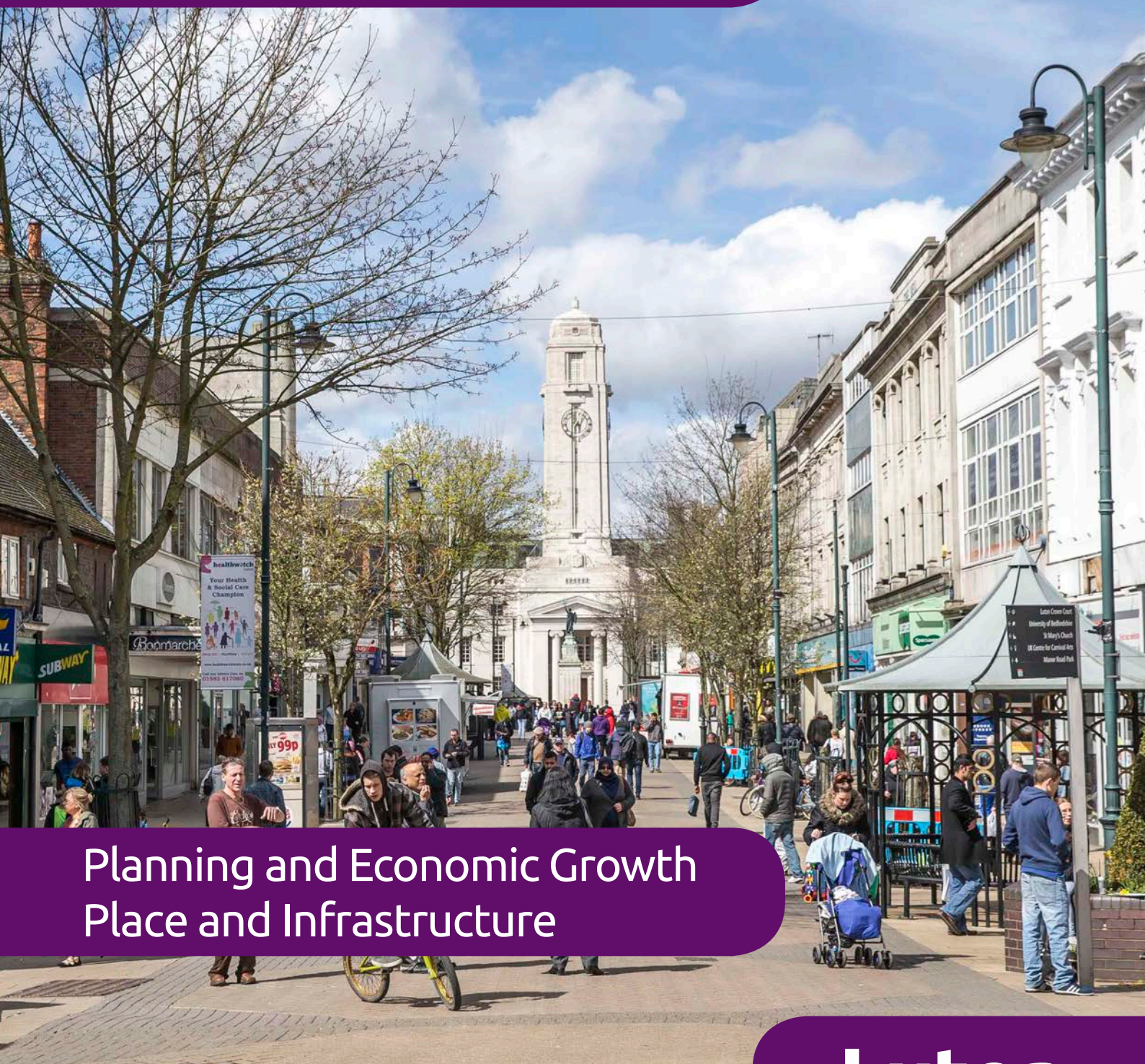




Luton Local Plan 2011–2031

November 2017



Planning and Economic Growth
Place and Infrastructure

www.luton.gov.uk

Luton

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Foreword

Foreword by Councillor Hazel Simmons



The Luton Local Plan (2011-31) was adopted by Luton Borough Council on 7 November 2017. It sets out our vision and approach for the sustainable growth of the Luton for the period up to 2031.

Luton has great potential for growth and possesses some of the best investment opportunities in the UK just a short distance from London. At the same time, Luton faces a number of challenges that will need to be addressed if our aspirations of our growing, vibrant and diverse population are to be achieved.

Luton's administrative boundaries are drawn tightly against the edge of the built-up area. This means we are unable to accommodate all of the housing growth pressures within the Borough. To address this we have been working, and will continue to work very closely within our neighbours, to ensure Luton's needs are met. This will include major growth on the periphery of Luton within both Central Bedfordshire and North Hertfordshire.

New jobs have a high priority and the local plan includes proposals for significant growth on key strategic sites - including growth around London Luton Airport - which will help safeguard Luton's traditional role as an important sub-regional employment centre.

The Local Plan is especially important because it provides the spatial framework within which Luton's ambitious Investment Framework is set, and the foundation stone upon which all decisions on planning applications will be assessed.

By planning positively, we will ensure that our growth aspirations are accommodated in a way that is both sustainable and deliverable but above all helping improve the quality of life and living standards for all of Luton's people.

Councillor Hazel Simmons

Leader
Luton Borough Council

Further Information and contacts

Background information on the Luton Local Plan preparation process, monitoring and review is available on the Council's website at the following url:

<http://www.luton.gov.uk/environment/planning> and follow the links through to the Luton Local Plan (2011- 2031).

If you have any questions regarding the Luton Local Plan (2011-31), please contact a member of the Strategic Planning Group at Luton Borough Council.

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For more detailed information and guidance on the planning system, visit the Department for Communities and Local Government website at [CLG's webpage](https://www.gov.uk/government/organisations/departments)⁽¹⁾.

1 Introduction and Background

Introduction

1.1 The Luton Local Plan (2011-2031) (further referred to as the "Luton Local Plan" or the "Plan") sets out a set of policies, development allocations and actions to meet the environmental, social and economic challenges facing the area over the 20-year plan period.

1.2 The Luton Local Plan provides a strategy for the distribution and level of development and supporting infrastructure, a set of proposals to meet that strategy, policies to deal with planning applications and proposals for monitoring the success of the plan.

1.3 The Plan was the subject of extensive public consultation prior to its submission for independent examination which took place between July 2016 and January 2017 to consider the legality and soundness of the plan. To be considered 'sound' (see paragraph 182 of the National Planning Policy Framework) the plan must be:

- **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;
- **Justified** - the plan should set the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** - the plan should be deliverable over its period, based on effective joint working on cross-boundary strategic priorities; and
- **Consistent** with national policy - the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

1.4 The plan must also comply with Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012 as well as the Planning and Compulsory Purchase Act 2004 (as amended).

1.5 Following receipt of the Inspector's Report, the Luton Local Plan (2011-31) was adopted at a meeting of the Full Council on 7 November 2017, incorporating all of the Inspector's Main Modifications.

Timetable/Plan-Making Process

1.6 There are a number of stages to the plan-making process as set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The plan-making stages and timetable followed are as follows:

July 2012 to August 2012	'Local Plan - What do you think' Consultation (Regulation 18)
June 2014 to August 2014	Draft Local Plan for Luton Consultation (Regulation 18)
October 2015 to December 2015	Pre-Submission Period for Representation (6 weeks, Regulation 19)
April 2016	Submission to Secretary of State
July 2016 to January 2017	Examination in Public
November 2017	Adoption

Background to the Luton Local Plan

1.7 The Luton Local Plan (2011-31), together with the Joint Minerals & Waste Local Plan, will be the statutory development plan for Luton Borough for the plan period between 2011 and 2031. If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise.

1 . Introduction and Background

1.8 This document identifies some of the main characteristics of the borough and the difficult challenges that the area faces both now and in the future and then sets out a vision for Luton for the plan period. To address these challenges and deliver the vision, the plan identifies 'strategic objectives' for achieving sustainable development, planning for economic growth, meeting the social needs of a growing population and protecting the places and assets that make Luton a dynamic place to visit, live and work in.

1.9 The Plan then sets out site allocations as well as strategic and development management planning policies that will help deliver new jobs, housing, retail and community facilities; it identifies specific sites that will be promoted for or protected from development; it identifies the new infrastructure that will be needed to support future growth; and it contains the planning policies that the Council will use when determining planning applications, including policies on open space, sustainable energy, sustainable transport and policies regarding the historic and natural environment.

1.10 Strategic policies and proposals for the development of mineral resources and sustainable waste management across Luton are included in the Minerals and Waste Local Plan: Strategic Sites and Policies, which was adopted in January 2014. The Luton Local Plan (2011-2031) updates and replaces the general and environmental policies from the Bedfordshire and Luton Minerals and Waste Local Plan (2005), where they affect the town.

National Policy and Working in Partnership

1.11 For the Local Plan to be fit for purpose, it needs to be consistent with a wide range of other policies, guidance, strategies and plans that have been produced not only by the Council but also by central government, neighbouring authorities and other public bodies and agencies. Through the Localism Act there is also now a legal 'duty to cooperate' with other organisations and neighbouring authorities in the

preparation of Local Plans. The following section identifies other policies, guidance, strategies and plans that have informed the content of the Luton Local Plan along with the key national and local partnerships that will be involved in delivering positive changes in the area over the plan period.

National Planning Policy Framework (NPPF)

1.12 The NPPF was formally introduced by the government on 27 March 2012, replacing more than 1,000 pages of previous national planning policy guidance notes with a succinct 59-page document. The Council must ensure that the Luton Local Plan is consistent with the objectives, principles and policies (along with the tests of soundness) set out in the NPPF. The framework advocates a 'presumption in favour of sustainable development', which requires local authorities, in their Local Plans to positively seek opportunities to meet the development needs in their area; and meet objectively assessed needs, having sufficient flexibility to adapt to rapid change. The NPPF is also a 'material consideration' in determining planning applications.

Planning Practice Guidance (PPG)

1.13 On 6 March 2014, the Department for Communities and Local Government (DCLG) launched its planning practice guidance web-based resource that provides further guidance to the NPPF ⁽²⁾. The PPG was accompanied by a written ministerial statement that includes a list of the previous planning practice guidance documents that were cancelled when the PPG was launched. The PPG is entirely online and includes links between the PPG and relevant planning practice guidance, as well as between the different categories of guidance. The PPG is also a material consideration and will be updated as needed by the DCLG.

South East Midlands Local Enterprise Partnership (SEMLEP)

1.14 Luton Borough is included within the Southeast Midlands Local Enterprise Partnership (SEMLEP), which comprises eleven local authorities. Local Enterprise

Partnerships (LEPs) offer local areas the opportunity to promote future economic development as part of the government's drive to facilitate local decision-making. Local authorities and businesses can also coordinate via SEMLEP and the Local Transport Body (Luton, Central Bedfordshire and Bedford Borough unitary authorities) to shape necessary infrastructure investment and benefit from assistance in attracting funding. The SEMLEP Strategic Economic Plan for the South East Midlands (April 2014) details how SEMLEP will grow the economy by £10.2billion by 2020 , create an additional 94,700 jobs and build an extra 70,600 homes (in association with the Regional Growth Fund) across Bedfordshire, Northamptonshire, Milton Keynes, Cherwell District and Aylesbury Vale District. As part of its Strategic Economic Plan, SEMLEP has prioritised infrastructure projects including London Luton Airport Highway Access. This Luton Local Plan builds on the borough's role within this partnership.

Working in Partnership

1.15 While the Council's Local Plan Team has overseen the preparation of the Luton Local Plan, it is far more than just a planning document. It is of high importance to all services within the Council and many of the partners that we work with. In this context, the Local Plan will provide a land use and infrastructure framework for the Council's Luton Investment Framework, which aims to achieve ambitious town-wide transformation together with other stakeholders. The Luton Local Plan attempts to integrate the strategies of different organisations because working in partnership will ultimately produce the best results on the ground. This includes, for example, working with the Environment Agency to ensure that our areas are kept safe from the risk of flooding and working with Highways England to understand how development proposals may impact the strategic road network.

Cross-Boundary Working

1.16 The Council also needs to recognise the strategies of neighbouring authorities and the 2011 Localism Act and NPPF place a duty on authorities to cooperate with each

other on planning issues of cross-boundary significance. Luton's adjoining neighbours are Central Bedfordshire Council and North Hertfordshire District Council. Luton's Functional Housing Market Area, however, covers a greater area than the borough itself; stretching into adjoining authorities as well as Aylesbury Vale District Council. Luton Borough Council has been working with these local authorities as well as Dacorum Borough Council, St Albans City and District Council, Stevenage Borough Council, Milton Keynes Council and Bedford Borough Council preparing a Luton & Central Bedfordshire Strategic Housing Market Assessment (SHMA) and working constructively on cross-boundary matters, including where Luton Borough's unmet housing needs could be delivered in other local authority areas. This cross-boundary planning on housing needs encompasses other supporting infrastructure via respective provision of transport, education and leisure, including green infrastructure, wildlife corridors and walking and cycling routes into and out of the Borough.

1.17 The Duty to Cooperate is intended to ensure that strategic cross-boundary planning issues are adequately taken into account following the abolition of Regional Spatial Strategies as well as ensuring that the prescribed bodies are effectively engaged in the process. Compliance with the Duty has enabled the strategic planning context of local policies and the involvement and responsibilities of other bodies to be appropriately and effectively taken into account where there are wider than local issues and to ensure the timely delivery and proper coordination of strategic infrastructure and investment priorities. In addition to working with its local authority neighbours on cross-boundary matters, there are additional prescribed bodies with which local planning authorities are required to cooperate and are set out in Regulation 4 of Part 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Council will continue to work with these organisations on an on-going basis. For Luton they comprise:

1 . Introduction and Background

- Environment Agency
- Historic England
- Natural England
- Bedfordshire Local Nature Partnership
- Mayor of London
- Civil Aviation Authority
- Homes and Communities Agency
- Luton Clinical Commissioning Group
- Office of the Rail Regulator
- Highways England
- Transport for London
- Highway Authorities
- increase income from business growth;
- better equip residents of all ages to get jobs through investment in education and training; and
- work efficiently with the Police (including the new Police and Crime Commissioner), the NHS, schools and academies, the University of Bedfordshire, the voluntary sector and Job Centre Plus to ensure that the most vulnerable in Luton are safe and supported.

Luton Borough Council Strategies

Sustainable Community Strategy (2008 - 2026)

1.18 The Sustainable Community Strategy was prepared by the Luton Forum (Luton's Local Strategic Partnership), whose members were from the public, business, community and voluntary sectors across Luton. The Sustainable Community Strategy describes the shared vision of how Luton will be in 2026, based on the Luton Forum's local knowledge and informed by the aspirations of local people through consultation.

Luton Borough Council Prospectus (2013 - 2016)

1.19 The prospectus is informed by a variety of other plans including the local health and wellbeing strategy that was itself informed by a joint strategic needs assessment. The prospectus' last three points encompasses the following three priorities identified by the health and wellbeing strategy: (1) every child and young person has a healthy start in life; (2) reduced health inequalities within Luton; and (3) healthier and more independent adults and older people. At the heart of this prospectus is a three point plan to:

Luton Borough Council Corporate Plan (2014 - 2017)

1.20 This Corporate Plan draws together all the key elements of Luton Borough Council's proposals as to how it will serve the town over the next few years. As well as looking at the current status of the authority in financial terms and in other ways, it examines the priorities and plans for service delivery in Luton, explains how the Council aims to transform itself over the coming years and also sets out the medium-term financial plan. Drawing up service plans for its many different areas of business has, in particular, allowed the authority to look hard at how it can maintain its performance following the economic downturn, which will require the Council to find savings of some £51m.

1.21 The Council's Corporate Plan vision is that:

- Luton Borough Council will be a high performing, financially viable authority, delivering high quality services that improve health and opportunity for local people and protect the most vulnerable.
- Together with our partners, we will help make Luton a place where everyone can learn and thrive and where business can grow and prosper.

- Celebrating and building on Luton's rich history and its vibrant cultural mix, we will develop safe, strong and sustainable communities.
- We will be responsive, accountable and innovative - a leader in what we do and a voice for our town.

Health and Wellbeing

1.22 The Council has a statutory responsibility under the Health and Social Care Act (2012) to improve the health and wellbeing of its community. It is also the responsibility of the local Planning Authority to ensure that health and wellbeing and health infrastructure is considered as part of the local plan making process. In addition to highlighting the importance of achieving sustainable development, promoting healthy communities is a key component of the process. The Local Plan can play an important role in supporting the reduction of inequalities in health, improving social interaction and creating inclusive communities.

1.23 This approach is supported by Luton's Health and Wellbeing Strategy (2012-2017) and the Joint Strategic Needs Assessment (2015) where the Council has committed to placing a greater emphasis on the underlying causes of ill health such as the environment and housing. The Local Plan will support and promote development that is designed, constructed and managed in ways that improve health and promote healthy lifestyles.

Minerals and Waste

1.24 Luton carries out its minerals and waste policy planning jointly with Bedford Borough and Central Bedfordshire councils through a shared service. This joint Minerals and Waste Local Plan: Strategic Sites and Policies (2014) plan was adopted by the three local authorities in January 2014. Minerals and waste development will be guided by the strategic policies of that plan, the more general policies of the Luton Local Plan 2011-2031 and the detailed, supplementary policies on Managing Waste in New Developments (2006). It is recognised that

minerals and waste development can have significant impacts on landscape, the Green Belt and other environmental concerns. The policies of this plan apply as much to minerals and waste activities as they do to all other forms of development.

1.25 No sites in the Borough are identified for mineral extraction. The minerals and waste policies map does, however, identify sites within Luton that are important for the distribution and processing of aggregates, concrete and asphalt. Such safeguarded sites are identified on the Luton Local Plan Policies Map.

Neighbourhood Plans

1.26 With the Localism Act coming into law, local communities can prepare Neighbourhood Plans through this legislation and, if adopted, they become part of the Development Plan for the area. In this way, local communities can express their wish for appropriate change in a flexible and locally distinctive manner.

1.27 Luton does not have Parishes or Town Councils but Neighbourhood Forums may be designated by the Council provided that the proposed Neighbourhood Forum meets the criteria and regulations under the Localism Act 2011, for the purposes of producing a Neighbourhood Plan, including demonstrating that the Neighbourhood Forum:

- consists of a minimum of 21 members who live or work in the area concerned;
- whose membership is open to all residents who live or work in the neighbourhood area, and elected councillors;
- is established for the express purpose of improving the social, economic and environmental wellbeing of the area; and
- has a written constitution.

1 . Introduction and Background

Policies Map

1.28 The Policies Map that is published alongside this Plan is a comprehensive map displaying the spatial boundaries of all relevant development plan policies.

1.29 Where policies have a spatial boundary or location, for example a development site or employment area, these are shown on the Policies Map. Many of the policies in the Luton Local Plan are applicable to the whole of the borough and are therefore not specifically identified on the Policies Map.

1.30 The Policies Map is published online.

Technical Evidence

1.31 The National Planning Policy Framework requires that Local Plans be prepared on the basis of robust evidence. Numerous studies have been prepared by the Council, key partners and specialist consultants on matters including employment, housing, infrastructure, retail and viability. Included in this is the Infrastructure Delivery Plan (IDP), which has been prepared to support the Luton Local Plan and identifies (as far as possible) the critical and other infrastructure necessary to support the delivery of the objectives, spatial development strategy and other policies set-out in the Local Plan. The IDP also provides an overarching framework for service providers' plans and programmes, bringing them into one place and helping infrastructure providers to plan for the predicted level and locations of future growth as set out in the Local Plan. The IDP will be regularly updated and published to provide the latest position on infrastructure delivery. A comprehensive list of the technical evidence is set out in Appendix 10.

Deliverability and Viability of the Local Plan

1.32 Government Guidance requires that Local Plans are deliverable throughout the plan period. Viability assessments are a tool that can assist with the development of Local Plans and policies to ensure that the Local Plan and its policies are realistic and provide

assurance that the proposals in the Plan are viable and have a reasonable prospect of delivery.

1.33 To ensure that the Local Plan meets these requirements and the proposals have a reasonable prospect of delivery throughout the life of the plan, viability assessments have been undertaken by independent consultants and are published as evidence to support the Plan. The conclusion of this evidence is that the proposed development strategy and the individual sites proposed are considered sound.

1.34 Understanding the viability of policies and development sites is an iterative process. Viability testing has therefore continued throughout the process of preparing the Local Plan.

Other Necessary Assessments

1.35 The Council has a statutory requirement to carry out a number of assessments in accordance with European and national legislation to ensure that the implications of policies and proposals in the Local Plan have been fully understood. Such assessments include:

- **Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA):** Sustainability Appraisal helps to ensure that Local Plans and other planning documents have a sound understanding of the environmental, social and economic characteristics and priorities of the area, and then ensuring that they are integrated into planning policies. A key requirement is for the SA to test all reasonable alternatives for the development strategy/options for the Local Plan. A Strategic Environmental Assessment (SEA) is required by European Directive to assess the environmental effects of policies and proposals in Local Plans. A combined Sustainability Appraisal (SA) and SEA has been prepared for the Luton Local Plan and is published on the Council's website. The Scoping Report, which was consulted on previously, is also available on the Council's website.

- **Integrated Impact Assessment:** This is a local requirement to ensure that all Council policies, plans and strategies support the corporate mission statement that: 'the needs of Luton's people will be first in everything we do'. The assessment embeds considerations of social justice principles and practice into the Council's decision-making process, ensuring adherence to the Equality Act 2010 and associated Public Sector Duty. While the integrated impact assessment will be reported separately, its key concerns are embedded within the SA to avoid duplication of work.

2 . Setting the Scene

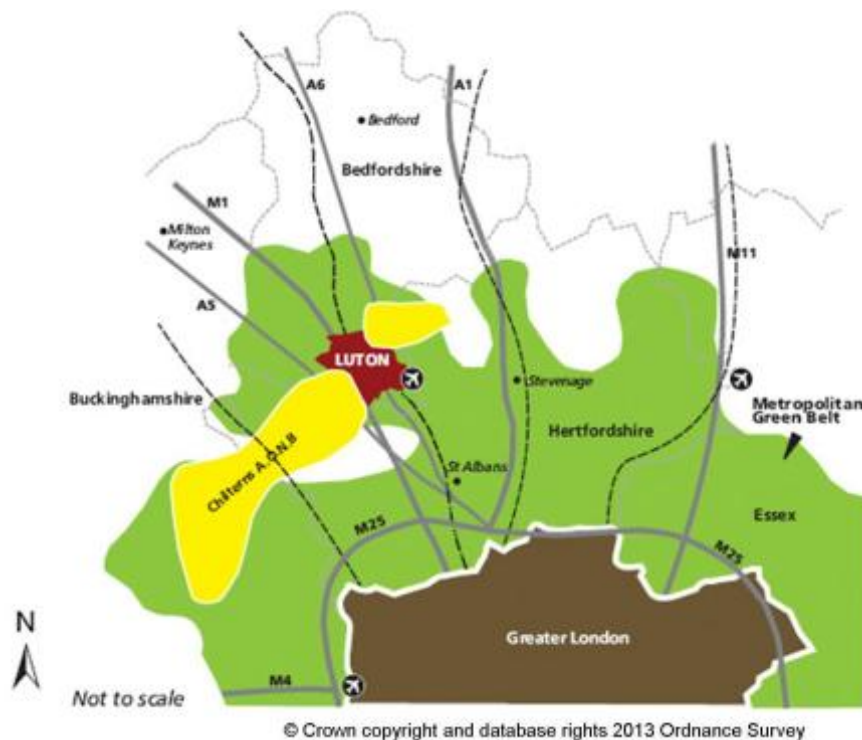
2 Setting the Scene

Settlement Profile / Key Issues and Challenges

2.1 Luton is a densely populated town with a rich history of wealth creation and cultural diversity. Surrounded by the Green Belt and situated within the Chilterns 'Area of Outstanding Natural Beauty', the town enjoys easy access to high quality landscapes, wildlife areas, parks and other sub-regional leisure attractions (e.g. Luton Hoo,

Dunstable Downs, Whipsnade Zoo, Woburn Abbey). At the same time, the town benefits from good strategic north-south access to the Midlands and Greater London (via the M1 and Midland Mainline Railway) and is also served by a busy and fast growing airport adjacent to high quality business parks. Significant investment in civic spaces and transport infrastructure around the town centre and key regeneration sites are also improving the look, feel and safety of the town and the way people enjoy its shops and services.

Luton's regional context



For a more detailed view of the landscape protection areas surrounding Luton see the Luton Key Diagram.

2.2 Luton became an established settlement during the medieval period, formed around the River Lea that played an important role in the early development of the town. Its medieval layout can be understood through many of the road names within the town centre such as Bridge Street, Castle Street and Mill Street. The town centre saw a large expansion during the 19th century at which time Luton grew into a successful market town. A number of factors were responsible for the town's growth, including the Great Northern Railway line in 1860 and the Midland Railway in 1868. The straw hat industry also saw great success

within the town and, by the end of the 19th century, was established and largely influenced the built form of the town centre.

2.3 Luton was made a borough in 1876 and, with the development of engineering and automotive industries, grew rapidly in the 20th century. Vauxhall Motors located itself in the town in 1905. Luton was bombed during the Second World War and after the war a number of estates were built at Farley Hill, Stopsley, Limbury and Legrave. London Luton Airport was officially opened on 16 July 1938 as 'Luton Municipal Airport' and the M1 was built in 1959, the central library in

1962 and the Arndale Centre in 1972 (now known as The Mall). In 1997 Luton was made a unitary authority. Luton Airport Parkway and a new passenger terminal at the airport were built in 1999.

2.4 As part of an ongoing programme of regeneration, St Georges Square was redeveloped in 2007. The Luton - Dunstable Busway, a high-quality service linking Houghton Regis, Dunstable and Luton, was opened in 2014. Today, the population of Luton numbers approximately 216,800 (ONS, mid-year estimate, 2016) and London Luton Airport is one of the UK's largest airports serving 10.5 million passengers in 2014 and continues to grow.

2.5 The above factors make the town attractive to business and investment. Luton is accessible to skilled workers within the wider sub-region and to businesses wishing to access national and regional markets as evidenced through demand to locate on Luton's quality business parks. Of particular note is a growing aviation-related and skilled engineering sector, an expanding service sector base and developing sub-regional business and office market. The prestige Capability Green business park is fully occupied while Butterfield Green research park continues to develop.

2.6 The town's industrial legacy includes some older manufacturing areas that greatly contribute to the character and local distinctiveness of the town but are in need of economic and environmental regeneration in order to restore investor confidence. These sites have the potential to add distinctive identity and architectural value to regeneration schemes. There is also a need to build on rising education standards to improve local skill levels, attract employers and increase job opportunities. This will enable people to access housing and services while making more sustainable choices about travel, energy use, leisure, food and health. There is insufficient accessible open space of recreational value within the urban area to serve some communities and there is an increasing demand to develop these spaces for other

uses. However, green space is typically endowed with important nature conservation or heritage status.

2.7 As a densely populated and multicultural town (in many ways similar to a London borough), Luton has provided access to relatively lower housing costs and rented accommodation compared to surrounding areas. However, in recent years there has been significant demand to accommodate a growing population, both from existing households and from people moving into the area, often with lower skills and wages.

2.8 Without the greenfield land to build sufficient new housing to meet demand, there is not only a significant level of unmet housing need but an increasing affordability gap, as wages lag behind market rent and house price rises. Development market values within the town are also significantly low compared to neighbouring towns. Consequently, the viability of mixed use development and recycling costly brownfield sites tends to be uneconomic or so marginal that the market has been unable to deliver affordable housing in recent years, except through major intervention by the Council.

2.9 Luton is therefore unique in that it has much potential for sustainable economic growth, which provides quality job opportunities to its neighbours and its own citizens, however, it is held back by a range of critical constraints and the most critical of these is the severe inability to house Luton's growing population and workers. Poverty and poor access to suitable housing and key services such as health and education, leisure and green space are key issues identified by Luton's Health and Wellbeing Strategy (2012-2017) and the Joint Strategic Needs Assessment (2015), where the Council has committed to placing a greater emphasis on the underlying causes of ill health such as the environment and housing. The Local Plan will have a key role to play in promoting health and wellbeing by setting out clear opportunities and a spatial strategy based on the town, district and neighbourhood centres hierarchy, for Luton's many communities to access jobs, housing, schools, healthy nutrition, leisure and green

2 . Setting the Scene

space locally within the town that is easily accessible via walking and cycling and public transport.

