

# **Planning and Transportation**

## ***Statement of Compliance with the Duty to Co-operate***

**April 2016**

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## 1. Introduction

1. Preparation of the Luton Local Plan has taken place over several years and a key aspect of this preparation has been Luton Borough Council's constructive cooperation with neighbouring authorities and other key organisations on cross-boundary strategic matters.
2. This Statement accompanies the submission of the Luton Local Plan and seeks to demonstrate how Luton Borough Council (LBC) has complied with the Duty to Co-operate in preparing its Local Plan. LBC has worked diligently to ensure that it has fulfilled the Duty to Co-operate and has compiled a log of the Duty to Co-operate activities it has undertaken since 2012 when work on the Local Plan commenced. There is a long history of strategic cross-boundary planning in and around Luton Borough which is also documented in this statement as a timeline of cross-boundary working in the lead up to commencing work on the Local Plan.
3. LBC has worked actively, constructively and on an on-going basis with its neighbouring authorities, the other prescribed Duty to Co-operate bodies, service and infrastructure providers over the course of the preparation of the Local Plan. These activities have ranged from undertaking statutory consultation, meetings (see Appendices A and B) preparing joint evidence to inform local plan making, exchanging written correspondence (see Appendices C and D) and on the production of Statements of Common Ground. Cooperation has culminated in the preparation of draft Statements of Common Ground which have been exchanged with LBC's neighbouring authorities. These Statements will be published when they have been agreed by LBC and the respective individual authorities. Given the continuous nature of working under the Duty to Co-operate, LBC will continue to seek agreement on Statements of Common Ground with Duty to Co-operate bodies up to and following the submission of the Local Plan to the Secretary of State.
4. The joint evidence base prepared to support the Local Plan includes the Luton & Central Bedfordshire Strategic Housing Market Assessment (2010, 2014, 2015), Housing Market Areas in Bedfordshire and Surrounding Areas (2015), various iterations of Transport

Modelling and two recently commissioned studies: the Luton Housing Market Area Joint Growth Options Study and Central Bedfordshire & Luton Green Belt Study. Local evidence prepared by LBC has included the involvement of Duty to Co-operate as appropriate including constructive engagement on the Luton Green Belt Study (Stage 1, 2014), Employment Land Review (2015), Functional Economic Market Area study (awaited) and the Strategic Housing Land Availability Assessment (SHLAA).

5. LBC has held constructive joint meetings and events with Officers and Members from neighbouring authorities and other Duty to Co-operate bodies throughout the preparation of the plan as evidenced by the Log of Meetings (see Appendices A and B). These activities consisted of multilateral meetings, workshops and round table discussions as well as a long running series of bilateral activities between LBC and the Duty to Co-operate bodies.
6. This statement is structured as follows:
  - Section 2 - the Legislative Background to the Duty to Co-operate
  - Section 3 - evidence to demonstrate compliance with the Duty to Co-operate
  - Section 4 - concluding remarks
7. This Statement includes a number of appendices documenting the Duty to Co-operate activities. The appendices are as follows:
  - Appendix A: Duty to Co-operate Log of Meetings
  - Appendix B: Minutes of Duty to Co-operate Meetings / Events
  - Appendix C: Duty to Co-operate Log of Correspondence
  - Appendix D: Correspondence between LBC and Duty to Co-operate Bodies
8. The log of meetings and correspondence (and accompanying documents) are not comprehensive. LBC has compiled records of its Duty to Co-operate using the best information available at the time of submission. A number of the meeting notes are in draft form and have, to our knowledge, been circulated to the attendees of the meetings for agreement.

## **2. Legislative Background to the Duty to Co-operate**

9. The Localism Act 2011 introduced the Duty to Co-operate in relation to planning for sustainable development. This duty requires local planning authorities to co-operate with

other local planning authorities, county councils and other prescribed bodies, as defined by the Town and Country Planning (Local Planning (England) Regulations 2012) (as amended), in maximising the effectiveness of the preparation of development plan documents. This requirement came into force on 15 November 2011.

10. The additional prescribed bodies with which local planning authorities are required to co-operate comprise:

- the Environment Agency
- the Historic Buildings and Monuments Commission for England (known as Historic England)
- Natural England
- the Mayor of London (where applicable)
- the Civil Aviation Authority
- the Homes and Communities Agency
- each clinical commissioning group established under section 14D of the National Health Service Act 2006
- the National Health Service Commissioning Board
- the Office of Rail Regulation
- Transport for London (where applicable)
- each Integrated Transport Authority
- each highway authority within the meaning of section 1 of the Highways Act 1980 (including the Secretary of State, where the Secretary of State is the highways authority)
- the Marine Management Organisation.

11. Planning Practice Guidance (PPG)<sup>1</sup> explains that Local Enterprise Partnerships and Local Nature Partnerships are not subject to the requirements of the duty but that local planning authorities and the public bodies that are subject to the duty must co-operate with Local Enterprise Partnerships and Local Nature Partnerships and have regard to their activities when they are preparing their Local Plans, so long as those activities are relevant to local plan-making.

12. The Duty requires the prescribed bodies to:

- engage constructively, actively and on an on-going basis with other Duty to Co-operate bodies on the preparation of plans and supporting activities;
- have regard to activities of other Duty to Co-operate bodies; and
- consider joint approaches to plan making.

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<sup>1</sup> Paragraph: 006 Reference ID: 9-006-20140306

13. The National Planning Policy Framework (NPPF) (2012) explains that public bodies have a duty to co-operate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities set out in paragraph 156. The Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities.

14. These 'strategic priorities' are:

- The homes and jobs needed in the area;
- The provision of retail, leisure and other commercial development;
- The provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- The provision of health, security, community and cultural infrastructure and other local facilities; and
- Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

15. The NPPF states the following about planning strategically across local boundaries:

*"178: Public bodies have a duty to co-operate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities set out in paragraph 156. The Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities.*

*179: Local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans. Joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework. As part of this process, they should consider producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans.*

*180: Local planning authorities should take account of different geographic areas, including travel-to-work areas. In two tier areas, county and district authorities should co-operate with each other on relevant issues. Local planning authorities should work collaboratively on strategic planning priorities to enable delivery of*

*sustainable development in consultation with Local Enterprise Partnerships and Local Nature Partnerships. Local planning authorities should also work collaboratively with private sector bodies, utility and infrastructure providers.*

*181: Local planning authorities will be expected to demonstrate evidence of having effectively co-operated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Cooperation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development.”*

There are two tests of soundness for plan making in the NPPF (paragraph 182) which relate directly to the Duty to Co-operate:

- *Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.*
- *Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.*

### **3. Evidence to Demonstrate Compliance with the Duty to Co-operate**

16. This part of the paper is split into a number of sub-sections. It first sets out the overarching context of Luton’s geographic location and functional relationships with its neighbouring authorities as established by the technical evidence base.

