Luton Local Plan review

Summary of scoping consultation October 2026 - (Regulation 22)

Author: Planning Policy team

Contact: localplan@luton.gov.uk

Version: 1.0

Last updated: October 2026

Contents

1. Introduction 1
2. Scoping consultation 2
3. Summary of main issues 3
Community involvement paper and booklet comments 3
Local green space nominations 32
Engagement strategy comments 37
SEA scoping report comments 39

1. Introduction

1.1 Luton Council is preparing a new Local Plan for Luton. Further information is available on the council's website here www.luton.gov.uk/newlocalplan.

1.2 A scoping consultation for the Local Plan started on 28 May 2026 and ran for 8 weeks until 23 July 2026 asking for views about what the Local Plan should contain and how the council should engage with the public and stakeholders going forward.

1.3 This document sets out the council's approach to the scoping consultation, a summary of the comments received and a response showing how the council have, to date, had regard to the representations.

The comments received will inform the next stage in the process, which sets out the proposed content of the Local Plan, scheduled for public consultation in May 2027. In relation to the response provided, due to further planned stakeholder engagement, further evidence gathering and emerging government policy, the approach taken in the Local Plan may change.

2. Scoping consultation

2.1 The scoping consultation included the following documents:

- a community involvement paper
- a summary booklet
- an engagement strategy
- SEA scoping report

2.2 A call for sites was also undertaken asking developers and landowners to submit sites for consideration in the Local Plan and for the submission of suggested areas of Local Green Space.

2.3 A notice of the scoping consultation was published on the council's website on 28 May 2026 and an email/letter notification was sent to all those on the council's Local Plan database, including to the required statutory consultees, such as the Environment Agency and Historic England.

The council's database contains over 1,000 contacts/consultees. The documents were available to view on the council's website and in hard copy at the council offices and libraries throughout the borough.

2.4 Social media posts were made on several occasions throughout the consultation period, highlighting the consultation and encouraging comments to be made. Public exhibitions were held on two occasions in the Frasers Plus shopping centre, where officers were available to speak to.

2.5 Broadly the range of representations identified several topics and matters including the following.

- The importance of continuing consultation and engagement with organisations and authorities over the preparation of the Local Plan including cross boundary matters.
- Following legislation and national guidance on plan making and identifying the scope of the plan, evidencing Luton's future needs linked to visioning and the benefits of concise outcome objectives.
- Ensuring that Luton accommodates its own needs as far as is sustainably possible, including efficient use of brownfield land and densities and maximising the benefits of housing and affordable housing ensuring it addresses family and special needs, linking education, skills and training with economic growth sectors such as aviation, transport distribution, leisure and retail and opportunities to regenerate the town centre and local centres.
- Ensuring that evidence is up-to-date and reflect practitioner and specialist advice including:
  - the habitats and the environment (for example, SEA)
  - health sector
  - business and industry
  - employers
  - infrastructure providers (including the needs of dependent services such as blue light services)
  - leisure, sport and open space bodies
  - providers
- Suggested policy approaches and best practice including for sustainable development including:
  - design (such as zero carbon and combatting climate change)
  - heritage and conservation
  - biodiversity

- urban greening
- flooding
- pollution, such as River Lea Linear Park project
- water resources
- waste and recycling
- sustainable transport

These should not pose undue costs and burdens on business and providers to ensure development and growth is viable and not constrained.

- Several site submissions were made to assist with accommodating Luton's future needs including a proposed Local Green space nomination.

2.6 The following table outlines the total number of responses to each document and call for sites.

Document	No. of responses
Community Involvement Paper and Booklet*	41
Engagement Strategy	3
SEA Scoping Report	7
Sites promoted for consideration**	12
Sites promoted as Green Space	1

* Note no booklet responses were made.
** Historic England do not submit sites but included a representation.

3. Summary of main issues

This section lists community involvement paper and booklet comments from various groups along with our response.

Community involvement paper and booklet comments

Chilterns Conservation Board

Support for references to Chilterns and the Protected Landscapes Duty and intentions for national landscape policy.

These are the main issues as supplied by Chilterns Conservation Board.

- The references to the Chilterns Beechwoods Special Area of Conservation (SAC) are welcomed
- National Landscape policy should not be conflated with Green Belt, general countryside or locally valued landscapes policies.
- Natural England 'made the decision to stop work on the Chilterns boundary review': there have been no boundary changes. Evidence gathered in support of this can however be used.
- Including a dedicated Chilterns National Landscape policy within the plan will support the conservation and enhancement of its natural beauty and special qualities.
- Designation of Local Landscape Areas adjacent to the Chilterns National Landscape, would require suitable consideration of the setting to the National Landscape
- Request that the emerging plan includes a policy on the protection and enhancement of chalk streams.

- Reference to the specific design needs of the Chilterns is sought, including a cross-reference to the Chilterns Buildings Design Guide.

The council's response to Chilterns Conservation Board

The council notes the matters raised. Officers will continue to engage with the Chilterns Conservation Board to form appropriate policies for the Local Plan including in relation to the Chilterns landscape and SAC

North Hertfordshire Council

These are the main issues as supplied by North Hertfordshire Council.

North Hertfordshire faces a significant housing challenge, with the Government's revised standard method identifying a need for 1,036 homes per year. The district has strong economic links with neighbouring areas, particularly Luton and the wider A1 corridor, forming part of a Functional Economic Market Area that extends into eastern Central Bedfordshire. While many highly skilled residents commute to employment centres such as Luton and Stevenage, limited rail connectivity to the west restricts sustainable access to some key destinations.

The council highlights the importance of recognising cross-boundary impacts, particularly in relation to air quality, transport and climate change. Maintaining recent improvements in air pollution levels will become increasingly challenging due to planned housing and infrastructure growth in Luton, as well as construction and operational impacts associated with the expansion of London Luton Airport. North Hertfordshire therefore welcomes continued collaboration with Luton and neighbouring authorities on shared environmental and climate-related issues.

North Hertfordshire supports ambitions to enhance the natural environment through measures such as biodiversity net gain above the statutory 10% requirement where viable, prioritising off-site provision close to development sites. It also supports the naturalisation and de-culverting of rivers, the designation of Local Green Spaces, and the adoption of robust open space standards to ensure residents have access to high-quality, inclusive green infrastructure. Innovative approaches to delivering supporting community facilities, such as schools, are also encouraged.

The council supports the preparation of a Luton Design Code to guide the efficient use of land and help meet housing needs through higher-density development where appropriate. Higher densities can be achieved without relying on tall buildings, particularly in a highly sustainable urban area such as Luton. Greater emphasis should be placed on sustainable and car-free development, with improvements to walking and cycling infrastructure helping to reduce car dependency and strengthen connections with neighbouring authorities.

Finally, North Hertfordshire emphasises the need to recognise the wider transport impacts of Luton Airport, adjoining industrial areas and new housing growth on the surrounding network. It welcomes ongoing discussions with Luton, Hertfordshire County Council, Central Bedfordshire and St Albans City and District Council to ensure coordinated infrastructure planning and delivery, including transport, bus service improvements (BSIP) and active travel networks (LCWIP).

The council's response to North Hertfordshire Council

The council notes the matters raised. Officers will continue to engage with North Hertfordshire Council in relation to housing, economic development, health and wellbeing, climate change, the natural environment. community facilities, place making and design, densities, transport and infrastructure and other matters, to inform the drafting of Local Plan policies.

Grand Union Transfer Project

These are the main issues as supplied by Grand Union Transfer Project.

The response outlines the Grand Union transfer project where water is planned to be transferred via a new pipeline to Atherstone within the North Warwickshire Borough Council area.

The project does not currently include any proposals within Luton Borough administrative boundary. It is intended that the pipeline, which will connect the potable water from the proposed Water Treatment Works to Affinity's supply network, will end at an existing covered reservoir near Luton which is located within Central Bedfordshire, close to but outside of the Luton Borough boundary. At this stage of the design process, there is no intention for the Project to extend into Luton's administrative area.

The council's response to Grand Union Transfer Project

The council notes the matters raised. Officers will continue to engage with GUTP in relation to the Grand Union transfer project. If required, the Local Plan will take account of any construction or infrastructure matters that arise that have the potential to give rise to environmental effects within Luton, working with the Project Group.

Hertfordshire County Council

These are the main issues as supplied by Hertfordshire County Council.

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

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

Support is given for the Plan Objectives in relation to transport, travel and infrastructure. However, the Local Plan should more clearly recognise the contribution that transport makes towards delivering wider objectives relating to housing, economic growth, health and environmental outcomes.

Support is given and the Local Plan should:

- support high-quality bus services and public transport connectivity
- safeguard and enhance strategic public transport corridors
- promote integration between different transport modes
- support improvements to cross-boundary public transport services
- encourage continued collaboration with neighbouring authorities and transport providers on strategic transport initiatives

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

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

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

The Local Plan should support:

- early identification of transport requirements
- appropriate assessment of cumulative impacts
- ongoing cross-boundary collaboration
- clear infrastructure delivery and funding arrangements

The plan should ensure that social infrastructure provision is factored into all development where mitigation is necessary and should be:

- appropriate in scale
- costed and viable
- coordinated and timely
- aligned with development phasing
- supported by cross-boundary collaboration

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

The council's response to Hertfordshire County Council

The council notes the matters raised. Officers will continue to engage with Hertfordshire County Council in relation to transport and infrastructure, cross boundary considerations and other matters to inform the drafting of the Local Plan.

Active Travel England

These are the main issues as supplied by Active Travel England.

Active Travel England (ATE) expects Local Plans to be underpinned by a robust evidence base that provides a clear understanding of current and future travel patterns, connectivity and transport infrastructure. This should include:

- analysis of travel behaviour
- mapping of existing planned walking, cycling and public transport networks
- assessment of access to key destinations such as schools, healthcare, shops, parks and community facilities

Evidence should also identify existing connectivity and accessibility issues, opportunities for improvement, and draw upon relevant transport strategies including Local Transport Plans, LCWIPs, ROWIPs and Bus Service Improvement Plans.

Local Plan visions should be informed directly by this evidence and adopt a vision-led approach that prioritises sustainable travel from the outset. ATE expects plans to promote greater use of active travel and public transport, reduce reliance on private car travel, and contribute to wider objectives relating to health, equality, inclusion, climate change and environmental improvement. Vision statements should set clear ambitions for different places, establish connectivity and infrastructure standards for new development, and ensure environments are safe, inclusive and accessible for all users.

In addition to baseline evidence, Local Plans should demonstrate that proposed spatial strategies and site allocations are the most effective means of delivering the vision. This includes forecasting future active travel and public transport demand, showing how site allocations maximise accessibility and support modal shift, and explaining how the strategy will improve connectivity to key destinations. Plans should also identify the infrastructure and services required to support growth, including costs, funding, delivery mechanisms and implementation risks.

ATE also expects assessments of the cumulative impacts of development on active travel and public transport networks, including cross-boundary effects where relevant.

The contribution of the strategy to public health, equality, inclusion, carbon reduction and wider environmental objectives should be clearly demonstrated, ensuring that transport planning supports broader place-making goals.

When assessing potential development sites, priority should be given to locations that maximise accessibility by walking, cycling and public transport, minimise dependence on private vehicles, and connect effectively to existing and planned sustainable transport networks. Sites should support the creation of complete and connected neighbourhoods and facilitate the early delivery of sustainable transport infrastructure.

Where transport improvements are required, active travel and public transport measures should be prioritised ahead of highway capacity enhancements, in line with the transport hierarchy.

The council's response to Active Travel England

The council notes the matters raised. Officers will continue to engage with Active Travel England in forming its draft policies and its evidence base. A transport assessment is being undertaken as evidence for the Local Plan.

Equality and Human Rights Commission

These are the main issues as supplied by Equality and Human Rights Commission.

The Commission does not have the resources to respond to all consultations, and it is not our practice to respond to consultations on local plans or infrastructure projects unless they raise a clear or significant equality or human rights concern.

Local and other public authorities have obligations under the Public Sector Equality Duty (PSED) in the Equality Act 2010 to consider the effect of their policies and decisions on people sharing particular protected characteristics.