Exceptional Issues

2.10 Luton is for the most part built up to its boundary and is surrounded by the Green Belt. The 2016 Strategic Housing Land Availability Assessment (SHLAA) indicates that the town does not realistically have sufficient capacity within its boundary to meet all of its housing needs.

2.11 Viability studies indicate that development is challenging on brownfield sites in Luton due to abnormal costs in recycling brownfield employment land and unusually low market values.

2.12 There are only four significant employment land allocations left within the town (Power Court, Century Park, Butterfield Green and Land South of Stockwood Park) to maintain Luton's economic contribution to itself and its neighbours, for businesses wishing to invest into the area or for firms wishing to expand. These sites (one regeneration site and two greenfield sites respectively) require key enabling infrastructure. There is, however, a significant economic growth multiplier for Luton and the wider sub-region, provided by the busy and growing London Luton Airport, which provides a range of aviation-related skilled engineering and technical employment and also lower skilled work related to aviation and business services. There will be a need to ensure that aviation and other related growth arising from the proximity to the airport or related business clusters are not held back by land and infrastructure constraints. To achieve this, a strategic allocation comprising London Luton Airport, Century Park and Wigmere Valley Park, is proposed in the Local Plan.

2.13 The town is attractive to business and investment as evidenced in the 2013 Employment Land Review study. Local industrial firms struggle to find modern, affordable accommodation and must rely on existing industrial sites with lower rents (often of lower quality or ageing stock) until the new employment land stock is built out.

2.14 Luton town centre is performing well for shopping and access and has an improving public realm. The town centre must, however, expand and improve its retail offer to remain competitive in the face of stiff competition from its sub-regional neighbours and national retailing trends.

2.15 The town lacks east - west orbital connectivity and so suffers from peak congestion where local traffic and through traffic conflict at key junctions and around the town centre.

2.16 School provision is struggling to meet demand, with significant capacity concerns in southern and central Luton.

2.17 The distribution of greenspaces across the Borough is unequal with the western and central areas of the Borough having significantly less overall greenspace. This is compounded by their location, being separated from open countryside and surrounded by built up areas. The overall current provision of greenspaces is below the standards (for each typology) devised by the Greenspace Strategy Review 2014. Future pressure from expected population growth makes the protection and continuous improvement of the existing greenspaces an important issue for the communities of Luton for recreation and in terms of health and wellbeing. The quality of the Borough's parks, greenspaces and gardens is also an important indicator of a town's attractiveness and is a key consideration for people and businesses when looking to locate to the area.

Challenges

2.18 Given the above unique circumstances, as evidenced by technical studies and analysis, the development strategy must ensure that Luton continues to successfully grow its economy as a sub-regional employer benefiting the town and its neighbours and use its space efficiently and effectively whilst looking to its neighbouring authorities to contribute quality and affordable housing and mixed communities accessible to the town. This will ensure that the benefits of economic drivers, including Capability Green business park, London Luton Airport and Napier Park

Strategic Allocations are shared by its citizens and workers in neighbouring authorities without compromising the town's environment and economic success. To ensure this, Luton must secure strategic transport investment unlocking key employment allocations whilst also protecting existing industrial sites to ensure that its economy expands and diversifies to meet the needs of local residents.

2.19 To ensure that Luton remains both attractive to investors and as the economic 'heart' of the Luton Housing Market Area, quality employment allocations must be protected and other industrial land should be released for housing and other uses only when modern accommodation is completed or where sites are already obsolete.

2.20 Luton Town Centre must also deliver increased convenience and comparison goods shopping on key sites and by expanding the town centre onto Power Court, taking advantage of the Luton - Dunstable busway, town station improvements and inner ring road improvements. A network of District and Neighbourhood Centres will also increase access to local goods and services and focus investment opportunities for new housing and employment regeneration, helping to reduce congestion as there would be less need to travel by car.

2.21 A key challenge for this Local Plan must be to secure significant levels of affordable housing while ensuring that development remains viable and people will continue to work and find employment in the borough. A significant contribution required from our neighbouring authorities is to provide much needed housing close to Luton taking account of the Luton - Dunstable busway and enabling key orbital road improvements, which can link communities whilst removing through traffic and freeing up capacity within the town.

2.22 This local plan is therefore structured around a spatial development strategy that will focus on a number of solutions.

2.23 Luton's contribution to the sub-regional economy needs to be maintained and enhanced through the bringing forward of its strategic allocations

coordinated with key infrastructure (e.g. Century Park, Napier Park, Power Court, Land South of Stockwood Park).

2.24 Marginal employment land needs to be protected to ensure that local firms can afford to do business in Luton until new stock is built out and the market improves. Only employment land that is currently not suitable or attractive to the employment market will be released.

2.25 The town centre needs regeneration through a limited expansion to boost competitiveness and provide an improved offer to claw back leaked trade. A network of Neighbourhood and District Centres need improvement to enable housing, employment, health and small scale retail needs to be met locally through reduced travel while maximising public transport connectivity to the Luton - Dunstable busway, Luton town centre, employment areas and Luton Airport Parkway Railway Station.

2.26 8,500 dwellings will be provided within the borough and will contribute towards meeting the full objectively assessed need for market and affordable housing requirements through allocations, development at High Town, regeneration of the town centre (Power Court) and former employment area (Napier Park). Neighbouring local authorities need to help meet Luton's unmet market and affordable housing needs in accordance with the 'Duty to Cooperate'.

2.27 The town's regeneration needs to be secured through a program of transport investment e.g. Town Centre Improvements, Luton railway station improvements, London Luton Airport surface access, Century Park access and Junction 10A South of Stockwood Park. Sufficient school places need to be provided for local communities.

2.28 The town's green spaces and green infrastructure network, including the River Lea and other open areas, need to be protected and enhanced for wildlife and accessibility for formal and informal recreation that bring important benefits in terms of health and wellbeing. In particular,

2 . Setting the Scene

access to greenspace networks that link up with cross boundary provision will be encouraged.

3 Vision and Objectives



Vision and Objectives

3.1 The Local Plan for Luton represents the long term spatial vision from which the objectives and spatial strategy have been derived. The 'vision' is a statement of what the plan is trying to achieve.

3.2 The strategic objectives form the link between the high level spatial vision and the detailed strategy. They are the objectives needed to fulfil the vision. The policies within the Local Plan show how this can be achieved within the plan period.

3.3 The vision and objectives build on and reflect Luton Borough's Sustainable Community Strategy and the Council's Prospectus.

Vision

3.4 Luton's economic, social and environmental resources and assets will be used efficiently and sustainably to deliver

economic prosperity and an improved quality of life, health and wellbeing for all the residents of the Borough. Luton will strengthen and, where appropriate, transform the places that continue to make the borough unique. It will continue to be a place for diverse communities, building on its strategic importance as a sub-regional driver of economic growth.

3.5 London Luton Airport will be improved to provide more jobs related to aviation industries and other associated business clusters and maintain London Luton Airport's key role as a sub-regional economic driver bringing wealth and job creation (including high skilled jobs) to the town and neighbouring local authorities. The completion of Butterfield Technology Park will support more job opportunities in high technology industries. Across Luton, a mix of high quality and low cost business accommodation will support a range of jobs suitable for the skills of local and neighbouring residents with Power Court,

3 . Vision and Objectives

Butterfield Technology Park, Century Park and Napier Park making a strategic contribution leading to an increase in employment. The creative and cultural industries will grow, stimulated by the presence of a modernised University of Bedfordshire, the historic and distinctive Creative Quarter and High Town.

3.6 High quality housing and neighbourhoods will be delivered in the Borough and in neighbouring authority areas to ensure there is a sufficient supply of an appropriate mix of dwelling types, sizes and tenures to offer local residents a choice of where to live. This includes mixed uses on certain strategic allocations such as Napier Park.

3.7 The local workforce will be more highly skilled and unemployment will be reduced considerably. There will be improved high standards in educational establishments, with students achieving high levels of education. The supply of school places will be sufficient and of good quality to meet local demand and provide for parental choice.

3.8 Luton will respect its classic Chilterns gap town setting in the steep-sided upper valley of the River Lea, characterised in parts by the Chilterns Area of Outstanding Natural Beauty, Luton Hoo and surrounded by the Green Belt. Luton will protect and enhance its networks of parks, heritage, waterways and natural features, which will continue to provide integral multi-functional open space, leisure opportunities and benefits to health and wellbeing in a densely populated Borough.

3.9 Luton will prosper through a well-connected network of vibrant and regenerated locally distinct places centred around Luton Town Centre, District Centres and Neighbourhood Centres which have evolved from the borough's rich history. Luton Town Centre will be a sub-regional focus for inward investment for development including retail⁽³⁾, the creative and cultural economy, new homes and town centre uses.

Power Court is a 'flagship' project shaping the future image and function of the town centre and what it has to offer to shoppers and people visiting the town for entertainment and leisure. The District Centres at Bury Park, Marsh Farm, Marsh Road, Stopsley and Wigmore will also be a focus for development to enable their shops and services to thrive for the benefit of their local communities. Neighbourhood Centres will be distributed across the town, between the larger centres, to serve day-to-day needs.

3.10 Luton's communities will be better connected and become less dependent on car use to promote healthy communities with good access to jobs, goods, services and leisure and cultural activities. An effective network of Town, District and Neighbourhood Centres (including a supporting network of District and Neighbourhood Parks) will serve as the heart of local neighbourhoods with improved access by train, bus, foot and cycle. Each place will build on its distinctive identity, role and function and will be well designed, vibrant and, above all, a great place to live.

Strategic Objectives

- **Strategic Objective 1:** Retain and enhance Luton's important sub-regional role as a place for economic growth and opportunity including the safeguarding of London Luton Airport's existing operations and to support its sustainable growth over the Plan period based on its strategic importance.
- **Strategic Objective 2:** To utilise Luton's economic, social and environmental resources efficiently and sustainably, including appropriate mitigation within the limited physical land capacity of the borough whilst ensuring the permanence of the Green Belt.
- **Strategic Objective 3:** To ensure that new housing delivers an appropriate level of provision to meet local needs in terms of the number of homes,

3 Luton town centre's description as a 'Regional Centre' is the terminology adopted by the White Young Green's (WYG) Luton Retail Study Update 2015. This is sourced from Venuescore, an acknowledged industry ranking of retail locations across the UK

subject to capacity constraints and a mix of dwelling types, sizes and tenures that offer local residents a choice of where to live and addresses issues of affordability and overcrowding. Luton Borough Council will work collaboratively with neighbouring authorities to help ensure unmet needs are provided for in appropriate locations outside Luton and to actively monitor progress in terms of unmet needs.

- **Strategic Objective 4:** To establish an effective network and hierarchy of Town, District and Neighbourhood Centres to serve as the heart of local communities; improving health and wellbeing through improved access by train, bus, foot and cycle to a mix of uses including shopping, services and jobs.
- **Strategic Objective 5:** To improve the built and natural environment to deliver quality places through high quality and sustainable design taking into account the landscape, setting and character of the town and neighbourhoods within its national (i.e. AONB) and local landscape settings, including heritage assets and providing safe environments that help to reduce crime and the fear of crime.
- **Strategic Objective 6:** Reduce social, economic and environmental deprivation, particularly where it is spatially concentrated, by taking priority measures to reduce unemployment, improve skills and education and renew housing, community and environmental conditions.
- **Strategic Objective 7:** To safeguard and enable new community, educational and cultural facilities to be delivered and expanded to meet the needs of a growing and diverse borough.
- **Strategic Objective 8:** Improve accessibility, connectivity, sustainability and ease of movement to, from and within the borough.
- **Strategic Objective 9:** To deliver a new Luton football stadium in a location capable of good access to transport infrastructure along with associated

uses, shared venue events, and ancillary sports related uses.

- **Strategic Objective 10:** Improve, protect and enhance the biodiversity of natural areas within the town, including the quality, accessibility, health and recreational value of green spaces, the River Lea Corridor, the Chilterns Area of Outstanding Natural Beauty (AONB), the Areas of Great Landscape Value (AGLV), Areas of Local Landscape Value (ALLV) and their connectivity.
- **Strategic Objective 11:** To safeguard and ensure the prudent use of natural resources, increase energy and water efficiency and encourage and promote the use of renewable energy sources to help adapt to climate change, manage pollution, natural and land use operational hazards, avoid inappropriate development in areas at risk of flooding, secure improvements in air and water quality and ensure effective waste management.

4 Spatial Strategy



Spatial Development Strategy

4.1 The spatial development strategy is to focus the majority of new development in the borough over the plan period on eight Strategic Allocations, whilst protecting the remaining Green Belt from development and regenerating Luton Town Centre. There will be a presumption in favour of sustainable development encouraging sustainable and high quality development throughout the borough. This preferred strategy has been developed through on-going consultation and engagement and the preparation of evidence on a wide range of topics including housing, employment, retail, infrastructure, viability and numerous other technical studies as set out in Appendix 10.

4.2 As the Development Strategy is cross-cutting, all of the Strategic Objectives are relevant to this section of the Plan.

Presumption in Favour of Sustainable Development

4.3 At the heart of the NPPF is a presumption in favour of sustainable development, which it explains should be a golden thread running through both plan-making and decision-taking. Opportunities should be sought to address development needs whilst seeking positive improvements in the built, natural and historic environment and enhancing people's quality of life. Luton provides a clear example of an area with high pressure for different land uses where the economic, social and environmental roles for the planning system to perform (as set out on paragraph 7 of the NPPF) cannot be treated in isolation. The Vision and Strategic Objectives of this plan reflect the range of outcomes sought from development. This Local Plan takes this approach in determining its preferred policy approach. The Plan does this by:

- Determining the objectively assessed development needs of Luton Borough and the functional Luton Housing Market Area and seeking to meet those needs;
- Ensuring flexibility to adapt to rapid change where appropriate and feasible in the Plan; and
- Proposing positive policies, which assume that development proposals that accord with the development plan will be approved without delay and, where the development plan is silent, it is assumed that planning permission will be granted unless the adverse impacts outweigh the benefits.

Policy LLP1 - Presumption in Favour of Sustainable Development

A 'presumption in favour of sustainable development' will be applied to development management decisions. Wherever possible, the Council will work proactively and positively with all applicants to help shape development proposals to deliver growth and sustainable development that can be approved without delay.

- A. Planning permission will be granted where applications accord with local plan policies (and, where relevant, with policies in neighbourhood plans) when taken as a whole, unless other material considerations indicate otherwise.
- B. The Council will require all new development in the borough to contribute to enhancing a sense of place, preserve or improve the character of the area. Development proposals should respond to and enhance local character, the natural environment, heritage assets, and the identity of the Borough.

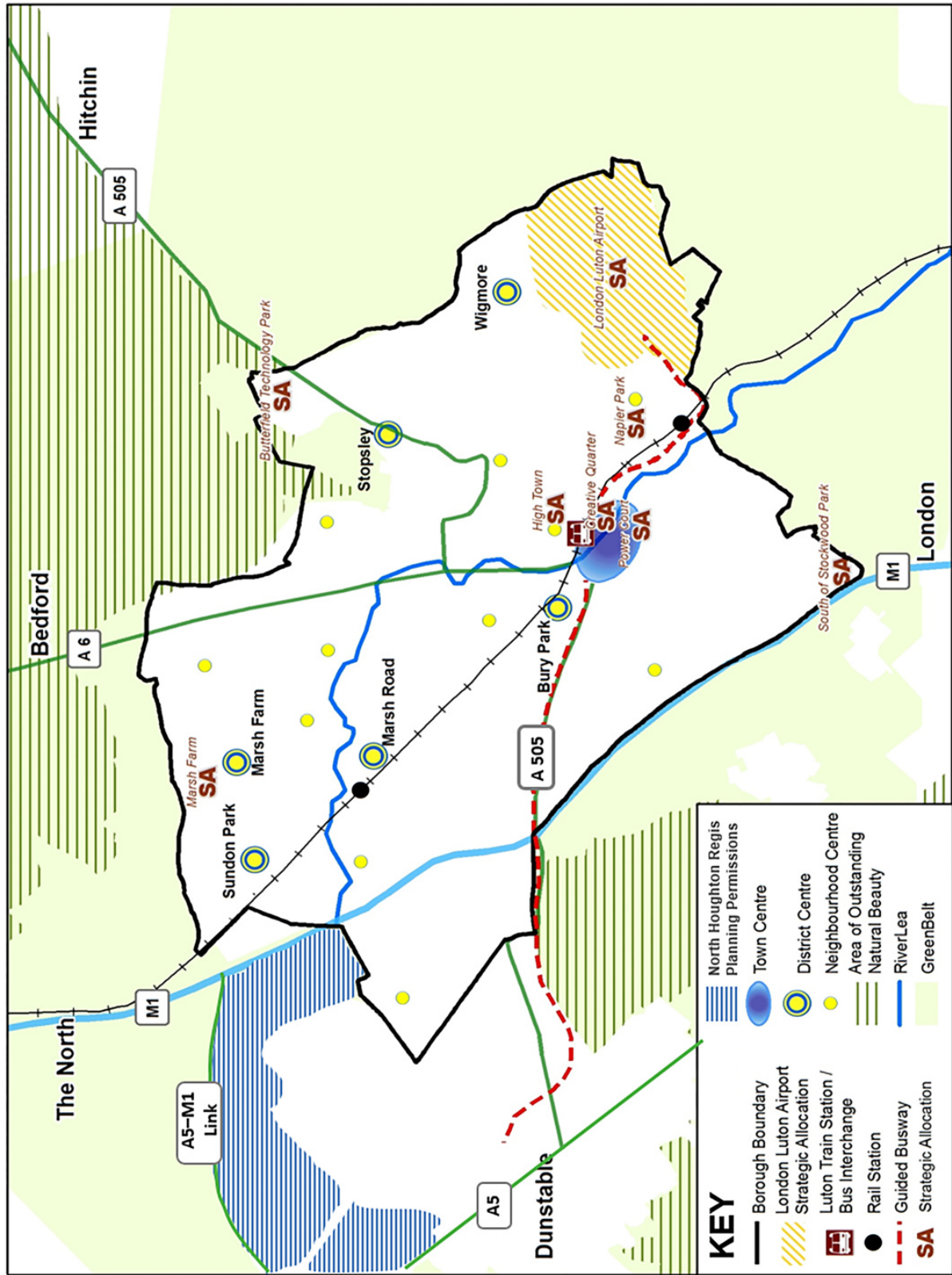
The Council will seek to encourage growth and sustainable development and manage change so as to create a network of connected, sustainable, high quality, locally distinctive and healthy places.

Growth in homes, jobs and services that constitutes sustainable development will be welcomed; provided the growth is directed to places with good concentrations of existing infrastructure or areas where there is capacity to grow with further sustainable infrastructure investment within the plan period to 2031. The Strategic Allocations and Luton Town Centre will be the primary location for growth, with District and Neighbourhood Centres also playing a substantial role as the heart of the communities of Luton (see the Key Diagram).

Sustainable Development Principles

To enable the delivery of sustainable development and sustainable communities, all development proposals will, where applicable, have regard to relevant plan policies.

4 . Spatial Strategy



Spatial Development Strategy

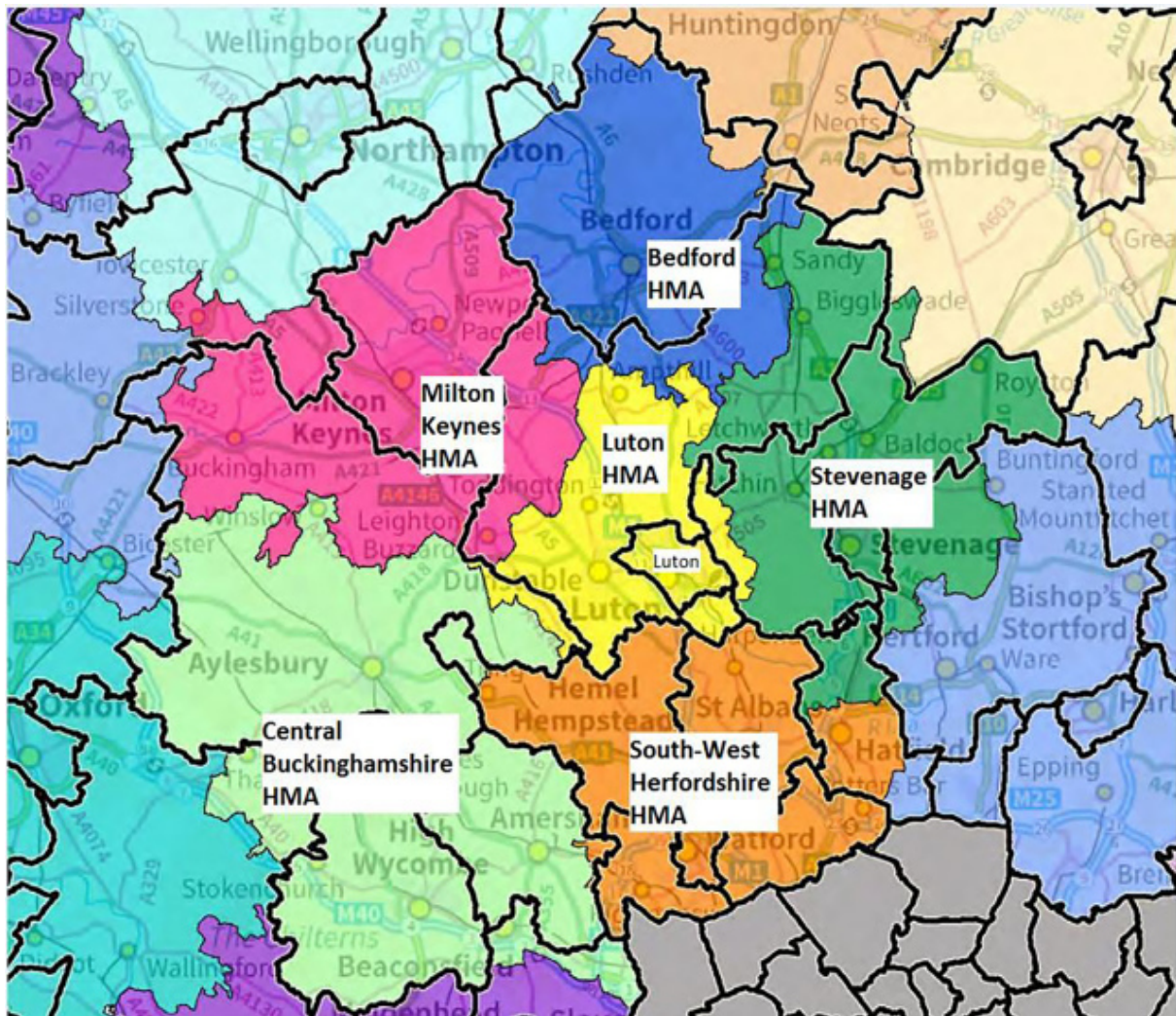
4.4 This policy sets out the quantum of objectively assessed development needs and requirements over the plan period for the borough and the functional Luton Housing Market Area and the preferred locations of growth in the borough as required of Local Plans in the NPPF.

4.5 It proposes that the objectively assessed housing need for the borough is 17,800 net additional dwellings and 31,800 net additional dwellings in the Functional Luton Housing Market Area over the plan period (2011 - 2031, of which, based on a pro-rata split based on population, 200 dwellings fall within North Hertfordshire and 400 dwellings within Aylesbury Vale and the balance of 13,400 dwellings within Central Bedfordshire) as evidenced by the Luton & Central Bedfordshire SHMA update of summer 2015, which provides more information/analysis.⁽⁴⁾ The Functional Luton Housing

Market Area (shown on the accompanying plan⁽⁵⁾ taken from the report, Housing Market Areas in Bedfordshire and surrounding areas Report of Findings, December 2015) includes all of Luton Borough, a significant proportion of Central Bedfordshire, and some of North Hertfordshire District and Aylesbury Vale District. The 2016 SHLAA identified a potential capacity of 9,322 over the plan period. However, some of this identified capacity is unlikely to be developed over the plan period due to market conditions and other uncertainties. Consequently, a realistic assessment is that there is sufficient capacity to deliver 8,500 dwellings. This, therefore, is the housing requirement for the plan period. Based on the objectively assessed housing needs and the lack of housing land to fully meet this need, there is a shortfall of 9,300 net additional dwellings in the borough over the plan period.

4 The 'Best Fit' Housing Market area OAN of 47,300 dwellings is based on whole districts and covers all of Luton and Central Bedfordshire Districts.
5 The HMA boundaries shown on the plan are illustrative and not to be taken as precise.

4 . Spatial Strategy



Source: Figure 38, page 47 of the "Housing Market Areas in Bedfordshire and Surrounding Areas - Report of Findings - December 2015".

4.6 As a result of this mismatch and the need for the borough to meet its objectively assessed needs whilst protecting other important existing land uses and designations in the borough such as open space and employment land, the Council is currently working with other local authorities in the area to seek the delivery of Luton's unmet housing needs in these areas outside the borough through their local plans under the Duty to Cooperate. Luton is therefore capacity capped in terms of the amount of housing it can meet within its administrative boundary and options to meet Luton's unmet housing needs will need to be thoroughly tested through preparation of joint evidence and potentially met through neighbouring authorities' local plans.

4.7 Luton Borough Council will seek to ensure delivery of the housing needs, which cannot be met within the Borough, within the wider Housing Market Area. As evidenced through the SHMA, Luton has the strongest functional links with Central Bedfordshire, therefore it is expected that a significant proportion of Luton's unmet housing needs will be met in Central Bedfordshire. However, North Hertfordshire District and Aylesbury Vale District also fall within the Luton Housing Market Area, so Luton BC will look to these local authorities to participate in joint working and, subject to the outcome of this work and preparation of joint evidence base, make provision for Luton's unmet housing needs in their local plans or local plan reviews. Only in the event of the joint work failing to meet the scale of objectively set housing needs within the Functional Luton HMA would those parts of Aylesbury Vale, Central Bedfordshire and

North Hertfordshire, which lie outside the Luton HMA, as well as land within other neighbouring authority areas further afield, be considered.⁽⁶⁾

4.8 The Borough Council considers that the interests of the town and sustainability would best be served by meeting Luton's unmet housing needs as close as possible to the communities from which the need arises. Indeed, under the duty to cooperate and in response to neighbouring plan preparation, particular account should be taken of this Council's policy supporting development to the west⁽⁷⁾ of Luton and requesting a thorough examination of strategic cross boundary options around the town (i.e. that an assessment of options north, east, south and west of Luton should be examined).

4.9 Development of a significant scale on or close to the edge of Luton would require significant investment in transportation infrastructure, including sustainable transport measures and orbital road capacity to ensure that through traffic can be removed from traffic needing to access the town and its employment and shopping areas or when accessing the M1. It would be critical to ensure that such improvements are well coordinated to ensure adequate infrastructure to allow traffic movements around both the north and south/east of Luton.

4.10 Due to very challenging development viability issues, it is proposed that only 20% affordable housing is required on all new residential development schemes.

4.11 A total net additional 18,000 jobs (i.e. 8,000 B class jobs and 10,000 non B class jobs) are proposed as the objectively assessed employment need of the Borough, based on the evidence in the Employment Land Review, balanced with the Borough's objectively assessed housing need.

4.12 A range of infrastructure requirements to deliver the preferred strategy in the Borough are set out in the Infrastructure Delivery Plan (IDP). The IDP is a 'living document' that will be kept up-to-date over the plan period.

4.13 A key component of the spatial strategy is the continued protection and enhancement of the borough's heritage and natural assets including open space of recreational value and the remaining Green Belt. The current provision of green spaces is below standard by typology and is unevenly distributed (particularly in the West and Central areas) as set out in the Green Space Strategy Review 2014. Green spaces are protected in Policy LLP27, which requires new or enhanced multi-functional green space to be provided in accordance with standards set out in Appendix 11.

Policy LLP2 - Spatial Development Strategy

There is a need for 17,800 net additional dwellings to support the population growth of Luton Borough over the period 2011 - 2031. Over the same period there is a need for 31,800 net additional dwellings in the Functional Luton Housing Market Area (which includes the need for 17,800 dwellings in Luton Borough).

The Local Plan will make provision for 8,500 net additional dwellings over the plan period in the Borough and requires 20% of all qualifying housing developments under Policy LLP16 (Affordable Housing) to be affordable dwellings. Luton therefore has an unmet housing need of 9,300 net additional dwellings over the plan period. The level of housing provision within Luton will not be treated as a ceiling. This is in order to enable development proposals to come forward on sites that are not specifically allocated for housing

6 The Luton Growth Options Study covering the Luton HMA and jointly commissioned between Luton, Aylesbury Vale, North Hertfordshire and Central Bedfordshire District Councils was published in April 2017.