17. It then sets out how LBC has worked jointly with adjoining authorities including a timeline of co-operation in the lead up preparation of the Local Plan. The report then goes on to consider co-operation with other Duty to Co-operate bodies and organisations not specifically referenced under the Duty to Co-operate but who nevertheless have an important role to play in identifying and engaging on strategic priorities for consideration in the Luton Local Plan. Consideration is given to the identification of the main strategic planning priorities identified in paragraph 156 of the NPPF throughout this section.

#### **Luton’s Geographic and Functional Relationships with Neighbouring Authorities**

18. Luton shares administrative boundaries with Central Bedfordshire and North

Hertfordshire District Councils. Other nearby neighbouring authorities include Aylesbury Vale District, Dacorum Borough, St Albans City and District, Stevenage Borough and Bedford Borough and, to a lesser extent Milton Keynes. (see figures 1 and 2 below).

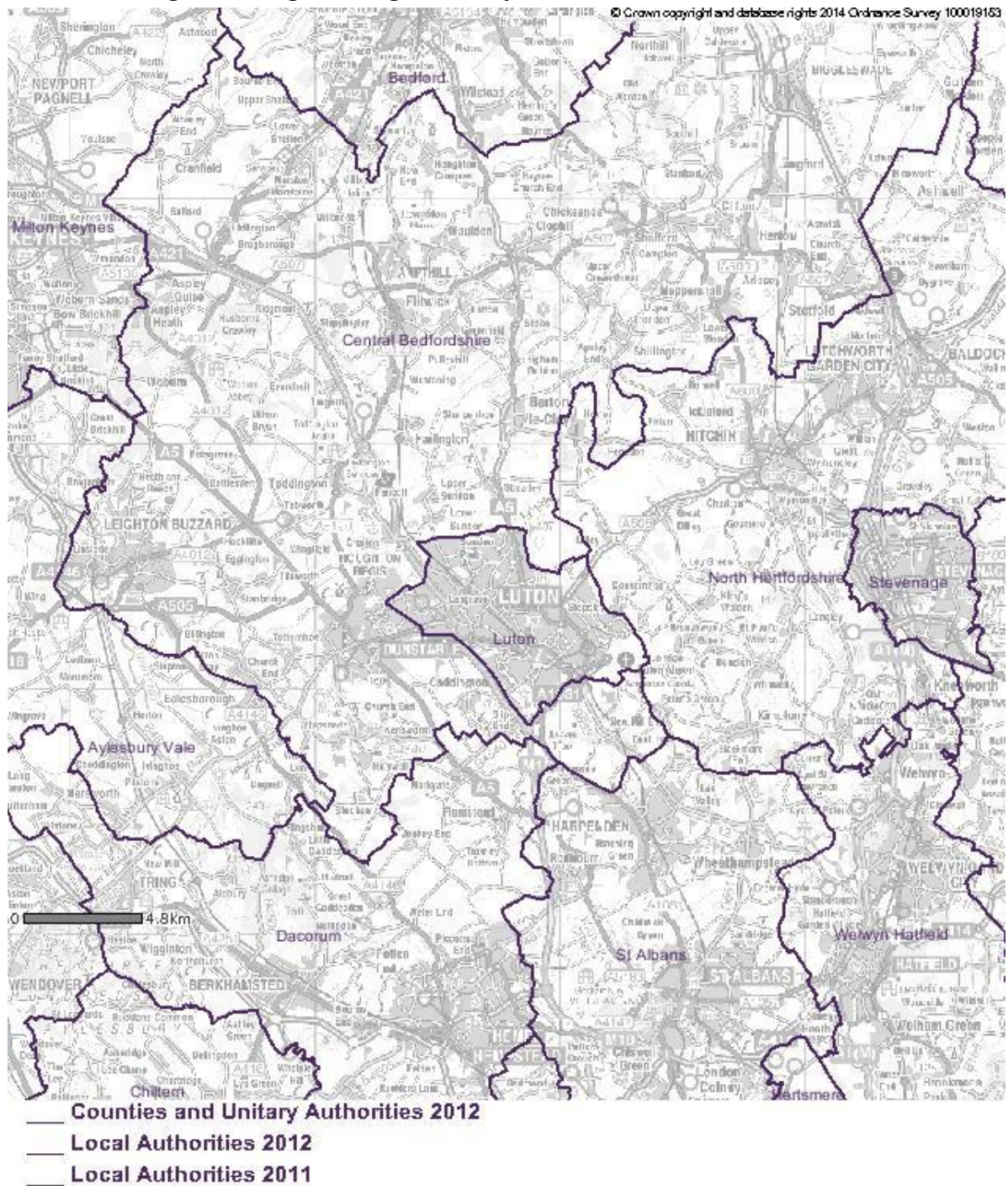
19. The 'Housing Market Areas in Bedfordshire and surrounding areas Report of Findings' (December 2015) and the 'Luton & Central Bedfordshire Strategic Housing Market Assessment Update (2015)' prepared by ORS identify the Luton Housing Market Area to cover the whole of Luton Borough and a significant proportion of Central Bedfordshire as well as smaller parts of Aylesbury Vale and North Hertfordshire Districts. Dacorum Borough was identified as being partially within the Luton Housing Market Area until 2015 when the Housing Market Area study was undertaken which demonstrated that there was no longer sufficient evidence to justify its inclusion in the Luton HMA.

20. Engagement between LBC and its neighbouring authorities and other Duty to Co-operate bodies has mainly focussed on the scale and distribution of housing and employment provision and the need for supporting infrastructure across the Luton Housing Market Area. The key strategic cross-boundary matters between LBC and the Duty to Co-operate bodies can be summarised as:

- The objectively assessed housing need for the Luton HMA and the constituent authorities within the HMA;
- The objectively assessed employment needs for Luton Functional Economic Market Area;
- Luton's significant shortfall in its capacity to accommodate its objectively assessed level of housing needs within its boundary;
- The Luton HMA's significant housing shortfall against its objectively assessed level of housing;
- The quantum, location and mix of housing of Luton's unmet need to be met in neighbouring local authorities;
- Potential justification and capacity for Luton and neighbouring authorities' Green Belt to be released for housing;
- London Luton Airport role as a key employer and economic driver for the sub region;
- Luton's existing employment sites as potential for alternative uses – mainly housing;
- Schools capacity in Luton and urban extensions to accommodate significant levels of housing and population growth in the Housing Market Area;
- Strategic and local highways capacity (existing and planned) to accommodate objectively assessed needs;