We provide advice for public authorities on how to apply the PSED, which is an ongoing legal obligation and must be complied with as part of the planning process.

Therefore, the PSED is the mechanism through which public authorities involved in the planning process should consider the potential for planning proposals to have an impact on equality for different groups of people.

The council's response to Equality and Human Rights Commission

The council notes the matters raised. An Equalities Impact Assessment is being undertaken for the Local Plan.

Sport England

These are the main issues as supplied by Sport England.

Sport England supports the Local Plan's focus on wellbeing but notes that Luton experiences poorer health outcomes than the national average. It recommends that the Vision explicitly commits to improving health outcomes and embedding health, wellbeing and physical activity into everyday life. Plan objectives should seek to create active environments, promote Active Design principles, protect existing sports facilities and provide new opportunities for sport and physical activity to meet current and future needs.

Sport England advises that the Local Plan should be informed by up-to-date evidence, particularly the Council's Playing Pitch Strategy (PPS) and Built Facilities Strategy (BFS). As these documents are now dated, they should be reviewed and updated to reflect current circumstances, including revised housing growth projections. The future strategy should align with their recommendations by safeguarding existing facilities, addressing identified deficiencies and allocating land for new indoor and outdoor sports provision where required.

The organisation raises concerns about suggestions that parks and green spaces could be lost or reduced as part of future development. While recognising the potential benefits of land swaps and improved facilities, it stresses that playing fields and sports facilities should not be lost, diminished

or relocated away from the communities they serve. Any proposals affecting existing playing fields should clearly identify replacement provision, with equivalent facilities delivered in advance of any loss.

Sport England encourages the Local Plan to support multi-functional open spaces, connected green infrastructure networks and supporting facilities such as toilets and digital connectivity that enable a range of formal and informal physical activities. It also recommends incorporating Active Design principles throughout the Plan, alongside dedicated planning policies for indoor and outdoor sports facilities. Separate sport-specific policies would better address the distinct requirements of playing fields, leisure centres and associated facilities than a broader community facilities policy.

Finally, Sport England highlights the importance of ensuring that wider uses of parks, green spaces and playing fields do not compromise their sporting function. The provision of sports facilities should be guided by the evidence and recommendations of the updated PPS and BFS rather than generic standards. The organisation also supports a co-location approach to community facilities where appropriate and encourages policies that promote active travel, recognising the contribution walking and cycling can make to increasing physical activity and improving public health outcomes.

The council's response to Sport England

The council notes the matters raised. Officers will continue to engage with Sport England in preparing the Local Plan and its supporting evidence base. Studies on open space, sport and recreation, green & blue infrastructure, are being undertaken for the Plan and potential site allocations will be carefully assessed.

Historic England

These are the main issues as supplied by Historic England.

Would like to see Policy approaches in the Plan developed for:

- the historic environment where there are issues/opportunities that are specific to Luton or themes requiring a specific approach, including designated and non-designated heritage assets
- conserving and enhancing the settings of heritage assets of particular prominence, significance and sensitivity
- local list
- important views that need to be protected
- site allocation policies that account for the need to conserve and enhance heritage assets, informed by proportionate Heritage Impact Assessment, particularly in areas where significant growth is proposed (e.g. urban extensions or new settlements)
- design policies, guides and codes that provide clarity on how development should respond to local character - approaches should be informed by evidence such as:
    - Conservation Area Character Appraisals and Management Plans
    - assessments of building height and density etc.
- re-use and retrofit of historic buildings
- approaches to flood risk management or change that take account of heritage assets, and areas of historic character
- renewable energy policies and/or areas that are informed by proportionate evidence on the historic environment.

Historic England also recommends an evidence base that should be collected and point to guidance which can be used to inform the Plan and how a heritage impact assessment of sites should be undertaken following a review of our Conservation Areas and heritage assets.

The council's response to Historic England

The council notes the comments received. Officers will continue to engage with Historic England and take account of the comments received in preparing the Local Plan and its supporting evidence in relation to the historic environment.

The Bedfordshire PCC

These are the main issues as supplied by Bedfordshire PCC.

Supports a Local Plan that delivers a transformational, inclusive and safe vision for Luton.

By embedding:

- social justice and inequality reduction
- designing out crime
- safe, inclusive and high-quality neighbourhoods
- road safety and sustainable transport
- infrastructure aligned to policing and emergency service demand

The Local Plan can play a critical role in achieving the ambitions of the Luton 2040 Vision and creating safer, healthier and more resilient communities. The PCC looks forward to continued partnership working as the Plan develops.

The council's response to Bedfordshire PCC

The Council notes the comments received. Officers will continue to engage with Bedfordshire PCC in forming its draft policies.

Anglian Water

These are the main issues as supplied by Anglian Water.

Expect the Local Plan to use an evidence-based approach: by way of Water Cycle Studies (WCS), Integrated Water Management Strategies (IWMS) and Strategic Flood Risk Assessments (SFRA) to inform the spatial strategy, site selection and phasing. In particular:

- use existing headroom first: direct growth to catchments with existing WRC and network capacity before relying on new infrastructure – subject to other plan-led constraints
- phase where needed: where water/ wastewater capacity is constrained, allocations should be phased so occupation aligns with delivery/ commissioning of required infrastructure upgrades
- reduce potable water demand: tighter water efficiency standards, and Sustainable Drainage 'SuDS first' approach reduces potable demand and wastewater network capacity water pressures
- integrated water management: treat water as part of place-making through multifunctional green and blue infrastructure with opportunities for non-potable reuse
- protect our critical infrastructure assets: safeguard access to AWS's underground and operational assets and avoid introducing sensitive receptors that constrain operations (agent of change). Site allocations or policy designations should not constrain the ability to extend and upgrade our operational sites to support growth, such as:
    - water recycling centres
    - pumping stations
    - water treatment works
- facilitate delivery of critical infrastructure, either:
    - safeguard areas for new critical water and wastewater infrastructure in relevant plans, where these schemes are sufficiently advanced

- ensure a positive policy framework to enable delivery of critical water and wastewater infrastructure to ensure alignment with supporting substantial growth planned for the region

Engagement on the preparation of the Local Plan is essential to ensure that growth strategies, site allocations and policies are deliverable and do not create avoidable delay at application stage. Water and wastewater constraints can be location-specific (catchment and asset specific) and can change over time; early engagement helps identify key risks, the most sustainable locations for growth, and any required phasing or safeguarding considerations. AWS will work with the LPA to provide data to inform this evidence.

The council's response to Anglian Water

The council notes the comments received. Officers will continue to engage with Anglian Water in forming its draft policies and evidence base. A water cycle study and SFRA are being undertaken.

Beds Police (Counter Terrorism)

These are the main issues as supplied by Beds Police (Counter Terrorism).

Welcome Luton's regeneration plans but urge the Council to embed protective security into the plan's objectives and policies. Explicit policy on Security and Resilience would ensure growth does not inadvertently increase risk. This aligns with national policy (NPPF 2024) and upcoming legal duties, and will ultimately support safer, more sustainable places. We would be pleased to assist further in refining wording or advising on specific projects.

The council's response to Beds Police (Counter Terrorism)

The council notes the comments received. Officers will continue to engage with Bedfordshire Police in forming its draft policies.

National Grid Electricity Transmission plc (NGET)

These are the main issues as supplied by NGET.

National Grid Electricity Transmission (NGET), which owns and operates the electricity transmission network in England and Wales, emphasises the importance of early engagement throughout the plan-making and development process. Early consultation will help ensure that the implications of proposed development for existing and future electricity infrastructure are properly understood and addressed.

The Council should safeguard all existing transmission assets, including overhead lines, underground cables and substations, and support future network reinforcement and expansion projects, including those associated with the Great Grid Upgrade and other strategically important national infrastructure. Planning policies should recognise the critical role of the transmission network in supporting economic growth, energy security and the transition to net zero.

Development proposals located near transmission infrastructure should demonstrate that they will not compromise the safe operation, maintenance, replacement or future expansion of National Grid assets. Consideration should also be given to maintaining appropriate access for inspection, maintenance and upgrade works throughout the lifetime of the infrastructure.

NGET also highlights the need to protect existing and potential routes for the movement of Abnormal Indivisible Loads (AILs), such as large transformers and other transmission equipment required for the construction, replacement and maintenance of strategic electricity infrastructure. Development proposals and highway alterations should not obstruct or constrain these routes unless suitable mitigation measures or alternative agreed access arrangements can be secured.

Overall, National Grid encourages the Council to incorporate policies that safeguard transmission infrastructure, facilitate future network investment and ensure that developers engage with NGET at the earliest stage to identify and resolve any potential impacts on the electricity network.

The council's response to NGET

The council notes the comments received. Officers will continue to engage with Bedfordshire NGET in forming its draft policies. An infrastructure study is being undertaken for the Local Plan.

The Forestry Commission

These are the main issues as supplied by The Forestry Commission.

Have no specific answers to the questions posed in the scoping consultation. An information guide is provided for local authorities undertaking the new local plan process to ensure trees and woodlands are appropriately considered within planning and the plan making process, together with some suggestions for policy development that you may wish to consider.

The commission are keen to work proactively with the Council from the earliest stages of plan preparation to help ensure tree and woodland considerations are effectively integrated into your evidence base and policies.

The council's response to The Forestry Commission

The council notes the comments made. Officers will continue to engage with the forestry commission and will consider the guide provided in drafting its policies and the preparation of the Local Plan.

Luton Local Access Forum

These are the main issues as supplied by Luton Local Access Forum.

The representation places strong emphasis on creating a healthier, greener and more resilient Luton. It argues that tackling crime and antisocial behaviour is essential to encouraging walking and cycling, and that active travel should move beyond broad aspirations to become a central priority of the Local Plan. Development should deliver safe, connected and attractive walking and cycling networks, support the objectives of LTP5, protect and enhance traffic-free routes, and improve cycle parking both within developments and at key destinations such as the town centre, rail station and bus hub.

The response highlights the importance of protecting and enhancing green infrastructure, biodiversity and open space. It stresses that biodiversity net gain should be delivered within Luton wherever possible, existing parks, wildlife sites and green spaces should be safeguarded, and all residents should have access to high-quality green space.

Particular concern is raised about the loss of open space to development, especially given increasing residential densities in the town centre. The representation supports a stronger and more transparent approach to Local Green Space designation, restoration of degraded wildlife sites, implementation of Natural England's Green Infrastructure Framework, and maintenance of green corridors that connect communities to the countryside and soften the urban edge.

Climate resilience and flood risk management are identified as key priorities. The respondent argues that the Local Plan should address not only the resilience of new development but also improvements to the existing urban environment and critical infrastructure. Specific recommendations include preparing an emergency flood plan, addressing different forms of flooding, improving communication and community engagement, supporting property-level resilience measures, and ensuring that public rights of way and active travel routes are designed to withstand periods of prolonged flooding and heavy use. New development should not exacerbate flood risk or wider environmental problems elsewhere.

The representation also seeks stronger protection for the Green Belt and environmentally sensitive areas, particularly around the airport, Stopsley Common and the Chilterns National Landscape. It emphasises the importance of maintaining landscape buffers, protecting nature corridors, and ensuring that any flexibility in airport-related land use does not become a means of facilitating unrelated housing or industrial development. River restoration and enhancement should be prioritised, with development adjacent to the River Lea expected to contribute positively to its ecological value.

Finally, the response calls for improved community infrastructure and greater transparency in planning. Concerns are raised about the availability of information on publicly owned land, while the town centre is identified as a suitable location for expanded healthcare facilities, including GP, diagnostic and outpatient services.

The respondent advocates clear, enforceable planning standards, stronger integration requirements for major developments, and a commitment that larger schemes contribute to improvements in the wider transport, green infrastructure and active travel networks beyond their immediate boundaries.

The council's response to Luton Local Access Forum

The council notes the comments made. Officers will continue to engage with the Forum in drafting its Local Plan policies and evidence base. Evidence is being collected on open space and recreation, biodiversity and green infrastructure and other matters.

NHS Central East Integrated Care Board (CEICB)

These are the main issues as supplied by CEICB.