7 Luton Borough Council resolved at its meeting 18 January 2011 to support development west of Luton.

4 . Spatial Strategy

but which comply with plan policies, subject to the availability of appropriate infrastructure. Luton Borough Council will continue to work with neighbouring and nearby local authorities to help ensure delivery of the Borough's unmet needs in other local authority areas under the 'duty to cooperate'. Luton BC will continue to work with its neighbouring authorities to help ensure that the needs of the Luton HMA are met within the HMA. This work is to be informed by the Joint Growth Options Study including 'Areas of Search' for growth of Luton to the North, South, East and West.

- A. Housing in the Borough will be delivered through (data derived from SHLAA, July 2016):
 - i. historic completions 2011/12-2015/16 (2,027 dwellings);
 - ii. existing permissions on sites delivering less than 5 homes (114 dwellings);
 - iii. strategic allocations at Power Court, Napier Park, High Town, Marsh Farm and the Creative Quarter (a minimum of 2,500 dwellings);
 - iv. housing allocations (2,266 dwellings*); and
 - v. identified non-allocated sites of at least 5 homes (1,573 dwellings).
- B. Employment in B Use Classes will be delivered through:
 - i. around 69 hectares of employment development on Strategic Allocations at Land South of Stockwood Park, London Luton Airport, Butterfield Technology Park, Power Court, Napier Park, High Town and the Creative Quarter; and
 - ii. delivering net additional employment land stock on allocated sites prior to releasing older unsuitable

employment land and premises to other uses.

- C. Town Centre and retail uses will be directed in accordance with the Centre Hierarchy (Policy LLP21) reinforcing and enhancing the vitality, viability and regeneration of Luton Town Centre as a regional centre** and the network of 6 District Centres and 12*** Neighbourhood Centres serving the Borough. The Town Centre, District and Neighbourhood network will be a focus for future investment provision including transport access and linkages, community facilities, opportunities for shared services as well as appropriate scale housing, retail and employment development.
- D. The infrastructure required to support the Spatial Development Strategy will be phased and funded in line with the Infrastructure Delivery Plan (IDP) and the policies in the Local Plan including:
 - i. opportunities to enhance and benefit from the Luton Dunstable busway connecting the town centre, employment and commercial centres with local communities, key transport interchanges and the airport;
 - ii. the relief of traffic congestion within the town centre and at junction 10A of the M1;
 - iii. complete planned accessibility and mobility improvements to Luton Town Centre railway station and transport interchange;
 - iv. increased capacity at London Luton Airport alongside transport access improvements; and
 - v. phasing and delivery of schools capacity including new provision, necessary to support the needs of Luton's population.

- E. The natural environment, historic environment and heritage assets of the borough will be protected and enhanced as set out in Policies LLP27, LLP28, LLP29 and LLP30 in the Local Plan including the protection and enhancement of the Green Belt.

Footnotes:

* Capacity remaining at April 2016.

** 'Regional Centre' is the terminology adopted by the White Young Green's (WYG) Luton Retail Study Update 2015. This is sourced from Venuescore, an acknowledged industry ranking of retail locations across the UK.

*** The location of one Neighbourhood Centre to be determined (see LLP21A).



Luton Town Centre

4.14 The NPPF (see paragraph 23) highlights the importance of recognising town centres as being at the heart of communities and identifying new ways of ensuring that town centres offer competitive environments by being prosperous, vital and vibrant and that planning policies set out how the growth of the centre will be managed over the plan period.

4.15 Luton town centre encompasses the Town Centre Shopping Area and the Mall, the University Campus, leisure attractions, two Conservation areas (Town Centre and Plaiter's Lea), several listed buildings including St Mary's Church and the Town Hall

and the main public squares of Luton. The extent of the Town Centre is, for the most part, delimited by the town's inner ring road.

4.16 The town centre is the focal point of Luton for shopping, leisure, culture, education and employment in the service and business sectors and also accommodates the major public transportation interchanges of the borough.

4.17 The Luton Town Centre Development Framework was published in December 2004 and was adopted as a Council policy. It presents a vision and development strategy to guide the regeneration of the town centre and is a material consideration in the determination of planning applications.

4.18 The Luton Town Centre Development Framework (2004) has guided many of the public realm improvements delivered by the Council (St George Square, Town Hall Square, Bus Interchange, Market Hill), which have attracted further investment from the private sector. The University Campus has also gone through an exciting process of regeneration and produced some of the more interesting contemporary architecture in the town alongside high quality public realm.

4.19 The town centre is thriving; however some parts remain in poor condition (e.g. lack of open space and recreation facilities) and are in need of redevelopment and improvement. The Council will produce a refresh of the Luton Town Centre Development Framework document to take into account the latest developments in the town centre and the strategic objectives of this Local Plan.

4.20 The Council has recognised the need to engage closely with businesses in the town centre. A Town Centre Team has been formed on the back of the 'High Street Innovation Fund' received from central government. The group proposes and implements initiatives to revitalise the central area. The Council will keep on working and engaging with these stakeholders either through this group and/or new bespoke board groups that will be formed in the future to work on the vitality and viability of the town centre.

4 . Spatial Strategy

4.21 The River Lea is an important asset of the town and, in particular, of the town centre; proposals to open up the river may, if viable and feasible, improve the environment by providing amenity spaces for residents and visitors. Improving access to the River Lea would help in extending the existing Upper Lea Valley Walk.

Luton Town Centre Evidence Studies

4.22 Luton Town Centre Surveys by BMG shows that while the majority of residents in Luton use the town centre quite regularly and visitors are generally satisfied with the environment, there is much more to be done to increase its vitality, accessibility and perception of safety.

4.23 Visits to the town centre decline as the time of the day progresses and very few people consider the town centre to be lively and exciting. Key regeneration sites remain vacant and need redevelopment.

4.24 Perception of barriers to access from individuals who consider themselves disabled is quite high while particular issues in terms of accessibility are to be found at almost all the gateways into the town centre. The Town Centre Development Framework (2004) has highlighted that the ring road has severed connections, in particular with the south and west of the town centre. This issue also impacts on the vitality and vibrancy of the area.

4.25 The Peter Brett Associates 'Review of town centre office / business premises for alternative re-use' (May 2013) found that there is an underlying need for residential accommodation driven by a growing population. Mixed-use residential and employment development is not viable although purely residential development is viable and provides an opportunity to replace some of the poorer vacant commercial stock within Luton.

4.26 The White Young Green 'Retail Study Refresh' (December 2012 - Update 2015) provides guidance and indicative figures for future growth in retail floorspace over the plan period. The study shows that the proportion of comparison units in the town centre is below the national average albeit

the proportion of floorspace is broadly reflective and the delivery of large, modern retail units occupied by quality national retailers should improve Luton's market share by providing an improved shopping offer to the Town (in association with continued investment and town centre environmental upgrade) through bringing forward potential retail development sites.

4.27 The study also found that convenience (food store) retail is proportionally under-represented.

4.28 The study suggests that the borough needs to continue with investment in order to make a marked improvement in the town centre's competitiveness and strive to increase what is considered a relatively low market share for comparison goods in the face of intensified competition from rival centres such as Milton Keynes and in the period from 2022 (when anticipated trading will start) from the retail scheme at Houghton Regis North. It considers an increased market share scenario to be achievable, based on the potential for the Northern Gateway and Power Court strategic allocations to deliver a step-change in the quality and range of the comparison goods sector within Luton allowing for lead times in delivering existing commitments. As stated in the report, the retail figures are indicative and, with the increased population growth within and adjacent to the town and phasing of development, the retail figures will be kept under review going forward - to ensure that the regeneration of Power Court and the Northern Gateway in the town centre deliver aspirations for an improved shopping offer to combat existing deficiencies and retail trade leakage.

4.29 The Luton Hotel Study (July 2015) and Luton Leisure Study (July 2015) sit alongside the Retail Study Update and each provides evidence of the additional demand for these facilities in the plan period. The studies respectively conclude that: a) there is a need for an extra hotel room requirement of 1,030 rooms by 2020, growing to potentially 1,830 rooms by 2030 predominantly related to aviation and business travel in the vicinity of the airport (i.e. not net additional town centre demand

above that already committed/allocated); and b) a quantitative need for 10,300sqm net of Class A3 floorspace by 2031; a theoretical cinema capacity of circa 15-18 screens is identified to meet the total Study Area need to 2031; a qualitative need for better co-provision and distribution of swimming/health and fitness and multi-purpose theatres/cinemas, and improved town centre pubs and clubs and museum/galleries to offer local choice.

4.30 The preferred policy approach for Luton Town Centre is to focus on the regeneration of key sites and enhancement of heritage assets and the historic environment to deliver new housing, retail, creative and traditional businesses, culture and leisure uses within the historic urban fabric of the town centre. There are also three key strategic allocations that are complementary to this regeneration approach including the Creative Quarter, Power Court and High Town, which will focus on appropriate niche roles for redevelopment opportunities respecting the character of each area. Within the Town Centre, such uses will be appropriate alongside proposals for creative businesses, art and education, building on the existing strengths and distinctive character of the area. Land will be used efficiently within the town centre so that development can contribute substantially to the delivery of the growth identified for the future and to the creation of a vibrant and competitive environment.

4.31 There will also be an opportunity to maximise public transport accessibility to existing and new strategic housing allocations in and around the town centre through linkages with the Luton - Dunstable busway and town centre rail station terminus. This connectivity will help improve access to employment areas stretching from east to west across Luton from the airport, Napier Park and Stirling Place via the town centre and on to Dallow, Chaul End and Dunstable. The Local Transport Plan and other sources of infrastructure funding (e.g. bids via the South East Local Midlands Enterprise Partnership) will all play a part in fostering further public transport access links to the proposed network of District and Neighbourhood Centres across the borough.

4.32 The Council will work with developers and applicants to ensure that a cohesive, inclusive and high quality pedestrian environment is delivered across the town centre that also maintains the high quality that has been achieved in public spaces in recent years.

4.33 There are two Strategic Allocations within the town centre that feature in the Town Centre Strategy and are also subject to their own specific policies:

- Power Court Policy LLP9; and
- Creative Quarter (including Station Gateway-Northern Gateway-Land north of St. George Square) Policy LLP11.

4.34 Areas with potential for regeneration but no specific proposals identified:

- University Campus; and
- Castle Quarter.



Policy LLP3 - Luton Town Centre Strategy

Luton Town Centre will be a location for positive change and a focus for economic and residential growth and an improved natural and built environment. Building on the town's rich heritage, this mixed use area will provide a balanced offer of high quality residential development, offices and studios, creative industries, independent and national retail, education institutions and thriving public spaces with a vibrant café culture and night time economy. Developments will complement and benefit from the

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town centre's key strengths: a growing connectivity as a sustainable transport hub with strong links to London and the wider sub region, served by the Luton Dunstable Busway and further improvements to Luton railway station and inner ring road. Local pedestrian and cycling accessibility will also link the Town Centre with key regeneration sites and surrounding Neighbourhood Centres. Proposals for deculverting and improving access to the River Lea, along with new greenspaces will be encouraged and supported by the Council where it is feasible to do so.

A. Power Court (see Policy LLP9), the Creative Quarter (see Policy LLP11) and the University Campus (see below) will be a key focus for development and change over the plan period. Development proposals for the town centre should address the following criteria:

- i. contribute towards residential growth of around 2,100 new dwellings that will provide a significant contribution towards the new homes in the borough and create an expanded residential community in the centre of Luton;
- ii. contribute towards job creation from retail, offices, creative industries, education, training and leisure;
- iii. provide circa 3,400sq.m. net convenience retail floorspace in the current period and provide circa 4,420sq.m. of non-bulky comparison goods for the period to 2020 and 30,096sq.m. by 2025, hotels, and leisure uses to maintain and enhance the retail regional* role of the town centre;
- iv. high quality residential development will respect the local distinctiveness of the town centre whilst making the best use of opportunities

for higher density development;

- v. opportunities for car free development will be encouraged where it conforms with Policy LLP32;
- vi. contribute to the achievement of a mixed area that is vibrant and active including enhancing a night time economy;
- vii. new development and redevelopment in the town centre will contribute positively to the economic regeneration and reuse of heritage assets while respecting the existing local distinctiveness and quality of the heritage, including sites with archaeological interest, in particular ensuring that the character of the Conservation Areas (Town Centre and Plaiters Lea), listed buildings and landmarks (including St Mary's Church and the Town Hall) are maintained and enhanced;
- viii. proposals that fall into the Plaiter's Lea Conservation Area should have regard to the Historical Area Assessment produced by Historic England for this area;
- ix. land within the area identified on the policies inset map as the Castle Quarter will be encouraged to be brought forward within a comprehensive scheme for a mixed use development (residential, retail and leisure);
- x. deliver a high quality, safe and publicly accessible pedestrian environment on key routes within and connecting to the town centre including maximising opportunities created by the completion of the inner ring road and other improvement schemes throughout the town;

- xi. make more effective use of the River Lea as a strategic corridor forming an historic, cultural and ecological landscape feature of the town, connecting into and through the town centre, increasing visibility and accessibility wherever possible for structural and flood maintenance, protection buffer zones (with native planting), cycling and pedestrian routes, green spaces, and habitats of recreational and biodiversity value along its course;
- xii. consider opportunities for enhancing existing or the provision of new quality green spaces, public art, public leisure space and environmental education;
- xiii. development should protect and improve water quality and not increase the capacity load on the River Lea culvert; and
- xiv. consider opportunities for inclusive use by the wider community including publicly accessible green space in accordance with Policy LLP27.

- B. University Campus: This area is allocated for cultural uses and higher education facilities and supporting uses. Development proposals should ensure:
- i. quality design and materials to complement the high quality setting of the existing Campus and of St Mary's Church; and
 - ii. a coordinated and accessible quality pedestrian network around St Mary's Church and linking to the surrounding streets (particularly Church Street, Park Street and Vicarage Street).

The Council will update the Luton Town Centre Development Framework and / or produce individual development briefs to provide further site specific guidance.

Footnote:

*Luton town centre's description as a 'Regional Centre' is the terminology adopted by the White Young Green's (WYG) Luton Retail Study Update 2015. This is sourced from Venuescore, an acknowledged industry ranking of retail locations across the UK.

Green Belt

4.35 The NPPF (paragraph 79) says that the fundamental aim of the Green Belt is to prevent urban sprawl, keeping land permanently open, with the essential characteristics of the Green Belt being its openness and permanence. It also says that, when undertaking a review of Green Belt boundaries, local planning authorities should:

- ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- not include land which is unnecessary to keep permanently open;
- where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
- satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

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4.36 A Stage 1 Green Belt Study (September 2014) has been undertaken by the Council (in line with the requirements of the NPPF), which reviewed the Green Belt designations and boundaries in the borough. The conclusion of this study is that no major changes to the Green Belt should be made. This is because the Green Belt areas serve the national purposes of the Green Belt. Given the level of unmet housing need in Luton and scale of potential development proposals on the edge of Luton, the Stage 1 Study concludes that a Stage 2 study be undertaken on a cross-boundary basis if there were to be agreement between the respective authorities to undertake such a study.⁽⁸⁾ The six Green Belt areas in Luton identified on the policies map include:

- Warden Hill
- Stopsley Common
- Oaket wood
- Putteridge
- Dane Street
- Someries.

4.37 As well as serving the key functions of a Green Belt as set out in national policy, Luton's Green Belt also provides a secondary purpose for beneficial uses such as amenity for the urban population and providing opportunities for joined up planning across the boundary for informal high quality outdoor recreation and green space, which is lacking in Luton. The Green Belt areas also have other national and local designations within Luton such as AONB, SSSI, County Wildlife Site, Scheduled Monument and Registered Parks and Gardens, which provide habitat for wildlife, preserve historic sites and their setting and conserve the landscape.

4.38 As the NPPF states, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. This applies to all development, including minerals and waste-related activities. The Green Belt Policy reflects this approach.

Policy LLP4 - Green Belt

- A. Within the areas defined as Green Belt on the policies map planning permission will not be granted for inappropriate development:
- Warden Hill
 - Stopsley Common
 - Oaket wood
 - Putteridge
 - Dane Street
 - Someries
- B. Inappropriate development is by definition, harmful to the Green Belt. Only in very special circumstances will inappropriate development be permitted in the Green Belt. Exceptions to inappropriate development are set out in the National Planning Policy Framework (NPPF).

Strategic Allocations

4.39 The NPPF (paragraph 157) requires Local Plans to allocate sites to promote development and the flexible use of land and to bring forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate.

4.40 The Local Plan makes eight strategic allocations in the borough where the most significant change will take place over the plan period in terms of the increase of new dwellings, jobs, retail, and improvements to the built and natural environment.

4.41 Five of the strategic allocations are located in the southern area of the Borough with three strategic allocations located in or adjacent to Luton Town Centre (Power Court, Creative Quarter and High Town).

8 A joint Green Belt Study - which includes a Stage 2 study for Green Belt within Luton's boundary - commissioned and agreed between Luton Borough Council and Central Bedfordshire District Councils was published in April 2017.

4.42 The majority of the strategic allocation sites are rolled forward and updated from the previous Local Plan as in the case of Butterfield Technology Park, Land South of Stockwood Park and Century Park (now combined with the London Luton Airport Strategic Allocation) and these represent the last remaining suitable greenfield sites for strategic development. Strategic Allocations at Napier Park, Power Court, Creative Quarter, High Town and Marsh Farm are all previously developed sites that are in need of redevelopment and improvement. Given the economic viability issues in the borough, as explained previously, coupled with the extent of environmental remediation required at a number of the sites, particularly Napier Park and Power Court, the quantum, mix of uses and phasing of allocations on previously developed land will need to be carefully considered to reflect the outcome of more detailed evidence that is currently being prepared on economic viability and remediation costs and consultation with landowners and stakeholders.

4.43 There are 8 strategic allocations proposed for designation in this Plan:

- Land South of Stockwood Park
- London Luton Airport (includes Century Park)
- Butterfield Green Technology Park
- Napier Park
- Power Court (Town Centre)
- High Town
- Creative Quarter (Town Centre)
- Marsh Farm

Land South of Stockwood Park

4.44 Land south of Stockwood Park, bounded by the M1 motorway to the east and M1 spur to Junction 10a in the west, is allocated as a prestige gateway business development. Regard will need to be had to the plan policies as a whole and, in particular because of the chalk aquifer, sustainable drainage and pollution matters in policies LLP36 and LLP38 and the adjacent landscape and heritage assets, which will need to be considered with regard to the matters in

policies LLP29 and LLP30. The proposed site is accessible to the strategic road network (e.g. Junction 10a and New Airport Way) and also offers opportunities for improved public transport links to the town centre and Luton Airport Parkway railway stations. This will be achieved by safeguarding 2 ha of land for the provision of a Park and Ride facility. The provision of the Park and Ride is not a requirement of the proposed B1 business use. Parking provision will accord with Policy LLP32 (Parking) and the character and form of development will respect relevant requirements set out in Policy LLP25 (High Quality Design). The B1 office use on the site will accommodate a shortfall in provision to meet an identified need for B1 office accommodation over the plan period⁽⁹⁾. Following the public examination of the plan, the relocation of Luton Town Football Club and uses and policies relating to the strategic allocation at Land South of Stockwood Park, including the provision of a Park and Ride facility will be considered in the early review of the local plan.

Policy LLP5 - Land South of Stockwood Park Strategic Allocation

- A. Land identified on the Policies Map south of Stockwood Park adjacent to Junction 10a of the M1 is allocated for a 14 ha prestige gateway development according to the following scales:
- i. B1 business use on 9.5 ha of land to meet an identified shortfall of office employment space over the plan period; and
 - ii. the safeguarding of 2 ha of land for a park and ride facility which will allow scope to secure enhanced public transport to the town centre.

B. Subject to the following:

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- i. development proposals should be accompanied by a comprehensive masterplan for approval, which includes an indicative layout and phasing plan, sustainable construction method and materials, landscape and biodiversity schemes and includes an analysis of impacts from and on the surrounding landscape and heritage assets and sets out details of how the Master Plan will be implemented and any identified impacts be mitigated;
- ii. the development will not take place until Highways England is satisfied the proposals do not have an unacceptable impact on Junction 10a improvements and upon the M1 motorway, and shall not compromise the safety of road users;
- iii. public transport services are secured to meet the expected demand arising from the development;
- iv. the development will provide a high quality southern gateway to the town and will use public art, green space, built design, lighting and topography to conserve and enhance the appearance of the adjoining Green Belt, Area of Great Landscape Value, County Wildlife Site, QE II playing fields, the Registered Park and Garden of Luton Hoo and the Chilterns AONB;
- v. the development will be of a height and with lighting that does not compromise the safety of the operations of London Luton Airport;
- vi. the development will protect features of nature conservation interest and heritage assets; and
- vii. improving connectivity to nearby cycle and footpaths and existing public rights of

way and the rights of public utility providers will be safeguarded.



London Luton Airport

4.45 London Luton Airport is a busy, growing airport currently operating at around 10 million passengers per annum with a capacity to manage up to 12.4mppa, and with the planning consent 12/01400/FUL allowing the airport to grow to an operating capacity of 18mppa. This is supported by Policy LLP6, which includes criteria to allow additional proposals to be considered in accordance with the most up-to-date Master Plan (i.e. that Master Plan which is applicable at the time of determining any planning application). The airport provides infrastructure and services for commercial and business-related aviation (in 2012 nearly 17% of airport passenger was for business travel) as well as air cargo/freight and generates significant employment for residents of the town and surrounding areas. This includes aviation-related engineering and services and other aviation-related jobs. The airport also provides and underpins employment for a pool of workers and businesses that use and rely on the airport from neighbouring local authorities' areas, in particular Bedfordshire, Hertfordshire and Buckinghamshire.

4.46 Luton lies within an airport safeguarding area. Certain planning applications will be the subject of consultation with the airport operator and there may be restrictions on the height or detailed design of buildings and operation

of cranes that impact on the flight path or radar or on development that could create a bird hazard as described in ODPM Circular 1/2003.

4.47 Further guidance on safeguarding issues, can be obtained from documents including the following published by the Civil Aviation Authority:

- CAP738 Safeguarding of Aerodromes
- CAP764 Policy and Guidelines on Wind Turbines
- CAP772 Wildlife Hazard Management at Aerodromes

4.48 In addition, Department for Transport Circular 01/2010 relates to the Control of Development in Public Safety Zones (PSZ). PSZs are areas at either end of the runway, within which development is restricted in order to control the number of people living, working or congregating on the ground in that area in order to minimise the risk in the event of an accident on take-off or landing.

4.49 Safeguarding maps and maps showing the PSZs are held by the Local Planning Authority and the airport operator and are available for reference. More complex proposals may require modelling to be carried out by the airport operator to establish the impact of a development on the airport operations.

4.50 Whilst growth at London Luton Airport is acknowledged, Policy LLP6 seeks to encourage the use of sustainable transport measures in accordance with the airport's own Surface Access Strategy, in preference to the use of private motor vehicles. Whilst it is recognised that there is a need for airport car parking, future growth does not necessarily require significant off-site car parking provision. The on-site car parking provision may provide adequate supply in the short term. The policy does not preclude further off-site provision, but applicants will be required to justify proposals in terms of need (taking into account existing capacity and occupancy). This approach has been supported by the Court of Appeal (GPS v Secretary of State for Communities and Local Government C1/20014/1264 11th February 2015).

4.51 Policy LLP6 makes provision for the airport to respond positively to future growth helping to safeguard Luton's key sub-regional economic contribution to jobs and wealth creation while setting a clear environment and transport framework with which to regulate future growth. Century Park is included within the strategic allocation for a range of Use Class B employment development with particular support for a range of aviation and automotive manufacturing-related uses to be delivered adjacent to the airport and including hotel provision. The Hotels Study 2015 concludes that there will be a need for extra hotel room provision of 1,030 rooms by 2020, growing to potentially 1,830 rooms by 2030 and generated mostly by aviation-related and business travel in the vicinity of the airport. Given the strategic relationship between Century Park, the airport (and their substantial inclusion within the Luton Airport Enterprise Zone designation - see Appendix 13), the sub-regional economy and local transport network with connections to M1 Junction 10a via New Airport Way, it is proposed that the Century Park site and Wigmore Valley Park, as allocated in the previous Local Plan, are integrated together with the London Luton Airport Strategic Allocation as a single strategic allocation.

Policy LLP6 - London Luton Airport Strategic Allocation

The London Luton Airport Strategic Allocation (approximately 325 hectares) includes land within the airport boundary, Century Park and Wigmore Valley Park (as identified on the Policies Map). The allocation serves the strategic role of London Luton Airport and associated growth of business and industry, including aviation engineering, distribution and service sectors that are important for Luton, the sub-regional economy, and for regenerating the wider conurbation.

Airport Safeguarding

- Development that would adversely affect the operational integrity or safety of London Luton Airport will

not be permitted. With respect to operational and national security considerations, this includes (but is not limited to) concerns over the height of buildings, lighting, bird activity, and proximity to Public Safety Zones. Refer to Policy LLP34 for the Local Plan policy for the Public Safety Zones.

Airport Expansion

- B. Proposals for expansion of the airport and its operation, together with any associated surface access improvements, will be assessed against the Local Plan policies as a whole taking account of the wider sub-regional impact of the airport. Proposals for development will only be supported where the following criteria are met, where applicable/ appropriate having regard to the nature and scale of such proposals:
- i. they are directly related to airport use or development;
 - ii. they contribute to achieving national aviation policies;
 - iii. are in accordance with an up-to-date Airport Master Plan published by the operators of London Luton Airport and adopted by the Borough Council;
 - iv. they fully assess the impacts of any increase in Air Transport Movements on surrounding occupiers and/or local environment (in terms of noise, disturbance, air quality and climate change impacts), and identify appropriate forms of mitigation in the event significant adverse effects are identified;
 - v. achieve further noise reduction or no material increase in day or night time noise or otherwise cause excessive noise including ground noise at any time of

the day or night and in accordance with the airport's most recent Airport Noise Action Plan;

- vi. include an effective noise control, monitoring and management scheme that ensures that current and future operations at the airport are fully in accordance with the policies of this Plan and any planning permission which has been granted;
- vii. include proposals that will, over time, result in a significant diminution and betterment of the effects of aircraft operations on the amenity of local residents, occupiers and users of sensitive premises in the area, through measures to be taken to secure fleet modernisation or otherwise;
- viii. incorporate sustainable transportation and surface access measures that, in particular, minimise use of the private car, maximise the use of sustainable transport modes and seek to meet modal shift targets, all in accordance with the London Luton Airport Surface Access Strategy;
- ix. incorporate suitable road access for vehicles including any necessary improvements required as a result of the development.

Airport-related Car Parking

- C. Proposals for airport-related car parking should be located within the Airport Strategic Allocation, as shown on the proposals plan (excluding Century Park and Wigmore Valley Park) and will need to demonstrate that the proposals: meet an objectively assessed need; do not adversely affect the adjoining highway network; and will not lead to the detriment of

the amenity of the area and neighbouring occupiers. Proposals for airport-related car parking outside this area will only be permitted where: there is demonstrated to be a long-term car parking need that cannot be met at the airport; they accord with the sustainable development principles as defined by the plan as a whole; they relate well to the strategic road network and do not exacerbate traffic congestion; they do not have an adverse impact on amenity; and are in accordance with the most recently approved London Luton Airport Surface Access Strategy.

Century Park

- D. Development of Century Park will be supported where proposals make provision for office, manufacturing and distribution employment. Particular support will be given and provision made for engineering and manufacturing for both aerospace and automotive purposes that demonstrate a need to locate close to the airport. In addition, a range of accommodation types, including small scale affordable B2 units to facilitate the expansion and relocation of existing Luton-based businesses, new business start-ups as well as significant inward investments, will be allowed provided that it does not generate bad neighbour issues. Warehousing-only developments must demonstrate a need to co-locate near the airport. Small scale retail, related services and leisure (as defined in Use Classes A1 to A3 and D2) will be permitted in order to serve the needs, primarily, of employees in the area, as well as a hotel (Use Class C1). The Council will require proposals to be subject to a comprehensive development brief or Master Plan, which shall set out

the proportion and phases of development and which shall include the following:

- i. details of the proposed access, which shall be via the extension of New Airport Way (which connects the airport to M1 J10A) and shall link Percival Way through to Century Park (as shown by the arrow on the Policies Map), such access shall be designed so as to ensure that no use is made of Eaton Green Road to provide access to Century Park or the Airport, except for public transport, cyclists, pedestrians and in case of emergency; and
- ii. secure opportunities to link site access via walking, cycling and bridleways to the wider network of routes via Wigmore Valley Park and access to the countryside to the east and south.