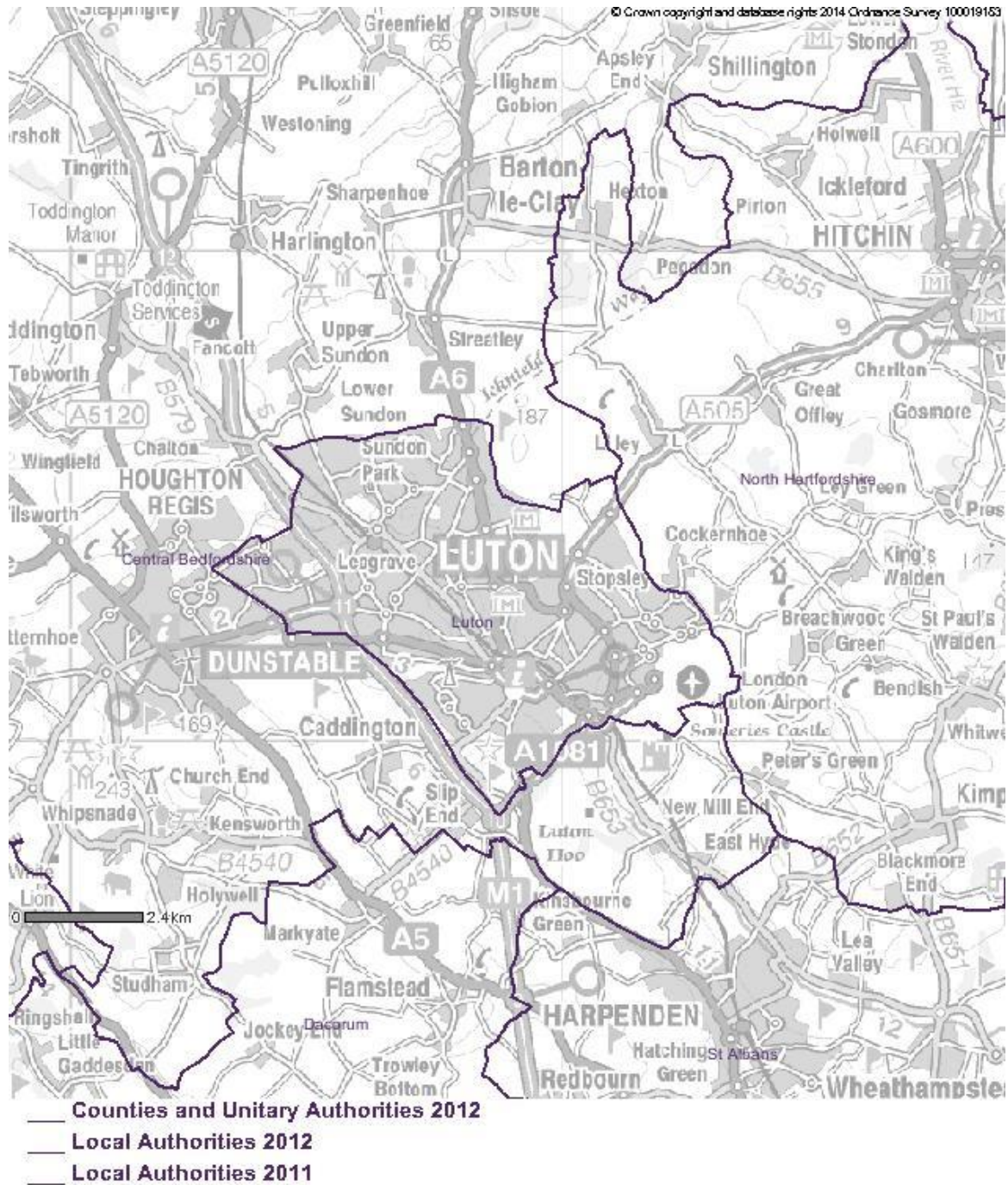
- Viability of development sites in Luton;
- Gypsies and Travellers Accommodation;
- Minerals and Waste planning and allocations.

**Figure 1: Luton Borough and Neighbouring Authority Boundaries**



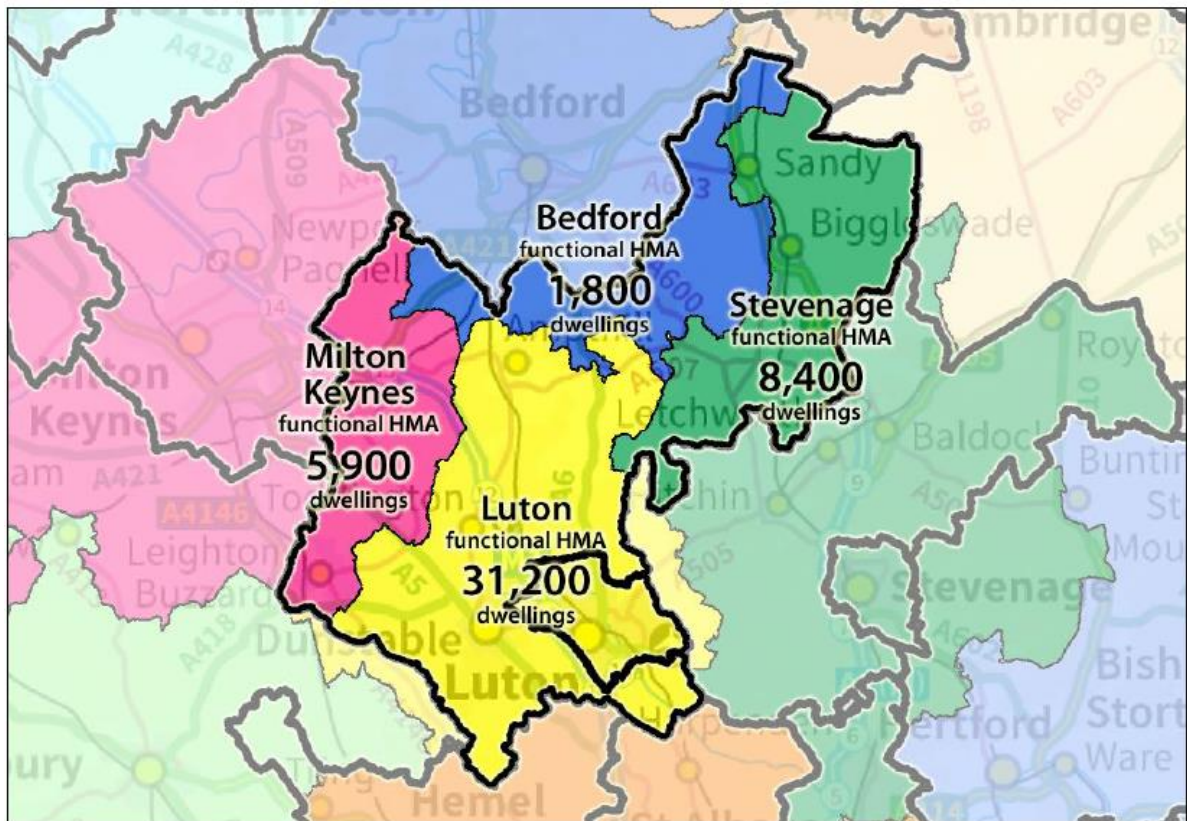
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**Figure 2: Luton Borough and Immediate Surrounding Areas**



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**Figure 3: Luton Housing Market Area**



Source: Luton & Central Bedfordshire Strategic Housing Market Assessment Update (2015)

### **Cross Boundary & Strategic Planning Context 2004 - 2012**

21. Luton and its surrounding local authorities have a long track record of co-operation, including working together on Structure Plans, presenting evidence to Regional Spatial Strategies (RSSs) and, a joint committee order was issued on the development strategy for Bedfordshire which was put into effect through the Luton and South Bedfordshire Joint Committee Order 2007.
  