The new Local Plan must provide a robust policy framework to support the planning and delivery of healthcare services required to meeting housing growth. The Local Plan must be clear that healthcare services are essential infrastructure which cover primary, community, mental health and acute healthcare and emergency ambulance services.

Further, the vision, strategic priorities and policies in the emerging Local Plan must:

- positively promote health and wellbeing and address local health inequalities
- facilitate improvements to health infrastructure, against the weight the National Planning Policy Framework (NPPF) gives to the importance of new, expanded or upgraded public service infrastructure or community facilities
- seek to ensure infrastructure providers, including the NHS receive a commensurate share of developer contributions to mitigate the healthcare impacts arising from housing growth
- recognise the impact of health services arising from planning applications made by specialist housing providers. Where planning applications are made for specialist housing, the NHS will seek developer contributions to mitigate the impact
- support the ability of the NHS as a landowner to continually review its healthcare estate, optimise land use, and deliver health services from modern facilities

The CEICB and NHS system partners look forward to working with the Council to deliver healthcare facilities fit for the future and to improve health outcomes for residents of Luton.

The council's response to CEICB

The council notes the comments received. Officers will engage with the Board in forming its draft policies and its evidence base. Work is being undertaken to understand infrastructure and community needs.

Stevenage Borough Council

These are the main issues as supplied by Stevenage Borough Council.

The Local Plan should recognise that Luton and Stevenage sit within a wider interconnected functional economic area within the A1(M)-M1-Cambridge-London corridor. Many of the key challenges facing Luton have direct implications for Stevenage, particularly around housing growth, infrastructure capacity, transport, decisions around further expansion and intensification of operations at Luton Airport and climate change.

It is also important to note that following the decision by Government Stevenage will be forming part of a new Central Hertfordshire Unitary Authority, which will share a boundary with Luton. This will increase the importance of cooperation on Plan making, specifically on the matters set out in this letter.

We consider it essential that the Local Plan addresses strategic cross-boundary matters from the outset.

The council's response to Stevenage Borough Council

The council notes the comments received. Officers will engage with Stevenage Borough Council in forming its draft policies and its evidence base.

The Marine Management Organisation

These are the main issues as supplied by The Marine Management Organisation

Provided information that Local Plans should consider in general.

The council's response to Stevenage Borough Council

The information is noted.

The Canal and River Trust

Clarifies that they do not own or manage any waterways in the Luton Plan area and have no comments to make on the Scoping consultation.

The council's response to The Canal and River Trust

Noted.

Transport for London

Have no comments to make at this stage.

The council's response to Transport for London

Noted.

The Environment Agency

These are the main issues as supplied by The Environment Agency.

The Environment Agency broadly supports the direction of the Local Plan and emphasises the need for sustainable development that protects water resources, improves environmental quality and increases resilience to climate change. It supports a joint approach to:

- waste planning across local authority boundaries
- the application of the waste hierarchy
- circular economy principles
- policies that steer higher-risk waste activities away from sensitive receptors such as homes, communities and groundwater source protection zones.

The agency also supports retaining strong existing policies on pollution and contamination and encourages tighter controls on drainage systems that could pose risks to groundwater quality.

The response places significant emphasis on climate change adaptation, flood risk management and sustainable drainage. The Agency supports a sequential approach to development that directs growth towards areas of lowest flood risk and recommends that flood risk be considered separately from transport objectives. It welcomes plans to update Luton's flood risk evidence base and supports the use of multifunctional solutions such as river restoration, natural flood management and sustainable drainage systems (SuDS) to:

- reduce flooding
- improve biodiversity
- enhance water quality
- deliver wider environmental benefits

SuDS should be designed as multifunctional assets and be accompanied by long-term management and maintenance plans.

The Environment Agency strongly supports measures to improve water quality and restore the River Lea. It endorses de-culverting and naturalising the river where possible, creating buffer zones along watercourses, and preparing a dedicated River Lea policy within the Local Plan.

Development should avoid culverting watercourses or constraining future restoration opportunities, while contributing to river restoration, habitat enhancement, floodplain reinstatement and biodiversity improvements. The Agency also advocates a catchment-based approach to water management, working with local partnerships to address flooding, pollution, biodiversity and water resource issues at a wider landscape scale.

Water efficiency is identified as a major priority due to the area's designation as being under serious water stress. The agency supports stronger water efficiency standards for new development, potentially reducing residential water consumption targets below the current 110 litres per person per day, alongside greater use of rainwater harvesting, greywater recycling and retrofitting of existing buildings. It also stresses that development should only proceed where there is sufficient capacity in water supply and wastewater infrastructure, with developers required to demonstrate that any necessary upgrades can be delivered.

A key theme throughout the response is the need to strengthen Local Plan policies to meet the objectives of the Water Framework Directive and River Basin Management Plans. Development should not lead to the deterioration of rivers, groundwater or other water bodies and should actively contribute towards their enhancement.

The agency supports ambitions to exceed the mandatory 10% Biodiversity Net Gain requirement where justified and viable, encourages habitat creation and restoration within the same catchment where possible, and highlights the importance of integrating biodiversity, green and blue infrastructure, climate resilience and water management objectives into both strategic planning and site-specific development proposals.

The council's response to The Environment Agency

The council notes the comments made. Officers will engage with the EA in drafting its Local Plan policies and evidence base. An SFRA, Water Cycle Study, ecological work and other evidence are being completed.

Bedfordshire Hospitals NHS Foundation Trust

These are the main issues as supplied by Bedfordshire Hospitals NHS Foundation Trust.

Bedfordshire Hospitals NHS Foundation Trust broadly supports the draft Vision and objectives but considers that the role of healthcare infrastructure in supporting sustainable growth and healthy communities should be more explicitly recognised. While the Vision refers to accessible community facilities and services, it should make clearer commitments to expanding and modernising healthcare provision, ensuring infrastructure keeps pace with population growth and supporting resilient neighbourhood-based models of care. The Trust suggests explicitly referencing the delivery of sufficient, accessible and resilient healthcare infrastructure within the Vision.

The Trust supports the Plan's focus on health outcomes, reducing inequalities and infrastructure provision but recommends the inclusion of a specific objective relating to healthcare capacity and accessibility. This should ensure that primary, community and acute healthcare infrastructure is planned, funded and delivered in step with population growth. The Local Plan should also better reflect the need for long-term infrastructure planning, account for cumulative pressures arising from development, and retain flexibility to respond to technological advances, digitisation, artificial intelligence and changing healthcare delivery models over the plan period.

A key concern is the capacity of healthcare services to meet future demand. Although the consultation acknowledges health inequalities and infrastructure pressures, the Trust considers that greater recognition should be given to existing pressures on primary and acute care, growing demand for mental health services, particularly for children and young people, and the additional demands arising from planned housing growth. Growth strategies and site allocations should therefore be assessed against their ability to support healthcare provision and access to health services.

The Trust recommends that Local Plan policies directly link housing growth and healthcare infrastructure delivery. Major developments should assess the need for new or expanded healthcare facilities, supported by evidence of population growth and service demand. Consideration should be given to infrastructure delivery triggers, safeguarding land for healthcare uses within larger development sites, aligning growth with existing or planned healthcare capacity, and supporting the housing needs of key workers, students and trainees in essential public service sectors.

The Trust also advocates policies that support the health and care sector as a major employer and facilitate the recruitment and retention of the workforce needed across healthcare, social care, education and emergency services. This includes recognising the relationship between good health and economic productivity, supporting workforce development pipelines, and planning for healthcare facilities alongside wider employment and housing growth across Bedfordshire.

In terms of place-making and community infrastructure, the Trust supports the inclusion of healthcare facilities such as GP surgeries, diagnostic centres, community health hubs and integrated care services within town and district centres. It encourages the co-location of health, community and social care services to improve accessibility and support neighbourhood health models. The Local Plan should also consider the adequacy, location and future needs of social care and care home provision, whilst ensuring healthcare facilities are designed with sufficient flexibility to accommodate future changes in technology, demographics and models of care.

The Trust supports the Plan's emphasis on green infrastructure and air quality improvements, recognising their contribution to preventative health, but stresses that these measures should be complemented by robust healthcare capacity planning. Healthcare infrastructure should be recognised as critical infrastructure within the Local Plan, with specific requirements identified and delivery mechanisms established to ensure provision keeps pace with population growth.

Climate resilience should also be embedded into healthcare planning, with facilities and transport networks capable of remaining operational during extreme weather events and ensuring reliable access to hospitals and emergency services.

Finally, the Trust considers that greater clarity is needed on funding and delivery mechanisms. Policies should identify how healthcare infrastructure can be supported through developer contributions, including Section 106 agreements and the Infrastructure Levy, whilst linking funding, phasing and infrastructure delivery. The Plan should also recognise that healthcare infrastructure.

The council's response to Bedfordshire Hospitals NHS Foundation Trust

The council notes the comments received. Officers will engage with the Foundation in forming its draft policies and its evidence base. Work is being undertaken to understand infrastructure, health and community needs

Be Active (Beds)

These are the main issues as supplied by Be Active (Beds). Beds Active broadly supports the draft Vision and objectives and encourages the Council to embed Sport England's Active Design (2023) guidance throughout the Local Plan and future design codes. It considers that the Local Plan should align closely with the wider ambitions of Luton 2040 and demonstrate how planning policies contribute to its strategic priorities, with consideration also given to aligning plan periods where possible.

Comment - section 5.10 - concerned by this section in relation to the protection of parks and green spaces and request that the policy is that all existing parkland and green spaces are protected with the only exception being situations where Sport England planning team approve development that enhances access to sport and physical activity.

Question 15 (Design): Beds Active recommends that Sport England's Active Design guidance is formally incorporated into design codes and development management processes to ensure developments promote active lifestyles through attractive, safe and accessible environments.

Question 18 (Employment): The organisation supports policies that prioritise employment opportunities for Luton residents and encourage investment in skills and training programmes that match the requirements of emerging employment sectors.

Questions 24, 29 and 51 (Active Travel): Beds Active strongly supports prioritising walking, cycling and wider active travel infrastructure. It recommends that development be designed around principles of safety, accessibility, comfort, attractiveness, directness and connectivity. It also advocates investment in coordinated active travel programmes, including community-led cycling initiatives, affordable access to bicycles, cycle maintenance support and training schemes to help residents travel actively and safely.

Questions 40, 41 and 42 (Sport, Open Space and Infrastructure): Beds Active highlights the importance of the Indoor Built Facilities Strategy and Outdoor Playing Pitch Strategy as key evidence bases for future planning and investment decisions. These strategies should be regularly updated and used to secure developer contributions towards the protection, enhancement and delivery of sports facilities and open spaces, including from developments adjoining Luton.

It also recommends identifying underused land that could be converted into green space, ensuring Active Design principles are reflected in development proposals, and securing appropriate developer funding to support sport, physical activity and active travel infrastructure. Additionally, it supports greater accessibility and affordability of sports facilities, including those located on educational sites, to maximise community benefit.

The council's response to Be Active (Beds)

The council notes the comments received. Officers will engage with Be Active in forming its draft policies and its evidence base. Various evidence base is being collected including an Open Space and recreation study and Green Infrastructure study.

Natural England

These are the main issues as supplied by Natural England.

Luton context

Natural England is broadly supportive of the draft Vision and Objectives, particularly the emphasis on protecting and enhancing the natural environment, improving health and wellbeing through access to open space, creating a River Lea linear park, reducing pollution, and delivering climate-resilient development. It highlights the emerging North Chilterns Super National Nature Reserve (sNNR) as an important future consideration and recommends that future policies recognise its potential significance and support landscape-scale partnership working and nature recovery initiatives.

Question 5 - strategy and site allocations

Natural England advises that development should be directed towards land of the least environmental and amenity value, in accordance with the NPPF. Site selection should:

- be supported by robust Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) evidence
- avoid significant impacts on designated sites, protected landscapes and best and most versatile agricultural land

The council should use Natural England's Impact Risk Zones and ensure mitigation measures are identified and secured through Local Plan policies where required.