Wigmore Valley Park

- E. Wigmore Valley Park is integral to the London Luton Airport Strategic Allocation. In delivering development and access under clause D (i.e. Century Park) above, including any reconfiguration of the land uses that may be necessary, the following criteria will need to be satisfied:
- i. provision will be made to ensure that the scale and quality of open space and landscaping in the area is maintained and, if feasible, ensure that there is a net increase in open space provision;
 - ii. bio-diversity will be enhanced and improved within the Borough;
 - iii. that the new open space to replace Wigmore Valley Park offers facilities of at least

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- equal quality and is available and accessible before any development takes place on the existing Wigmore Valley Park;
- iv. the long term management of open space, landscaping and bio-diversity interest is compatible with that for safe airport operations and will be of a high quality and secured through a legal agreement establishing long term funding.

Design and Drainage

- F. Development proposals for the London Luton Airport Strategic Allocation will ensure:
 - i. appropriate strategic landscaping to be provided both on and off-site, which shall have regard to the potential for significant visual prominence within the wider area of built development at Century Park and which does not increase risk to aviation operations arising from structures, lighting, bird strike or open water and having regard to operational and national security considerations;
 - ii. the height and design of buildings will reflect the site's rural fringe setting, its high visibility from surrounding countryside and its proximity to London Luton Airport;
 - iii. provision is made for sustainable drainage and the disposal of surface water in order to ensure protection of the underlying aquifer and prevent any harm occurring to neighbouring and lower land; and
 - iv. that development proposals, where applicable / appropriate will fully assess the impacts upon heritage

assets and their setting, and should be designed to avoid harm to the setting of any heritage assets. Proposals will be considered in line with Policy LLP30 (historic environment).

Butterfield Green Technology Park

4.52 The site contains high value, knowledge-based businesses such as Hitech Instruments and MTL Instruments, as well as some University of Bedfordshire uses, the Enterprise Hub and the Basepoint Innovation Centre. 40% of the overall developable site has been developed to date and provides the only credible and available land within Luton to attract knowledge-based activities, including advanced manufacturing (such the arrival of MTL Instruments in 2008).

4.53 The site has been assessed against uses other than employment due to its long-term vacancy (Employment Land Review). The study concluded that Butterfield Green Technology Park is, and should remain, a good quality employment site.

4.54 The analysis indicates that Luton will have a shortage of land for B1 office premises, which often also accommodates R&D activities. This may include applied research and development involving product innovation and advanced manufacturing processes requiring B1c light industry facilities to be provided. In addition, the retention of land at Napier Park by Vauxhall has increased pressure to secure alternative opportunities for other B Class uses, especially B2.

Issues to address during the plan:

4.55 The majority of the site has been undeveloped for a long period of time arising from the subdued national economy.

4.56 The Butterfield area represents the only opportunity to provide a park and ride facility on the A505 gateway into Luton. The policy therefore safeguards land required, considered to be circa 1 hectare, having regard to preliminary studies on the implementation of park and ride in Luton.

4.57 The proximity of County Wildlife Sites and the Area of Outstanding Natural Beauty, including the setting of the Registered Park and Garden at Putteridge Bury, requires a thorough control of densities and landscaping.

Policy approach:

4.58 Commercial market views were that this site would attract development when the property market recovers. Recent enquiries by large employers support this view. However, to stimulate the market, some flexibility is permitted for high quality B2, where compatible with the Technology Park, and also a limited number of plots for high quality B8 provision contained physically and visually within the site.

4.59 Built development should be low rise and low density in order to retain the essentially open nature of the area, with generally no more than 35% of the plot area occupied by buildings.

4.60 Existing natural features and rights of way should be retained and, where possible, enhanced.

4.61 The existing development of the Innovation Centre and Enterprise Hub are examples of sustainable design and should be replicated by new development to reduce their impact on the natural environment as much as possible.

4.62 Appropriate public transport facilities must be incorporated into the detailed development proposals.

Policy LLP7 - Butterfield Green Technology Park

The undeveloped land (23 hectares) at Butterfield Green is allocated for:

- the development of high quality B1 and B2 uses that are compatible with the technology park concept. This will provide opportunities for both inward investment and the expansion and relocation of existing businesses within Luton's administrative boundary;
- high quality B8 use, where the scale and nature of the use are compatible with the technology park concept, will be only acceptable on the undeveloped 2.45 hectare plot in the north-east corner of the site and on 6.59 hectares of land to the west of the Business Base within the existing hedgerow/tree feature;
- support will also be given to the provision of a park and ride facility to mitigate traffic in the borough (on circa 1 hectare of land; and
- other uses such as small scale retail (A1 and A3) and leisure uses such as a gym (Class D2) to serve the development and support the overall success of Butterfield as a modern Technology Park will also be permitted. All development proposed will be of a quality of design compatible with the technology park.

A. Development should accord with the Spatial Development Strategy, other policies in the plan and follow the site-specific requirements:

- i. development proposals should be accompanied by an indicative masterplan to demonstrate how each plot can be delivered without prejudicing the delivery of the wider site requirements referred to in (a), (b), (c), and (d) above;

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- ii. new development shall have regard to and, where possible, replicate or exceed the high benchmark of sustainability achieved by existing developments at Butterfield and be an exemplar of high quality and energy efficient modern development in the town;
- iii. materials should reference those used in the existing structures and create continuity with the existing development;
- iv. proposals must achieve a sense of spaciousness that reflects the technology park concept and for this reason buildings should generally not occupy more than 35% of the plot area but the precise percentage achieved will be determined by the quality of the design of the development taking account of proposed layout, landscaping and positioning of buildings;
- v. access to the site should be provided by the existing access from the A505 (Hitchin Road);
- vi. integrated sustainable drainage systems are particularly appropriate for this site;
- vii. existing landscape features such as hedgerows and ponds shall be retained and opportunities taken to enhance such features where practicable and may include minor alteration or replacement elsewhere in order to achieve this and accommodate infrastructure requirements;
- viii. the views from the adjacent Stopsley Common and Oaket Wood County Wildlife Site and the setting of the Registered Park and Garden at Putteridge Bury should be protected through sensitive planting and landscaping. Typically, buildings will be restricted to two storeys, increased to three storeys where it can be demonstrated that the development will not adversely impact upon views into the site;
- ix. existing rights of way shall be safeguarded or redirected as necessary. Opportunities to promote pedestrian and cycle access to the wider area will be addressed where this is practicable;
- x. a plot of land sufficient for a new 450 space Park and Ride facility to be provided near the entrance of the existing Innovation Centre* in order to mitigate traffic in the borough and promote sustainable trips to/from the development. This land will be safeguarded for 5 years following transfer of the title to the Council to enable delivery of the Park & Ride scheme. The transfer of the land will occur when 30% (from the position at January 2017) of the remaining undeveloped technology park is developed. If the facility is not built within 5 years from the transfer date, the land will transfer back to the landowner at nil cost. Subject to its provision, additional S106 contributions towards off-site transport infrastructure or funding of the facility from within Butterfield will not be sought; and
- xi. B2 and B8 elements will only be permitted where the developer can demonstrate that these proposals will not lead to demonstrable harm by way of noise, vibration, visual impact (including lighting), and any noxious emissions or potential contamination.

Footnote:

* Or at an alternative location to be proposed and agreed with the Council in the indicative masterplan.

Napier Park

4.63 Napier Park is the largest brownfield site in Luton, which would contribute considerably to the growth of the town when redeveloped.

4.64 Around 23 hectares of the former Vauxhall Plant lends itself to be redeveloped for housing, offices, light industry, retail, leisure, tourist accommodation and car parking. The reacquisition of a 7.58 ha plot by GM Vauxhall for operational reasons, and its implications for delivering B class accommodation, will be kept under review and be the subject of the early plan review.

4.65 The Council has already delivered new access to the north of the railway tracks onto the Luton Airport Parkway Railway Station, to ensure full accessibility to the rail services linking to central Luton, London, the Midlands, the wider region and beyond. The proximity of the Luton - Dunstable guided busway will provide excellent accessibility to the areas of Luton, Dunstable and Houghton Regis, the main town centre transport hub and London Luton Airport.

Key issues

4.66 The land drops significantly: the difference being approximately 140 feet of slope between the top western side and the bottom eastern side of the site.

4.67 The land is a series of platforms raised above Kimpton Road and there is likely to be difficulty in providing accessible, convenient access.

4.68 Vehicular access will only be permissible off Kimpton Road, which will involve careful management of traffic implications at peak hours between the residential elements,

service and employment traffic, while still allowing access for emergency vehicles.

4.69 A covenant limits the location of housing to the eastern side of the site.

Policy approach

4.70 The key aim for this site is to deliver high quality housing, offices and light industry, including a new neighbourhood centre composed mostly of convenience retail units clustered around a vibrant public space to serve the needs of the new community.

4.71 The proximity of Luton Airport Parkway railway station allows leisure and hotel uses to be delivered on the site.

4.72 Flood risk mitigation such as Sustainable Drainage Systems (SuDS) is required due to the flood risk issues of the site.

4.73 The public space should be vibrant, safe and well linked to the rest of the town.

4.74 Development should complement and not have an adverse effect upon the vitality or viability of Luton Town Centre.

Policy LLP8 - Napier Park

Napier Park is a brownfield site of around 25 hectares, located on the former Vauxhall car plant. The site is allocated for a mixed use neighbourhood development including B1 business uses with particular support for B1a offices and B1c light industry as well as small scale, affordable B2 accommodation. Provision will be made for between 600 and 1,300 residential units with a convenience retail-led Neighbourhood Centre and a hotel.

A. Development proposals should be accompanied by a comprehensive

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masterplan for approval, which includes an indicative layout and phasing plan and Landscape Plan and sets out details of how these will be achieved.

B. Development should accord with the Spatial Development Strategy, other policies in the plan and follow these site-specific requirements:

- i. a new neighbourhood centre focused around a vibrant public space, including green spaces, with safe and direct walking and cycling routes to Luton Airport Parkway Railway Station and the town centre;
- ii. integrated Sustainable Drainage System (SuDS) and/or other appropriate measures will be required to mitigate flood risk;
- iii. development should respect and minimise its impact on the local landscape including Hart Hill and the nearby cemetery;
- iv. parking and service access should be well integrated into the design of the scheme away from the main public square or on underground parking;
- v. offices and industrial uses shall be of a high quality contemporary design and energy efficiency in accordance with Policies LLP25 and LLP37;
- vi. a range of housing densities appropriate to the site should be provided to meet the housing need of Luton's community;
- vii. proposals should make best use of the Guided Busway and Luton Airport Parkway Railway Station and also provide public transport and walking and cycling routes within the site to serve the new residential and employment areas to encourage

sustainable travel patterns with particular regard to the need for disabled access; and

- viii. a new access road shall be provided off Kimpton Road into the site and be designed for cars, buses, walking and cycling.



Power Court

4.75 The Power Court site is located on a disused power station and prior to this was a residential neighbourhood. The cooling towers of the electric works were a landmark in the town until the 1970s when the site was redeveloped for a mix of manufacturing and general industrial uses. The site is now vacant with the exception of a small warehouse currently in use.

4.76 The site is strategically important as it consists of 7 hectares adjacent to the main shopping area of Luton Town Centre and is a key gateway to the town from the east. The site benefits from excellent accessibility in terms of its proximity to the main modal transport hub of the town (formed by the guided bus, the bus interchange and the main train station), the university campus and the eastern road route between the town centre and London Luton Airport.

4.77 Therefore Power Court is a major redevelopment opportunity within Luton Town Centre, which needs to be brought back into effective use over the plan period to help deliver the strategic objectives of the Plan. Any new development on this site should deliver a high quality scheme that

manages to improve the image of Luton, whilst respecting the role of St Mary's Church and its grounds immediately to the south.

Key issues

4.78 The area is exposed to fluvial flooding from the River Lea and pluvial flooding. The Chapel Viaduct/ Stuart Street Critical Drainage Area and surface water flooding maps show the extent to be much larger than the fluvial impact alone (Surface Water Management Plan 2013).

4.79 The British Geological Survey groundwater flooding susceptibility maps also show a high to very high risk of fluvial (River Lea) and pluvial flooding (e.g. Chapel Viaduct Stuart Street Critical Drainage Area, 'CHAST').

4.80 Currently the ring road is perceived as a barrier to pedestrian movement and the site is considered to be disconnected from the town centre.

4.81 Contaminated land from previous uses might impact on development viability.

4.82 The River Lea runs under a culvert and currently does not meet the quality standard of the Water Framework Directive.

4.83 The Retail Study Refresh (2012 - Update 2015) identifies that the site is able to accommodate a current need for circa 3,393sq.m. net convenience retail floorspace. The Employment Land Review (2013) identifies the site as appropriate for a large mixed use scheme, providing also a modest amount of offices.

Policy approach

4.84 The main objectives for Power Court are to maximise the redevelopment opportunity of the site and its important location through the delivery of a mix of uses and in a form

that complements the historical town centre and makes the site an integral part of it.

4.85 To establish strong pedestrian links with other parts of the area, creating a more pedestrian oriented environment.

4.86 Make the most of the River Lea, including opportunities for deculverting the river, which could become an attractive feature of the town centre as a restored landscape feature and part of the identity and history of Luton; while providing an efficient flood defence and bio retention system, and improving water quality.

4.87 Opportunities to accommodate the convenience retail needs of the town and expand the housing and business supply in the town centre, through sustainable construction.

4.88 The Town Centre Development Framework (and its proposed review - see Policy LLP3) provides background information for proposals at Power Court.

Policy LLP9 - Power Court

Power Court is a brownfield site of around 7 hectares located in Luton Town Centre's northeast gateway bounded to the north by the route of the Luton-Dunstable Guided Busway and the railway line and to the south by St Mary's Road.

Power Court is a key site for achieving regeneration objectives of the plan, which includes providing a sustainable mixed use development, the Master Plan and future consent, which will extend the primary shopping area to improve the town centre retail offer and as an accessible, convenient and attractive location in which to live, shop and be entertained. Power Court will deliver a mix of town centre uses. The following uses are all acceptable in principle as

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components of a mixed use development: housing, convenience and comparison retail, leisure, cultural and entertainment uses and B1 offices. This development will enhance the offer of the town to residents and students of Bedfordshire University and also the wider community, as well as visitors, and tourists.

Land at Power Court, as shown on the Policies Map, is allocated for town centre uses in a mixed use redevelopment. Any scheme should include around 600 dwellings and a need for circa 3,393sq.m. net retail convenience floorspace. The site could provide for a proportion of the borough's overall identified need for comparison floorspace within the town centre.

- A. Development should accord with the Spatial Development Strategy, other policies in the plan and address the following requirements:
- i. proposals should be accompanied by a comprehensive masterplan that includes indicative layout, materials, access, massing, uses and phasing, and the proposed delivery mechanism;
 - ii. proposals should include measures to ensure that development on the site is accessible from the Town Centre Shopping Area and is perceived as being a part of the town centre;
 - iii. development should respect and enhance the setting and context of the site and its high visual profile. High quality design should be integral to the scheme to complement adjacent landmark buildings, adjacent vistas and the public realm, the University of Bedfordshire Campus and the UK Centre for Carnival Arts and development

should preserve, and seek opportunities to enhance, the character and appearance of the Plaiters Lea Conservation Area and the setting of the Grade I listed St Mary's Church;

- iv. Make more effective use of the River Lea as an accessible strategic green infrastructure for the town providing habitat and an accessible historic landscape feature, and consider options for deculverting and redirecting the River Lea channel, where feasible, to link with nearby walking and cycling networks;
- v. proposals will need to mitigate flood risk issues of the site by integrating Sustainable Drainage Systems (SuDS) and/ or other reasonably suitable mitigation measures;
- vi. ensure that development elevations maintain the high visual profile of the site and maintain views to other adjacent vistas in the town (e.g. Hart Hill and the railway line); and
- vii. land decontamination and works affecting the River Lea should be carried out in line with the best practice available and be in accordance with Policy LLP38 to avoid any harmful impact on the water resources.

High Town

4.89 High Town is one of the more historic areas of Luton and is situated immediately to the north of the town centre with excellent access to Luton Railway Station and bus interchange and the rest of the town. Originally connected to the Town Centre, High Town developed as a small settlement in 1815 and is one of the older areas of Luton. The area grew rapidly and,

according to the 1851 census, was the fastest growing area of the town in terms of population, hosting one sixth of the total population of Luton. Most of the original inhabitants of High Town worked in the hat industry in the town centre or in a few of the larger houses in High Town itself, which accommodated the domestic element of Luton's hat industry with modest workshops attached to residential houses and small makers producing goods to sell to central warehouses. High Town was split from the Town Centre by the construction of two railway lines in 1858 and 1862. These constructions marked the boom of the hat industry in Luton and led to a cluster of purpose built hat factories located near the railway station on Midland Road and Dudley Street. Walking along High Town Road is like taking a step back through time. The parade of shops retains the original urban fabric of the area and provides old remnants of an active and crowded high street. A strong rhythm of elevations and chimneys, along with the richness of the roof lines and the polychrome decorative elements of the Methodist Church, Church Hall and other key unlisted buildings, give the street a very strong identity providing a good example of the town's Edwardian and Victorian legacy.

4.90 The central part of High Town is composed of a Victorian and Edwardian parade of shops designated as the High Town Road Conservation Area, with a distinctive character and some buildings with architectural merit. The parade of shops accommodates specialist retailers, restaurants and pubs. The area is suffering from relatively poor trade and some empty premises, however the Council has recently invested in environmental improvements to the area and funded the temporary use of empty shops. This investment is beginning to bring life back into the area, however it is in need of further significant private sector investment to fully realise the opportunities of the area as a vibrant historic mixed use neighbourhood with opportunities for start-up businesses and creative activities - similar to and complementing the Creative Quarter of the Town Centre, which is in close proximity.

4.91 A High Town Team has been formed in this area and is working alongside the community to devise projects and programmes to improve the image of the area and attract funding.

Key Issues:

4.92 A health check on the vitality of local retail centres (Luton Retail Study Refresh 2012 - Update 2015) recommended that High Town be designated as a Neighbourhood Centre because a lack of facilities like a bank or post office and an anchor store do not allow this centre to be a viable District Centre.

4.93 Its proximity to the facilities and more valuable assets of the town centre hinders investment in the area. In particular, there is also an under provision of open space (Green Space Strategy Review 2015) and addressing this would also make the area more attractive to investment.

4.94 The ward experiences many problems with anti-social behaviour, in particular, but not limited to, 'The Paths'; a post war housing area.

4.95 There are a number of derelict and underused industrial buildings, interspersed with land currently used for car parking, that are detrimental to the vibrancy of High Town that need to be brought back into effective use.

4.96 Given the current and previous industrial uses of the area, there is potential for contaminated land.

4.97 Sections of High Town are located on the Upper Lea Chalk Aquifer.

Policy approach:

4.98 The vision for the area is to create a more sustainable residential-led mixed use neighbourhood including small scale offices / workshops, live-work units (with opportunities for start-up business and creative activities) and increased retail

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provision, which will enhance the area with better pedestrian access and permeability, more public open space and an enhanced natural environment.

4.99 A Supplementary Planning Document (SPD) was prepared in 2007 for the whole of the High Town Action Area (Local Plan 2001-2011). This SPD has been replaced by the High Town Masterplan (adopted September 2016), which explains how the approach in Policy LLP10 can be achieved.

4.100 The land between the Conservation Area and Hitchin Road has been subject to further detailed guidance through the High Town East Village Design Codes 2009, which is retained as SPD.

4.101 High Town is proposed as a Neighbourhood Centre in the 'centre hierarchy' (see Policy LLP21) and, as such can, accommodate town centre uses appropriate to the scale and size of the area. However, its proximity to the Town Centre could allow for substantial town centre uses to be located in the area easily accessible to the station, provided they have been subject to a sequential test.

4.102 The aim of the HighTown Masterplan is to contribute to making High Town a more vibrant neighbourhood, improving the overall image and perception of the area. High Town has a strong identity of place, which the Masterplan aims to build upon while also strengthening the mix and viability of employment, residential, live/work and creative industries.

4.103 The Masterplan suggests the use of ground floor units as live/work spaces, studios and offices, while vacant and underused sheds and workshop buildings to the east of the Conservation Area might be redeveloped to include housing and facilities such as showrooms, galleries and workshops. The market baseline has confirmed this as feasible, identifying the High Town area an appropriate location for a new high quality residential living

environment, which could include a complementary mix of employment, retail and commercial uses.

Policy LLP10 - High Town

The High Town Strategic Allocation is an area located to the north of the Luton Railway Station as identified on the Policies Map.

The vision for the area is to create a sustainable, vibrant and historic neighbourhood destination delivered through residential-led mixed use development whilst preserving and seeking opportunities to enhance the historical environment and heritage assets including small scale offices / workshops, live-work units and increased retail provision, which will enhance the area including increased footfall, better pedestrian access and permeability, more public open space and an enhanced natural environment.

It is expected that, over the plan period, the area can accommodate at least 750* new residential units and around 350 jobs, taking account of the following:

- A. To ensure the vision is realised, development proposals must achieve appropriate densities, height, permeability, mix of uses; including housing, employment and shops as well as niche roles such as for the creative industry and scope for art and open spaces in the public realm; in the three key areas of change in High Town (Old Bedford Road Block, East Village and 'The Paths') and delivering key infrastructure and environmental improvements. The area benefits from the proximity to the town centre, which offers many facilities and services: however the need for recreational facilities, in particular for young people, has been identified and should be improved. The High Town Masterplan SPD and

East Village Design Codes SPD explain how an appropriate quality of development can be achieved.

- B. High Town is situated on a Source Protection Zone 1, as it sits on an aquifer, very susceptible to the potential effects of pollution. Planning applications will need to be accompanied by a Contamination Risk Assessment, addressing the previous uses of the site and the resulting potential for contamination as required by the Environment Agency.
- C. The area could be susceptible to surface water flooding and as such any development will need to be in compliance with the recommendations set in the Surface Water Management Plan and Luton Local Flood Risk Management Strategy.
- D. Development proposals that improve design, safety and visual interpretation of the built environment, a clear distinction of public and private realm and which achieves better integration with walking and cycling routes linking to open space, the town centre and the wider surroundings, will be encouraged.

Footnote:

*The July 2016 SHLAA indicates capacity for c840 dwelling units in High Town.

Creative Quarter

4.104 The Creative Quarter is situated between Luton Railway Station and the Main Shopping Area of Luton Town Centre. It includes the Plaister's Lea Conservation Area with many buildings of architectural merit and remnants of the traditional hat industry and is the main gateway to the town centre from the north.

4.105 The current uses in the area are predominately eating and drinking establishments, leisure and very limited retail. Within the Hat Factory Arts Centre there are a number of digital media agencies with international reach, several smaller organisations and freelancers, a recording studio and the region's specialist film and television studio facility. In the Mill Yard Collective co-working spaces, independent artists and filmmakers are housed alongside start up charities and larger companies. Two new music venues have opened and will help reinvigorate the night-time economy. The Bute Mills is back in use accommodating the Youthscape charity, alongside the School of Art and Design (University of Bedfordshire) accommodated in the former Walter Gurney & Sons Hat Factory and in the Alexon Building. All of these facilities are in a strategically important location. The core of this area is in the main pedestrian corridor between the railway station, multi-modal transport hub and the main shopping area in Luton.

Key Issues:

4.106 The area has a number of derelict and blighted sites and buildings which need to be brought back into use, e.g. through the use of creative means such as pop-up shops.

4.107 The area is mostly covered by the Plaister's Lea Conservation Area. Historic England's historic area assessment identified the importance of the surviving architectural fabric of the area including many of the remaining buildings and roads and their role in the historical and commercial development of Luton arising from the hat manufacturing era. Many of these heritage assets are in a state of disrepair. The assessment also recognised the key issues in the area relating to demolition, insensitive alterations, deterioration and development pressures. This made recommendations for an effective appraisal and management plan to be drawn up for the area to better understand the impact of piecemeal

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development and applications for change. The Council will work with Historic England on how to ensure that the heritage of the area is adequately documented and refreshed in the future.

4.108 The scale, extent and condition of the buildings immediately mark them (and this area) out as being notably different from other elements of the town. The concentration of such large, multi-storey, hatting premises within a small geographical area gives this area character and uniqueness that need to be replicated and also protected from comprehensive development.

4.109 Most of the area is crossed by the River Lea, which currently runs underground, and issues with the structural soundness of the culvert and current poor quality of the river need to be taken in account.

Policy approach:

4.110 This key gateway is to be transformed into the Creative Quarter of the town with a thriving café culture and night-time economy, appropriate mix of restaurants, galleries, retail, education facilities and creative businesses and an excellent quality public realm. Retail will be small scale shops (including permitted flexible use A1, A2, A3, B1 and D2) to serve visitors, local residents and businesses, with the exception of the Northern Gateway where the scale of retail provision for convenience and comparison goods will help to ensure that the retail role of the Town Centre is supported.

4.111 The Council will favour development that celebrates and enhances a very special context by drawing from its strong character while addressing the poor quality of the public realm and the lack of enclosure of many sites in the area.

4.112 This area is already well established for the creative industries that have always gravitated

around the Hat Factory and now also around Mill Yard. The Employment Land Review (2013), using EEFM projections and historical trends in the region and local market, foresees that jobs related to art, entertainment and media will grow by more than 40% (more than 1,000 new jobs).

4.113 The presence of the University of Bedfordshire and its department of Media and Design, alongside the UK Centre for Carnival Arts, creates further opportunities for creative industries and education related development.

4.114 The presence of restaurants and pubs (including venues such as the Hat Factory Arts Centre providing a theatre, gallery and basement live venue) also make this area suitable to encourage a vibrant night-time economy. Creative businesses globally are also seen as the conduit to a thriving café culture and to active and vibrant public spaces.

4.115 New public open spaces will be encouraged at the station forecourt and on Bute Street.

4.116 A pedestrian friendly environment and opportunities to pedestrianise most of Bute Street in compliance with the Town Centre Development Framework should be encouraged to create a vibrant environment. Delivery of additional residential accommodation is supported where it would contribute to comprehensive mixed-use development within the allocation.

4.117 Within the creative quarter, three sub areas have been identified for their potential to be regenerated. Given the substantial amount of development that could be delivered within these areas, specific policies have been drafted to guide their future development:

1. The Northern Gateway: a retail led development to the north of the Mall;

2. The Station Gateway: a residential and office led development to the north of the site;
3. North of St George Square: a leisure and retail led development to the north of St. George Square.

4.118 The opportunity to accommodate most of the convenience retail need of the borough in this area will also be encouraged in accordance with the specific policies for the sub-areas.



Policy LLP11 - Creative Quarter

The Council will work with developers, landowners and stakeholders to transform the Creative Quarter into a thriving mixed use area with 600 residential units, a café culture and night-time economy, appropriate mix of restaurants, galleries, retail, leisure, education facilities and creative businesses and an excellent quality public realm.

- A. Proposals for the Creative Quarter as identified on the town centre inset map and comprising the 1. Northern Gateway, 2. Station Gateway and 3. North of St Georges Square development areas, will be supported where they deliver the following requirements as far as they are material to the application:

- i. improve the mix of uses, including education facilities related to art, media and design (mix of A1, A3, A4, D1, D2, C3, B1);
- ii. deliver flexible use of the space to maintain future viability and activity;
- iii. deliver the conversion of empty premises into studios and spaces for artists, work-live units and creative businesses;
- iv. enhance the night-time economy;
- v. maintain and enhance the access;
- vi. increase the level of connectivity in the area and ensure public accessibility across the areas at all times;
- vii. Improve the quality of the public realm and, in particular, the link between the Railway Station and the Mall;
- viii. make effective use of opportunities to extend use outside ground floor level e.g. cafés and the night-time economy;
- ix. ensure that development design respects and complements the character of buildings and spaces in the area and, where possible, the original urban grain of this historical area; and
- x. development proposals must be shaped by heritage considerations at the outset, and the Council will carry out an appraisal of the Plaiters Lea Conservation Area including heritage assets at risk in accordance with Policy LLP30 (Historic Environment) in order to assist with this requirement.

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1. Northern Gateway

The area is composed of approximately 0.5 hectares of land immediately to the north of The Mall allocated for a retail-led comprehensive scheme.

B. Proposals for the Northern Gateway will be acceptable if they comply with the criteria set above and where they deliver the following:

- i. retail floorspace (including flexible use classes A1-A3, B1 and D2), market, residential accommodation and complementary mixed-use development (C3, A4);
- ii. improve the north-south links and maintain east-west connections to Library Road and St George's Square;
- iii. improve the quality of the entrance to The Mall through high quality architecture that enhances the quality of the visual experience and physical connectivity to The Mall while also conserving and seeking opportunities to enhance the Plaiters Lea Conservation Area. Applications must be accompanied by an assessment of the significance of the heritage assets and how they may be affected and conserve and, where possible, take opportunities to enhance the Plaiters Lea Conservation Area;
- iv. facilitate the creation of a new public space on Bute Street;
- v. deliver uses at the ground floor that extend appropriately into the public realm, in particular around the new public space (Bute Square).