22. Luton Borough Council has been preparing its Local Plan since 2012 after the Luton and South Bedfordshire Joint Committee ceased. A timeline of the co-operation on cross-boundary strategic matters that took place between Luton, its neighbours and other key stakeholders is provided below. It demonstrates that constructive joint working and cross-boundary working are not new to LBC and its neighbours and that the growth of the Luton and Dunstable conurbation has been a key focus of strategic planning in the area for a considerable time. As can be seen from the timeline, this involved the setting up of a Local Delivery Vehicle (Luton Gateway), Joint Technical Unit and the Luton and South Bedfordshire Joint Committee and preparing a South Bedfordshire and Luton Joint Core

Strategy which was ultimately withdrawn from examination on the 29<sup>th</sup> July 2011.

**Figure 4: Timeline of Co-operation prior to Local Plan Commencement**

October 2004	It is recognised that Joint working on LDSs and LDDs and in connection with a Local Delivery Vehicle will now need to involve to some degree seven local authorities – Luton, South Bedfordshire, Bedfordshire, North Hertfordshire, Hertfordshire, Aylesbury Vale and Buckinghamshire plus three Town Councils – Dunstable, Houghton Regis and Leighton-Linslade.
21 December 2004	At a joint Luton/Dunstable/HR/Leighton-Linslade Growth Area meeting all authorities agreed the need to engage in co-operative research and liaison on early LDS/LDD work, regardless of progress on joint working. Proposals for how joint working arrangements and a Joint Committee would operate were tabled. It is proposed a formal Joint Committee is formed by the end of the Municipal year.
5 January 2005	Anne Hemming of ODPM writes to inform us that the Minister will be encouraging through the contribution of 50k and 100k in 2004/5 and 2005/6 respectively in order to finance a shadow joint delivery vehicle/unit.
21 February 2005	Members met from the seven local authorities of the Growth Area - Luton, South Beds, Beds.CC [the core authorities], North Herts, Herts.CC, Aylesbury Vale and Bucks.CC. They discussed the formation of a formal Joint Committee. The core authorities agreed to take to their Executives a Growth Area covering Luton and whole of South Beds under a Joint Committee structure of 6 Members from Luton, 4 Members from S.Beds and 2 Members from Beds.CC. Policy planning for these two areas would be surrendered by their LPAs. The Chairman will not have a casting vote, so this is an equal partnership between the local authorities where they will have to agree matters if they are to move forward. The non-core authorities decide to sit on the fence and attend the JC as observers. It is agreed an external co-ordinator post will be financed to move joint working forward.
20 June 2005	In a report to Luton's Executive the constitution and terms of reference of the "Luton & South Beds Growth Area - Joint Planning and Transportation Committee" are agreed. The ODPM is requested to constitute the Joint Committee as a LPA under S.29 of the Planning & Compulsory Purchase Act 2004. Also agreed is the dissolving of the Joint Advisory Committee with Beds CC, authority is given to the Corporate Director of Environment & Regeneration to negotiate with County Council & Bedfordshire Districts the establishment of a new Advisory Committee.
24 November 2005	A meeting of the Luton/Dunstable/Houghton Regis and Leighton-Linslade Growth Area Joint Planning and Transportation Committee takes place. A chair and vice-chair are elected; constitutional and procedural matters agreed; finance arrangements agreed; Draft LDS agreed; Draft Airport

	2030 Master Plan, Major Transport Schemes within the Growth Area are reported. An Economic Vision for Luton, Dunstable and Houghton Regis and a separate Joint Retail Study are reported; future working arrangements & issues are reported.
7 December 2005	Officers from across what will become the Joint Technical Unit meet formally/informally for the first time.
5 May 2006	(approximate date) The S.29 Local Agreement for ODPM is finalised. The process to recruit a Growth Area Manager is begun. Reference is made to the Joint Technical Unit. The process of recruiting retained consultants for technical work starts.
13 June 2007	<b>The Luton and South Bedfordshire Joint Committee Order 2007</b> (Statutory Instrument 1412) comes into force. The Joint Committee is formally born.
30 June 2007	<b>Issues and Options</b> consultation starts, this runs until 26 October 2007 and involves intensive staffed exhibitions and workshops. Nearly 2,000 representations are received.
17 April 2009	<b>Preferred Options</b> consultation starts, this runs until 12 June 2009 (six week consultation). One main stakeholder workshop and a series of staffed exhibitions are held. Some 8,200 representations are held, although over 6,500 of these are either in postcard or petition form arranged by anti-growth pressure groups.
23 July 2010	A draft Core Strategy is presented to the joint Committee that reflects the coalition government's change in emphasis from regional planning to local need, following their election in May 2010. Housing numbers was based on net, nil-migration; the ratio of jobs to housing was raised; urban extensions were reduced.
September 2010	A low key Notification event was held and all stakeholders informed of the changes to the Plan. Comments were not sought, but were received. An document prepared with these representations accounted for was presented to the Joint Committee on 22nd October 2010.
29 November 2010	<b>The Core Strategy: Pre-Submission</b> document is presented for a consultation event that runs until 17 January 2011. Over 1,000 responses were received.
8th March 2011	The Luton and southern Central Bedfordshire Joint Core Strategy is submitted to CLG.
15 April 2011	The Inspector to the Core Strategy Examination, David Vickery, writes to the Joint Committee for Luton and South Bedfordshire with a comprehensive list of concerns.
18 May 2011	David Vickery of PINS holds an Exploratory Meeting.
24 June 2011	Joint Committee meeting.
29 June 2011	David Vickery issues a decision to suspend the Examination for six months until 6 December 2011
29 July 2011	Luton and South Bedfordshire Joint Committee meets and resolves to seek withdrawal of the joint Core Strategy. That same day Cllr Roy Davis - Chair of Luton & South Beds Joint Committee and Cllr Nigel Young, Vice Chair write to Rt Hon

	Bob Neill MP, the then SoS at CLG to ask if he would withdraw the submitted Luton & southern Central Bedfordshire Core Strategy.
31 March 2012	The Luton and South Bedfordshire Joint Committee formally ceases to exist as a LPA. The critical reason underlying the breakdown was the scale and location of strategic growth, in particular a dispute over West of Luton.