Questions 20, 24, 27, 38 and 39 - economy, town centre, health and nature recovery

Natural England supports embedding green, circular economy principles into employment growth and promoting active travel links between homes, employment areas and the wider green infrastructure network. It supports the continued celebration of Luton's unique character, heritage and the Hat District, whilst strengthening links between the town centre, River Lea and surrounding countryside through green and blue corridors.

The organisation strongly supports the daylighting and naturalisation of the River Lea, recommending a dedicated policy and the identification of opportunities through the Green and Blue Infrastructure Study. It also emphasises the important role of green and blue infrastructure in:

- tackling health inequalities
- supporting physical activity
- improving air quality
- reducing overheating and flooding
- encouraging social interaction
- enabling green social prescribing

Investment should be targeted towards areas experiencing the greatest environmental and social deprivation using tools such as the Environmental Equity Index and Indices of Multiple Deprivation.

Natural England also strongly encourages Luton to pursue Nature Towns and Cities Accreditation, using the Local Plan process, Green Infrastructure Strategy and community engagement to help achieve Foundation and Advanced accreditation standards.

Questions 31, 32 and 33 - climate change, flooding and water

Natural England welcomes the strong focus on climate change adaptation and supports measures including increased tree canopy cover, urban greening, retrofitted Sustainable Drainage Systems (SuDS), rainwater harvesting, greywater recycling and water efficiency standards that exceed current regulations.

It supports a multifunctional approach to drainage, separation of surface and foul water systems, and stronger policy wording requiring development to improve water quality and protect receiving watercourses and aquifers.

The organisation emphasises the importance of early preparation of a Water Cycle Study, ensuring sufficient wastewater treatment and environmental capacity exists before development is approved, and taking account of hydrological connections beyond the borough boundary. Water supply, wastewater capacity, chalk streams, River Basin Management Plans and protected site requirements should all be reflected in evidence gathering and policy development.

Questions 35, 36, 37, 42, 47, 51 and 55 - green infrastructure, biodiversity and landscape

Natural England supports an ambitious approach to Biodiversity Net Gain (BNG) and would welcome targets above the statutory 10% requirement where viability evidence supports this. It recommends aligning BNG delivery with the Bedfordshire Local Nature Recovery Strategy (LNRS), exploring habitat banks, and using tools such as the Urban Greening Factor and Environmental Net Gain to deliver wider environmental benefits.

The Local Plan should contain a strong Green and Blue Infrastructure (GBI) policy, embedding Natural England's Green Infrastructure Framework, including the Accessible Greenspace Standard, Urban Greening Factor and tree canopy standards. Green and blue infrastructure should be multifunctional, supporting health, biodiversity, climate adaptation, flood management and active travel. Natural England also suggests identifying strategic greenspace projects that developments can contribute towards where on-site provision is limited.

The Council should also strengthen policies relating to the Chilterns National Landscape and Green Belt, helping to deliver the Chilterns Management Plan and Nature Recovery Plan. Opportunities should be taken to improve access to the countryside while managing recreational pressure on sensitive sites. Walking and cycling policies should connect communities with nature-rich green spaces, helping to achieve the Government's aspiration that everyone lives within 15 minutes of quality green infrastructure.

Evidence base and strategic policies

Natural England strongly supports the proposed evidence base and recommends that the Habitats Regulations Assessment (HRA), Water Cycle Study and Green and Blue Infrastructure Study are prepared as early as possible and developed alongside Local Plan policies. Assessments should consider cumulative impacts from growth within and beyond Luton, including impacts on designated sites, air quality, water resources, recreation and habitat connectivity.

It recommends a suite of strategic policies covering:

- protection and enhancement of designated environmental sites
- The Chilterns National Landscape
- Biodiversity Net Gain and Local Nature Recovery Strategy delivery
- Green and Blue Infrastructure standards and targets
- water quality, water resources and flood risk management
- River Lea restoration and naturalisation
- strategic mitigation for recreational impacts on protected sites

- climate resilience, sustainable drainage and water efficiency

Overall, Natural England strongly supports a Local Plan that uses nature recovery, green infrastructure and environmental enhancement as central tools for delivering healthier communities, climate resilience and sustainable growth.

The council's response to Natural England

The council notes the comments receive. Officers will engage with Natural England in forming its draft policies and its evidence base. Evidence is being collected for various matters and a HRA is being undertaken.

National Trust

These are the main issues as supplied by National Trust.

The National Trust highlighted the importance of protecting the Chilterns Beechwoods Special Area of Conservation (SAC), parts of which affect the south-western area of Luton. The respondent advises that:

- the Local Plan's Habitats Regulations Assessment should fully consider impacts on the SAC and align with the Chilterns Beechwoods SAC Mitigation Strategy
- while current evidence does not require Strategic Access Management and Monitoring Strategy (SAMMS) contributions from developments in Luton, the respondent notes that developments of over 100 dwellings within the SAC Zone of Influence should provide Suitable Alternative Natural Greenspace (SANG) in accordance with Natural England guidance
- future monitoring may also require SAMMS contributions if visitor pressures increase.

The council's response to National Trust

The council notes the comments received. Officers will engage with the National Trust on plan preparation and appropriate policies and evidence base. Evidence is being collected for various matters for SEA and a HRA is being undertaken in accordance with national policy, planning and environmental regulation.

Swifts Local Network: Swifts and Planning Group

These are the main issues as supplied by Swifts Local Network: Swifts and Planning Group.

Supports stronger biodiversity measures within new development and specifically requests a policy requiring the installation of swift bricks in accordance with national planning guidance. They note that:

- Swift bricks benefit a range of small bird species, are not covered by mandatory Biodiversity Net Gain calculations, and therefore require a separate planning policy
- National Planning Practice Guidance advises that developments should include integrated nest boxes (swift bricks) wherever possible

The council's response to Swifts Local Network: Swifts and Planning Group

The council notes the comments received. Officers will engage with Swifts Local Network. Evidence is being collected for various matters including biodiversity, sustainable design including habitat and ecological needs and appropriate policies. The plan will be prepared to address the requirements of national policy.

Bloor Homes Ltd

These are the main issues as supplied by Bloor Homes Ltd.

Bloor Homes highlighted the importance of recognising the contribution that strategic housing allocations east of Luton within the North Hertfordshire Local Plan will make towards meeting housing needs across the wider housing market area. In particular:

- the East of Luton Strategic Housing Allocation (Sites EL1, EL2 and EL3), which will deliver approximately 2,100 homes, including a significant proportion of family and affordable housing
- argued that housing requirements in the new Luton Local Plan should be based on an up-to-date assessment of local housing need and should account for housing already planned through neighbouring authority allocations
- requested policy alignment between:
    - the new Luton Local Plan
    - the North Hertfordshire Local Plan
    - the East of Luton Strategic Masterplan Framework
    - future planning permissions associated with those developments

The council's response to Bloor Homes Ltd

The council notes the comments received. Officers will engage with developers and cross boundary suppliers. The government have set out the current approach to identifying future housing need via the Standard Method, National Planning Policy Framework and other Planning Practice Guidance.

The council continues to cooperate and with neighbouring authorities and is pleased to work with North Hertfordshire District Council on cross boundary matters responding to existing unmet needs as well as potential future growth needs and will seek to ensure that emerging plans and policies are consistent and complementary.

Sheriff Construction

These are the main issues as supplied by Sheriff Construction.

Broadly support a long-term vision for Luton but suggest greater emphasis on retail, hospitality, youth opportunities and community services.

- A recurring theme is concern about the condition and perception of Luton town centre. The respondent believes the town centre requires significant regeneration, drawing comparisons with towns such as Hitchin and Harpenden. They advocate greater pedestrianisation, more events and cultural attractions, improved hospitality provision, enhanced public spaces and stronger design standards for shopfronts and signage. Concerns were also raised regarding inactive commercial spaces, with suggestions to repurpose vacant buildings for housing, training facilities and community services.
- On housing, supports brownfield-led development, greater flexibility over housing mix, and stronger consideration of family housing needs. They oppose significant housing growth outside Luton's boundaries and suggest reviewing assumptions regarding unmet housing need that informed neighbouring authority plans. They also support variable affordable housing requirements and greater control over HMOs where evidence demonstrates harm.
- The Local Plan should do more to strengthen links between economic development, education and key sectors such as technology, renewables, green industries and research and development. Greater support for apprenticeships and skills development was also suggested.
- Environmental priorities include green roofs, biodiversity enhancements, increased tree cover, renewable energy generation, water efficiency measures, protection of the River

Lea corridor and roadside verges, and consideration of the environmental impacts of airport expansion.
- Supports stronger public realm improvements, including better lighting, safer public spaces and enhanced pedestrian environments.
- Finally, highlighted concerns about crime, anti-social behaviour and road safety as barriers to walking and cycling. They also suggested future consultations should be shorter and more accessible to encourage wider public participation.

The council's response to Sheriff Construction

The council notes the comments received. Officers will engage with developers and providers. Evidence has been commissioned to ensure that the new local plan can respond to social, economic and environmental regeneration of the town, its high streets and centres, including:

- economic, retail, leisure and demographic evidence
- family and special needs (including affordable)
- training/educational needs
- sustainable travel and design, density
- greening
- safety
- placemaking

Tarmac

These are the main issues as supplied by Tarmac.

Heatons Planning (consultancy) made on behalf of Tarmac.

Climate change mitigation and adaptation

The Council should take pragmatic, viable and achievable measures which acknowledge the balance of creating significant economic and housing growth and working towards a more sustainable society. In particular, Tarmac commented in terms of climate change adaptation.

- This could involve substantial infrastructure investment which is not 'net zero' in itself but is necessary in order to protect residents and the economy. Overall, the new Local Plan must not introduce net zero requirements which stifle new development and make it unviable.
- The council must avoid stifling economic growth as this is counterproductive to the goals of climate change mitigation and adaptation in the long term.
- Significant economic growth cannot be achieved without the construction materials and viable bulk transport of materials such as that provided by safeguarded rail heads and related infrastructure in Luton. The Local Plan must therefore ensure that these sites are safeguarded and no constraints are placed on their existing and future operation, either through stifling Local Plan policies or through the allocation of new development nearby (i.e. 'agent of change').
- Tarmac also considers that economic growth should be the focus of the new Local Plan. Economic growth is the national priority, and Local Plans are a vital part of delivering significant future economic growth.

The council's response to Tarmac

The council notes the comments received. Officers will engage with infrastructure providers. Responding to the climate emergency, the council has commissioned evidence on a range of topics with a view to ensuring sustainable growth, climate mitigation, adaptation and net zero

carbon in accordance with national policy. Some matters will likely be for the new Minerals and Waste Local Plan being jointly prepared by the Bedfordshire authorities.

Arrow Planning

These are the main issues as supplied by Arrow Planning.

Arrow Planning (on behalf of Arnold White Group AWG) broadly supports the Vision and its five priorities, but considers that housing affordability, homelessness and access to secure, high-quality homes should be given greater prominence within the new Local Plan. Whilst these issues are referenced under the Population Wellbeing priority, the scale of Luton's housing challenges, particularly its reliance on temporary accommodation and affordability pressures, justifies a more explicit housing-focused priority. The proposed objective relating to the delivery of high-quality, energy-efficient and affordable homes, particularly social rented housing, is strongly supported.

Arrow welcomes the suggestion that the new Local Plan could run to 2050, aligning with Central Bedfordshire Council's emerging plan period. A shared timeframe would provide a consistent long-term planning framework across authority boundaries and support effective strategic planning to address housing and growth requirements across the wider area. The response also emphasises the need for strong and ongoing cooperation with neighbouring authorities in accordance with national planning policy.

The response highlights the significant gap between Luton's current Local Plan housing requirement (425 dwellings per year) and the current standard method figure (1,095 dwellings per year). It notes that Luton's physical constraints make it difficult to meet this need within the borough and that recent delivery has been dominated by smaller flats, despite evidence showing a much greater need for family housing.

Arrow supports Luton's acknowledgement that some unmet housing need will need to be accommodated elsewhere within the wider Housing Market Area and encourages early engagement with neighbouring authorities to identify suitable and sustainable locations.