2. Station Gateway

This area includes approximately 1.5 hectares of land located between the railway station and the Plaiter's Lea Conservation Area and is allocated for a residential led scheme.

C. Proposals for the area will need to comply with the general policies of the area and with the following criteria:

- i. redevelop the train station to provide a well-designed facility with an attractive, safe, sheltered environment for travellers, visitors and staff;
- ii. maintain and improve accessibility to the transport facilities and to High Town;
- iii. improve the quality, safety and comfort of the public realm including opportunities for public space and a pedestrian friendly environment;
- iv. respect and enhance landmark buildings and key views in the area;
- v. contribute to the delivery of a substantial amount of residential units, in the form of contemporary flats, and offices and ancillary hotel, leisure and limited retail (C3, B1 and C1, D1, D2, A1, A2, A3, A5); and
- vi. provide car parking in suitable discreet locations.

3. North of St George's Square

The area to the north of St George's Square and bounded to the north by Guildford Street is allocated for mixed use development including leisure, cultural and retail uses to reinforce and complement the existing offer of the town centre.

D. Proposals for the area will need to comply with the general policies

of the Creative Quarter and with the following criteria:

- i. incorporate leisure, cultural and retail uses (D1,D2, A1-A5) and make effective use of the River Lea environment to enhance the character of development where appropriate and feasible;
- ii. propose retail uses at ground floor that contribute to the café culture already established;
- iii. is of a scale and design which complements and enhances the historical townscape, built character of the area and opportunities to improve the skyline;
- iv. improves the safety, comfort and ease of pedestrian movements linking the area with the wider town centre; and
- v. delivers opportunities for education establishments to locate in the area.

Marsh Farm

4.119 Marsh Farm, (within the Northwell ward) is the biggest housing estate in Luton. Developed in the late 1960s and early 1970s, it is designed upon cul-de-sacs arrangement of properties, the segregation of vehicular and pedestrian routes and has oversized wide roads flanked by underused lawn areas.

4.120 Marsh Farm is characterised by severe problems of multiple deprivation, including unemployment, poverty, lack of skills, poor educational achievement, and poor health.

4.121 Extensive regeneration has improved the central part of the neighbourhood, which has been provided with a brand new library and theatre in a state of the art new school, Lea Manor, and new community centre and facilities at Futures House. The area benefits from existing and potential walking and

cycling routes connecting local places and new amenity spaces with opportunities to link up with a network of Green Infrastructure extending north to the wider open countryside.

4.122 The considerable population of this neighbourhood, the existing services and the potential for further regeneration have brought recognition, confirmed by the Retail Study (WYG 2012), that Marsh Farm should be designated as a District Centre in the new hierarchy of local centres established in this Plan. As such, it could attract investment to expand the retail offer that would cater for local needs and also attract shopping journeys from a wider catchment area.

Policy LLP12 - Marsh Farm

Development proposals for the central area of Marsh Farm as identified on the Policies Map and for the rearrangement of the housing estate's layout shall be accompanied by a comprehensive masterplan with an indicative layout and phasing plan setting out detail of how it will be delivered.

- A. Development should accord with the Spatial Development Strategy, other policies in the plan and follow the site-specific requirements:
 - i. a foodstore of around 1,000sq.m. shall be accommodated to act as an anchor, alongside existing and improved facilities, increasing the vitality of the District Centre;
 - ii. a rearrangement of the residential and retail units should be of an appropriate design and ensure a safer, more vibrant area and allow a higher level of activity in the centre;
 - iii. proposals must improve the opportunities for creating places of local identity and amenity easily connected to services by walking and

4 . Spatial Strategy

- cycling via identifiable routes that may connect with Green Infrastructure to the wider countryside to the north of the urban area;
- iv. a significant net increase in dwellings is not anticipated given the existing high rise, high density nature of the area;
- v. Make efficient use of the existing space including investigation of the opportunity to reduce the land take of the nearby roundabouts to allow for other uses;
- vi. Improvement to the landscape with mature trees and appropriate planting to build on the natural assets and to enhance the character of the area;
- vii. Proposals for the housing estate should address the current lack of natural surveillance, poor layout and perception of poor safety that characterise the area;
- viii. Access and links in the area should be convenient direct and at level.

5 Growing Luton's Economy



Economic Strategy

Strategic Objectives

Strategic Objective 1: Retain and enhance Luton's important sub-regional role as a place for economic growth and opportunity including the safeguarding of London Luton Airport's existing operations and to support the airport's sustainable growth over the Plan period based on its strategic importance.

Strategic Objective 2: To utilise Luton's economic, social and environmental resources efficiently and sustainably including appropriate mitigation within the limited physical land capacity of the borough whilst ensuring the permanence of the Green Belt.

Strategic Objective 6: Reduce social, economic and environmental deprivation, particularly where it is spatially concentrated, by taking priority measures

to reduce unemployment, improve skills and education and renew housing, community and environmental conditions.

5.1 The objectives above reflect the integrated aspirations of the borough to deliver sustainable, balanced economic, environmental and social wellbeing for local people as well as visitors and workers from neighbouring areas. These objectives reflect the need for enhanced skills and opportunities for younger and older people entering and returning to the workforce. The objectives are founded on corporate and community aspirations including evidence of the key structural and capacity issues underlying Luton's economic performance and future business potential.⁽¹⁰⁾

Key Issues:

5.2 The key issues that the borough faces in terms of planning for growth and prosperity over the plan period include the need to plan for growth of around 18,000 jobs (8,000 B class jobs

5 . Growing Luton's Economy

and 10,000 non B class jobs). The Luton economy is capable of generating those jobs as evidenced by the Employment Land Review.

5.3 The delivery of employment land at strategic allocations, coordinated with key infrastructure, would accommodate the B class jobs required and some mixed use non B class jobs. The Strategic Allocations in the Plan need to make provision for the generation of jobs (including the business, office and aviation sectors) to provide choice and flexibility to the market. This will also maintain and strengthen Luton's important contribution to the sub regional economy for skilled workers from neighbouring areas as well as offering job opportunities for Luton residents.

5.4 Strategic allocations provide employment space arising from:

- future population growth and migration (see housing chapter for population considerations);
- future employment land losses;
- delayed or non delivery of sites due to lack of infrastructure funding (such as access to Century Park);
- displacement and relocations within Luton; and
- a 10% floorspace market allowance.

5.5 There is a need to deliver modest B2 provision on appropriate Strategic Allocations for local firms wishing to relocate or expand or to move into modern yet relatively affordable work space. There is a simultaneous need to protect existing key employment areas (termed Category A) that have been assessed as performing well and also land that is important for the distribution and processing of aggregates, concrete and asphalt.

5.6 The release now of a limited number of the poorest B use employment sites must be managed against the need to protect marginal employment land (Category B identified on the policies map) in the short and

intermediate period to ensure local firms can still afford to do business in Luton until new modern affordable accommodation becomes available. Safeguarded Category A sites offer the best quality employment opportunity sites, which includes greenfield employment land allocations, most recently assessed as fit for purpose. These sites are therefore safeguarded for employment use although it is recognised that, over the lifetime of the plan, exceptional circumstances may arise that justify a different approach.

5.7 The development of, and improved access to, the London Luton Airport Strategic Allocation, which includes Century Park, is needed to serve aviation engineering, business and logistics related growth and some small scale B2 accommodation for local businesses.

5.8 Land south of Stockwood Park will provide a B1 business park to meet future office demand benefitting from the M1 Junction 10a improvements.

5.9 Butterfield Green Technology Park will provide important opportunities in delivering a long term diversification and restructuring of Luton's economy, addressing under representation in higher technology sectors as well as providing opportunities for high quality B2 and B8-only developments.

5.10 The Napier Park Strategic Allocation is a key regeneration site for mixed B Class employment and residential use including a convenience retail-led neighbourhood centre linked to guided busway and Luton Airport Parkway Railway Station. The reacquisition of a 7.58 ha plot by GM Vauxhall for operational reasons, and its implications for delivering B class accommodation, will be kept under review and be the subject of the early plan review.

5.11 The Power Court Strategic Allocation is a key regeneration site for mixed retail, B1 business, and residential use integrated with the town

centre and enabled by town centre (final phase ring road) scheme improvements.

Policy approach

5.12 The National Planning Policy Framework (NPPF) published in March 2012 requires a Presumption In Favour of Sustainable Development (a golden thread running through both plan making and decision making). It also requires:

- a clear economic vision and strategy; a positive proactive and sustainable approach to economic growth and land allocation;
- up-to-date evidence on demand and supply and deliverability; and
- justification for long term protection of allocated employment land; a sequential approach to town centre uses that includes employment.

5.13 Policy LLP13 sets out a positive and flexible economic strategy for delivering jobs and strategic allocations and LLP14 will regulate the process by which land will be protected and delivered in accordance with the Employment Land Study. Luton's economy has been performing fairly well in terms of job growth, and its future economic growth prospects appear reasonably good, supported by planned infrastructure improvements and Airport growth.

5.14 Luton also functions as an important sub-regional employment centre. However, it also has above average unemployment, modest levels of new firm formation and a lower skilled workforce.

5.15 Luton's economy is more reliant on manufacturing and distribution than the wider region but there has been little job growth in these sectors. Representation in knowledge based sectors is generally low, although its level of business services jobs has been above average.

5.16 The Borough's existing 1.4 million square metres stock of employment land (78% industrial and 22% Office) is significantly ageing and needs renewal and replacement. The replacement or renewal of industrial land is happening but lags behind the region especially for completed new/modern offices space. Uptake of land has been modest due to the subdued economic situation, although local demand remains healthy.

5.17 In the last decade there have been some notable successes, particularly on established and emergent business parks for office, yet overall the borough has been losing B space stock (-18%) over the past decade. Almost all of this loss is from industrial stock, sustaining greater loss than adjacent areas while the region as a whole has grown.

5.18 Vacancy levels are about average for offices but low for industrial space, reflecting higher demand even for poorer quality accommodation (e.g. for local, small scale businesses, start-ups, and professional business services) because of its affordability and lack of alternative space. The older and lower quality vacant office stock in and around the town centre will be difficult to modernise or replace because of the low rents achievable. Refurbishment is more likely.

5.19 The scope for redeveloping existing employment land for mixed employment and housing is not currently a viable option in the present economic climate without comprehensive planning (e.g. parking and amenity issues) and financial interventions. It would be prudent to maintain most of this stock (e.g. amber employment sites identified Category B sites on the policies map) until economic conditions improve and there is progress on delivering new accommodation on the outstanding land allocations and particularly, Century Park, Butterfield Green Technology Park and Stockwood Park (Junction 10a).

Policy LLP13 - Economic Strategy

- A. Planning applications will be granted where they deliver sustainable economic growth and prosperity to serve the needs of Luton and the wider sub region. Jobs will be generated through business and industry development on strategic employment allocations, and within the existing key employment areas safeguarded for B class uses, (including securing automotive and advanced manufacturing clusters and supporting industries/services such as the GM / Vauxhall plant to respond to the market and core business demands) as identified on the Policies Map. Further growth in employment in commercial and service related industries including retail, leisure, culture and tourism will be generated within the Town Centre, District and Neighbourhood Centres including where ancillary or proposed within the strategic employment allocations. The strategic allocations for delivery are:
- i. Land South of Stockwood Park: B1 office and light industry (see Policy LLP5);
 - ii. London Luton Airport (Century Park): mixed aviation related B1b-c, B2 and B8, small scale ancillary service uses and hotel use (see Policy LLP6);
 - iii. Butterfield Green Technology Park; high quality uses in line with Policy LLP7; and
 - iv. Napier Park: predominantly B1 office light industry and small scale affordable B2 use and ancillary hotel use; small scale A1 to assist regeneration and housing provision (see Policy LLP8).
- B. Proposals for warehousing (B8) over 500 sqm floorspace will be directed

to employment locations well connected to the strategic highway network, motorway access, at rail served depots and exceptionally at Crescent Road . The preferred locations are London Luton Airport (including Century Park), Sundon Park employment area, Junction 11 Craddock Road and Chaul End Lane, and Limbury Sidings. Warehousing of this size will be directed away from the inner urban area to ease traffic issues associated with large warehousing developments of this nature.

- C. Employment Areas (Categories A & B) allocated on the Policies Map and listed in Appendix 3 and smaller existing B use employment sites not identified will be protected to retain and deliver jobs in the borough.
- D. Provided that category B sites and unidentified employment sites satisfy criteria as set out in Policy LLP14 section B, they may be redeveloped for employment, mixed use or other needs accordingly.
- E. Planning permission for proposals that would increase and improve tourism and visitor attractions will be granted, provided that it does not cause an adverse impact on the road network, any town centre use accords with the sequential approach and is in conformity with the policies in the Local Plan.

Employment Areas

Policy LLP14 - Employment Areas

Category A

The existing employment areas (Category A) set out in Appendix 3 as shown on the Policies Map shall be protected for B1, B2 or B8 uses. Once developed, strategic allocations containing B1, B2 or B8 uses are safeguarded as Category A employment

areas. Changes of use or redevelopment within the employment areas and sites that would result in a loss of floorspace for economic development uses will be resisted.

- A. Redevelopment, extensions and intensification in these areas that would result in additional floorspace for B1, B2 or B8 uses will be supported provided that:
- i. it would not have unacceptable amenity or traffic implications;
 - ii. an appropriate size and range of units is provided; and
 - iii. appropriate levels of parking are provided.

Category B & Existing Unidentified Employment Sites

- B. Redevelopment, extensions and intensification in Category B and existing unidentified employment sites that would result in additional floorspace for B1, B2 or B8 will be supported in accordance with clauses i to iii of part A (above). Where a building or site within a Category B or unidentified employment site has been vacant for at least twelve months, a mixed use development that retains significant employment or alternative redevelopment to non B uses to meet identified needs will be permitted where:
- i. it can be demonstrated that suitable alternative accommodation at comparable rents is available; and
 - ii. it can be demonstrated that it is no longer suitable or viable for B1, B2 or B8 uses and where the site is vacant, there is evidence of active marketing for a reasonable period.

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Housing Provision

Strategic Objectives

Strategic Objective 2: To utilise Luton's economic, social and environmental resources efficiently and sustainably including appropriate mitigation within the limited physical land capacity of the borough whilst ensuring the permanence of the Green Belt.

Strategic Objective 3: To ensure that new housing delivers an appropriate level of provision to meet local needs in terms of the number of homes, subject to capacity constraints and a mix of dwelling types, sizes and tenures that offer local residents a choice of where to live and addresses issues of affordability and overcrowding. Luton Borough Council will work collaboratively with neighbouring authorities to help ensure unmet need is provided in appropriate locations outside Luton, and to actively monitor progress in terms of unmet need.

Key Issues

6.1 A key issue facing the Borough in terms of planning for new homes up to 2031 is population growth, meaning that 17,800 new dwellings are needed in Luton Borough by 2031. There is, however, limited developable land available for new homes within the built up area. The plan makes provision for the delivery of 8,500 dwellings. This quantum of housing provision will enable the Council to annually identify and update a supply of specific, deliverable sites sufficient to provide five years' worth of housing with an additional buffer of 5% (as required by NPPF paragraph 47).

6.2 There is a need to achieve a level of affordable housing that addresses the level of objective housing need, whilst still ensuring that developments are viable and that much needed market homes continue to be built in Luton.

6.3 The need to make provision for housing is set against the need to allow for land to be provided for employment, education, health, retail and other community facilities in order to ensure a good quality of life for the residents of new housing in the long term.

Policy approach

6.4 National planning policy requires that Local Plans seek to meet their objectively assessed development needs and, in the case of housing, that this should be forecast through a Strategic Housing Market Assessment (SHMA). The Council prepared a joint SHMA in 2010 with the other Bedfordshire authorities, which indicated that 4,700 new homes would be required in Luton Borough between 2007-2021 based on minimum requirements of the former Regional Spatial Strategy (East of England Plan), which was revoked in January 2013. The SHMA was consequently updated in 2012 to inform the Local Plan preparation following publication of the NPPF, which requires local authorities to objectively assess housing need. The SHMA 2012 identified a need for 11,000 homes for Luton Borough based on trend migration. In order to take account of the most up-to-date Central Government population and household data released in 2013, the Council prepared a draft Luton & Central Bedfordshire SHMA Refresh in 2014 subsequently updated in 2015 determining the objectively assessed housing need for Luton as 17,800 dwellings. This was led by a SHMA steering group that includes eight other local authorities (Central Bedfordshire Council, North Hertfordshire District Council, Stevenage Borough Council, Bedford Borough Council, Milton Keynes Council, St Albans City and District Council, Dacorum Borough Council and Aylesbury Vale District Council). The SHMA indicates that parts of Central Bedfordshire Council, North Hertfordshire District Council and Aylesbury Vale District Council are within the functional Luton Housing Market Area.

6.5 The Strategic Housing Land Availability Assessment (SHLAA) (2014) and Sustainability Appraisal (2015) and viability evidence demonstrate that there is only a limited supply of land in Luton for new homes without stifling development, eroding open land including the Green Belt, other locally protected open spaces and important nature designations. This limited capacity also reflects the need to provide land for other uses such as employment, education, health and other infrastructure to support growth in Luton. The SHLAA is updated regularly to take account of the latest circumstances. The Strategic Housing Land Availability Assessment (July 2016) represents the most up-to-date evidence used to inform the estimates of capacity for housing land in this plan.

6.6 Planning for the provision of 8,500 new homes in Luton reflects the availability of land for development in the Borough, the need to provide a mix of homes to support sustainable communities and the objective to provide a choice of homes for people at all stages of life. To ensure that Luton maximises its contribution towards meeting its own housing need, all other sources of suitable housing supply have been considered through strategies for empty homes and encouraging conversion of vacant town centre office buildings where they are obsolete for meeting business needs.

6.7 The SHLAA methodology follows the directions of the NPPF and PPG in examining what land is available, suitable and viable for housing. The SHLAA also monitors completions and identifies whether there is enough land supply to meet housing requirements for the next five years.

6.8 The SHLAA has been informed by the 'Call for Sites' consultation, where landowners put forward sites as part of the local plan Regulation 18 notification consultation stage, and by further capacity work undertaken by the Council (e.g. examining brownfield employment,

commercial and other previously developed land and also potential green space). Whilst the SHLAA assesses the suitability and deliverability of land for housing, it is the Local Plan that determines what land should be allocated for development. In preparing this plan, allocations have been informed by the sustainability appraisal and independent viability assessment.

6.9 Based on the findings of the SHMA 2014 and 2015 update and the SHLAA capacity work, there is an unmet need from Luton Borough of around 9,300 net additional dwellings over the plan period.

6.10 There is a housing need of 31,800 dwellings in the Luton Housing Market Area. The full extent of the unmet need arising from this will only be determined when the other local authorities in the Luton Housing Market Area reveal the quantum and location of development they intend to deliver in the housing market area.

6.11 Given the identified shortfall of housing capacity in the borough, the Council will continue to work with neighbouring local authorities under the Duty to Cooperate in order to ensure its housing needs are met. The Council will work with neighbouring local authorities to prepare a Growth Options Study to provide the evidence necessary to determine the most sustainable growth strategy for meeting the needs of the Housing Market Area including Luton's unmet housing requirements.

6.12 The Government has indicated its intention to require a specific provision for starter homes (at a 20% discount) and that these will be made exempt from Community Infrastructure Levy and section 106 obligations. Housing sites in Luton will be expected to make provision for Starter Homes and Custom Build where there is a demonstrated need.

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Affordable Homes

6.13 Recent economic viability evidence, undertaken by independent consultants on behalf of the Council, has indicated that sites are difficult to develop economically within Luton because costs are high and sales values relatively low, particularly in the early phases of the Local Plan due to the slow recovery from the economic downturn following the financial crash of 2008. This makes the delivery of affordable housing challenging in the first 5 years. The local plan viability evidence, which analyses development in the borough, has found that a requirement for 20% on-site affordable homes provision will be viable for the majority of sites over the plan period regardless of site size.

6.14 The Council considers that affordable rent homes (homes available at 80% of market rent levels) meet a range of needs within the sector, including the need for social rented affordable homes due to the availability of Universal Credit/Housing Benefit to tenants unable to afford the full rent for an affordable rent property. Development proposals should be accompanied by a sustainable letting scheme to support the use of affordable rent homes in meeting the need for social rented housing and also to develop and maintain balanced communities. The SHMA (2015) recommends that at least 72% of affordable housing be provided as affordable rented housing with a target of 85%, and that the balance of affordable housing be provided through intermediate housing products consistent with the definitions set out in Annex 2 of the NPPF. Given the need to maximise affordable housing delivery in the Borough, the split between affordable rented housing and intermediate housing may be adjusted where there are specific viability constraints relating to individual sites. It is unlikely that SHMA updates would significantly alter the recommended split between affordable rented and intermediate housing. The Council will monitor the delivery of affordable housing.

6.15 The presumption will be that affordable housing will be provided on-site for schemes of 10 dwellings or more.

However, the Council acknowledges that there may be circumstances where it is agreed by the Council and a Registered Provider that on-site provision is not achievable.

6.16 Table 6.1 shows the modelled outputs for housing mix need in Luton over the plan period based on the objectively assessed housing need of 17,800 net additional dwellings, which includes a need for 7,200 affordable dwellings.

6.17 Due to the scale of Luton's unmet housing needs coupled with the shortage of development land, the Council will seek to ensure that appropriate housing provision to meet affordable housing needs can be provided across administrative boundaries under the Duty to Cooperate.

Table 6.1 Dwelling Mix 2011 - 2031

	Dwellings	%
Market Housing	10,600	59.5%
Affordable housing/ affordable rent	7,200	40.5%
All dwellings	17,800	100.0%
Annual Average	890	

Mix and Size of Homes

6.18 The mix and size requirements for all tenures of homes planned in the borough has been estimated in the SHMA 2015. The findings of the SHMA are set out in Tables 6.2-6.3 below.

Table 6.2 Market Housing Mix

1 bedroom flat	1.5%
2 bedroom flat	1.0%
2 bedroom house	13.1%
3 bedroom house	69.6%
4 bedroom house	12.3%
5 bedroom house	2.1%

Table 6.3 Affordable Housing Mix

1 bedroom flat	3.6%
2 bedroom flat	17.2%
2 bedroom house	15.8%
3 bedroom house	49.0%
4+bedroom house	14.9%

Housing with Specific Needs

6.19 The Government's reform of Health and Adult Social Care is underpinned by a principle of sustaining people at home for as long as possible. This was reflected in the recent changes to building regulations relating to adaptations and wheelchair accessible homes that were published in the 2015 edition of Approved Document M: Volume 1 (Access to and use of dwellings), which sets out three categories of dwellings:

- Category 1: Visitable dwellings - Mandatory
- Category 2: Accessible and adaptable dwellings - Optional
- Category 3: Wheelchair user dwellings - Optional, equivalent to wheelchair accessible standard.

6.20 This Local Plan does not set out specific policy requirements for the Optional Category 2 or Category 3 standards. Those bringing forward proposals are encouraged to take into account the findings of the latest assessment of housing needs. The changing demographics of the area indicate that developments that respond to residents' current and future needs for accessible or adaptable accommodation will provide choice and flexibility to meet a growing demand.

6.21 The SHMA demonstrates that the needs for these types of accommodation affect the whole Housing Market Area. The Council commits to keeping this evidence up-to-date and recording the extent to which

opportunities to meet changing needs are being provided, including as part of dialogue with neighbouring authorities.

6.22 The demographic projections showed that the population of Luton and Central Bedfordshire was projected to increase by around 81,900 persons over the 20-year period 2011-31, based on long-term migration trends. The number of people aged 65 or over is projected to increase by around 41,400 persons, which equates to around half of the overall growth. This includes an extra 9,200 persons aged 85 or over. Most of these older people will already live in the area and many will not move from their current homes; but those that do are likely to need accessible housing.

6.23 The CLG guide to available disability data⁽¹¹⁾ shows that currently around 1 in 30 households in England (3.3%) have at least one wheelchair user, although the rate is notably higher for households living in affordable housing (7.1%). It is also important to recognise that these proportions are likely to increase over the period to 2031 in the context of the larger numbers of older people projected to be living in the area.

6.24 In addressing the need for temporary accommodation (e.g. hostels for homeless people), proposals will have a specific focus on addressing local needs. This will help to resolve the problems faced by those people living in Luton but who struggle to access suitable accommodation.

Quality and Standards

6.25 New homes in Luton need to provide a choice of housing for people at all stages of life. In order to do so, they will need to meet minimum standards of design. Policy LLP25 (High Quality Design) establishes what design and amenity standards are expected from new and converted developments. This policy will be applied in conjunction with site specific policies in the Local Plan, with the external amenity space standards set out in Appendix 6 and with development briefs, masterplans and future Supplementary Planning Documents (SPDs).

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6.26 Developments will be encouraged to exceed Building Regulation standards according to Policy LLP37 (Sustainable Energy) and the energy hierarchy. Together, these policies ensure that developments incorporating new homes will contribute to promoting sustainable use of resources and the principles of good design.

People Wishing to Build their Own Homes

6.27 Paragraph 50 of the NPPF identifies that local planning authorities should plan for people wishing to build their own homes. NPPG (paragraph 21) states that the Government wants to enable more people to build their own homes and make this form of housing a mainstream housing option and that local planning authorities should, therefore, plan to meet the strong latent demand for such housing. However, based on the self-build portal run by the National Custom and Self Build Association (NCaSBA) there are currently no registrations from groups and individuals looking for land in Luton (Source: 'Need-a-Plot' Portal NCaSBA, July 2015). The Council will continue to monitor the register and keep a register of eligible prospective custom and self-build individuals, community groups and developers.

Houses in Multiple Occupation (HMOs)

6.28 There is recognition at both national and local levels that, whilst HMOs make a valuable contribution to the provision of low-cost housing, high concentrations of HMOs can have an adverse effect on the character and amenity of existing neighbourhoods.

6.29 The Town and Country Planning (Use Classes) Order 1987 (as amended in 2010), defines HMOs as houses that are inhabited by three or more unrelated people, as their only or main residence, who share one or more basic amenity (such as a kitchen). Two types of HMOs are identified:

- Small HMOs - those housing between three and six unrelated people (categorised under Class C4 of the Order); and
- Large HMOs - those housing more than six unrelated people (categorised under Class 'Sui Generis' of the Order).

6.30 The amendment to the Use Class Order allows the change of use from a dwelling house (categorised under class C3 of the Order) to a HMO (categorised under Class C4 of the Order) without the requirement of planning permission, as class C4 has been included in permitted development rights.

6.31 An Article 4 Direction can be put in place to remove this permitted development right. This means that, once a Direction comes into force, planning permission would need to be obtained to change a dwelling house to a HMO of either type. Planning permission is already required to change a dwelling house or a small HMO to a large HMO. There is evidence to suggest that HMOs are on the increase in Luton, particularly in older high density pre-war stock located in and around the town centre and adjacent to deprived wards. It is likely they will continue to increase as population increases, affordability worsens and housing land becomes scarcer in the borough over the plan period. The Council will keep under review whether Article 4 Directions are required to ensure that HMO proposals require planning permission and do not have an adverse effect on the character and amenity of existing neighbours, while enabling closer monitoring of HMOs in the Borough.

Older Person's Housing

6.32 National Guidance requires that the future need for older persons is assessed and that the assessment should set out the level of need for residential institutions (Use Class C2). Using the Housing Learning and Improvement Network (LIN) toolkit, this identifies future need for circa 1,300 specialist older person housing units of various types in Luton over the 20-year period 2011-31 (see Figure of the SHMA

2015). This indicates almost two thirds of this need (63%, 630 units) is for Leasehold Schemes for the Elderly, 240 Extra Care units, 100 Sheltered units and 30 Dementia units. The total need for older person's housing represents only 5.6% of Luton's overall housing need. Older person's housing needs are included in the overall objectively assessed housing needs and Policy LLP18 (Older Person's Accommodation) sets out a criteria based policy for determining schemes for Older Person's Housing.

Gypsies, Travellers and Travelling Showpeople

6.33 National Policy for Gypsies and Travellers is contained within 'Planning Policy for Traveller Sites'. This identifies three key criteria for identifying appropriate sites for delivery through the planning system. To be deliverable within five years or developable within years 6-15, sites should be:

- suitable - the site should be in a suitable location for development;
- available - the site should be available now or there should be a reasonable prospect that the site is available at the point envisaged; and
- achievable - there is a realistic or reasonable prospect that housing could be viably developed at the point envisaged.