### **Duty to Co-operate 2012 – 2016**

23. Following the cessation of the Joint Committee, LBC commenced work on the Luton Local Plan (2011 -2031) leading to its initial Regulation 18 consultation ‘Tell Us What You Think’ consultation from 25 June to 3 August 2012.
24. In the years 2012 -2016 activity under the Duty to Co-operate has involved a diverse set of constructive activities with Duty to Co-operate bodies on strategic cross-boundary matters with the aim of preparing joint evidence and Local Plan policies that can be supported by the Duty to Co-operate bodies in their local plans and implementation strategies.
25. Figure 5 (Summary of Engagement with Neighbouring Authorities and Prescribed Bodies) summarises the engagement LBC has undertaken with neighbouring authorities and prescribed bodies.

#### ***Meetings and Workshops:***

LBC has meetings and workshops between senior politicians, officers and representatives to engage on strategic cross boundary matters with all the Duty to Co-operate bodies. These meetings and workshop are documented in the Meeting Log in Appendix A and the notes of these meetings, where available, in Appendix B.

#### ***Correspondence / Letters:***

There has been extensive communication and co-operation on joint strategic matters between LBC and neighbouring authority Officer and Members since the preparation of the Local Plan began. A log of this correspondence is provided in Appendix C with copies of the letters provided in Appendix D.

#### ***Preparation of Joint Technical Evidence Base:***

- **Luton and Central Bedfordshire Strategic Housing Market Assessment (2012, 2014, 2015)** A joint steering group was set up to guide this study and its subsequent updates. The steering group was chaired by Luton BC and members of the group

included Central Bedfordshire, North Hertfordshire, Aylesbury Vale, Dacorum, Bedford, Stevenage, St Albans and Milton Keynes. The SHMA (2010, 2012, 2014, 2015) was jointly commissioned by Luton and Central Bedfordshire to provide a consistent evidence base for housing across the Luton HMA. The methodology and emerging outputs were shared and discussed as part of this long standing process of preparing and updating this key evidence base for determining objectively assessed housing needs for the Housing Market Area.

- **Housing Market Area Study (2015).** A joint steering group included Central Bedfordshire, North Hertfordshire, Aylesbury Vale, Bedford, Stevenage, St Albans and Milton Keynes. local authorities. This group coordinated with a wider reference workshop group (i.e. other authorities that neighbour the 7 local authorities directly engaged in the HMA study) which guided the preparation of this study.
- **Joint Transport Modelling – SATURN model** jointly prepared with Central Bedfordshire and shared with North Hertfordshire Council for its plan preparation , and Hertfordshire County Council and Buckinghamshire County Council and Highways England.
- **East of England Forecasting Model (EEFM)** runs undertaken by a steering group hosted by Cambridgeshire County Council for the authorities across the former Bedfordshire County area (including Central Bedfordshire.), Hertfordshire, Norfolk and Suffolk area and the associated LEPs.
- **Luton’s Stage 1 Green Belt Review Study** prepared in 2014 was an inclusive process whereby authorities in the Luton Housing Market Area were invited to comment on the methodology and drafts of the study and included a Green Belt workshop where these local authorities were invited to attend.
- **Luton Housing Market Area Joint Growth Options Study (commissioned April 2016)**
- **Central Bedfordshire & Luton Green Belt Study (commissioned April 2016)**

***Sharing Technical Evidence Base Briefs and Draft Evidence Base:***

Reports for numerous studies were circulated to neighbouring authorities for review and input including:

- Employment Land Review Site Assessments (October 2015)
- Luton Functional Economic Market Area (FEMA) Study (Commissioned)
- Strategic Housing Land Availability Assessment (SHLAA)

***Participation in SEMLEP Planners and Transportation Forums:***

LBC regularly attends and contributes to SEMLEP meetings take place every 6-8 weeks attended by LBC officers and Members (Leader, Chief Exec, Planners, Economic Development officers etc). LBC has been particularly involved in the following groups at SEMLEP:

- SEMLEP Planners Forum
- SEMLEP Planning Delivery Infrastructure and Implementation Group
- South East Midlands Local Transport Board (LTB)

**Preparation of Joint Minerals and Waste Local Plan:**

The Minerals and Waste Local Plan: Strategic Sites and Policies (MWLP:SSP) was adopted by Luton Borough, Central Bedfordshire and Bedford Borough in January 2014. The plan sets out strategic policies on which future waste management and mineral extraction will be assessed. It identifies strategic sites for mineral extraction, non-hazardous waste landfill and other waste management activities. Waste recycling and recovery, including generating energy where appropriate, is an important part of the plan. The nearest strategic site to Luton will be at Thorn Turn, on the A5 near Houghton Regis. The plan safeguards the existing rail served aggregates depots at Legrave Road and Crescent Road, as well as the asphalt-making plants and the concrete batching plants that provide essential materials for road construction and maintenance. No sites in the borough are identified for mineral extraction or for large scale waste management because no sites have been previously proposed and Luton is a heavily built up area. Following approval by Bedford Borough, Central Bedfordshire and Luton Borough councils in January 2014, the plan is now fully adopted.

Central Bedfordshire Council provide the Minerals and Waste Planning Function for Luton under the terms of a Service Level Agreement and this has included formulating input to the Luton Local plan 2011 to 2031 at each stage of preparation.