In considering where unmet housing need could be accommodated, Arrow suggests that strategic locations should be:

- within Luton's Housing Market Area (HMA)
- capable of delivering development at scale within the plan period
- well connected by public transport and infrastructure
- consistent with neighbouring authorities' growth strategies

Arrow argues that evidence from previous plan-making exercises has identified the Leighton Buzzard area as a sustainable location capable of accommodating some of Luton's unmet housing needs. In particular, it highlights the proposed Eastern Way Quarries (EWQ) development in Central Bedfordshire as a potential contributor. The scheme is described as a highly sustainable, net-zero mixed-use development and could make a significant contribution toward both local and unmet housing needs.

Eastern Way Quarries (EWQ)

- Up to 3,600 homes
- 45% affordable housing (approximately 1,620 affordable homes)
- Primary and secondary schools
- Country Park and community facilities
- Elderly care provision
- Employment space and infrastructure hubs
- On-site renewable energy generation

- Live planning application (CBC ref. CB/26/01392/OUT)

The response also places significant emphasis on climate change and renewable energy. It supports the Government's net-zero and clean power ambitions and argues that the new Local Plan should prioritise renewable energy infrastructure and require new housing to be powered by renewable energy sources wherever possible.

Finally, Arrow recommends strengthening policies relating to cross-boundary cooperation and updating the evidence base, particularly through a new Strategic Housing Market Assessment (SHMA), Housing and Economic Land Availability Assessment (HELAA), and a comprehensive assessment of sites outside Luton's boundaries to explore options for meeting unmet housing needs.

The council's response to Arrow Planning

The council notes the comments received. Officers will engage with neighbouring authorities, stakeholders, agents on cross boundary matters in drafting the Local Plan.

A wide range of evidence is being collected for the Local Plan including a housing and economic needs assessment, regeneration, density and place making to ensure Luton maximises its development opportunities to address its needs within the town sustainably.

Boyer Planning

These are the main issues as supplied by Boyer Planning.

Focuses primarily on ensuring that the Local Plan is underpinned by a robust and up-to-date employment evidence base. It argues that, before identifying employment allocations or drafting policies, the Council should undertake a comprehensive assessment of economic land demand and supply in accordance with national planning guidance. Boyer also recommends engaging closely with landowners and developers so that evidence reflects market conditions, realistic assumptions and development opportunities.

A key theme is the importance of existing employment sites, particularly Butterfield Business Park (BBP), as the starting point for accommodating future economic growth. Boyer considers established employment areas to be well placed to meet future needs due to their existing infrastructure, market attractiveness and ability to deliver development quickly. It highlights BBP's role in contributing to Luton's economy, noting that more than 30,000 sqm of commercial floorspace has already been delivered.

The response strongly advocates for flexible employment policies that can respond to changing market demand. Boyer argues that policies should not continue to prioritise office, light industrial and general industrial uses at the expense of other sectors. In particular, it highlights increasing demand for B8 warehousing and logistics uses and considers existing policy restrictions to be overly rigid and potentially harmful to economic growth.

In relation to the consultation options, Boyer supports the protection of existing employment land but warns against policies that limit the range of employment uses that can come forward. It also challenges approaches that prioritise "higher value" sectors, arguing that logistics and distribution activities make a significant economic contribution and support extensive supply chain employment. The response notes that industrial and logistics development generates substantial indirect employment benefits and should not be judged solely on direct job numbers.

Key policy recommendations

Retain and intensify existing employment sites before allocating new land. Ensure policies remain flexible and responsive to market demand. Recognise growing demand for B8 warehousing and logistics uses. Avoid policies that favour certain employment sectors to the exclusion of others.

Apply a consistent Biodiversity Net Gain (BNG) requirement across all developments rather than different standards for different sites.

Boyer is particularly critical of Policy LLP7 (Butterfield Green Technology Park), describing it as outdated, overly prescriptive and inconsistent with modern economic needs. It argues that restrictions limiting B8 uses and requiring developments to fit a "technology park" concept no longer reflect market realities. Given that the 2024 outline planning permission allows flexible B2 and B8 uses across the site, Boyer considers the new Local Plan should provide greater flexibility at BBP to enable it to adapt to changing economic conditions and continue contributing to Luton's economic growth.

The council's response to Boyer Planning

The council notes the comments received. Officers will engage with stakeholders and agents of business and industry. Evidence has been commissioned on economic and other needs. and these matters will be considered in the formulation of the Local Plan.

Henry Boot Developments (HBD)

These are the main issues as supplied by HBD.

Submitted by Boyer (on behalf of HBD). HBD is a development partner for Butterfield Business Park (BBP).

The response strongly supports the Council's ambition for economic growth but argues that the new Local Plan must be more flexible, market-responsive and aligned with modern industrial and logistics requirements than the current Plan.

A key theme is that employment policies should be based on an up-to-date evidence base and reflect significant changes in the economy since the adoption of the 2017 Local Plan. HBD argues that future employment land requirements should be informed by market evidence, engagement with developers and landowners, and the growing demand for industrial and logistics floorspace. It highlights its experience at BBP and elsewhere to demonstrate that demand for modern B2 and B8 employment space remains strong.

The response emphasises the strategic importance of Butterfield Business Park, noting that over 30,000 sqm of employment floorspace has already been delivered and that a further outline permission granted in 2024 could deliver up to 42,170 sqm of additional commercial floorspace. HBD considers existing employment sites such as BBP should be prioritised as the primary locations for future economic growth because they can deliver development quickly and already benefit from established infrastructure and market demand.

HBD strongly advocates flexible employment policies that can respond to changing business needs. It argues that the logistics sector is increasingly important, generating higher-skilled jobs, supporting supply chains and contributing significantly to economic productivity. The response notes that emerging national policy places greater emphasis on supporting logistics, storage and distribution uses, and states that Local Plan policies should avoid restricting employment sites to a narrow range of uses.

Key proposals:

- prepare the Local Plan using an up-to-date assessment of employment land supply and demand
- engage developers and landowners to inform the evidence base and understand market needs
- prioritise the retention, intensification and expansion of existing employment locations, particularly BBP

- provide flexibility for a broad range of employment uses, including B2 (general industry) and B8 (storage and distribution)
- avoid overly restrictive policies that prioritise certain employment sectors over others
- apply a consistent Biodiversity Net Gain requirement across developments
- ensure employment policies align with both the adopted and emerging NPPF

The response is particularly critical of Policy LLP7 (Butterfield Green Technology Park), describing it as outdated, overly prescriptive and no longer reflective of market conditions. HBD argues that restrictions on B8 uses and the requirement to meet a loosely defined "technology park" concept have created uncertainty and constrained investment. As the 2024 outline consent already permits flexible B2 and B8 uses across the remaining site, HBD contends that the new Local Plan should update its policy framework to reflect current permissions and market demand.

Overall, HBD's response seeks a more flexible and commercially focused employment strategy. It argues that the council's economic growth ambitions will be best achieved through:

- supporting established employment locations
- recognising the growing importance of logistics and industrial sectors
- ensuring policies are adaptable enough to respond to future changes in economic conditions and business requirements

The council’s response to HBD

The council notes the comments received. Officers will engage with stakeholders and agents of business and industry. Evidence has been commissioned on economic and other needs and these matters will be considered in the formulation of the Local Plan.

Crown Estate

These are the main issues as supplied by Crown Estate.

Submitted by Savills (on behalf of the Crown Estate), the Crown Estate is broadly supportive of the emerging Vision and priorities for the new Local Plan, recognising the importance of promoting sustainable development, housing delivery, economic growth, regeneration and environmental improvement. However, it emphasises that policies must be applied proportionately and take account of site-specific circumstances.

A key concern is that the proposed 26 draft objectives are too numerous and lack focus. Savills argues that the objectives should be streamlined into a smaller number of clear, outcome-based objectives aligned with the three pillars of sustainable development set out in the NPPF: economic, social and environmental. It considers a more concise set of objectives would provide a stronger framework for preparing, implementing and monitoring the Local Plan, with a clearer link between the Vision, objectives and policies.

The response also notes that national policy requires Local Plans to look ahead at least 15 years from adoption. Based on the proposed timetable for adoption in 2028, Savills considers the Plan should cover a period extending to at least 2043. It supports the Council's commitment to engaging residents, businesses, infrastructure providers and other stakeholders throughout plan preparation and stresses that the strategy should be informed by identified local needs and sustainable growth principles.

Housing is identified as a key priority. Savills supports the Council's focus on delivering sufficient housing, including affordable homes, but notes the significant challenge presented by Luton's standard method housing requirement of 1,095 homes per year. Given the borough's tightly constrained boundaries and limited development opportunities, it argues that cross-boundary planning will remain essential in meeting housing needs.

The response highlights the importance of strategic cooperation with neighbouring authorities and points to existing allocations in North Hertfordshire that are already helping to meet Luton's unmet need.

Key points on housing

- Support for continued prioritisation of housing and affordable housing delivery.
- Recognition that Luton is unlikely to accommodate all identified housing needs within its boundaries.
- Support for strategic planning and cooperation across local authority boundaries.
- Reference to the North Hertfordshire Local Plan allocation east of Luton (Sites EL1, EL2 and EL3), which will deliver approximately 2,100 homes, including family housing that is difficult to provide within Luton itself.

Overall, Savills supports maximising redevelopment and regeneration opportunities within the urban area but considers that, where evidence shows housing needs cannot be met within the borough, the Council should continue exploring sustainable growth opportunities in neighbouring authority areas to ensure housing requirements are met across the wider area.

The council's response to Crown Estate

The council notes the comments received. Officers will engage with stakeholders and agents of landowners, developers and providers including on visioning, objectives and potential cross boundary matters, in drafting the Local Plan.

Evidence has been commissioned on a wide range of topics, including environmental appraisal, housing and economic needs assessment, regeneration, density and place making to ensure Luton maximises its development opportunities to address its needs within the town sustainably.

Gladman

These are the main issues as supplied by Gladman.

Broadly supportive of the emerging Vision, particularly its focus on delivering a range of high-quality, energy-efficient homes, including affordable, specialist and adaptable housing. It also supports development that promotes active travel, sustainable lifestyles and strong connectivity, with growth directed towards accessible locations close to services and facilities.

The response notes that the proposed plan period to 2050 accords with national policy requirements for Local Plans to look at least 15 years beyond adoption. Gladman highlights that, due to Luton's tightly constrained boundaries, some of the most suitable locations for accommodating future housing growth are likely to be on the edges of existing settlements outside the borough, particularly within neighbouring authorities.

A key theme is the need for effective cross-boundary cooperation. Gladman considers that housing requirements should be established through an updated local housing need assessment and acknowledges that a significant proportion of Luton's future housing needs will need to be accommodated in Central Bedfordshire and North Hertfordshire. It stresses the importance of continued collaboration with neighbouring authorities to ensure identified housing needs can be met.

The response also supports the delivery of a broad range of housing types and tenures, including higher-density development in appropriate locations, such as areas with good public transport accessibility. It advocates the inclusion of policies supporting accessible and adaptable homes to respond to changing demographic needs and recognises the importance of creating healthy, safe and inclusive communities.

Gladman supports the council's climate change ambitions and acknowledges the important role of the planning system in supporting the transition to a low-carbon economy. It states that environmental improvements and sustainability measures should be embedded within future development and notes its commitment to helping deliver climate-related objectives through its land interests.

Key points

- Support for high-quality, energy-efficient, affordable and adaptable housing.
- Recognition that much of Luton's housing need will need to be accommodated through neighbouring authorities.
- Support for higher-density development in suitable and accessible locations.
- Support for policies promoting healthy communities, active travel and sustainability.
- Support for protecting natural and historic environments through a proportionate approach.
- Opposition to Local Plan policies that exceed or duplicate national requirements, particularly where they go beyond Future Homes and Building Standards.

Overall, Gladman advocates a balanced approach that supports housing delivery, climate objectives and environmental protection while ensuring policies remain proportionate, flexible and aligned with national policy requirements.

Key points

- Support for high-quality, energy-efficient, affordable and adaptable housing.
- Recognition that much of Luton's housing need will need to be accommodated through neighbouring authorities.
- Support for higher-density development in suitable and accessible locations.
- Support for policies promoting healthy communities, active travel and sustainability.
- Support for protecting natural and historic environments through a proportionate approach.
- Opposition to Local Plan policies that exceed or duplicate national requirements, particularly where they go beyond Future Homes and Building Standards.

