, biodiversity and pollution.

⁹ Is the proposal likely to impact on low carbon includes issues such as use of energy, fuel and transport.

(please see footnote below)

Is the proposal likely to impact on the waste hierarchy which includes issues shown in the table below:

Waste Hierarchy



The Skills and Employability Strategy has a neutral impact on the natural and built environment

[For advice and support on Economic Development click here](#)

5. Economic Impacts

If you have identified any impacts related to Luton's economy and businesses ¹⁰, creating jobs¹¹ or improving skill levels ¹², please describe here what this may be and who or where you believe could be affected (– please see footnote below)

Guidance Notes:

Please use this section to describe the social impacts and detail any specific actions or mitigations in the action plan below.

Impact on Luton's economy and/or businesses

31 Continue to facilitate the work being carried out by the council to bring employers together through the Luton Technology Network. Replicate across all the business growth sectors to

¹⁰ Is the proposal likely to impact on Luton's economy and businesses for example by creating an opportunity to trade with the Council, support new business opportunities?

¹¹ Is the proposal likely to impact on the creation of new jobs in the local economy? This will also link to health and well-being and the reduction of poverty in the social box.

¹² There are significant skills gaps in Luton's economy. Is the proposal likely to create opportunities for up skilling the workforce or to create apprenticeships?

- identify and address skills gaps and other constraints to growth
- 32 Marketing campaign to improve the reputation and image of Luton in the media and promoting the town as a competitive place to invest
- 33 Continue to provide business start up advice and support
- 34 Work with SEMLEP to support and increase local business growth and development
- 35 More work bringing together the council, training providers, the university and employers to assess skills needs and develop training for company employees

Impact on jobs

- 36 Raise awareness and promote the employment opportunities being provided by the airport growth and other major developments in and around the town.
- 37 Marketing campaign to improve the reputation and image of Luton in the media and promoting the town as a competitive place to invest
- 38 Continue to provide business start up advice and support
- 39 Work with employers to encourage the employment of people with disabilities who want to work and can do with some reasonable adjustments in the work place

Impact on skills

- 40 Work with the Airport and developers to create and provide work experience and apprenticeship opportunities for local people
- 41 Engage and work with business of all sizes including self employed tradespeople to encourage creation of apprenticeship opportunities for all ages at all levels and linking to the jobs pipeline.
- 42 Work with employers and training providers to develop apprenticeships for adults particularly at higher levels and in the business growth sectors.
- 43 Develop a coordinated multi-agency skills programme providing access to provision to improve the skills of Luton's workforce and to develop skills and experience to meet tomorrow workforce. (Luton's Investment Framework 2015-2030)
- 44 Explore, encourage and facilitate take up of funding opportunities to provide of a wider selection of accessible and funded training and self development opportunities with progression pathways, for learners of all ages and abilities
- 45 Continue to work with the University of Bedfordshire to engage and support businesses in their research, development and training needs and to promote and increase take up of short and intense courses for company employees, particularly at a higher level, including higher level ESOL
- 46 Continue to provide business start up advice and support
- 47 More work bringing together the council, training providers, the university and employers to assess skills needs and develop training for company employees
- 48 Ensure there is adequate provision, awareness and take up of ESOL and qualification conversion programmes in the town
- 49 Develop a Careers Information web site for residents that will provide material and links on careers progression routes and pathways, qualifications and skills required, local training and job opportunities
- 50 Work with our colleges, university and training providers to provide a tailored and flexible approach to learning. There should be an awareness of local provision, skills requirements

nationally and locally along with an awareness of the specific needs of different people and communities

	Deadline	Responsible Officer	Intended Outcome	Date Completed/ Ongoing
All actions identified in the IIA fall under a strategic objective and will be owned by a multi agency group who will oversee the actions relating to their work area and ensure they are progressed in order to achieve the identified outcomes. Not all the agencies have been agreed at this stage.				
Consultation (with who)	General public and stakeholders and partners listed above and business through FSB and Chamber	Lesley Nicholls	Update IIA with results of consultation	Completed April 2016
Report to Overview and Scrutiny	7 June 2016	Paul Adams	To be supported.	7 June 2016 – OSB supported the Strategy and requested scrutiny of the action plan.
Report to Executive	19 September 2016	Paul Adams	To approve the Strategy.	

A review of the action plan will be prompted 6 months after the date of completion of this IIA

Key Contacts:
Paul Adams, ext 6173

Next Steps

- All Executive Reports, where relevant, must have an IIA attached
- All report authors must complete the IIA section of Executive Reports (equalities, cohesion, inclusion, health, economic, business and environment)
- All reports are to be forwarded to the Social Justice Unit, Public Health and Strategy & Sustainability Unit for sign off in time for Executive deadline
- On the rare occasion that the Social Justice Unit are unable to sign off the report, e.g. recommendations are in breach of legislation, a statement will be submitted by Social Justice Unit Manager or Equality and Diversity Policy Manager

Completed and signed IIA's will be published on the internet once the democratic process is complete

Corporate Plan

<http://intranet/SupportServices/Document%20library/Corporate%20plan%2011th%20July%202011.doc>

Equality Charter

<http://intranet/SupportServices/socialjustice/Document%20library/Equality%20charter.pdf>

Social Justice Framework

http://www.luton.gov.uk/Community_and_living/Lists/LutonDocuments/PDF/Social%20Justice/Social%20Justice%20Framework%202012%20-2026.pdf

Family Poverty Strategy

http://www.lutonforum.org/Forum/Documents/Family-Poverty-Strategy-Final-October2011_001.pdf

Joint Strategic Needs Assessment (JSNA)

http://www.luton.gov.uk/Council_government_and_democracy/Lists/LutonDocuments/PDF/Consultation/Reports/Final%20JSNA%202011.pdf

Community Involvement Strategy

http://www.luton.gov.uk/Community_and_living/Lists/LutonDocuments/PDF/Community%20involvement%20strategy.pdf