**Figure 5: Summary of Engagement with Neighbouring Authorities and Prescribed Bodies**

Name of Duty to Co-operate Body	Nature of Co-operation
Central Bedfordshire Council	<ul style="list-style-type: none"> <li>• Representations on the consultation of numerous local plan iterations;</li> <li>• Continuous engagement including discussions, meetings and correspondence at Planning Director, Officer and Portfolio Holder level;</li> <li>• Engagement on potential urban extensions to Luton;</li> <li>• Engagement at SEMLEP Forums</li> <li>• Joint working on the identification of objectively assessed development needs;</li> <li>• Sharing of SATURN Transports Model (Developed jointly with AECOM) and scenario runs to inform plan making</li> <li>• Joint commissioning of and / or officer input into the production of evidence base studies including: -               <ul style="list-style-type: none"> <li>○ the SHMA and HMA studies in order to determine respective OAHNs for ‘best fit’ and ‘functional Housing Market Areas’</li> <li>○ Luton FEMA Study</li> <li>○ Luton Green Belt Study</li> <li>○ Luton Employment Land Review update</li> <li>○ Luton SHLAA</li> <li>○ the Luton HMA Growth Options Study and Joint Green Belt Study</li> <li>○ Input and Feedback on Luton’s Infrastructure Delivery Plan;</li> </ul> </li> </ul> <p>A Statement of Common Ground is drafted and under discussion.</p>
Aylesbury Vale District Council	<ul style="list-style-type: none"> <li>• Representations on the consultation of numerous local plan iterations;</li> <li>• Continuous engagement including discussions, meetings and correspondence at Planning Director, Officer and Portfolio Holder level;</li> <li>• Engagement on potential urban extensions to Luton;</li> <li>• Engagement at SEMLEP Forums</li> <li>• Joint working on the identification of objectively assessed development needs;</li> <li>• Sharing of SATURN Transports Model (Developed jointly with AECOM) and scenario runs to inform plan making</li> <li>• Joint commissioning of and / or officer input into the production of evidence base studies including: -               <ul style="list-style-type: none"> <li>○ the SHMA and HMA studies in order to determine respective OAHNs for ‘best fit’ and ‘functional Housing Market Areas’</li> <li>○ Luton FEMA Study</li> <li>○ Luton Green Belt Study</li> <li>○ Luton Employment Land Review update</li> <li>○ Luton SHLAA</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>○ the Luton HMA Growth Options Study and Joint Green Belt Study</li> <li>○ Input and Feedback on Luton’s Infrastructure Delivery Plan;</li> </ul> <p>A Statement of Common Ground is drafted and under discussion.</p>
<p>North Hertfordshire District Council</p>	<ul style="list-style-type: none"> <li>● Representations on the consultation of numerous local plan iterations;</li> <li>● Continuous engagement including discussions, meetings and correspondence at Planning Director, Officer and Portfolio Holder level;</li> <li>● Engagement on potential urban extensions to Luton;</li> <li>● Engagement at SEMLEP Forums</li> <li>● Joint working on the identification of objectively assessed development needs;</li> <li>● Sharing of SATURN Transports Model (Developed jointly with AECOM) and scenario runs to inform plan making</li> <li>● Joint commissioning of and / or officer input into the production of evidence base studies including: - <ul style="list-style-type: none"> <li>○ the SHMA and HMA studies in order to determine respective OAHNs for ‘best fit’ and ‘functional Housing Market Areas’</li> <li>○ Luton FEMA Study</li> <li>○ Luton Green Belt Study</li> <li>○ Luton Employment Land Review update</li> <li>○ Luton SHLAA</li> <li>○ the Luton HMA Growth Options Study and Joint Green Belt Study</li> <li>○ Input and Feedback on Luton’s Infrastructure Delivery Plan;</li> </ul> </li> </ul> <p>A Statement of Common Ground is drafted and under discussion.</p>
<p>Dacorum Borough Council</p>	<ul style="list-style-type: none"> <li>● Representations on the consultation of numerous local plan iterations;</li> <li>● Continuous engagement including discussions, meetings and correspondence at Planning Director, Officer and Portfolio Holder level;</li> <li>● Engagement on potential urban extensions to Luton;</li> <li>● Engagement at SEMLEP Forums</li> <li>● Joint working on the identification of objectively assessed development needs;</li> <li>● Joint commissioning of and / or officer input into the production of evidence base studies including: - <ul style="list-style-type: none"> <li>○ the SHMA and HMA studies in order to determine respective OAHNs for ‘best fit’ and ‘functional Housing Market Areas’</li> <li>○ Luton FEMA Study</li> <li>○ Luton Green Belt Study</li> <li>○ Luton Employment Land Review update</li> <li>○ Luton SHLAA</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>○ the Luton HMA Growth Options Study and Joint Green Belt Study</li> <li>○ Input and Feedback on Luton’s Infrastructure Delivery Plan;</li> </ul> <p>A Statement of Common Ground is drafted and under discussion.</p>
Bedford Borough Council	<ul style="list-style-type: none"> <li>● Representations on the consultation of numerous local plan iterations;</li> <li>● Continuous engagement including discussions, meetings and correspondence at Planning Director, Officer and Portfolio Holder level;</li> <li>● Engagement on potential urban extensions to Luton;</li> <li>● Engagement at SEMLEP Forums</li> <li>● Joint working on the identification of objectively assessed development needs;</li> <li>● Joint commissioning of and / or officer input into the production of evidence base studies including: - <ul style="list-style-type: none"> <li>○ the SHMA and HMA studies in order to determine respective OAHNs for ‘best fit’ and ‘functional Housing Market Areas’</li> <li>○ Luton FEMA Study</li> <li>○ Luton Green Belt Study</li> <li>○ Luton Employment Land Review update</li> <li>○ Luton SHLAA</li> <li>○ the Luton HMA Growth Options Study and Joint Green Belt Study</li> <li>○ Input and Feedback on Luton’s Infrastructure Delivery Plan;</li> </ul> </li> </ul> <p>A Statement of Common Ground was agreed in April 2016</p>
Stevenage Borough Council	<ul style="list-style-type: none"> <li>● Representations on the consultation of numerous local plan iterations;</li> <li>● Continuous engagement including discussions, meetings and correspondence at Planning Director, Officer and Portfolio Holder level;</li> <li>● Engagement on potential urban extensions to Luton;</li> <li>● Engagement at SEMLEP Forums</li> <li>● Joint working on the identification of objectively assessed development needs;</li> <li>● Joint commissioning of and / or officer input into the production of evidence base studies including: - <ul style="list-style-type: none"> <li>○ the SHMA and HMA studies in order to determine respective OAHNs for ‘best fit’ and ‘functional Housing Market Areas’</li> <li>○ Luton FEMA Study</li> <li>○ Luton Employment Land Review update</li> <li>○ Luton SHLAA</li> <li>○ the Luton HMA Growth Options Study and Joint Green Belt Study</li> <li>○ Input and Feedback on Luton’s Infrastructure Delivery</li> </ul> </li> </ul>

	<p>Plan;</p> <p>Statement of Common Ground drafted and is under discussion.</p>
Milton Keynes Council	<ul style="list-style-type: none"> <li>• Representations on the consultation of numerous local plan iterations;</li> <li>• Continuous engagement including discussions, meetings and correspondence at Planning Director, Officer and Portfolio Holder level;</li> <li>• Engagement at SEMLEP Forums</li> <li>• Joint working on the identification of objectively assessed development needs;</li> <li>• Joint commissioning of and officer input into the production of evidence base studies including: - <ul style="list-style-type: none"> <li>○ the SHMA and HMA studies in order to determine respective OAHNs for ‘best fit’ and ‘functional Housing Market Areas’</li> <li>○ Luton FEMA Study</li> <li>○ Luton Employment Land Review update</li> <li>○ Luton SHLAA</li> <li>○ the Luton HMA Growth Options Study and Joint Green Belt Study</li> <li>○ Input and Feedback on Luton’s Infrastructure Delivery Plan;</li> <li>○ MK Visioning</li> </ul> </li> </ul>
Hertfordshire County Council	<ul style="list-style-type: none"> <li>• Duty to Co-operate Meetings between Officers and formal consultation;</li> <li>• Sharing of SATURN Transport Model (Developed jointly with AECOM) and scenario runs to inform plan making</li> <li>• Discussions at SEMLEP Forums;</li> <li>• Input and Feedback on Luton’s Infrastructure Delivery Plan.</li> </ul>
Buckinghamshire County Council	<ul style="list-style-type: none"> <li>• Duty to Co-operate Meetings between Officers and formal consultation;</li> <li>• Sharing of SATURN Transports Model (Developed jointly with AECOM) and scenario runs to inform plan making</li> <li>• Discussions at SEMLEP Forums;</li> <li>• Input and Feedback on Luton’s Infrastructure Delivery Plan.</li> </ul> <p>Statement of Common Ground drafted and under discussion.</p>
Greater London Authority	<ul style="list-style-type: none"> <li>• LBC attended the launch event (31 January 2014) and the Wider South East Consultation Event (28 March 2014) held by the GLA on its Further Alterations to the London Plan (FALP) in 2014</li> <li>• Bilateral meetings between GLA and LBC officers regarding potential prospect for cross-boundary strategic matters between the authorities.</li> <li>• LBC and GLA invited to submit responses to each local authorities’ plans.</li> <li>• Luton submitted representations to the FALP consultation on 10 April 2014</li> </ul>