Overall, Gladman advocates a balanced approach that supports housing delivery, climate objectives and environmental protection while ensuring policies remain proportionate, flexible and aligned with national policy requirements.

The council’s response to Gladman

The council notes the comments received. Officers will engage with stakeholders and agents of landowners, developers and providers on potential cross boundary matters, in drafting the Local Plan. Evidence has been commissioned on a wide range of topics, including environmental appraisal, housing and economic needs assessment, regeneration, density and place making to ensure Luton maximises its development opportunities to address its needs within the town sustainably.

Rt Hon Blake Stephenson MP

These are the main issues as supplied by Rt Hon Blake Stephenson MP.

Supports continued cross-boundary cooperation between Luton and neighbouring authorities on housing, growth and infrastructure planning. In particular:

- encourages Luton to maximise housing delivery within the borough through urban regeneration, brownfield redevelopment and higher-density development where appropriate

- considers Luton should seek to meet its own housing needs as far as possible to minimise additional development pressures on the Central Bedfordshire countryside
- recognises the economic opportunities associated with London Luton Airport expansion and the proposed Universal UK theme park, and the need for supporting infrastructure and transport integration

Supports increased provision of visitor accommodation and wider strategic collaboration to support economic growth across Bedfordshire.

The council's response to Rt Hon Blake Stephenson MP

The council notes the comments received. Officers will continue to engage with all stakeholders in drafting the Local Plan. Evidence has been commissioned on a wide range of topics, including exploring all potential options to sustainably accommodate its own needs.

This includes maximising the use of its land opportunities and infrastructure assets, as well as maintain its sub-regional employment role (e.g. aviation and related sectors) including for leisure and a place people want to visit.

Luton will continue to consult with and work cooperatively with its neighbours on any cross-boundary matters that emerge with respective plan making including any potential unmet need that may arise.

Bedfordshire Fire & Rescue Service (BFRS)

These are the main issues as supplied by BFRS.

BFRS welcomes preparation of the Luton Local Plan 2050 and seeks ongoing engagement with the Council through the Local Plan, Infrastructure Delivery Plan (IDP) and any revised Planning Obligations SPD. It considers itself a key statutory stakeholder and essential infrastructure provider whose service requirements should be recognised throughout the planning framework.

Vision, objectives and policy recognition

BFRS recommends that Objective 20 be amended to explicitly recognise the role of fire and rescue, police and ambulance services in creating safe, healthy, resilient and sustainable communities. It also seeks stronger policy recognition of emergency services as essential social infrastructure providers within the Local Plan.

Infrastructure funding and development contributions

A key concern is that the Local Plan does not currently provide sufficient recognition of developer-funded emergency service infrastructure. BFRS recommends:

- explicit support for developer-funded fire, police and ambulance infrastructure within Local Plan policies
- inclusion of emergency service infrastructure requirements within the IDP
- a requirement for strategic housing allocations of more than 250 dwellings to contribute towards emergency service infrastructure
- amending the Local Plan glossary so that 'infrastructure' includes fire, police and ambulance facilities.

Impact of future growth

BFRS highlights that it is already operating at capacity and that planned housing, population and employment growth to 2050 will place significant additional demands on services. Key concerns include:

- increased emergency incidents and callouts

- longer response times and changing risk profiles
- greater demand for prevention, community safety and engagement work
- increased fire safety audits, inspections and enforcement activity
- additional pressures arising from commercial, employment and leisure development.

Infrastructure and operational requirements

To respond to growth, BFRS identifies a range of infrastructure needs, including:

- expanded or enhanced fire stations and training facilities
- communications, ICT and digital infrastructure
- firefighting equipment and specialist operational apparatus
- fire hydrants and water supply infrastructure
- emergency vehicles, boats, drones and EV charging facilities
- additional firefighters and community safety personnel.

Recommended policy and funding approach

BFRS argues that fire and rescue infrastructure can legitimately be funded through development and recommends its requirements are embedded within Local Plan policies, the IDP and Planning Obligations SPD. It seeks developer contributions from major developments, including:

- £375 per dwelling for residential development (indicative rate)
- specific infrastructure requirements for strategic housing sites over 250 dwellings
- £10 per m² for employment developments over 1,000 m² (indicative rate)
- contributions secured through planning conditions, Section 106 agreements and/or CIL

Overall, BFRS's principal concern is ensuring that planned growth is matched by sufficient investment in emergency service infrastructure, equipment and staffing so that community safety and service resilience can be maintained through to 2050.

The council’s response to BFRS

The council notes the comments received. Officers will engage with the BFRS in forming its draft policies and its evidence base. Work is being undertaken to understand infrastructure, vulnerable communities, safety and emergency needs.

Pickleball England

These are the main issues as supplied by Pickleball England.

Pickleball, the national governing body for the sport, seeks that Pickleball is included within any current or future Built Facilities Strategies, Sports Facility Assessments, and related evidence base studies. Pickleball is one of the UK's fastest-growing sports and supports local authority objectives by increasing physical activity, particularly among:

- people with little or no previous sporting background
- older adults
- individuals returning to exercise after injury or inactivity

Pickleball is low-cost, accessible and space-efficient, as courts can be accommodated within existing facilities:

- indoor courts can be marked on existing badminton courts
- outdoor courts can be incorporated within existing tennis facilities

Pickleball England wishes to contribute by inclusion in the council’s consultation database for future sport, leisure and facilities plan making, consultation and evidence work.

The council's response to Pickleball England

The council notes the comments received. The consultation database will be updated accordingly. Officers will continue to engage with all stakeholders in drafting the Local Plan. Evidence has been commissioned on a wide range of topics including sport and recreation.

Resident

These are the main issues as supplied by resident.

Suggests the plan is kept 'short and sweet' and foresee no problems with it and to continue. It has been put together extremely well and all concerned should be commended!

I see no reason for any objections.

The council's response to resident

The council notes and welcomes the comments received.

Resident

These are the main issues as supplied by resident.

The respondent expressed concerns about the condition and perception of Luton town centre. Key issues identified include homelessness, anti-social behaviour, begging, drug-related activity and poor environmental quality. The respondent believes these issues create a negative first impression of the town and should be a major priority for the Council as part of future planning and regeneration efforts.

The council's response to resident

The council notes the comments received. Officers will continue to engage with all stakeholders in drafting the Local Plan. Evidence has been commissioned on a wide range of topics, including:

- environmental
- housing
- economy skills
- education
- health
- safety and community needs assessment
- neighbourhood regeneration
- sustainable design
- density
- urban greening
- place making

This will help to ensure Luton maximises its development opportunities to address its needs within the town sustainably making effective use of available land and opportunities for sustainable travel.

Resident

These are the main issues as supplied by resident.

The respondent raised concerns about infrastructure, housing, environmental protection and town centre accessibility. They emphasised the importance of maintaining drainage infrastructure, including regular clearing of drains, gutters and debris to reduce flood risk. They highlighted concerns over:

- inconsistent recycling messages across Bedfordshire authorities and suggested a more coordinated approach

- the delivery of affordable housing, questioning whether current developments are providing the types of homes needed by local families - they criticised reliance on high-rise development and highlighted cases where affordable housing commitments are reduced after planning permission is granted
- the need for stronger enforcement of planning conditions and construction management, citing examples of environmental impacts and parking issues associated with recent developments
- questioned policies aimed at reducing car journeys to the town centre, arguing that adequate and secure parking remains important for shoppers, families and workers
- raised concerns regarding residential parking pressures, airport-related parking overspill, and a lack of enforcement against illegal parking

In relation to sustainability and climate issues, the respondent supported measures such as:

- solar panels
- heat pumps
- electric vehicle charging points
- water butts
- greywater recycling
- improved water management.

They also:

- identified Bramingham Woods and Icknield Recreation Ground as important green spaces
- stressed the importance of well-maintained public infrastructure, including footpaths, signage, street furniture and road drainage, to improve the appearance and quality of the town

The council's response to resident

The council notes the comments received. Officers will continue to engage with all stakeholders in drafting the Local Plan. Evidence has been commissioned on a wide range of topics, including

future sustainable development needs including demographic, economic and transport growth, housing (including special and affordable needs) and employment needs together with necessary supporting infrastructure. Work is also commissioned on:

- sustainable travel
- design and density for community placemaking
- biodiversity conservation
- greening
- open space

Account will also be taken of other strategies, such as on matters such as waste and recycling (including preparation of a joint Minerals and Waste Local Plan with neighbouring Bedfordshire authorities), including maintenance, implementation and regulatory services.

Resident

These are the main issues as supplied by resident,

Supports a new Local Plan underpinned by a strong evidence base, strategic priorities and a SWOT assessment to inform future plan-making and consultation and:

- emphasises that the scoping stage should focus on identifying key issues, evidence requirements and strategic priorities rather than detailed policies

- seeks comprehensive evidence on economic growth, including AI, automation, airport-related development, inward investment, skills needs and future employment land requirements
- highlights housing affordability, homelessness, infrastructure provision and town centre performance as key issues requiring further assessment and evidence gathering
- supports continued focus on environmental protection, climate resilience and clear short, medium and long-term priorities supported by published forecasts and evidence

The council's response to resident

The council notes the comments received. Officers will continue to engage with all stakeholders in drafting the Local Plan.

Evidence has been commissioned on a wide range of topics and will be part of the next consultation on what the plan should contain including future demographic, housing economic and employment needs and environmental information, such as environmental appraisal of potential alternatives and options.

Resident

These are the main issues as supplied by resident.

Overall supports the Local Plan review and advocates an evidence-led approach focused on sustainable, inclusive, resilient and deliverable growth. In particular:

- support for the Local Plan Review raising no objections to the proposed approach
- considers the consultation document to be well prepared and commends those involved in its production
- supports progression of the Local Plan review without amendment
- notes that while objections from others may emerge, the respondent has no concerns with the proposals presented

The council's response to resident

The council notes the comments received. Officers will continue to engage with all stakeholders in drafting the Local Plan.

Local green space nominations

This section lists local green space nominations comments along with our response.

Resident 1 - individual submission

These are the main issues as supplied by resident 1.

Supports designation of Raynham Way Recreation Ground as a protected community green space, citing its recreational, environmental and community value, accessibility to local residents, defined boundaries, and importance as an irreplaceable open space, while arguing that any perceived underuse is a consequence of airport-related parking pressures rather than a lack of community need.

The council's response to resident 1

The council notes the comments received. Officers will continue to engage with all stakeholders in drafting the Local Plan. The submission will be subject to appropriate assessment against national and local policy before potential inclusion within the plan.

Call for Sites submissions

This section lists call for sites submissions comments along with our response.

Butterfield Green Technology Park

These are the main issues as supplied by Butterfield Green Technology Park.

Boyer Planning (consultants) on behalf of HBD - Development Partners of the Crown Estate, Butterfield Land and Luton Borough Council, with a remit to deliver commercial development at Butterfield Business Park (BBP). In particular:

- BBP in its entirety measures 32ha. Policy LLP7 allocates the undeveloped land at BBP for the development of high-quality B1 and B2 uses compatible with the technology park concept.
- In September 2024 outline planning permission (23/01319/OUT) was granted for the remaining circa 13.5 ha of undeveloped land at BBP and secured up to 42,170sqm (GIA) of new build flexible commercial accommodation ((Class E(g)(ii), E(g)(iii), B2 and B8 uses).
- The development will provide a range of unit sizes to accommodate a variety of businesses to ensure employment potential is maximised and capable to responding to future changes in economic circumstances and occupier demand.

The council's response to Butterfield Green Technology Park

The council notes the submission received. Officers will continue to engage with stakeholders and agents of business and industry. Evidence has been commissioned on a wide range of topics including sustainable transport, business and the economy, environment, infrastructure and other matters and these will be considered in the formulation of the Local Plan and approach to strategic allocations.

Land at Stockingstone Road (Bowling Cub)

These are the main issues as supplied by Land at Stockingstone Road (Bowling Cub).