6.34 It requires that local planning authorities identify sufficient deliverable sites to provide five years' worth of sites against their locally set targets. For years 6-10 and, where possible, for years 11-15, they should identify a supply of specific developable sites or broad locations for growth. Therefore, Government indicates that councils should assess and meet Gypsy, Traveller and travelling showpeople's (GTTS) housing needs in the same way as other housing needs, including providing land for sites. Without adequate sites this group has to resort to unauthorised sites, which might result in problems with local communities. It also makes it more difficult for them to access local services and facilities.

6.35 A Gypsy and Travellers Accommodation Assessment (GTAA) was completed in 2015 to establish the need for Gypsy, Traveller and travelling showpeople accommodation in the Borough. The study identifies a potential need for 19 Gypsy and Traveller permanent pitches over the plan period but, allowing for existing supply, needs are already met over the first 5 years, whereas there is a need for an additional 14 pitches over the remaining 15 years of the plan. Need for a transit site of 10 pitches was also identified. The study has not identified a need for additional travelling showperson provision. The Gypsy and Traveller Sites - Site Identification Study 2015 (G&TSSIS 2015) assessed the suitability, availability and achievability of potential sites, however it was unable to identify a site(s) following assessment. However, Government's Planning Policy for Traveller Sites (PPTS) amended the definition of Gypsies, Travellers and travelling showpeople on 31st August 2015 after completion of the GTAA study. The recent changes to PPTS now require a GTAA to determine whether households living on sites, encampments and in bricks and mortar fall within the new definition and whether their housing needs should be assessed separately from the wider population as required by the Housing Act (2004). This late change in Government policy could potentially alter the need and provision for Gypsies and Travellers, therefore a separate Local Plan Part 2 (Gypsies and Travellers Site Allocations) will be required following a further update of the evidence base, which may consequently change any further site assessment work to accommodate these needs.

6.36 Policy LLP15 ensures that existing GTTS sites are safeguarded for that use and that the provision of accommodation for Gypsies and Travellers is located in a sustainable manner. In applying the policy, the extent to which a traditional lifestyle and a settled base can contribute to sustainable development will be considered. The location of new pitches must enable the residents to access services including schools and health facilities in the same way that residents of new houses need to be able to access community facilities. In addition,

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Gypsy and Traveller sites need good access to the road network as they often need to move larger vehicles as part of their livelihood and way of life.

Policy LLP15 - Housing Provision

Provision will be made for 8,500 dwellings in the borough to help meet the housing needs of Luton and the Luton Housing Market Area ensuring the size, type and tenure (including provision for starter homes, custom build and households with specific needs) provided reflects the identified housing need requirements of the area in the Strategic Housing Market Assessment (SHMA).

- A. Planning permission will be granted for residential development and mixed-use schemes on allocated sites in line with Appendix 4.
- B. Planning permission for residential development will also be granted on sites not allocated for housing provided that it would not lead to a loss of other uses for which there is a recognised local need.
- C. Demolition and redevelopment of existing housing to other uses will be permitted provided that replacement dwellings are provided on-site or off-site or there is an overriding need for other uses, which provide benefits to the community that outweigh the loss of housing.

Higher densities will be encouraged within Luton Town Centre and the district and neighbourhood centres. New housing should not result in over-intensification of the site. Development will achieve a mix of different housing sizes, types and tenures informed by the latest housing market assessments and local circumstances.

Affordable Housing

Policy LLP16 - Affordable Housing

Luton has an affordable housing need of 7,200 dwellings. The application of Policy LLP16 could help deliver around 1,700 affordable dwellings potentially leaving an unmet need of around 5,500 dwellings.

- A. The Council will require the provision of 20% affordable housing units on developments that deliver a net gain of at least 11 dwellings and on sites of 10 dwellings or less that have a combined floorspace of more than 1,000sq.m.
- B. Affordable housing should be provided on-site phased alongside market housing, indiscernible from and well integrated with market housing. An equivalent financial off-site provision will only be acceptable where there is robust justification for off-site provision.
- C. Development proposals will need to ensure that the size, type and tenure of affordable dwellings provided reflects the identified housing need requirements of the area (and in accordance with the Homes & Communities Agency space standards) in the Strategic Housing Market Assessment (SHMA) for future household types.
- D. If the required level of affordable housing would render the proposal economically unviable, developers will be expected to produce a financial assessment that clearly demonstrates the maximum number of affordable dwellings that can be achieved on-site, off-site or as a commuted sum. In

that case, the Council will reduce the requirement for affordable housing proportionately.

- E. The Council will require that affordable housing be occupied by households who would not otherwise be able to afford to rent or buy a dwelling of sufficient size for their needs on the open market and who either:
- i. already live in the borough and are in housing need (as identified on the housing waiting list); or
 - ii. can demonstrate a need to live in the borough.

Intermediate tenure is to be managed by a registered provider unless the affordable housing is an intermediate affordable housing product where a discount is protected by a covenant on the deed that will apply on resale but where there is no equity that is owned by a Registered Provider.

The Council will keep its affordable housing evidence base up-to-date including the calculation of commuted sums. This evidence base should be utilised when submitting and determining planning applications.

Under the Duty to Cooperate, the Council will seek to ensure that appropriate housing provision to meet affordable housing needs can be provided across administrative boundaries.

Houses in Multiple Occupation

Policy LLP17 - Houses in Multiple Occupation

The sub-division of an existing building to create a HMO or the development of a new HMO accommodation will be permitted provided that:

- i. the proposal, or cumulative impact of the proposal (including operational and management requirements) with other similar proposals, would not adversely affect the character of the area, particularly in conservation areas; and
- ii. the accommodation units conform with adopted licensing and amenity standards and to design requirements as set out in Local Plan Policy LLP25 (High Quality Design); and
- iii. appropriate outdoor amenity space, bin storage, and parking provision are provided.

Student Accommodation

Policy LLP17A - Student Accommodation

Proposals for student halls of residence will be permitted where they demonstrably meet an unmet need, provided that the criteria for HMOs are met and the proposals:

- i. are either within 1 km of the university or college building that they are primarily intended to serve, or are close to established

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public transport routes leading to the relevant university or college building; and

- ii. would not have a significant adverse impact on the amenity of adjacent residents or businesses.

through physical adaptations and energy efficiency enhancements; and

- ii. alterations to the external appearance do not harm the character of the surrounding area.

Older People's Housing

Policy LLP18 - Older People's Housing

- A. The development of new accommodation designed specifically for older people should meet all of the following criteria:
 - i. offer easy access to community facilities, services and frequent public transport; or, where a site is not within easy access to community facilities, services and frequent public transport, services should be provided on-site;
 - ii. be well-integrated with the wider neighbourhood;
 - iii. provide sufficient car parking for visitors and residents (in compliance with Appendix 2); and
 - iv. where appropriate, provide choice of tenures.
- B. Permission will be granted for improvements to existing older people's housing where:
 - i. the measures proposed assist people in staying in their existing homes, for example

Extensions to Dwellings and Annexes

Policy LLP19 - Extensions to Dwellings and Annexes

- A. Planning permission will be granted to extend a dwelling provided that:
 - i. The scale, mass, layout, design and external materials, are consistent with and proportionate to the principal dwelling, surrounding properties, streetscape and character of the area;
 - ii. Proposals should ensure that the extension is of ancillary scale to the original / principal building;
 - iii. Ensure that an extension has a roof style and pitch that is in keeping with the original roof;
 - iv. The proposed extension does not adversely affect the amenity of nearby occupiers, in respect of visual intrusion, loss of light, loss of privacy and/or overlooking, particularly where there is effect on a habitable room (bedroom, kitchen, living room for example) and/or patio/seating area;
 - v. The extension should respect prevailing gaps and spaces between buildings, provision for services (e.g. waste

collection), and existing patterns of development, especially in areas that are spacious in character; and

- vi. If incorporating an original or innovative design element, ensure that this will not look out of keeping with the existing design and character of the building and surrounding buildings.

Annexes

- B. In addition to the criteria in part A above, the provision of annexes to accommodate dependent relatives will be permitted, provided that:
 - i. a functional link between the principal dwelling and the annex or extension can be demonstrated defined as an immediate family relationship between the occupants of the principal dwelling and the annex;
 - ii. there is no boundary demarcation or sub-division of garden areas between the principal dwelling and the annexe or extension; and
 - iii. where an annex is detached from the original dwelling, it must in every respect be ancillary to the principal dwelling in terms of its size and facilities.
- C. If the annex would be self-contained so that it could function as an entirely separate dwelling, then the proposal would not be considered under this policy.

Gypsies, Travellers & Travelling Showpeople

Policy LLP20 - Gypsies, Travellers & Travelling Showpeople

The existing Gypsy and Traveller site at St Thomas's Road and traveller show person site at numbers 14 and 72 Wigmore Lane are safeguarded for these purposes (as identified on the policies map).

Gypsy and Traveller and travelling showpeople pitches and plots will be permitted or allocated in accordance with current government policy to meet the needs identified in the Gypsies and Travellers Accommodation Assessments updated as necessary.

Planning permission will be granted for permanent Gypsy and Traveller provision where the following criteria can be met:

- i. the site has reasonable access to shops, schools and other facilities;
- ii. the site has adequate road access and is well related to the primary road network;
- iii. hardstanding and basic facilities including electricity, water supplies, sewage disposal, and waste collection are provided on site; and
- iv. in the case of travelling showpeople, the site provides for future needs and includes sufficient space for storage and maintenance of equipment and the parking and manoeuvring of all vehicles associated with the occupiers.

7 . Luton Town Centre & District & Neighbourhood Centres

7 Luton Town Centre & District & Neighbourhood Centres



Strategic Objectives

7.1 Strategic Objective 4: To establish an effective network and hierarchy of Town, District and Neighbourhood centres to serve as the heart of local communities and improve health through improved access by train, bus, walking and cycling to a mix of uses including shopping, services and jobs.

7.2 Strategic Objective 6: Reduce social, economic and environmental deprivation, particularly where it is spatially concentrated, by taking priority measures to reduce unemployment, improve skills and education and renew housing, community and environmental conditions.

7.3 Strategic Objective 8: Improve accessibility, connectivity, sustainability and ease of movement to, from and within the borough.

National Policy

7.4 The NPPF has replaced all previous policy statements and guides. The principle of the Town Centre as the preferred place for shopping, business and leisure remains a key principle of planning guidance. This serves the dual purpose of strengthening town centres while ensuring good access to jobs and facilities by public transport, walking and cycling.

7.5 The NPPF also requires planning authorities to define:

- a network and hierarchy of centres resilient to anticipated future economic changes;

7 . Luton Town Centre & District & Neighbourhood Centres

- the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres; and
- policies that define which uses will be permitted within these locations.

7.6 The planning authority must also allocate suitable sites that meet the scale and type of required town centre uses and, if necessary, expand town centres to ensure a sufficient supply of sites. Policies must be set for town centre uses that cannot be accommodated in or next to town centres.

7.7 Applicants for main town centre uses are required to pass the sequential approach to site selection and provide a full assessment of the impact of the proposal on the vitality and viability of protected centres for applications greater than 2,500sq.m. or a locally set threshold.

Local Situation

7.8 To help evaluate Luton's needs against the criteria set out above a retail study was commissioned.⁽¹²⁾ Within this report, Luton is defined as a regional shopping centre.

7.9 This research revealed that most food and drink shopping trips are kept within Luton, with Dunstable stores offering some competition. It identified that Luton should increase its market share due to expected increases in expenditure, over trading of some existing stores and in order to help provide choice and competition. A larger food store within the Town Centre would act as an anchor for linked shopping trips and attract greater numbers of visitors to the Town Centre.

7.10 For non-food shopping (comparison goods), the research recommended that the Authority seeks to markedly improve Luton's market share and increase its competitiveness in the face of competition from regional competitors such as Milton Keynes and Watford. However, increasing market share is in-part predicated on the

timely delivery of Luton's opportunity sites, which should help provide a step change in the quality of the Luton's comparison offer and are aimed to be delivered by 2025. The delivery of the North Houghton Regis retail scheme will further increase competition. The research recommends the planned delivery of comparison floorspace to help ensure Luton's status is maintained.

7.11 The study found that the number of evening trips to Luton Town Centre for leisure/retail purposes is relatively low.

7.12 The 2015 study found that a locally set impact threshold policy would ensure that development proposals providing greater than 1,000sq.m. gross floorspace for main town centre uses in an edge or out of centre location should be the subject of an impact assessment. The setting of a lower threshold allows scrutiny to be given to application proposals that might threaten to have an adverse impact on defined centres.

7.13 The majority of the existing District and Local Centres are serving their local communities well and complement the Town Centre. Some have the potential to accommodate more community uses. There is scope for the establishment of an additional new Neighbourhood Centre at Chaul End Lane or Dallow Road based on areas of search with proximity to local facilities and communities in those areas.

Retail Strategy

7.14 Accounting for committed retail floorspace, the Retail Study identifies a need for additional net convenience and comparison retail floorspace as outlined below. The Study recommends that any additional floorspace is directed to the Creative Quarter within the Town Centre, Power Court and to the centre hierarchy in line with the sequential approach as set out in paragraph 24 of the NPPF. This will serve to further reinforce the network of the Town Centre and District, Neighbourhood and Local Centres across the borough and the

12 The Luton Retail Study Refresh December 2012 - Update 2015. Luton town centre's description as a 'Regional Centre' is the terminology adopted by the White Young Green's (WYG) Luton Retail Study Update 2015. This is sourced from Venuescore, an acknowledged industry ranking of retail locations across the UK.

7 . Luton Town Centre & District & Neighbourhood Centres

appropriate scale of retail provision according to each centre's function stated in the centre hierarchy identified within the Retail Study.

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

7.15 For qualitative reasons, the additional food floorspace required currently in 2015 will be provided at Power Court. Up to 2020, an additional 2,900sq.m. of convenience floorspace may be distributed to the centre hierarchy including at Marsh Farm District Centre (subject to the Marsh Farm Masterplan), Napier Park, a modest allocation for a foodstore at Birdsfoot Lane South (supporting the strategic upgrading of this centre to Neighbourhood Centre status) and a further foodstore commitment (for an Aldi store) at Sundon Park (upgrading that Neighbourhood Centre to a District Centre function).

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

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

7.16 The above floor space requirements are based on an assessment of growth in Luton's convenience and comparison shopping market share, which will be moderated by a) delivery of existing commitments meeting demand and b) lead times in delivering existing commitments and new floorspace up to 2025. However, by this period, despite increased competition (e.g. from the substantial scale retail scheme at North Houghton Regis anticipated to be trading potentially around 2022), the delivery of large, modern retail units occupied by quality national retailers should improve

Luton's market share by providing an improved shopping offer to the Town. The primary location for the identified comparison floor space up to and beyond 2020 will be the town centre and Power Court.

Sequential Test and Impact Assessments

7.17 When considering edge of centre and out of centre sites, preference will be given to sites that are or will be connected to the nearest centre. To facilitate this, it is expected that both applicants and the Council will be flexible on issues such as format or scale. The sequential test will consider the extent of the catchment area likely to be served by the proposal, identifying alternative sites located in and near to existing centres within that catchment. Where no centres exist within the catchment (e.g. a small newsagent proposed within a residential area), the closest centres must be considered. When considering the need for development to be located in a specific area, this must be based on an understanding of any deficiencies in the range of existing facilities. Purely commercial objectives are not an appropriate basis. Where mixed uses are proposed, the sequential test must consider whether sites in designated centres are able to accommodate any of those uses individually or collectively. Impact assessments must consider effects on centres as a whole. For example, the vitality and viability of centres that are heavily dependent on convenience retailing are likely to be vulnerable to the effects of large, out of centre food stores. Extensions to existing uses will be subject to the sequential test and impact assessment. In such instances, the sequential test will focus on the level of additional development proposed. The impact assessment will, however, be based on the total offering provided at a specific site (existing development plus any proposed extensions and other alterations) to ensure that the gradual growth of existing, main town centre uses in out-of-centre locations does not have a significant, negative impact on designated centres.

7 . Luton Town Centre & District & Neighbourhood Centres

Centre Hierarchy

7.18 The borough's centres as defined on the Policies Map will be the focus for town centre uses and will promote a network of mixed use centres accessible to local communities, which promote linked trips to local shops and services via public transport, walking and cycling. Acceptable uses in the centres include retail, leisure, entertainment (including the night-time economy) community facilities, public space, offices, arts and tourism. Residential development will be encouraged in Town, District and Neighbourhood centres provided that it would promote the vitality and viability of the respective centre (see policy LLP15 Housing Provision). Each centre will be developed to promote its unique identity and the overall retail hierarchy adhered to.

Planning Conditions

7.19 Main town centre uses such as retail can have a significant impact on social, economic and environmental concerns. To maximise beneficial impacts and reduce negative effects, restrictions are applied to retail frontages and conditions may be applied to operations on a case-by-case basis. For example, the range of goods sold at out-of-centre retail parks might be restricted to support the vitality and viability of designated centres, while the operation of food retail might be managed to support the improvement of public and environmental health.

Policy LLP21 - Centre Hierarchy

A. The centre hierarchy is as follows:

- Town Centre: Luton Town Centre;
- District Centres: Bury Park, Marsh Road, Marsh Farm, Wigmore, Stopsley, Sundon Park;
- Neighbourhood Centres: Farley, High Town, Round Green, Lewsey, Bushmead, Bramingham, Hockwell Ring, Biscot Road, Calverton Road,

Birdsfoot Lane South, Napier Park; and

- Potential for a new Neighbourhood Centre at Chaul End Lane or Dallow Road.

Proposals for main town centre uses will address the identified scale of retail need over the plan period, distributed at a scale appropriate to the centre hierarchy functions, and the allocated Power Court and Northern Gateway retail developments (identified on the policies and inset maps), and be subject to the sequential test. This requires such uses to be located within town centres, then edge of centre locations and then, only if suitable sequentially preferable sites are not available, in out-of-centre locations. For all retail ('A' use classes), the extent of Luton town centre comprises the town centre shopping area, while the extent of the district and neighbourhood centres comprises the relevant shopping frontage. For all other main town centre uses, the extent of a centre is the wider boundary as marked on the policies map.

- B. Applications for retail, leisure, and office development over 1,000sq.m. located outside of town centres, not in accordance with this Local Plan, are required to submit an impact assessment, as defined in the NPPF, to the Council.
- C. The Council will grant planning permission for retail development, provided it is demonstrated that:
- i. retail proposals meet the sequential test; and
 - ii. the vitality and viability of the town centre, and individually, each District and Neighbourhood centre in the borough would not be significantly adversely affected by the development either on its own or in

7 . Luton Town Centre & District & Neighbourhood Centres

combination with other proposals or commitments.

- D. A new Neighbourhood Centre at Chaul End Lane or Dallow Road will be designated where town centre use proposals come forward which are of a Neighbourhood Centre scale.



Primary and Secondary Shopping Areas and Frontages

Policy LLP22 - Primary and Secondary Shopping Areas and Frontages

The Luton Town Centre Shopping Area, premier, primary, and secondary shopping frontages are defined for Luton Town Centre on the Policies Map. The premier frontage identified within the Mall is equivalent to the primary shopping frontage for the purposes of applying the sequential and impact tests.

- A. Primary and secondary shopping frontages as defined by the frontages on the Policies Map are the prime focus for:
 - i. convenience retail;
 - ii. comparison (non-bulky) retail floor space; and
 - iii. other town centre uses as defined in the NPPF, which

promote jobs, leisure and the night-time economy.

- B. Within the premier, primary and secondary shopping frontages of the town centre shopping area, identified on the Policies Map, planning permission will be granted for the development of non-A1 town centre uses provided that the premises:

- i. are above ground floor level in the primary shopping area; or
- ii. are at ground floor level in the primary shopping area, and the proposed use will not result in:
 - a. more than 10% of the relevant premier shopping frontage being in non-A1 use; or
 - b. more than 25% of the relevant primary shopping frontage being in non-A1 use; and
 - c. more than two adjacent units (of not greater than the normal frontage width) being in non-A1 retail use; and
 - d. the change of units in A1 use in part or whole where there are vacant non-A1 units within the same frontage.
- iii. are in the secondary shopping area, and the proposed use will not result in more than 50% of the identified frontage being in non-A1 use.

District and Neighbourhood Shopping Areas and Shopping Parades

Policy LLP23 - District & Neighbourhood Areas & Shopping Parades

The Council will approve planning applications that help to deliver and reinforce a network of mixed use District and Neighbourhood centres (which promote linked trips to local shops and services via public transport, walking and cycling) according to the centre hierarchy.

- A. Planning permission will normally be granted for the development of town centre uses that:
- i. strengthen the functional role, vitality and viability of the centre;
 - ii. increase the mix of uses in the area;
 - iii. maintain A1 retail on 75% of the shopping frontage;
 - iv. provide no more than two adjacent non A1 units;
 - v. provide a service principally to visiting members of the public;
 - vi. retain existing window displays above ground level; and
 - vii. propose a flexible use of spaces to optimise the use of land and buildings for shared services and facilities.

Shopping Parades

- B. In existing small shopping parades, planning permission will be granted for developments that:
- i. retain existing shops selling convenience goods;
 - ii. propose convenience retail (A1);
 - iii. propose non A1 uses provided that a minimum of 75%

- shopping frontage remains in A1 use;
- iv. propose a service to visiting members of the community provided that the traffic generated is appropriate for the site; and
 - v. maintain a shop front or an equally active frontage.
- C. Loss of A1 facilities will be permitted where:
- i. there are equivalent alternative shopping facilities within a convenient walking distance of the catchment area of the existing shop; or
 - ii. the existing use is demonstrably no longer viable.

8 . Education and Other Community Facilities

8 Education and Other Community Facilities



Education and Other Community Facilities

Strategic Objectives

8.1 Strategic Objective 2: To utilise Luton's economic, social and environmental resources efficiently and sustainably including appropriate mitigation within the limited physical land capacity of the borough whilst ensuring the permanence of the Green Belt.

8.2 Strategic Objective 4: To establish an effective network and hierarchy of Town, District and Neighbourhood centres to serve as the heart of local communities and improve health through improved access by train, bus, walking and cycling to a mix of uses including shopping, services and jobs.

8.3 Strategic Objective 7: To safeguard and enable new community, educational and cultural facilities to be delivered and expanded to meet the needs of a growing and diverse borough.

Key Issues

8.4 The borough faces various issues involving planning for education and community services up to 2031.

8.5 There is a need to serve the social, community safety, learning and leisure needs of a growing Luton population in an urban area with as high a density in some places as London boroughs. This will increase demands upon existing schools and other community facilities (including within the private, public and voluntary sector), many of which are already at or exceed their designed capacity.

8.6 There are limited opportunities to accommodate new facilities because:

- there isn't enough suitable land of the right size and location (particularly greenfield land);
- development tends not to be viable within Luton on brownfield land and so there is likely to be

8 . Education and Other Community Facilities

insufficient investment from developer contributions towards much needed new or improved facilities; and

- public investment in future provision, maintenance and running of existing schools and other community facilities is being restricted because of spending cuts and changes in national policy. There is, therefore, a need to prioritise spending with efficiency gains met through rationalising and making more effective use of schools and services (e.g. shared use of libraries and community centres). In some cases, facilities might be lost to local communities unless and until economic recovery and Government finances improve over the plan period.

8.7 Additional capacity is needed for the equivalent of a 900-place secondary school and 500-place primary school over the next 5 years and further high school places over the plan period in central and southern Luton. Two sites are allocated for this purpose on land at the Brache (former tennis courts and former GM Vauxhall cricket ground) to meet this need.

8.8 Additional education needs arising in other parts of the borough will be met through careful management (e.g. expansion) of existing education facilities.

8.9 There is a need to reduce costs and adapt and make more efficient use of existing community services to meet modern provider expectations (e.g. ambulance, fire and rescue, police, primary and secondary healthcare, GPs, dentist surgeries) and corporate service objectives via integrated and shared facilities (e.g. libraries, leisure and community centres, swimming pools and children's play facilities).

8.10 There is a need to collocate shared social and health support services, schools and other community facilities with new infrastructure based

on an accessible network of District and Neighbourhood Centres, distributed across the borough.

8.11 In the face of pressure for housing development, it will be important that Luton has the evidence to retain its attractions and green spaces as well as facilities for sport, play, formal and informal leisure and worship. These are critical to the health and wellbeing of the town's communities and visitors and they help to promote the cultural diversity and cohesiveness of Luton and its reputation as a place to stay, do business or be entertained. The recycling of land and buildings to establish facilities that meet community needs including culture, worship, education and leisure, will have to be sensitive to the safety and amenity of users, adjacent residents and occupiers and the character of each location.

Policy approach

8.12 The NPPF urges that planning policies reduce the need to travel by balancing land uses for employment, shopping, leisure, education and other activities within their area (NPPF paragraph 37).

8.13 Large scale residential development should provide opportunities for living and working on-site and for daily linked trips to key facilities such as primary schools and local shops that should be located within walking distance of most properties (NPPF paragraph 38). A sufficient choice of school places to meet needs might be delivered through joined up working with services and applicants (e.g. give great weight to the need to create, expand or alter schools (NPPF paragraph 72)).

8.14 Smarter working between authorities, services and providers to assess the quality and capacity of infrastructure (e.g. transport, water supply, energy utilities, waste, health, social care, education, flood risk) to meet forecast demands including

8 . Education and Other Community Facilities

strategic infrastructure and nationally significant infrastructure (NPPF paragraph 162).

8.15 High quality communications infrastructure (e.g. broadband) is essential for sustainable economic growth and in enhancing the provision of local community facilities and services (NPPF paragraph 43).

8.16 Sustainable communities should be planned positively for shared space, retention and integration of social and community facilities with housing to allow communities to meet their needs (NPPF paragraph 70).

Evidence base

8.17 Luton's growing population is characterised by a younger population profile than the regional average, leading to a significant natural increase with more births, fewer deaths and a rising school age population. There is demand for childcare facilities and school places, in particular primary school places.

8.18 Most of the identified sites for new housing developments are located in the south or centre of the town. The ability of the Council to find and afford land for new schools is limited and the implications of not securing additional schools close to new housing is that children will have to travel excessive distances to access a school place. This will be difficult for families to manage and would have an adverse impact on the Council's revenue budget.

8.19 Good quality education underpins employment prospects for the town's residents and the prosperity of the local economy. An expanding university with a modernised new and enhanced campus and leisure offer is based in the town centre. Barnfield College and other colleges present in the town are rationalising their portfolios and there are opportunities for consolidation in and around the Town Centre and 'Creative Quarter'.

8.20 Luton's population is also ageing and facing an increase in single person households in line with national trends, however migration, ethnic mix and cultural expectations also lead to larger family sizes and extended families with an increased demand for shared properties, e.g. 'granny annexes', loft conversions, houses in multiple occupation etc.

8.21 Language barriers, lower skills and wages attained by many in the resident workforce (including women, carers and parents wishing to return to work) have increased the incidence of social deprivation in some Luton wards. This increases reliance on public support services such as childcare and healthcare, social services and emergency and community safety.

8.22 The Luton and Dunstable hospital provides the major general and specialist health care facilities although it is developing its strategy for decentralising certain outpatient clinics into the wider community.

8.23 The Playing Pitch Strategy (PPS 2014) sets out key aims and supporting objectives for sport provision in the Borough. The PPS recognises Luton's constrained supply of land for facilities, growing demand in some sporting sectors as the population is set to grow with a consequent increasing pressure to develop sites for alternative uses. Essentially, the key aims seek to protect and enhance levels of outdoor sports facilities and better manage the resources including maximising shared access (e.g. to educational sports facilities) and investment.

8.24 A prioritisation list is included within the Strategy, which identifies the future sport by sport demands (e.g. football, rugby, tennis, cricket etc.) and trends. In this way, the PPS provides guidance for planning decisions across Luton up to 2021; a further Indoor Sports Facilities Strategy 2015 (ISFS 2015) has also been published. This sets out a vision to increase access to, and better manage, indoor sports facilities to improve social inclusion and healthy lifestyles with objectives seeking to protect, provide and enhance provision (both the PPS14 and ISFS 2015 include supplementary guidance on

8 . Education and Other Community Facilities

developer contributions). The Luton Green Spaces Strategy 2014 (GSS 2014) has been published in partnership with the Greensand Trust in 2014. It sets out the scale and type of green space provision across the borough and its role including spatial analysis of the accessibility, standard and shortfall/deficit in green space provision by type and location in order to guide planning decisions. This evidence is also supported by the Luton Green Infrastructure Plan published in partnership with the Greensand Trust in 2015 and this identifies a strategic network of green infrastructure across the borough.

Policy LLP24 - Education and Other Community Facilities

Protection of education and other community facilities

- A. Planning permission will be granted for development that contributes towards an identified need for community facilities and services arising from the impact of the development either on-site or off-site within service hubs based in District or Neighbourhood Centres. Development that would lead to a loss of community facilities will be permitted where:
- existing facilities elsewhere in a suitable location can meet the displaced needs; or
 - it is unsuitable for alternative community uses for which there is a demonstrable need; or
 - equivalent or better replacement facilities in terms of quantity and quality are provided in a suitable location.