Highways England	<ul style="list-style-type: none"> <li>• Development Plan consultations</li> <li>• Liaison meetings to review the matter of the spatial strategy with respect to balance of homes and jobs; the functional conurbation; unmet housing need; individual and cumulative impacts on the highway network; measures to address pinch points junction/road improvements; and how these would be delivered.</li> <li>• Consultation on the joint Luton and Central Bedfordshire SATURN model including validation</li> </ul> <p>Consultation on Luton Infrastructure Delivery Plan</p>
Natural England	Formal and informal consultation and ongoing discussions on the evidence base and policies for the Local Plan.
Environment Agency	<ul style="list-style-type: none"> <li>• LBC provided draft Local Plan policies to the EA for input and meetings held between LBC and EA.</li> <li>• EA formally consulted at each stage of the Local Plan.</li> <li>• EA provided input into the LBC Infrastructure Delivery Plan.</li> </ul>
Historic England / English Heritage	<ul style="list-style-type: none"> <li>• LBC provided draft Local Plan policies for input and meetings held between LBC and EH / HE.</li> <li>• Formally consulted at each stage of the Local Plan.</li> </ul>
SEMLEP	<ul style="list-style-type: none"> <li>• In addition to LBC's involvement in numerous SEMLEP Planning and Transport forums LBC held Duty to Co-operate meetings with SEMLEP.</li> <li>• Input to the preparation of the SEMLEP Infrastructure Investment Plan</li> <li>• Input to the preparation of the SEMLEP Strategic Economic Plan (SEP)</li> <li>• Input to Luton's Infrastructure Development Plan</li> <li>• Bi-lateral DTC meeting held with SEMPLEP during pre submission consultation</li> </ul>
Bedfordshire Local Nature Partnership	<p>To Be added.</p> <ul style="list-style-type: none"> <li>• Input into draft local plan policies and evidence preparation including the Sustainability Appraisal methodology</li> <li>• DTC meetings to review submitted representations and objections</li> </ul>

### **Consultation with Neighbouring Authorities in the preparation of the Local Plan**

26. In addition to all of the joint working undertaken in preparing the Local Plan, LBC has carried out direct consultation with the Duty to Co-operate bodies at each stage in plan-making (i.e. during the Regulation 18 and 19 consultations) and LBC has responded to Local Plan consultations for various neighbouring authorities. This two-way consultation has taken place with numerous neighbouring authorities including (but not limited to) Central Bedfordshire, North Hertfordshire, Aylesbury Vale, Dacorum, Bedford, Stevenage

and the Greater London Authority and are set out below by each local authority.

27. LBC played an integral role in the Central Bedfordshire Development Strategy Examination in 2014 -2015 and took part in the Vale of Aylesbury Local Plan Examination in 2013 – 2014 which demonstrates even further the active, ongoing and constructive role LBC has played in seeking to fulfil its Duty to Co-operate even whilst neighbouring authorities had submitted their plans for Examination. This constructive involvement by LBC has played an important role in helping to secure the agreement by the LPAs within the Luton HMA to prepare a Luton HMA Growth Options Study and a joint Green Belt Study between Central Beds and Luton.

28. The tables below set out the formal consultation undertaken between LBC and its neighbouring authorities.

**Figure 6: Formal Consultations between LBC and Neighbouring Authorities**  
**Aylesbury Vale District Council**

<b>Plan</b>	<b>Consultation</b>	<b>Date of response</b>
Luton Local Plan 2011-31	Local Plan 2011 – 2031, Regulation 18 part 1 July/ August 2012	No response
Luton Local Plan 2011-31	Local Plan 2011 – 2031, Regulation 18 part 2 June 2014	21 August 2014
Luton Local Plan 2011-31	Local Plan 2011-2031, Regulation 19 Pre submission consultation stage October/ December 2015	7 December 2015
Vale of Aylesbury Local Plan	Vale of Aylesbury Local Plan Scoping Consultation Regulation 18 April 2014	29 May 2014
Vale of Aylesbury Local Plan	Vale of Aylesbury Local Plan Issues and Options 2013 – 2033 October 2015	16 November 2016

## Bedford Borough Council

Plan	Consultation	Date of response
Luton Local Plan 2011-31	Local Plan 2011 – 2031, Regulation 18 part 1 July/ August 2012	No response
Luton Local Plan 2011-31	Local Plan 2011 – 2031, Regulation 18 part 2 June 2014	29 August 2014
Luton Local Plan 2011-31	Local Plan 2011-2031, Regulation 19 Pre submission consultation stage October/ December 2015	4 December 2015
Bedford Borough Council Local Plan 2032	Issues and Options Consultation. Regulation 18	3 March 2014
Bedford Borough Council Local Plan 2032	Regulation 18 Stage 2 Consultation	10 December 2015

## Buckinghamshire County Council

Plan	Consultation	Date of response
Luton Local Plan 2011-31	Local Plan 2011 – 2031, Regulation 18 part 1 July/ August 2012	No response
Luton Local Plan 2011-31	Local Plan 2011 – 2031, Regulation 18 part 2 June 2014	No response
Luton Local Plan 2011-31	Local Plan 2011-2031, Regulation 19 Pre submission consultation stage October/ December 2015	7 <sup>th</sup> December 2016

## Milton Keynes Council

Plan	Consultation	Date of response
Luton Local Plan 2011-31	Local Plan 2011 – 2031, Regulation 18 part 1 July/ August 2012	No response

Luton Local Plan 2011-31	Local Plan 2011 – 2031, Regulation 18 part 2 June 2014	No response
Luton Local Plan 2011-31	Local Plan 2011-2031, Regulation 19 Pre submission consultation stage October/ December 2015	7 <sup>th</sup> December 2016
Plan MK topic Papers	Regulation 18 Consultation 21 <sup>st</sup> November 2014	31 <sup>st</sup> October 2014
Plan MK Visioning Workshop	Vision Workshop	26 <sup>th</sup> March 2015

### Central Bedfordshire Council

Plan	Consultation	Date of response
Luton Local Plan 2011-31	Local Plan 2011 – 2031, Regulation 18 part 1 July/ August 2012	4 December 2015
Development Strategy for Central Bedfordshire	Revised Pre-submission Version June 2014 NB: CBC resolved to withdraw the Development Strategy in November 2015.	26 August 2014
Luton Local Plan 2011-31	Local Plan 2011 – 2031, Regulation 18 part 2	22 August 2014
Development Strategy for Central Bedfordshire	Draft Development Strategy	15 April 2013
Development Strategy for Central Bedfordshire	Draft Development Strategy June 2012	September 2012
Luton Local Plan 2011-31	Local Plan 2011-2031 Regulation 19 Pre submission consultation stage October/ December 2015	4 December 2012