Pegasus (consultants) on behalf of Coop Group.

- Promotion of residential allocation (56 no. dwellings) for Call for Sites and representations submitted subject of current Full planning application following pre-app advice.
- Indoor & outdoor bowls facilities to be retained, in line with Appendix 4 site allocation requirements.
- Expected determination July 2026.
- Expected completion 2029.
- Note: also submitted in previous call for sites 2024/25.

The council's response to Land at Stockingstone Road (Bowling Cub)

The council notes the submission received. Officers will continue to engage with stakeholders and agents of landowners and developers. The site submission will be considered and assessed together with other plan evidence for potential inclusion within the plan.

Land to rear of Tree Tops Close

These are the main issues as supplied by Land to rear of Tree Tops Close.

Mr Ryan Albone (agent) on behalf of sole owner of the site.

- Garden curtilage area 0.07 ha greenfield land.
- Proposed for C3 housing x 2 (4 bed space) units 2027/28.

The council's response to Land to rear of Tree Tops Close

The council notes the submission received. Officers will continue to engage with stakeholders. The site submission is below the threshold for site allocation and will need to be determined via the Development Management process.

Land at 36 to 38 Crescent Road

These are the main issues as supplied by land at 36 to 38 Crescent Road.

Mr Joe Read (agent) on behalf of Optimis Consulting.

- Proposed C3 housing (100 units).
- Class E (a) shops and heat pump (air/ground etc.).
- History 90 dwellings (21/00731/FUL).

•The principle of residential development is established on this site through recent planning permission. Significant work has already been undertaken.

The council's response to land at 36 to 38 Crescent Road

The council notes the submission received. Officers will continue to engage with stakeholders. The site submission will be considered and assessed together with other plan evidence for potential inclusion within the plan.

Land at Auction House – Crescent Road

These are the main issues as supplied by land at Auction House – Crescent Road.

Mr Joe Read (agent) on behalf of Optimis Consulting.

- Land at Auction House, Crescent Road, Luton LU2 OAH = 1.3 ha of which 1 ha developable.
- Proposed mixed use housing (C3 Class and C2 Class); Plots for Custom/Self-build; Extra Care/ Sheltered (225 units), Class E (a) shops.
- Currently in use as a car park.
- Note: also submitted in previous call for sites 2024/25.

The council's response to land at Auction House – Crescent Road

The council notes the submission received. Officers will continue to engage with stakeholders. The site submission will be considered and assessed together with other plan evidence for potential inclusion within the plan.

1 to 11 Cumberland Street

These are the main issues as supplied by 1 to 11 Cumberland Street.

Miss Kate Goldie (agent) on behalf of JRL Group.

- Site area developable 0.28 ha.
- Proposed C3 housing: 248 (Flats) 2028/30. Class E (a) [shops.
- Current site allocation in the Local Plan (Castle Quarter, Policy LLP3).
- Permission for C3 176 housing units including flats/studio apartments 17/0176/FUL.
- New planning application to be submitted 2026, estimate approved 2027.

The council's response to 1 to 11 Cumberland Street

The council notes the submission received. Officers will continue to engage with stakeholders. The site submission will be considered and assessed together with other plan evidence for potential inclusion within the plan.

1 to 5 Dudley Street

These are the main issues as supplied by 1 to 5 Dudley Street.

Mr Hayden Todd (agent) on behalf of Osprey London.

- Vacant developable 0.093 ha 100% Previously Developed Land (PDL).
- Proposed 30 dwellings units 2029 to 2030.
- Mixed use housing (C3 Class, C2 Class Cohousing, supported housing, for disability, Extra Care/Sheltered Student Accommodation, Build for rent and Temporary Accommodation and E g i Office; C1 hotels.

The council's response to 1 to 5 Dudley Street

The council notes the submission received. Officers will continue to engage with stakeholders. The site submission will be considered and assessed together with other plan evidence for potential inclusion within the plan.

The Atrium Park Street West

These are the main issues as supplied by The Atrium Park Street West.

Mr James Fitzpatrick (agent) on behalf of Home Counties Estates Limited.

- Promoted in the 2025 Call for Sites for a different residential scheme.
- Mixed uses, housing (C3 Class) 296 net dwellings by 2034-35. Class E (c) (iii) Services appropriate to provide in a commercial, business or service locality.
- Note: also submitted in previous call for sites 2024/25.

The council's response to The Atrium Park Street West

The council notes the submission received. Officers will continue to engage with stakeholders. The site submission will be considered and assessed together with other plan evidence for potential inclusion within the plan.

Land next to Inkerman Street

These are the main issues as supplied by land next to Inkerman Street.

CFS202510

Mr James Fitzpatrick (agent) on behalf of EM Chamberlain Ltd (Reference: CFS202510 submitted through the Council's Call for Sites process in 2025)

Confirms the site continues to be actively promoted for residential development in line with the details provided within the previously submitted Call for Sites pro forma. The site remains available for development, and the proposed residential use continues to be fully supported by the landowner.

There have been no significant changes to the site circumstances or the proposals that would require the previously submitted information to be updated.

We would therefore be grateful if the Council could continue to consider the site through the Local Plan preparation and site assessment process.

The council's response to land next to Inkerman Street

The council notes the submission received. Officers will continue to engage with stakeholders. The site submission will be considered and assessed together with other plan evidence for potential inclusion within the plan.

Wigmore Place, Eaton Green Road

These are the main issues as supplied by Wigmore Place, Eaton Green Road.

Mr Finn O'Donoghue (agent) on behalf of DTZ Investors.

- Site and developable area 1.78 ha.
- Conversion or redevelopment.
- Mixed use, housing (C3 Class120 dwellings by 2028 - 2029. E (a) retail/Shops, B class employment including giga factory and data centre.
- Current evidence work underway.

The council's response to Wigmore Place, Eaton Green Road

The council notes the submission received. Officers will continue to engage with stakeholders. The site submission will be considered and assessed together with other plan evidence for potential inclusion within the plan.

Luton Rising

These are the main issues as supplied by Luton Rising.

Mr Duncan Ray (Luton Rising).

- Bartlett Square – part of Previously promoted Napier Park development (Policy LLP8 Napier Park).
- Previous planning history 18/00271/EIA and 21/01082/FUL
- Consider mixed use and placemaking.

The council's response to Luton Rising

The council notes the submission received. Officers will continue to engage with stakeholders, infrastructure providers and employers. The site submission will be considered and assessed together with other plan evidence for potential inclusion within the plan.

Historic England

These are the main issues as supplied by Historic England.

Historic England does not comment on the suitability of individual sites but provides advice on how the historic environment should be considered throughout the site assessment and allocation process. It recommends that the Council follows its published guidance on local plan preparation, heritage impact assessment and the setting of heritage assets when evaluating potential development sites.

The response emphasises that the historic environment should be considered broadly, encompassing not only designated heritage assets but also locally significant buildings, areas, landscapes, townscapes and archaeological remains.

It notes that archaeological interest is often not fully understood and highlights the importance of consulting Historic Environment Records (HERs), as well as conservation and archaeology officers, when assessing sites.

A key message is that site assessments should move beyond simple distance or visibility-based measures. Instead, the Council should undertake a comprehensive heritage impact assessment to understand the significance of heritage assets, the contribution made by a site to that significance, and the potential effects of development.

Recommended approach to site assessment:

- identify heritage assets that may be affected
- understand the contribution the site makes to their significance
- assess the likely impact of development
- seek opportunities to avoid harm and deliver enhancements
- determine whether allocation is appropriate against NPPF tests of soundness

Historic England also stresses that some sites may be unsuitable for development due to heritage constraints, while others may have reduced development capacity. Where development is proposed, opportunities should be taken to enhance heritage assets, improve their setting and address heritage at risk through sensitive design and place-making.

The response highlights the importance of clear, detailed site allocation policies. It advises that allocations should set out expectations regarding development form, design, landscaping, open space, protection of important views, mitigation measures and, where necessary, phasing. This will provide greater certainty for developers, communities and decision-makers and help ensure that heritage considerations identified through site assessments are properly implemented.

Overall, Historic England's response seeks to ensure that heritage considerations are embedded throughout the site selection and allocation process, with robust assessment, clear policy requirements and a strong emphasis on conserving and where possible enhancing the historic environment. It also offers ongoing advice and support as the Local Plan progresses.

The council’s response to Historic England

The Council notes the comments received. Officers will continue to engage with Historic England in preparing its Local Plan and informing its evidence base for site selection.

Engagement strategy comments

This section lists engagement strategy comments along with our response.

North Herts District Council

These are the main issues as supplied by North Herts District Council.

Generally, supports the proposed engagement strategy and consultation approach for the new Local Plan. In particular:

- agreed with the key matters identified for discussion and the bodies proposed for engagement and considered the planned engagement methods to be appropriate
- no additional organisations, forums or groups were suggested, and no recommendations were made regarding alternative consultation formats or the availability of consultation materials
- as a neighbouring authority, the respondent indicated that they would like to be involved throughout all stages of the plan-making process and requested to be kept informed of future planning policy updates and all stages of preparation of the new Luton Local Plan

The council’s response to North Herts District Council

The council notes the comments received. Officers will continue to work with the authority on cross boundary matters.

Natural England

These are the main issues as supplied by Natural England.

Note that the engagement strategy indicates that Natural England will be consulted on the following themes:

- mitigating the impact of development on Chilterns Beechwoods SAC
- conservation and enhancement of the natural and historic. environment including landscape and visual impact
- green and blue infrastructure
- flood risk
- climate change mitigation and adaptation
- provision of utilities infrastructure (including telecoms, wastewater capacity, water supply, energy)
- provision of health infrastructure and local facilities
- provision of security, community and cultural infrastructure and other local facilities (including burial capacity)
- provision of infrastructure for transport
- Luton Airport and other airport/airspace impacts

We agree with these themes and most of our comments in this letter will align with the above.

The council's response to Natural England

The council notes the comments received. Officers will continue to engage with Natural England in forming its draft policies and its evidence base.

Bedfordshire Fire & Rescue Service (BFRS)

These are the main issues as supplied by xxx.

BFRS's main interest is in chapter 5: Issues & Options for Luton - Sustainable Infrastructure & Funding. The service considers itself a key infrastructure provider and wishes to be actively involved in the preparation of the Local Plan and Infrastructure Delivery Plan (IDP).

BFRS emphasises that it, alongside Bedfordshire Police and the East of England Ambulance Service, is an essential social infrastructure provider and a key 'Blue Light' partner supporting safe, resilient and sustainable communities.

Key concerns:

- Blue Light emergency services are not given sufficient prominence within the proposed engagement framework
- fire and rescue services are already operating at capacity
- future growth is expected to place significant additional pressure on emergency service infrastructure and resources
- existing engagement proposals may not provide sufficient ongoing involvement for emergency service providers

BFRS highlights that planned housing growth could increase significantly, from approximately 425 dwellings per annum to around 1,095 dwellings per annum, which would have major implications for service delivery and infrastructure requirements.

Key recommendations:

- increase the level and profile of engagement with BFRS
- increase engagement with Bedfordshire Police and the East of England Ambulance Service

- ensure emergency services are recognised as key infrastructure stakeholders throughout the plan-making process
- maintain engagement throughout both Local Plan and IDP preparation

BFRS considers that meaningful engagement should begin at the earliest stages of plan preparation so that infrastructure requirements and service impacts can be properly identified, assessed and incorporated into future planning policies and infrastructure planning.

Preferred engagement methods:

- electronic transfer of consultation documents and information
- online stakeholder workshops and meetings
- adequate notice periods for consultations
- sufficient time for responses from BFRS, its officers and technical consultants

In response to whether the council has identified the correct bodies for engagement, BFRS specifically states that it does not fully agree with the proposed approach and believes greater emphasis should be placed on engagement with the three emergency service providers.