New and extended education, childcare, nursery, and other community facilities

Provision for the equivalent capacity for sufficient primary and secondary school places over the plan period will be supported. Subject to a review by the

Education Service, this will include any scope for an expansion of existing schools through innovative design and density, opportunities for shared facilities (including multi-storey facilities) and primary and secondary school allocations on former tennis courts south of the Brache and former cricket ground east of the River Lea on the Brache (as identified on the policies map).

- B. New and extended education, childcare, nursery, and other community facilities will be granted planning permission provided that:
- a demonstrable local or regional need is established, and the facility is well related to the area it serves;
 - it would not adversely affect the viability and vitality of a District or Neighbourhood centre;
 - there would be no unacceptable effect on the amenity of any surrounding residential dwellings and other uses;
 - it does not take land either in or allocated for other uses, unless it is demonstrated that the need for the facility outweighs that for the existing or allocated use;
 - there is suitable vehicular access and safe dropping off and picking up areas; and
 - where the proposed facility would be in premises that are used for another purpose, it remains subordinate to the main use of the premises.

Integrating Facilities

- C. Increased local and integrated service delivery will be supported in conjunction with local communities (unless such use would have an adverse impact on the delivery of the educational

8 . Education and Other Community Facilities

service or adverse impact on the character of the area or amenity of nearby residents/ properties), particularly:

- i. flexible multi-use buildings in public and community ownership;
- ii. co-location of sports centres and playing pitches with schools;
- iii. agreements to use schools facilities and other public buildings for community use;
- iv. co-location of doctor, dentist, and pharmacy facilities; and
- v. to share and integrate police, fire, and ambulance facilities.

9 High Quality Design



High Quality Design

Strategic Objectives

Strategic Objective 2: To utilise Luton's economic, social and environmental resources efficiently and sustainably including appropriate mitigation within the limited physical land capacity of the borough whilst ensuring the permanence of the Green Belt.

Strategic Objective 3: To ensure that new housing delivers an appropriate level of provision to meet local needs in terms of the number of homes, subject to capacity constraints and a mix of dwelling types, sizes and tenures that offer local residents a choice of where to live and addresses issues of affordability and overcrowding. Luton Borough Council will work collaboratively with neighbouring authorities to help ensure unmet need is provided in appropriate locations outside Luton, and to actively monitor progress in terms of unmet need.

Strategic Objective 4: To establish an effective network and hierarchy of Town, District and Neighbourhood Centres to serve as the heart of local communities and improve health through improved access by train, bus, walking and cycling to a mix of uses including shopping, services and jobs.

Strategic Objective 5: To improve the built and natural environment to deliver quality places, through high quality and sustainable design taking into account the landscape, setting and character of the town and neighbourhoods within its national (i.e. AONB) and local landscape settings, including heritage assets and providing safe environments which help to reduce crime and the fear of crime.

Strategic Objective 8: Improve accessibility, connectivity, sustainability and ease of movement to, from and within the borough.

Strategic Objective 10: Improve, protect and enhance biodiversity of natural areas within the town, including the quality, accessibility, health and recreational value of green space, the River Lea Corridor, the Chilterns Area of Outstanding Natural Beauty

9 . High Quality Design

(AONB), the Areas of Great Landscape Value (AGLV) and Areas of Local Landscape Value (ALLV) and their connectivity.

Strategic Objective 11: To safeguard and ensure the prudent use of natural resources, increase energy and water efficiency and encourage and promote the use of renewable energy sources to help adapt to climate change, and manage pollution and natural hazards, avoid inappropriate development in areas at risk of flooding, secure improvements in air and water quality and ensure effective waste management.

9.1 National Planning Policy says that planning should always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings. Good design is a key aspect of sustainable development (e.g. mitigation and adaption to climate change and sustainable use of resources including energy, water supply and quality with particular regard to policies LLP37 and LLP38) and is indivisible from good planning, and should contribute positively to making places better for people. Local plans should contain robust and comprehensive policies that set out the quality of development that will be expected for the area.

9.2 National policy also explains that local planning authorities should consider using design codes where they could help deliver high quality outcomes. Design policies should, however, avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally. Local planning authorities should have local design review arrangements in place to provide assessment and support to ensure high standards of design. In assessing applications, local planning authorities should have regard to the recommendations from the design review panel.

9.3 Planning policies and decisions should address the connections between people and places and the integration of new

development into the natural, built and historic environment. An early engagement on design produces the greatest benefits.

9.4 In determining applications, great weight should be given to outstanding or innovative designs that help raise the standard of design more generally in the area. Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

9.5 Local planning authorities should not refuse planning permission for buildings or infrastructure that promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting, which is not outweighed by the proposal's economic, social and environmental benefits).

9.6 Poorly placed advertisements can have a negative impact on the appearance of the built and natural environment. Control over outdoor advertisements should be efficient, effective and simple in concept and operation. Only those advertisements which will clearly have an appreciable impact on a building or on their surroundings should be subject to the local planning authority's detailed assessment. Within conservation areas, internally illuminated adverts are unlikely to be acceptable but will be considered on their merits having regard to the characteristics of the conservation area.

9.7 The NPPF also highlights the important role planning and design play in creating healthy, inclusive communities and that planning policies and decisions should aim to achieve places which promote:

- opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use developments, strong neighbourhood centres and active street frontages, which bring together those who work, live and play in the vicinity;

- safe and accessible environments where crime, disorder, and the fear of crime do not undermine quality of life or community cohesion; and
- safe and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas.

9.8 The proposed design policies reflect the Government's approach and the Council recognises the very important role design plays in developing sustainable communities, including attracting investment to the borough. The look and feel of the built environment is a key determinant of health and fundamental to the creation of sustainable environments. The quality of internal and external spaces can impact greatly on physical and mental health and wellbeing. Good quality environments can also support many local strategies and initiatives such as the Luton Dementia Action Alliance.

9.9 Land within the borough is a finite resource and the Council will seek to ensure that it is developed and used efficiently and effectively to meet demand and a range of local community needs including opportunities to promote sport, leisure and other physical activity in order to pursue healthy communities and lifestyles. For example, there is an under-provision of allotments to fully meet demand in Luton and development should therefore include layouts and design features to provide opportunities for allotments and communal Green Space/ Green Infrastructure as well as private space, for residents to grow their own healthy produce. Using density as a measurement does not adequately address issues of character and context; therefore development must also have regard to plot ratio, development mix, scale and form to help identify spaciousness as a reflection of character. The future application of development densities also needs to be informed by securing adequate internal and external space, privacy, sunlight and daylight, which becomes increasingly important as densities increase. The Council will require new developments to demonstrate that all housing has acceptable

private space, privacy, daylight and sunlight having regard to the requirements of future occupiers, site specific circumstances and the character of the locality.

9.10 Development potentially affecting the Chilterns AONB its setting should refer to the Chilterns Building Design Guidance to ensure consistency of design and materials across the Chilterns and the Chilterns Conservation Board's Position Statement on Development Affecting the Setting of the Chilterns AONB where appropriate.

9.11 Development provides opportunities to secure a more accessible environment for everyone including those with mobility concerns such as wheelchair users, people with impaired vision, elderly people and those with young children. Further consideration will be given to the need and appropriateness of producing a Supplementary Planning Document and development briefs for the design of new development.

Policy LLP25 - High Quality Design

Buildings and spaces will be of high quality design with distinctive character and be safe and easily accessed by all members of the community. Proposals will need to demonstrate adherence to the best practice principles of urban design to help create quality places in the Borough.

In particular, where the following design criteria are material to an application site, its context and development proposals, provision should be made to:

- enhance the distinctiveness and character of the area by responding positively to the townscape, street scene, site and building context, form, scale, height, pattern and materials, distinctiveness, and natural features including bio diversity;
- create or enhance attractive safe, accessible, and active open public spaces, creatively using hard and soft landscaping and public art for all members of the community;

9 . High Quality Design

- iii. provide continuity of built form, connectivity, active frontages, and enclosure;
- iv. optimise and improve accessibility to walking and cycling and connections to public transport, local services, open spaces, and community services and facilities;
- v. optimise higher densities and avoid backland development where it would give rise to adverse amenity whilst meeting the other requirements of this policy;
- vi. provide green infrastructure and measures to protect, conserve, or enhance natural assets and biodiversity;
- vii. be adaptable to change of uses and flexible to accommodate changing living and working requirements of all the members of the community;
- viii. reduce carbon emissions, risk of flooding, and increase energy and water efficiency and quality;
- ix. promote sport and physical activity and healthy communities ⁽¹³⁾;
- x. promote opportunities for reducing crime and anti-social behaviour;
- xi. deliver new housing in accordance with external amenity space standards set out in appendix 6, and minimises noise, overlooking and overshadowing/loss of light, address tall buildings and the protection of important views, and ensure access to storage and privacy; and
- xii. deliver and integrate public art, particularly in strategic allocations.

The Council will use a Design Review Panel to review major development proposals where appropriate and will take into consideration its recommendations when considering applications.

Supplementary guidance through SPDs and Development Briefs on high quality design may be produced to expand and

complement the principles established in this Plan and to provide clear guidance to applicants.

Advertisements and Signage

Policy LLP26 - Advertisements and Signage

- A. Consent will be given for advertisements, signage, and displays that do not:
 - i. adversely affect the character or appearance of the building or area;
 - ii. hinder the view of a valued landscape, or feature;
 - iii. cover important decorative features of a historic building;
 - iv. result in proposals that are out of keeping in their setting in terms of size, design, illumination, materials, or colour; or
 - v. have an adverse effect on traffic safety, including pedestrian safety.
- B. Advertisement consent for hoardings around development sites will only be granted for a limited period.

10 Natural & Historic Environment



Natural & Historic Environment

Strategic Objectives

Strategic Objective 5: To improve the built and natural environment to deliver quality places, through high quality and sustainable design taking into account the landscape, setting and character of the town and neighbourhoods within its national (i.e. AONB) and local landscape settings, including heritage assets and providing safe environments which help to reduce crime and the fear of crime.

Strategic Objective 10: Improve, protect and enhance biodiversity of natural areas within the town, including the quality, accessibility, health and recreational value of green space, the River Lea Corridor, the Chilterns Area of Outstanding Natural Beauty (AONB), the Areas of Great Landscape Value (AGLV) and Areas of Local Landscape Value (ALLV) and their connectivity.

10.1 The objectives above reflect the integrated aspirations of the borough to deliver quality places through high quality design and sustainable development that will enhance and protect the natural and built environment and the amenities of its residents. This includes protection of the town's important natural and built assets as well as bringing such assets back into productive use in sympathetic and appropriate ways through conservation and enhancement measures for built heritage, valued landscapes, green spaces, important wildlife habitats and geological sites.

10.2 In particular, objective 5 is founded on national legislation that requires local planning authorities to recognise heritage and habitat assets as irreplaceable resources and to set out positive strategies for their conservation and enjoyment. To help achieve this, Luton will seek to work with stakeholders and other bodies to maintain

10 . Natural & Historic Environment

an up-to-date evidence base using objective and local expertise. Relevant parties will include the Bedfordshire & Luton Wildlife Working Group (and its various sub-groups), Bedfordshire Local Nature Partnership, Upper River Lea Catchment Partnership, Greensand Trust, Luton Friends of Parks and Green Spaces and the Biological Records & Monitoring Centre (BRMC).

Key Issues:

10.3 The population of the town is expected to grow significantly over the plan period. This will increase the demand placed on Luton's limited and, in some communities, deficient supply of green space and wildlife habitats and also upon local heritage and valued landscapes of national and local importance.

10.4 Future development will consequently need to protect, enhance and, where feasible, increase the limited supply of recreational green space and green infrastructure networks within the borough in order to remedy deficiencies (e.g. in areas deficient in open space of recreational value) and achieve local standards, as identified in the Greenspace Strategy Review (2014) and the Green Infrastructure Plan for Luton (2015). This evidence identifies the strategic role and importance of GI across the borough and its interrelationship with green networks crossing the boundary linking with GI in neighbouring local authorities (see Appendices 11 and 12): to make publicly accessible open space assets available to all Luton residents as the population grows significantly over the next 20 years.

10.5 A need to ensure that green infrastructure networks of quality green and blue space (e.g. ponds, rivers, streams and lakes etc.) continue to contribute towards improving the quality of life, health and recreation opportunities for Luton's existing and future residents and visitors. Green

infrastructure networks should also make important contributions to conserving wildlife, habitats and landscapes in order to promote biodiversity and opportunities for climate adaptation at a strategic and local level. It should be recognised that ordinary householders can also contribute through positive gardening for wildlife. School and community ecological projects (potentially within other public or institutional land) play an important role in the ecology of the Borough.

10.6 A need to protect the most important green space (including District and Neighbourhood Parks) and future designations from the community of Local Green Space (as defined in the NPPF) and only in exceptional circumstances allow losses arising from development. Natural open space and green infrastructure may include parks and gardens (including Neighbourhood and District parks) for informal leisure and recreation. In Luton, such open space is often multi-functional, recognising the need to maximise the utility of scarce open space and green infrastructure that combine more formal provision for outdoor and indoor playing pitches and sporting activities. Policy LLP24 will, however, specifically apply in relation to formal indoor and outdoor sporting facilities. It is not realistic to expect significant net additional provision of open space and green infrastructure, given the constrained land available within a built up area such as Luton. Protection and enhancement of existing open space and green infrastructure, including for multi-functional purposes, is therefore a significant requirement and reflected in the policy LLP27.

10.7 A need to ensure that development delivers an appropriate quantity and quality of green space including on and off-site provision, replacement facilities, commuted sums and management costs.

10.8 Ensure the statutory protection of designated wildlife and geology while seeking net additional contributions to the stock of biodiversity and plant and animal habitats with regard to Section 40 of the Natural Environment and Rural Communities Act 2006.

10.9 Trees, including mature and veteran trees and those protected by tree preservation orders, provide valuable eco-system services and environmental benefits. These include carbon reduction, filtering from noise and intrusion, cooling effects and, together with hedgerows, also act as strategic wildlife corridors and havens, which harbour many diverse plant and animal species that need protection.

10.10 Require that the environmental impacts and significant effects of development are clearly identified and supplied under the statutory regime ((Town and County Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999)). This should be via an Environmental Statement. Impact assessments might also be required in cases where forms of development are not proscribed in regulations but can, depending on their nature, also have significant environmental effects.

10.11 The need to conserve and enhance important nationally designated landscapes such as the Chilterns AONB (within and adjacent to the borough), scheduled monuments, registered parks and gardens, registered common land and access land, Queen Elizabeth II Playing Fields and local designations including the AGLV and ALLV (see Policies Map and glossary) to ensure that development is sensitively located and designed to protect important landscapes and their setting.

10.12 Ensure statutory protection of allotments while seeking net additional contributions in line with the standards identified in the Greenspace Strategy (see greenspace standards in Appendix 11).

10.13 To improve the built environment by delivering high quality places that take into account heritage assets, bringing them back into an appropriate use that conserves the asset for future generations. This will be achieved by encouraging development that makes a positive contribution to local character and distinctiveness, which is sensitive to its context and, where appropriate, ensures that any impact on the archaeological resource for the borough is properly mitigated.

10.14 Ensuring appraisals are produced for each of the borough's five Conservation Areas and to review other areas for potential designation.

10.15 To maintain and review Luton's local list of heritage assets to ensure important designated heritage assets (including listed buildings, conservation areas and scheduled monuments) and non-designated heritage assets (including locally listed buildings and archaeology) are valued, conserved and given policy protection. Non-designated heritage assets are those elements of the historic environment that contribute to the unique character and identity of the town.

10.16 To ensure that all development affecting heritage assets with archaeological interest give due consideration to the archaeological resource and include appropriate mitigation measures. Information on heritage assets gathered as part of the plan making or development management processes will be made publicly available by depositing it with the Historic Environment Record and archives with Luton Culture.

10.17 To ensure that those heritage assets currently considered to be at risk of neglect or decay and included on the Historic England at Risk Register are effectively managed and protected. These currently include:

- Plaiters Lea Conservation Area

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- Drays Ditches Scheduled Monument
- Putteridge Bury Registered Park

Policy approach

National Policy

10.18 Local planning authorities should set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure (NPPF paragraph 114).

10.19 Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks (NPPF paragraph 113).

10.20 The duty to have regard to the Chilterns AONB and give great weight to conserving its landscape and scenic beauty and its protection from major development, whilst also protecting and enhancing valued landscapes, geological conservation interests and soils (NPPF paragraphs 109, 115 and 116 and NPPG Ref ID: 8-003-20140306); recognising the wider benefits of ecosystem services (NPPF paragraph 109); and minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures (NPPF paragraph 109).

10.21 Local authorities should set out a positive strategy for the conservation and enjoyment of heritage assets most at risk through neglect decay or other threats (NPPF paragraph 126).

10.22 Local authorities should look for opportunities for new development within Conservation Areas and in the setting of heritage assets to enhance and better reveal their significance (NPPF paragraph 137).

10.23 Local authorities should have an up-to-date evidence base about the historic environment in their area to assess the significance of heritage assets and the contribution made to the environment (NPPF paragraph 169).

10.24 Planning (Listed Buildings and Conservation Areas) Act 1990 requires that local planning authorities formulate and publish proposals for the preservation and enhancement of any parts of their area that are conservation areas. A key issue for Luton's Conservation Areas, and particularly Plaiters Lea, arises from the demolition of buildings.

Evidence base

10.25 The Bedfordshire & Luton, Local Biodiversity Action Plan (BAP) 2001 and legacy plans are as updated via the 'UK Post-2010 Biodiversity Framework', published in July 2012 and the Habitat and Species action plans set out under Rebuilding Biodiversity in Bedfordshire & Luton Volume 1 (2006) and Volume 2 (2007) are available on the BRMC website. The 1992 Nature Conservation Strategy for Luton is currently under review.

10.26 There are currently no examples of Special Protection Areas (SPA), Special Areas of Conservation (SAC), Ramsar Sites or other internationally protected sites within the borough. Similarly, there are currently no Sites of Special Scientific Interest (SSSIs) within Luton.

10.27 However, Natural England have recently indicated a desire to review SSSIs associated with the Bedfordshire chalk, and surveys of Bradger's Hill (2003 & 2012), Dallow Downs (2003 & 2012) and Cowslip Meadow (2012) have all indicated these sites to be of SSSI quality, and designation may

follow in due course. SSSIs can be regarded as the 1st tier of UK biodiversity site designations.

10.28 County Wildlife Sites (CWS - see Glossary) represent the principal components of the ecological network in the borough, (formerly known as 'Prime Sites of Nature Conservation Interest') and they were reviewed in 2012 by the independent panel applying DEFRA criteria and guidelines. An additional CWS was recognised at the land tenanted by the Sunshine Riding Stables. Recognition as a CWS does not confer statutory protection of the site, nor any right of access. The 25 CWSs in Luton can be regarded as the 2nd tier of UK biodiversity site designations:

1. Biscot Churchyard (Holy Trinity, Trinity Road)
2. Castle Croft and Bluebell Wood (includes meadows off Roebuck Close)
3. Bradgers Hill (includes parts of Stopsley Common, the old Hexton Highway and parts of the former Nail's Hill Common in Bushmead Park)
4. Bramingham Wood (includes Bramingham Long Field)
5. The Chase (also known as Mixes Hill Wood)
6. Church Cemetery (Crawley Green Road)
7. Cowslip Meadow
8. Croda Colloids (New Bedford Road)
9. Dallow Downs (includes Runley Downs & Wood and Winsdon Hill)
10. Honeygate and Crick Hills
11. Leagrave Common (includes Whitefield Spinney and Castle Way (Spinney Wood) and Wauluds Bank)
12. Fallowfield
13. Oaket Wood (part lies in Hertfordshire)
14. Oosey Hill (part lies in Central Bedfordshire)
15. People's Park
16. River Lea (includes headstreams and tributaries and sections of adjoining open spaces)
17. Riverside Walk (Riverside Park)
18. Slaughters Wood and Green Lane (also known as Haverings)
19. Stockwood Park (part)
20. Stony Hill (also known as Icknield School)

21. Wigmore Park
22. Wandon End Park
23. Winch Hill Wood (part lies in Hertfordshire)
24. Sunshine Riding Stables

10.29 District Wildlife Sites (DWS) are a third tier designation which replace 'other sites of nature conservation Interest' and are designated via the 'Local Sites Partnership' using criteria on the BRMC website (see Glossary). There are 14 DWS in the Borough:

1. Dairyborn Scarp (former CWS also known as Spittlesea Hill)
2. Dallow Lane
3. Foxdell
4. Great Bramingham Park
5. Great Hayes Wood
6. Hatters Way
7. Hay Wood & Stopsley Common
8. Hitchin Road Spinney
9. Lewsey Park
10. Luton Parkway Verges
11. Mixes Hill
12. River Lea
13. Stockingstone Hill (sometimes known as Cowridge End)
14. Stockwood Park (part)

10.30 The Green Spaces Strategy Review includes a hierarchy of parks and open space and identifies in more detail the needs and deficiencies in the town in relation to open space of recreational value, natural and semi-natural habitats and for allotments (please refer to Appendix 11 for space standards). The Green Infrastructure Plan 2015 also sets out the network of green space across the borough and its boundary linking up with networks in other local authorities (see Appendix 12).

10.31 The following comprise District Parks (as identified in the Policies Map):

1. Leagrave Park
2. Lewsey Park
3. Stopsley Common
4. Stockwood District Park
5. Wardown Park
6. Wigmore Valley

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10.32 The following comprise the Neighbourhood Parks (as identified in the Policies Map):

1. Addington Way Sports Field
2. Aschroft Road
3. Birdsfoot Lane
4. Blundell Road Rec
5. Brantwood Neighbourhood Park
6. Buckingham Tip
7. Chaul End Lane Neighbourhood Park
8. Crawley Green Rec
9. Crawley Green Road/Colwell Rise/Linbridge Way
10. Dallow Downs
11. Foxdell Neighbourhood Park
12. Great Bramingham Park
13. Mayne Avenue (1)
14. Mayne Avenue (2)
15. Icknield Recreation Ground
16. Kingsway Rec Neighbourhood Park
17. Lancaster Avenue
18. Lea Manor Recreation Ground Northwell Drive/Whitehorse Vale
19. Lewsey Green/Regis Rec
20. Little Bramingham Park
21. Manor Road Neighbourhood Park
22. Memorial Neighbourhood Park
23. Peoples Park and Popes Meadow
24. Powdrill's Field Neighbourhood Park
25. Freeman's Green Marsh Farm
26. The Moor
27. Wandon Close
28. Whitefield

10.33 The Greenspace Strategy Review will provide evidence on Luton's strategic green space resources and needs.

10.34 The Luton Rights of Way Improvement Plan (2008) sets out a number of actions, building upon improvements to the network of paths and cycleways in and around the town, together with various initiatives to encourage greater use of them.

10.35 When development includes the provision of playing pitches, the Playing Pitch Strategy (2014) provides useful information for playing space standards and other requirements.

10.36 The green space requirement within specialist accommodation (e.g. communal housing for the elderly) will be confined to provision of amenity space as part of the scheme.

10.37 The following are evidence studies relating to landscape:

- Chilterns AONB Management Plan (2014-2019).
- Chilterns Conservation Board's Position Statement on Development Affecting the Setting of the Chilterns AONB, 2011.
- Luton Landscape Character Assessments (LCA), drafted in 2014 as evidence for a 'Proposed Landscape Designations for Luton' study (Greensand Trust and Local Landscape Working Group) provide evidence for a 2 tier designation of areas of local landscape importance. Tier 1 Areas of Great Landscape Value (AGLV) and Tier 2 Areas of Local Landscape Value (ALLV) as identified on the Policies Map. These are as follows:

AGLV

- Stopsley Common
- Dallow Corridor (includes Bluebell Wood)
- Stockwood Park
- Bradger's Hill Corridor (includes Popes Meadow and Bell's Close)
- Bramingham Wood Corridor
- Great Bramingham Park

ALLV

- Hart Hill
- Someries Farm & Dane Street Farm
- Turnpike Drive
- Lower Lea Valley
- Lewsey Park
- Wigmore Rural
- Upper Lea Valley
- Putteridge Edge

This LCA evidence also identifies Landscape Opportunity Areas that provide guidance on where the Council, in partnership with other agencies

and bodies, might consider targeting further enhancements to improve landscapes not currently at a standard for designation.

10.38 The following are evidence studies related to heritage assets:

- Luton Local List of Heritage Assets updated in 2010 and subjected to detailed assessment through public engagement against a set of criteria. Buildings of special local, historical or architectural interest feature in the list.
- Plaiters' Lea Conservation Area, Luton Historic Area Assessment (English Heritage June 2011).
- Central Bedfordshire and Luton Historic Environment Record including a survey of Borough owned heritage sites.
- The National Heritage List for England.
- Archaeological Assessment of Strategic Housing Land Availability Assessment (SHLAA) and Potential Employment Sites (Central Bedfordshire Archaeological Service 2013).
- The Hat Industry of Luton and its Buildings (English Heritage October 2013).
- Urban Panel Review Paper (CABE / English Heritage October 2009).

Policy LLP27 - Open Space and Natural Greenspace

The Council will work with developers, landowners, and stakeholders and support proposals that safeguard and enhance existing networks of open space (including the District and Neighbourhood Parks identified in the Policies Map) and establish new green infrastructure within the borough in accordance with standards established in the Green Infrastructure, Nature Conservation and Greenspace Strategies (including for recreation and biodiversity).

- A. Where there is a shortfall of open space to meet the needs of occupants of new housing development, proposals which

generate demand for new or enhanced open space and Green Infrastructure will be supported in accordance with the following sequence:

- i. The type, quantity, and quality of open space needed to support the development is provided on-site in accordance with open space standards (Appendix11) and existing deficiencies to be addressed within the locality, as identified by the local plan evidence; or
- ii. An equivalent provision is made in the vicinity where on-site provision is not practicable; or
- iii. An equivalent commuted sum is provided to enhance existing off-site facilities including provision for long term maintenance where open space is transferred to the Council or to a third party.

Loss of Open Space

- B. Development proposals that result in the loss of open space, parks, allotments, important green space, and green infrastructure will only be permitted where the most up-to-date evidence demonstrates that the open space is not in an area of identified deficit in the locality and is surplus to requirements. Exceptionally, losses will also be permitted where:

- i. replacement open space provision can be made that is of an equivalent type, quality, and quantity or better and is accessible and within the vicinity; or
- ii. the proposal is for alternative or ancillary sports and recreational provision, the need for which clearly outweighs the loss.

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Development on Open Space

- C. Development will only be permitted on parks, playing fields, other outdoor sports facilities, allotments, or other important green spaces shown on the Policies Map, where development is ancillary, complementary, and limited in scale securing the efficient and effective use of the existing green space.



Biodiversity and Nature Conservation

Policy LLP28 - Biodiversity and Nature Conservation

The Council will work with partner organisations to positively assess, manage, and designate sites and ecological networks including giving support to development proposals that add to the net stock of wildlife habitats or where they help to deliver a net gain in the conservation and enhancement of such sites. The protection given will be commensurate with their status, giving appropriate weight to their importance and the contribution they make to ecological networks.

- A. Development proposals that impact adversely on statutory or other designated sites, and ecological networks will need to demonstrate

compliance with the following sequential criteria:

- i. avoidance, wherever possible; otherwise
 - ii. the benefits of the proposal must clearly outweigh the intrinsic nature conservation interest;
 - iii. mitigation must be used, including retention, protection, enhancement, and appropriate management to minimise any harm during and after development; and
 - iv. compensation, through acquisition and management of an alternative habitat of equivalent wildlife value in the vicinity.
- B. All existing habitats and ecological networks will be afforded a level of protection from harm according to statutory and non-statutory nature conservation hierarchy designations and the contribution they make to wider ecological networks. Tier 1 designations are of national statutory importance and tier 2 and tier 3 are of regional or local importance but with policy protection in this statutory local plan:
- tier 1 National Nature Reserves and Sites of Special Scientific Interest;
 - tier 1 National Biodiversity Action Plan;
 - tier 1 Habitats and Species listed in section 41 of the Natural Environment & Rural Communities Act (2006);
 - tier 1 Species protected by law;
 - tier 1 or 2 Ancient Woodland;
 - tier 2 Local Nature Reserves including those previously proposed;
 - tier 2 County Wildlife Sites;
 - tier 2 Sites of Heritage Interest to Natural England;

- tier 2 Local Biodiversity Action Plan;
 - tier 3 District Wildlife Sites; or
 - tier 3 other features of biodiversity value within the green network including aged or veteran trees.
- C. Sites within Luton deemed of tier 1 importance by Natural England for potential SSSI designation in association with the Bedfordshire Chalk include Bradgers Hill, Dallow Downs, and Cowslip Meadow.
- D. Where there is a reasonable likelihood that a development proposal could have an adverse effect on habitats or species of biodiversity interest, the prospective developer will be required to submit an ecological assessment with the planning application. This should normally include a phase 1 habitat survey and protected species information. If invasive weed species listed on Schedule 9 of the Wildlife and Countryside Act in England and Wales are present, such as Japanese Knotweed and Himalayan Balsam, an invasive species management plan should be submitted.
- E. Development site layouts should retain any existing areas of National Priority Habitats wherever possible, and to enhance their visual and biodiversity value with appropriate planting of locally native trees, shrubs, and hedgerows but only in such locations that the long term impact on existing habitats (grasslands, hedgerows, ponds, etc.) is not deleterious through effects of shading, leaf fall, or other impacts.