### Dacorum Borough Council

<b>Plan</b>	<b>Consultation</b>	<b>Date of response</b>
Luton Local Plan 2011-31	Local Plan 2011 – 2031, Regulation 18 part 1 July/ August 2012	26 July 2012
Luton Local Plan 2011-31	Local Plan 2011 – 2031, Regulation 18 part 2 June 2014	20 August 2014
Luton Local Plan 2011-31	Local Plan 2011-2031, Regulation 19 Pre submission consultation stage October/ December 2015	7 December 2015

### Greater London Authority (GLA)

<b>Plan</b>	<b>Consultation</b>	<b>Date of response</b>
Luton Local Plan 2011-31	Local Plan 2011 – 2031, Regulation 18 part 1 July/ August 2012	No response
Luton Local Plan 2011-31	Local Plan 2011 – 2031, Regulation 18 part 2 June 2014	No response
Luton Local Plan 2011-31	Local Plan 2011-2031, Regulation 19 Pre submission consultation stage October/ December 2015	No response
GLA Further Alterations to the London Plan	FALP Consultation January – April 2014	10 April 2014

### North Hertfordshire District Council

<b>Plan</b>	<b>Consultation</b>	<b>Date of response</b>
Luton Local Plan 2011-31	Local Plan 2011 – 2031, Regulation 18 part 1 July/ August 2012	3 August 2012

North Hertfordshire Local Plan 2011-31	North Hertfordshire – New Local Plan Consultations - Housing Additional Location Options – July 2013	1 August 2013
Luton Local Plan 2011-31	Local Plan 2011 – 2031, Regulation 18 part 2 June 2014	21 August 2014
North Hertfordshire Local Plan 2011-31	North Hertfordshire Local Plan 2011-2031, Preferred Options December 2014	23 January 2015
Luton Local Plan 2011-31	Local Plan 2011-2031, Regulation 19 Pre submission consultation stage October/ December 2015	6 January 2016

#### **St Albans City and District Council**

<b>Plan</b>	<b>Consultation</b>	<b>Date of response</b>
Luton Local Plan 2011-31	Local Plan 2011 – 2031, Regulation 18 part 1 July/ August 2012	No response
Luton Local Plan 2011-31	Local Plan 2011 – 2031, Regulation 18 part 2 June 2014	15 August 2014
St Albans City and District Strategic Local Plan	Draft Strategic Local Plan Options Consultation Autumn 2014	19 November 2014
Luton Local Plan 2011-31	Local Plan 2011-2031, Regulation 19 Pre submission consultation stage October/ December 2015	7 December 2015
St Albans City and District Strategic Local Plan	St Albans City and District Strategic Local Plan 2011-31, Publication 2016	19 February 2016

#### **Stevenage Borough Council**

<b>Plan</b>	<b>Consultation</b>	<b>Date of response</b>
Luton Local Plan	Local Plan 2011 – 2031, Regulation 18	No response

2011-31	part 1 July/ August 2012	
Luton Local Plan 2011-31	Local Plan 2011 – 2031, Regulation 18 part 2 June 2014	15 August 2014
Luton Local Plan 2011-31	Local Plan 2011-2031, Regulation 19 Pre submission consultation stage October/ December 2015	No response
Stevenage Borough DIPPS	2 Vision for Stevenage – Draft Interim Planning Policy Statement	1 March 2012
Stevenage Borough Local Plan 2011 - 2031	Stevenage Borough Local Plan – early stage consultation	31 January 2013
Stevenage Borough Local Plan 2011 – 2031	Stevenage Local Plan – first consultation	19 August 2013
Stevenage Borough Local Plan 2011-2031	Stevenage Local Plan 2011 – 2031	16 February 2016

### Cooperation with other Organisations

29. LBC has worked closely with other infrastructure and service providers. LBC provided infrastructure providers (along with Duty to Co-operate bodies) with an opportunity to provide input into the preparation of the LBC Infrastructure Delivery Plan (IDP) from its initial stages of preparation to publication of the IDP. In March 2016 LBC requested that infrastructure providers provide any update in respect of the IDP to enable this document to be updated. LBC will continue to engage the infrastructure providers to ensure the IDP contains the latest information. The service providers LBC has worked with are set out in the IDP however are listed here for ease of reference:

- Thames Water
- Mobile Operators Association
- Affinity Water
- Active Luton
- Bedfordshire Fire & Rescue Service
- East of England Ambulance Service NHS Trust
- Office of the Policy and Crime Commissioner for Bedfordshire
- National Grid

- UK Power Networks

30. Sport England has been consulted throughout the preparation of the Local Plan and were involved in the preparation of the Luton Playing Pitch Strategy (2014-2021) including Developer contributions supplementary Report, and the Luton Indoor Sports Facilities Strategy and Action Plan (January 2015). These strategies were developed through ongoing engagement with a range of key partners including Active Luton, Luton sports clubs, Sport England, Team Beds and Luton, national governing bodies of sport (NGBs) and Luton schools.

31. LBC held a Developer and Registered Provider Workshop on 26<sup>th</sup> January 2016 with the purpose of engaging with the local housing market on key issues and opportunities and to scope out the potential for the formation of a Luton Housing Market Partnership (HMP) The HMP will provide further opportunities for HMP members to contribute experience and expertise and share information and market intelligence, including relevant contextual and policy information on housing land availability, housing markets and financial data where appropriate. The Terms of Reference for the HMP have been drafted and circulated and the inaugural meeting is planned for summer 2016.

#### **4. Concluding Remarks**

32. The Duty to Co-operate Statement of Compliance has set out in detail the considerable and diligent effort placed on strategic cross-boundary by LBC. This has involved joint working on joint technical studies including the establishment of an agreed definition of the Luton Housing Market Area and the agreed level of objectively assessed housing needs (OAHN) for both Luton and the wider HMA in the period up to 2031.

33. There has been extensive constructive engagement with Duty to Co-operate bodies regarding the potential sustainable urban extensions on the edge of Luton to the west, north and east of the town as well as North of Houghton Regis which has planning consent. It is still recognised that further work is required to fully test and assess all the potential growth options in the Luton HMA and the Luton HMA Growth Options Study and the Central Bedfordshire Green Belt Study are now both commissioned.

34. Luton Borough Council has and continues to work diligently with neighbouring authorities and other Duty to Co-operate bodies on a bi-lateral and multi-lateral basis and through its representations on emerging development plans with the objective of ensuring that all relevant cross-boundary are properly addressed through a plan-led approach which is mutually beneficial for LBC and its neighbouring authorities.