Participation requests:

- BFRS wishes to be involved in all stages of Local Plan preparation
- BFRS wishes to be involved in preparation of the IDP
- BFRS seeks continued engagement on infrastructure funding and delivery matters
- BFRS refers the Council to its separate Fire & Rescue evidence base submission (August 2026)

Additional proposals:

- ensure the Local Plan and IDP provide policy and budgetary recognition for developer-funded fire and rescue infrastructure
- engage BFRS directly in discussions regarding infrastructure requirements arising from growth
- consult BFRS on planning applications involving 250 dwellings or more
- involve BFRS in pre-application discussions for major development proposals to ensure emergency service requirements are considered at an early stage

The council's response to xxx

The council notes the comments received. Officers will update the Local Plan consultation database and will continue to work with the BFRS and other blue light services to boost further engagement processes on infrastructure matters.

SEA scoping report comments

This section lists SEA scoping report comments along with our response.

Chilterns Conservation Board

These are the main issues as supplied by Chilterns Conservation Board.

The Management Plan for the Chilterns National Landscape should be clearly identified as a relevant plan or programme within the Strategic Environmental Assessment Scoping Report.

The Countryside and Rights of Way Act is referred to in the Strategic Environmental Assessment Scoping Report, but only regarding its provisions in respect of public access to the countryside: reference should also be made to the Protected Landscapes Duty.

Reference is made to The National Parks and Access to the Countryside Act 1949, but the text explaining its relevance omits reference to the fact that the Chilterns National Landscape was designated under this legislation.

The council's response to Chilterns Conservation Board

The council notes the comments received. Officers will work with the Chilterns Conservation Board and take account of the comments for the preparation of the Local Plan and supporting evidence base. Appropriate references will be added to the Initial SEA report.

Historic England

These are the main issues as supplied by Historic England.

Non-designated and unknown historic assets should be identified for the SEA process and setting is referenced.

Historic England documents, guidance and material referenced which the council should use/reference.

We would suggest some additions to the Issues, Objectives and assessment criteria set out in the report and the assessment process should not just be based on proximity but on judgement and a sequential approach to considering the impact on significance. There needs to be some mechanism of identifying where an impact is so great that the proposal should not be progressed.

It is considered that the historic environment can make a significant contribution to the success of development and there may be opportunities for the enhancement of the historic environment which comes from sustainable development proposals. It is considered that the SEA should highlight these opportunities. The historic environment should be a factor when considering a method for the generation of alternative proposals.

Scoping and evaluation of archaeological and landscape impacts needs to be an iterative process

The National Planning Policy Framework (para 33) is very clear that, in terms of sustainable development, harm to the historic environment should be avoided in the first instance and wherever possible alternative options which reduce or eliminate such impacts should be pursued.

Historic England strongly advises that the local authority conservation teams and archaeological advisors are closely involved throughout the preparation of the assessment of this evidence.

The council's response to Historic England

The council notes the comments received. Officers will continue to work with the Historic England on plan preparation and appropriate references will be added to the Initial SEA report.

North Herts District Council

These are the main issues as supplied by North Herts District Council.

- Generally, supports the scope and methodology of the SEA Scoping Report. They agreed that the baseline information is robust and provides a suitable basis for assessing the new Local Plan and considered both the SEA framework and its sustainability objectives to be appropriate.
- No additional environmental issues, plans, policies, programmes, or other matters were identified as needing inclusion, and no specific comments were made on the content of the report.

The council's response to North Herts District Council

The council notes the comments received. Officers will continue to work with adjacent authorities on cross boundary matters.

Bedfordshire Local Nature Partnership

These are the main issues as supplied by Bedfordshire Local Nature Partnership.

Comments submitted by the Green sand Trust on behalf of the Bedfordshire Nature Partnership. Welcomed the opportunity to comment on the SEA Scoping Report, recognising its importance in ensuring that the environmental impacts of the Local Plan and future growth are fully considered. In particular:

- the LNP emphasised the need for a robust and comprehensive SEA given the significant levels of growth anticipated over the plan period
- it advocated for stronger integration of green and blue infrastructure throughout the SEA objectives, supported by policies that protect and enhance biodiversity, including aquatic habitats
- specific recommendations included strengthening SEA Objective 2 by embedding the priorities of the Local Nature Recovery Strategy (LNRS), incorporating Biodiversity Net Gain, Environmental Net Gain, and urban canopy cover considerations; updating SEA Objective 4 to promote access to green infrastructure while safeguarding biodiversity; and expanding SEA Objective 7 to include the preparation of an integrated water management plan for Luton
- the LNP also suggested introducing a dedicated SEA objective focused on enhancing sense of place and local distinctiveness through the relationship between heritage, landscape and biodiversity
- in addition, it recommended that Natural Capital reports produced by the LNP be included within the evidence base, as these provide valuable information on woodland cover and ecosystem service benefits across Luton
- the respondent indicated that they would like to be kept informed about future preparation of the new Luton Local Plan

The council's response to Bedfordshire Local Nature Partnership

The council notes the comments received. Officers will continue to work with BLNP and will forward comments to the SEA consultants to ensure robust evidence and integration of appropriate references including following further consultation on the Local Plan.

Environment Agency

These are the main issues as supplied by Environment Agency.

Flood risk plans, policies and programs (PPP)

We would like to see the inclusion of the following Flood Risk policies included within your Plans, Policies and Programs list within your Sustainability Appraisal (SA).

National Flood and Coastal Erosion Risk Management Strategy for England - GOV.UK The strategy sets out a vision of a nation ready for, and resilient to, flooding and coastal change – today, tomorrow and to the year 2100.

River basin management plans: updated 2022 - GOV.UK which describe the challenges that threaten the water environment and how these challenges can be managed. The aim of the river basin management plans is to enhance nature and the natural water assets that are the foundation of everyone's wealth, health and wellbeing, and the things people value, including culture and wildlife.

Rivers, lakes, canals, estuaries, coasts and groundwater, and the essential services they provide, are worth billions of pounds to the economy. All parts of society benefit from clean and plentiful water.

Flood risk management plans 2021 to 2027 - GOV.UK Flood risk management plans (FRMPs) set out how organisations, stakeholders and communities will work together to manage flood risk in England.

Drainage and wastewater management plans: guiding principles for the water industry - GOV.UK These are policies produced by the water industry around strategic and wastewater plans to maintain, improve, and extend robust and resilient drainage and wastewater systems.

Surface water management

We are pleased to see the SA identifying that surface water is the primary source of flooding within Luton as a whole, however we would like to see more information about surface flooding within the Flood Risk chapter of the SA. We strongly encourage the production of a surface water management plan.

A surface water management can not only reduce and manage flooding but can highlight opportunities to reduce the volume of contaminated urban run-off entering watercourses, to minimise the volumes of surface water entering the sewer network, and to increase the possibility of rainwater reuse. More information on surface water management plans can be found here: Surface water management plan technical guidance - GOV.UK (www.gov.uk).

Water quality comments

The Water Framework Directive

We are pleased to see mention of the Water Framework Directive and regulation 33 in the SA document, including the legal responsibility the council has to ensure that there is no deterioration in the ecological status of any WFD water body or of its associated elements.

We would also like to draw attention to paragraph 3.58 of the SA which highlights that the River Lea is at poor ecological potential, it is unclear of what year classification it is referring to. Luton Council should have regard to the Thames RBMP, the Thames RBMP focuses on 6-year cycles of waterbodies.

We are currently at the end of Cycle 3 (2021-2027), which will compare 2025 classifications to 2019 as the baseline. Additionally, for some elements, we have an interim 2022 classification.

We would be seeking commitment to protect any of the improvements between 2019 and 2022, and no further deterioration to be caused.

Additionally, whilst the 2025 classifications have not been fully published yet, these are due imminently ahead of the 2027 plan, and thus Luton Council should consider this data when formulating their Reg 18. New development needs to consider the impact to the waterbodies and should be using the most up to date data available. This information can be found via the Catchment Data Explorer.

Groundwater comments

From a groundwater perspective we are pleased to see a comprehensive response to groundwater and potential contamination within the SA and Strategic Environmental Assessment Scoping Report (2024).

We are pleased to see the EA Approach to Groundwater Protection appropriately referenced, discussion on EPA 1990 Part 2A and plans to update your Brownfield Land Register within the documentation. However, we would like to see more discussion and investigation into drainage and water quality at this stage.

Brownfield Land Register

Page 83, 3.90 of the SA gives specific reference to the preparation of a Brownfield Land Register. We are particularly pleased to see such an initiative and wish to be consulted when the process for updating the register begins. While we are pleased to see the inclusion of this paragraph, we would recommend moving this paragraph and into a more appropriate section of the document, as it seems out of place among discussion about soils and agriculture.

Drainage Systems

We note that the supporting document has limited discussion about drainage systems with regard to water quality, and discussion is mostly from a flood risk perspective. While this is important, from a groundwater protection point of view we'd expect consideration to be made for the appropriateness of infiltration drainage at certain sites.

We assess the risk of infiltration drainage to groundwater quality at sites affected by (or potentially affected by) contamination on a site-by-site basis and can object to developments within an Inner Source Protection Zone (SPZ1) that propose infiltration drainage without a supporting risk assessment that proves an unacceptable risk is not being posed; this is in line with position statement G13 in the Environment Agency's approach to groundwater protection.

The council's response to Environment Agency

The council notes the comments received. Officers will continue to work with the Environment Agency and take account of the comments for the preparation of the Local Plan and supporting evidence.

Natural England

These are the main issues as supplied by Natural England.

Natural England currently considers the scope of the SEA to be appropriate, agree with the sustainability issues identified, and welcome the SEA Framework questions for assessing the new Local Plan's options and alternatives. Sources are suggested by NE to use for the Local Plan.

The council's response to Natural England

The council notes the comments received. Officers will continue to work with Natural England and take account of the comments for the preparation of the Local Plan and supporting evidence.

Bedfordshire Hospitals NHS Foundation Trust

These are the main issues as supplied by Bedfordshire Hospitals NHS Foundation Trust.

Focuses on strengthening the treatment of healthcare planning within the Strategic Environmental Assessment (SEA). While it broadly supports the scope and framework of the SEA, it argues that greater emphasis should be placed on healthcare infrastructure, service capacity and the links between population growth and future healthcare demand.

A consistent theme throughout the response is that the SEA should move beyond considering health outcomes and environmental determinants alone and explicitly assess whether healthcare services can support planned growth. It recommends that healthcare capacity, infrastructure requirements, service delivery and the cumulative impacts of growth on health inequalities and vulnerable communities should form a more prominent part of the assessment process.

The respondent also considers that the SEA should be aligned more closely with healthcare policy and service planning. In particular, it highlights the need to take account of NHS planning frameworks, neighbourhood health initiatives and Bedfordshire, Luton and Milton Keynes (BLMK) Integrated Care Board strategies to ensure that spatial planning and healthcare delivery are coordinated.

Key areas where the evidence base could be strengthened:

- GP capacity and patient-to-list ratios
- hospital capacity and demand pressures
- mental health indicators, particularly for children and young people
- healthcare workforce availability
- access to healthcare services across the borough
- social care capacity and care home provision
- distribution and accessibility of residential and nursing care facilities

The response identifies healthcare infrastructure capacity and resilience as an additional key sustainability issue for the SEA. It argues that the assessment should consider the impact of growth on primary, urgent and hospital care services, the need for new or expanded healthcare facilities and neighbourhood health hubs, and the effects of climate change on population health, health inequalities and healthcare infrastructure resilience.

A number of amendments to the SEA framework are proposed. While the existing objective to improve public health is welcomed, the respondent considers the framework should more explicitly assess healthcare provision and infrastructure delivery alongside population growth. A suggested additional objective is:

"Ensure sufficient, accessible and resilient healthcare infrastructure is delivered to meet population needs arising from development."

Overall, the response concludes that the SEA provides a strong foundation but should place greater emphasis on healthcare infrastructure planning, funding and delivery. It recommends stronger consideration of how healthcare services, community facilities and neighbourhood health hubs will be planned, funded and delivered alongside development, helping to ensure that future growth is supported by the infrastructure needed to maintain healthy, resilient and sustainable communities.

The council’s response to Bedfordshire Hospitals NHS Foundation Trust

The council notes the comments received. Officers will continue to work with the NHS Foundation Trust and take account of the comments for the preparation of the Local Plan and supporting evidence including the SEA.