Landscape and Geological Conservation

Policy LLP29 - Landscape & Geological Conservation

A. Development proposals will be supported where they protect, conserve, or enhance the character, setting, and natural beauty of national and local landscape areas, according to the following hierarchy of designations:

i. Tier 1 National landscape areas

- the special character, natural beauty, landscape and setting of the Chilterns Area of Outstanding Natural Beauty;
- the historic character and environmental quality of Registered Parks and Gardens and their settings;
- the historic integrity, biodiversity and recreational value of Registered Commons, and their settings; and
- the environmental and recreational value of Access Land and Section 15 Land as identified under the Countryside and Rights of Way Act (2000)

ii. Tier 2 Local landscape areas

A robust two -tier system of designated local landscape areas has been introduced to replace the ad hoc local landscape designations in earlier local plans. It is derived from the Landscape Character Assessments of 2014 and sites assessed against a standard range of landscape criteria. The most significant

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local landscapes are designated and shown on the Policies Map as:

- a. ***Areas of Great Landscape Value (AGLV)*** that include the most important green corridors and sites adjoining the Chilterns AONB:

- Stopsley Common
- Dallow Corridor (includes Bluebell Wood)
- Stockwood Park
- Bradger's Hill Corridor (includes Popes Meadow and Bell's Close)
- Bramingham Wood Corridor
- Great Bramingham Park

- b. ***Areas of Local Landscape Value (ALLV)*** that include areas of more limited value within the local context:

- Hart Hill
- Someries Farm & Dane Street Farm
- Turnpike Drive
- Lower Lea Valley
- Lewsey Park
- Wigmore Rural
- Upper Lea Valley
- Putteridge Edge

Geological Landscapes

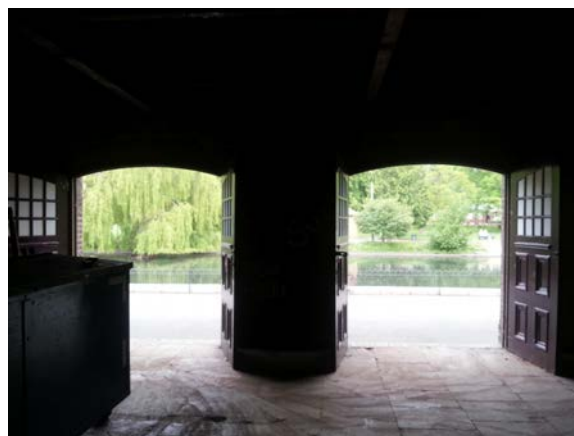
Regionally Important Geological Sites that are a statutory designation will also be afforded a level of protection from harm consistent with their tier 1 statutory designation.

- B. Planning applications will be supported where they protect or enhance and add to the designated

ROW network (including informal pedestrian routes) giving access for all users, where feasible, to the countryside and green space, provided that:

- i. traditional and historic routes are maintained, such as Icknield and Theed ways, Hexton Way, Dallow Lane, and the Old Bedford Road; and
- ii. access is designed and regulated to encourage biodiversity and prevent inappropriate use of materials, planting, signage, and potential anti-social uses e.g. from motorcycles and vehicles.

Historic Environment



Policy LLP30 - Historic Environment

- A. To protect, conserve and enhance Luton's unique and rich heritage, identity, and sense of place, development proposals must take account of the character, setting, and local distinctiveness (including materials and detailing) of local affected heritage assets, and features of particular importance including:
- i. the manufacturing industry and the hat industry;

- ii. registered parks and gardens including Luton Hoo and Wardown Park;
- iii. historic landscape features such as the Chilterns and River Lea; and
- iv. prominent listed buildings including within the town centre, the medieval street patterns, the Town Hall, and the Parish Church of St. Mary.

Any degree of harm and benefit arising from development proposals will be assessed against the significance of any affected heritage assets including:

Designated heritage assets:

- listed buildings
- conservation areas
- scheduled monuments
- registered parks and gardens.

Non-designated heritage assets:

- locally listed buildings
 - archaeology
- B. There will be a presumption in favour of the retention of heritage assets. Development proposals will be supported where they conserve heritage assets, bringing them back into appropriate use for the benefit of future generations.
- C. Any harm or loss to a heritage asset requires clear and convincing justification. Substantial harm to or loss of a designated heritage asset should be exceptional or wholly exceptional depending on the significance of the affected heritage assets. It will only be permitted where there are substantial public benefits that outweigh the harm or loss, or the nature of the heritage asset is such that no reasonable alternative use including conversion can be found, and that appropriate marketing or options for grant-funding or charitable/public ownership have been exhausted. Less than

substantial harm to the significance of a heritage asset should be weighed against the public benefits of the proposal.

The loss of a building or other element that makes a positive contribution to the significance of a conservation area should be avoided and treated as substantial harm or less than substantial harm depending on the circumstances.

- D. Proposals affecting designated and non-designated heritage assets require a Heritage Statement for validation (which may be included within a Design and Access Statement), setting out the significance of the asset, the resulting impact, and mitigation, addressing the setting of the asset.
- E. Where a site includes, or has the potential to include, heritage assets with archaeological interest, developers should submit an appropriate desk based assessment and, where necessary, a strategy for field evaluation using non-invasive and invasive techniques prior to the determination of the planning application. On the basis of this assessment, an appropriate conservation strategy will be developed, which may include preservation in situ where appropriate and/or full or partial recording, with the record of evidence being made publically accessible. If non-designated heritage assets of archaeological interest are of equivalent value to a designated asset, they would need to be subject to the same policies for designated heritage assets.
- F. Applicants will be required to record and advance an understanding of heritage assets that are to be lost (wholly or in part). The recording will be in a manner proportionate to their

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importance and the impact. This evidence (and any archive generated) should be made accessible to the public. Recording and advancing the understanding of heritage assets will be regulated by legal agreements on the phasing of demolition and development.

The Council will seek to:

- maintain a regularly updated schedule of Luton's Designated Heritage Assets and locally listed heritage;
- ensure that heritage assets considered to be at risk of neglect or decay, included on the Historic England's at Risk Register, are effectively managed and protected; and
- work with stakeholders and the community to establish Conservation Area Appraisals and Management Plans for its Conservation Areas.

11 Transport, Communications & Climate Change



Sustainable Transport Strategy

Strategic Objectives

Strategic Objective 1: Retain and enhance Luton's important sub-regional role as a place for economic growth and opportunity including the safeguarding of London Luton Airport's existing operations and to support the airport's sustainable growth over the Plan period based on its strategic importance.

Strategic Objective 4: To establish an effective network and hierarchy of Town, District and Neighbourhood Centres to serve as the heart of local communities; improving health and wellbeing through improved access by train, bus, walking and cycling to a mix of uses including shopping, services and jobs.

Strategic Objective 8: Improve accessibility, connectivity, sustainability and ease of movement to, from and within the borough.

Key Issues

11.1 Luton faces significant traffic congestion dominated by car travel. The town's radial road pattern and lack of orbital routes and chalk scarp topography funnels road traffic into the central area or along a small number of key routes. However, sustainable transport choices are possible to tackle congestion. Luton's high population density and its compact form makes public transport, walking and cycling potentially the preferred mode of transport to car use because most journeys are short.

11 . Transport, Communications & Climate Change

11.2 The Local Plan is required to safeguard land committed for major road schemes. The Council recognises the economic benefits that will result from increasing road capacity, including improved access to the Airport, but will improve infrastructure for pedestrians and cyclists as part of these schemes. The Local Transport Plan sets out a strategy for transport improvements designed to overcome existing environmental problems caused by traffic and to facilitate the efficient operation of public transport, walking and cycling networks.

11.3 The East Luton Circular Road (north) route is safeguarded as a long term option that might be required to support future development. Running between Stopsley and the A6, including a link to Barton Road along the line of Weybourne Drive, it could allow the introduction of traffic calming measures to certain routes. Some traffic could be diverted away from the town centre while access to the airport and key employment areas to the east of the town could be improved. Any road proposal will be considered against national policy and guidance, local plan policy and legislative requirements relating to heritage, biodiversity and landscape.

11.4 There is a need to improve accessibility to key services by all members of society, including the mobility impaired and non-motorised users. Major new development including new transport interchange facilities will need to accommodate bus accessibility improvements and, where appropriate, safeguard and enhance pedestrian and cycle routes.

11.5 Mitigation will be required against:

- freight traffic on the network as a result of an increase in distribution and warehouse development; and
- any additional load on the local transport network arising from airport growth.

Policy approach

11.6 Government policy requires significant traffic generating uses to be supported by a Transport Statement or Transport Assessment (NPPF paragraph 32). Development plans should promote sustainable transport solutions and a pattern of development that supports reductions in greenhouse gas emissions and reduces congestion (NPPF paragraph 30).

11.7 Local planning authorities should identify and protect routes and infrastructure to widen transport choice (NPPF paragraph 41). They should work with other authorities and providers to assess the quality and capacity of infrastructure (e.g. for transport, energy, telecommunications etc) to meet forecast demand and the need for local strategic and national infrastructure (NPPF paragraph 162).

Evidence base

- PAS - A steps approach to infrastructure planning and delivery June 2009
- Creating Growth - Cutting Carbon, Department for Transport, 2012
- Network Management and Congestion Strategy 2008-2012 section 4.2
- Local Transport Plan 2011-2026 sections, 5.3, 6.2 and 9.2
- Sustainable Travel Plan 2011-2015
- Action for Roads, Department for Transport, 2013
- Understanding Walking and cycling, 2011
- Local measures to promote walking and cycling, NICE, 2012
- Europe health economic tool for walking and cycling, WHO/HEAT
- South East Midlands LEP Transport Strategy March 2014 WYG

Policy LLP31 - Sustainable Transport Strategy

The strategy for sustainable transport in Luton is based on the vision for the Local Transport Plan 2011-2026, which is to ensure that an integrated, safe, accessible, and more sustainable transport system supports the economic regeneration and prosperity of the town.

A. The Council will work with its partners, agencies and developers to deliver:

- i. reduced congestion around the town centre and key strategic routes including seeking to deliver targeted road and junction improvements needed to accommodate Luton's growth including strategic and local improvements to address cross boundary growth while promoting sustainable modes of transport;
- ii. sustainable connections via the Luton Dunstable busway serving the conurbation with potential links to neighbouring authorities and key developments in Luton;
- iii. improved accessibility and connectivity for a more pedestrian friendly town centre environment for all users;
- iv. controlled parking within the town centre, district, and neighbourhood centres to support sustainable local service delivery, housing, and jobs, linked trips and accessible destinations; and
- v. controlled freight traffic and facilities by using traffic management on key corridors and routes into Luton and potential development sites on its borders.

B. Planning Permission will be granted for proposed developments that meet the criteria below, where these are relevant to the proposal:

- i. minimises the need to travel;
- ii. provides a sustainable transport choice with priority for buses, pedestrians, and cyclists;
- iii. reduces road congestion particularly at peak times;
- iv. reduces the safety risk to motor vehicles, non-motorised, and vulnerable users;
- v. provides cycle parking / storage; and
- vi. ensures the quality of the local environment is not compromised.

C. Transport Assessments, Transport Statements, and Travel Plans should be provided for developments (as set out in Appendix 7) and should conform to the stated requirements.

London Luton Airport

D. Support for the continued economic success of London Luton Airport as a transport hub (policy LLP6) will be delivered through:

- measures to ensure there is capacity at strategically important junctions; and
- continued enhancement of sustainable modes of transport via the Airport Surface Access Strategy.

Improvements Needed and Safeguarded Land

E. The following strategic infrastructure schemes are needed to support proposed development and land is safeguarded for this purpose where needed as shown on the Policies Map:

11 . Transport, Communications & Climate Change

- Luton Airport Parkway Railway Station North Entrance - dedicated tunnel to accommodate a feasible and viable public transport based solution linking to the airport
- Century Park Link - Access road to Century Park
- East Luton Circular Road (North including the Weybourne Link)*
- Luton Railway Station improvements

F. In addition to the above new sections of road, the following junctions on the priority traffic network in Luton will require improving to cater for increased travel generated, in particular by strategic allocations both within Luton and neighbouring areas, some of which may require additional land to be safeguarded as shown on the Policies Map:

- New Bedford Road / Austin Road / Kingsdown Avenue signals - widening of New Bedford Road approaches
- Chapel Viaduct / Castle Street roundabout - conversion to signal control or grade separation
- Hatters Way / Chaul End Lane roundabout - additional approach lanes on Hatters Way (sign cyclists via underpass/ busway route)
- Vauxhall Way / Crawley Green Road - additional/longer approach lanes on Vauxhall Way
- Vauxhall Way / Stopsley Way / Hitchin Road - additional approach lanes on Stopsley

Way & Vauxhall Way (includes dedicated slip for this left turn movement)

- Vauxhall Way / Eaton Green Road - additional approach lanes
- Kimpton Road / Vauxhall Way roundabout - replace roundabout with signals
- Hitchin Road / Stopsley Way / Ashcroft Road - improvements to existing roundabout
- Old Bedford Road / Barnfield Avenue signals - additional approach lanes on Barnfield Avenue
- Eaton Green Road / Lalleford Road roundabout - additional approach lanes on Eaton Green Road
- Old Bedford Road / Stockingstone Road signals - additional approach lanes on Old Bedford Road (south)

Footnote:

* The East Luton Circular Road is a safeguarded route option and is not currently a formal transport proposal. Any road proposal will be considered against national policy and guidance, local plan policy, and legislative requirements relating to heritage, biodiversity, and landscape.

Parking



Strategic Objectives

Strategic Objective 3: To ensure that new housing delivers an appropriate level of provision to meet local needs in terms of the number of homes, subject to capacity constraints and a mix of dwelling types, sizes and tenures that offer local residents a choice of where to live and addresses issues of affordability and overcrowding. Luton Borough Council will work collaboratively with neighbouring authorities to help ensure unmet need is provided in appropriate locations outside Luton, and to actively monitor progress in terms of unmet need;

Strategic Objective 4: To establish an effective network and hierarchy of Town, District and Neighbourhood Centres to serve as the heart of local communities and improve health through improved access to a mix of uses including shopping, services and jobs by train, bus, walking and cycling;

Strategic Objective 8: Improve accessibility, connectivity, sustainability and ease of movement to, from and within the borough.

Key Issues

11.8 The availability of car parking is a major influence on travel behaviour. Car parking also takes up a large amount of space in development, is costly to businesses and reduces development densities.

11.9 The Council Parking Strategy is aimed at improving the quality of parking in town centres so that it is convenient, safe and secure, including appropriate provision of signage for

motorists. The Local Plan will set and apply maximum levels of car parking and minimum levels of cycle parking for broad classes of development in order to encourage modal shift. This is subject to highway, user and residential safety and amenity and except in respect of parking for disabled people or unless applicants demonstrate, through a Transport Statement or Assessment, a higher car parking need. In such cases, applicants must show via design, location and implementation how parking is minimised.

11.10 Parking charges will need to ensure that they do not undermine the vitality of town centres while parking enforcement should be proportionate.

11.11 In areas highly accessible by public transport and in certain other circumstances, the amount of parking in new developments will be restricted to levels below the maximum parking standards (e.g. car free housing if a demand is demonstrated). Parking provision in the central area, in particular, will be limited to operational purposes and will mean that, for many developments, private non-residential parking will not be permitted. Where car free housing developments are proposed (or with limited parking), the use of car clubs should be promoted. They can help to reduce the need for car ownership, increase the proportion of low emission vehicles, help to improve air quality and reduce CO2 emissions. The Borough Council LAQM reports (Local Air Quality Monitoring Reports) written by Environmental Health for DEFRA, report on the local air quality situation (see Appendix 10). Lower car ownership can also help to reduce the demand for on-street parking, particularly in or close to the town centre.

11.12 The Local Plan will consider Park and Ride facilities at land south of Stockwood Park adjacent to Junction 10a and at Butterfield to intercept car journeys to employment locations in the

East Luton Corridor area as well as to the town centre. Further sites around the periphery of the Luton/Dunstable/Houghton Regis conurbation, but outside the borough boundary, are being considered by adjoining local authorities. To maximise passenger transfer, significant investment will be made in bus priority measures for those corridors served by Park and Ride sites.

Policy approach

11.13 Government policy requires the setting of local parking standards for residential and non-residential development, taking into account the accessibility, type, mix and use of development, opportunities for public transport, car ownership, and an overall need to reduce the use of high-emission vehicles (NPPF paragraph 40).

Evidence base

- Local Transport Plan 2011-2026, section 6, policy 4
- Parking and Enforcement Plan 2013 Luton Borough Council
- Carplus Annual Survey 2013/14

Policy LLP32 - Parking

Parking provision in Luton will be managed to ensure that a proportionate number of spaces are available to support the growth of the town centre.

- A. Proposals for reducing on-street parking in and around the town centre and for car free development may be supported in areas of high public transport accessibility including when linked to park and ride facilities, provided that:
- i. there is no adverse impact on occupier amenity in other areas through displaced on street parking;

- ii. they are supported with a travel plan that promotes car clubs where feasible; and
- iii. the impact on short-term parking is minimised.

Parking provision will be stringently controlled at London Luton Airport (in line with Policy LLP6C). Parking provision at the Luton & Dunstable Hospital will be stringently controlled to ensure that on site provision is prioritised.

- B. Development will be permitted providing that:
- i. car parking provision should not exceed the maximum standards set out in Appendix 2 in order to promote modal shift, however within those standards, sufficient parking should be provided to help ensure that adverse effects on highway safety and the convenience of nearby residents and users are avoided;
 - ii. minimum cycle parking standards set out in Appendix 2 is provided for non-residential developments;
 - iii. cycle storage of an appropriate standard is provided for residential developments; and
 - iv. parking standards shown in Appendix 2 are minimised in identified areas demonstrated to be of high accessibility.

Freight

Strategic Objectives

Strategic Objective 1: Retain and enhance Luton's important sub-regional role as a place for economic growth and opportunity.

Strategic Objective 2: To utilise Luton's economic, social and environmental resources efficiently and sustainably including appropriate mitigation within the limited physical land capacity of the borough whilst ensuring the permanence of the Green Belt.

Strategic Objective 8: Improve accessibility, connectivity, sustainability and ease of movement to, from and within the borough.

Key Issues

11.14 The Council will seek to maximise opportunities for rail freight, particularly those for inter-modal freight facilities that link safeguarded rail and aggregates/concrete batching depots with strategic roads within the borough. The Council will encourage proposals for rail freight interchange that serves the conurbation, such as the freight consolidation centre proposed at the former Sundon Quarry. However, road freight is likely to remain at the core of the local distribution system for the foreseeable future and the Council will seek to develop and implement a Freight Quality Partnership. This will involve local partner organisations such as the freight industry, businesses, local economic partnerships, residents, community and environmental groups.

11.15 The Council will work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development. The relatively high proportion of Luton's economic activity involving manufacturing and distribution means that there is strong demand for overnight goods vehicle parking in and around the borough. Additions to the supply of such parking accommodation will be permitted, provided that a need for the facility can be demonstrated; and provided that the site is acceptable in terms of amenity, environmental impact and highway capacity.

11.16 The Council, through partnership working, will establish Strategic Lorry Routes and produce a map of these for freight operators and businesses. It will improve existing, and provide more, signage to guide lorries to destinations such as key employment sites and town/district centres. Where, in the absence of controls, there is likely to be harm to residential amenity, operations or deliveries will be rationalised to particular times and/or categories of vehicle.

Policy approach

11.17 Freight performs a vital role in Luton's strategic sub regional economy. This includes large scale facilities such as rail freight interchanges, roadside facilities for motorists or transport investment necessary to support strategies for the growth of ports, airports or other major generators of travel demand in their areas. The primary function of roadside facilities for motorists should be to support the safety and welfare of the road user (NPPF Paragraph 31). Through the Local Plan, the council will be delivering warehouse and distribution facilities at Century Park and airport related development. It has a responsibility for ensuring that the routing of freight traffic to these new and existing sites as well as the siting of new lorry parks is controlled in a sustainable and non-obtrusive way.

11.18 The Bedfordshire authorities are keen to limit the reliance on road transport as a method of transporting mineral and waste materials within the area. It is, however, recognised that the construction of additional transport links such as rail may only be viable where a long-term use for the site has been identified. Additionally, sustainable transport methods are generally only economically viable for long distances and it is understood that road transport will continue to be relied on for local waste collection and transport.

Evidence base

- Network Management and Congestion Strategy 2008-2012, section 4.6
- Local Transport Plan 2011-2026, section 6 policy 5
- National Planning Policy Guidance Consultation document Sept/Oct 2013, paragraph 31

Policy LLP33 - Freight

The Council will support freight schemes that do not cause harm to the environment or residential amenity, are served by the strategic network and involve alternative methods of freight distribution including inter-modal facilities.

- A. In considering any impacts of freight proposals on the environment or residential amenity, the Council will take into account the following factors:
- strategic routing
 - strategic signage
 - delivery and service plans
 - weight restrictions
 - delivery restrictions
 - alternative methods of freight distribution
- B. Proposals will be permitted for new lorry parks where:
- i. it is demonstrated that there is a need for the facility;
 - ii. they are located within key employment areas with good access to the strategic road network;
 - iii. they do not cause harm to the environment or residential amenity; and
 - iv. there is capacity on the local highway network to accommodate heavy goods vehicles.

Where practicable, the use of rail, conveyors, or pipelines should be preferred over the use of roads for the bulk transportation of materials. Relevant proposals must demonstrate that alternative transport methods have been considered.

Public Safety Zones

Strategic Objectives

11.19 Strategic Objective 11: To safeguard and ensure the prudent use of natural resources, increase energy and water efficiency and encourage and promote the use of renewable energy sources to help adapt to climate change, and manage pollution, natural and operational hazards, avoid inappropriate development in areas at risk of flooding, secure improvements in air and water quality and ensure effective waste management.

Key Issues

11.20 London Luton Airport is situated close to Luton's urban area and the runway runs north east to south west and potentially introduces a risk of aircraft landing and take off incidents arising along this axis, typically bordering the ends of the runway.

11.21 This zone of risk is termed the 'Public Safety Zone' (PSZ), an established government policy under the Department for Transport but administered and reviewed by the Civil Aviation Authority (CAA). It operates with the objective of limiting development close to civil airports by controlling the number of people on the ground living working or congregating in the PSZ who would be at risk, through regulating developments and changes of use over time, reducing the number present as the opportunity arises.

11.22 The PSZ is modelled and defined using mathematical formulae looking at statistics of and probability of incidents and mortality over 30 years at airports related to annual and forecast air transport movements. These are measured as contours of risk and approximated as triangles. The size and shape of the triangle may increase with air transport movements.

Policy approach

11.23 Government guidance is unclear whether the NPPF replaces existing national guidance set out in the circular DfT Circular 01/2010 on the "Control of Development in Airport Public Safety Zones" or whether subsequent guidance will emerge. For the avoidance of doubt, policy LLP 34 is a reintroduction of a previous 'unsaved' policy of the former Luton Local Plan 2006.

Evidence base

- A planning application has been approved for proposals to expand the current capacity of the airport up to 18 million passengers per annum (mppa)

Policy LLP34 - Public Safety Zones

Within the Public Safety Zones (as identified on the Policies Map), planning permission will not be granted for:

- A. any development, including extensions and changes of use, which is likely to result in more people:
 - i. living in the property, unless it is for the purpose of enlarging or improving the living accommodation for the benefit of existing residents; or
 - ii. working or congregating at the property or site.

- B. short-stay car parking (where the maximum stay is expected to be less than six hours);
- C. sorting depots or retail warehouses;
- D. children's playgrounds, playing fields or sports grounds;
- E. sports clubhouses; or
- F. any other development likely to result in significant numbers of people being present at a site on a regular basis.

Communications

Strategic Objectives

Strategic Objective 8: Improve accessibility, connectivity, sustainability and ease of movement to, from and within the borough.

Strategic Objective 11: To improve the built and natural environment to deliver quality places, through high quality design and sustainability taking into account the character and setting of the neighbourhoods, including historic assets and seeking safe environments which help to reduce crime and the fear of crime.

Key Issues

11.24 There is an increased use of mobile phones and subsequent demand for telecom masts. Telecom development is subject to development control but many minor schemes, such as the installation of some residential satellite dishes, is 'permitted development' under the General Permitted Development Order 1995 (as amended) [M1] and hence does not require planning permission. Telecom code system operators also enjoy a general planning permission, subject to certain exclusions. In these cases, the operator has to make a 'prior approval' application, which allows the authority to consider, within 56 days, the siting and appearance of the proposed development.

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11.25 There is a need to consider visual and amenity impact in determining applications, particularly in sensitive locations (e.g. schools and residential areas). Developers should discuss the proposals affecting schools with the relevant educational body before submitting an application.

11.26 Operators should explore the potential for mast sharing or erecting new masts on existing buildings or other structures. However, sharing can sometimes look ungainly and actually increase visual intrusion. Good design, camouflage, screening and planting should be used to help blend the apparatus into the landscape.

11.27 Health considerations can be a material consideration in determining applications. However, if a proposed mobile phone base station meets the International Commission for Non-ionizing Radiation Protection guidelines for public exposure, this would demonstrate that public health concerns have been addressed.

Policy approach

11.28 Government guidance states that advanced, high quality communications infrastructure is essential for sustainable economic growth. High speed broadband technology and other communications networks also play a vital role in enhancing community facilities and services (NPPF paragraph 42).

11.29 Local Plans should support the expansion of electronic communications networks but keep the numbers of telecommunications masts and the sites to a minimum, consistent with the efficient operation of the network. Existing infrastructure should be preferred unless the need for a new site has been justified. Equipment should be sympathetically designed and camouflaged where appropriate (NPPF paragraph 43).

11.30 Local Planning Authorities should not impose a ban on types or locations of new telecommunications development (e.g. using Article 4 directions) or insist on minimum distances between new telecommunications development and existing development. However, evidence will be required to demonstrate that such infrastructure will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest or the possibility of buildings or other structures interfering with broadcast and telecommunications services (NPPF paragraph 44).

11.31 Applications for telecommunications (including for prior approval under Part 16 of the General Permitted Development Order, 2015) should be supported by evidence to justify the proposed development (NPPF paragraph 45). This should include:

- the outcome of consultations with organisations with an interest, the relevant body e.g. Local Education Authority or within a statutory safeguarding zone surrounding an aerodrome or technical site; and
- for masts or base station, a statement that self-certifies that the cumulative exposure, when operational, will not exceed the International Commission on non-ionising radiation protection guidelines; or
- evidence that the applicant has explored the possibility of sharing or using existing structures and a statement that self-certifies that, when operational, International Commission guidelines will be met.

11.32 Local planning authorities must determine applications on planning grounds. They should not seek to prevent competition between different operators, question the need for the telecommunications system, or

determine health safeguards if the proposal meets International Commission guidelines for public exposure (paragraph 46).

Policy LLP35 - Communications Infrastructure

The Council will support the expansion of advanced high quality communications infrastructure including telecommunications and high speed broadband/ video conferencing networks to promote sustainable economic growth of the borough and minimising the need for car journeys. Planning permission will be granted and prior approval proposals supported for telecommunications development providing:

- A. installations have been designed, sited, and appropriately landscaped to minimise their impact on amenity;
- B. the development would not harm the setting of a listed building, or the character of a conservation area, or any other area designated for its landscape, historic, or nature conservation importance;
- C. the equipment does not detract from the appearance of the building on which it is proposed to be erected;
- D. the developer has demonstrated that opportunities for sharing sites accommodating existing telecommunication equipment have been fully explored before proposals for new sites are submitted;
- E. the proposed installation complies with the national guidelines in respect of exposure of members of the public to electromagnetic fields;
- F. the proposal should include the necessary ducting infrastructure to facilitate the implementation of broadband services.

Flood Risk

Strategic Objectives

11.33 Strategic Objective 2: To utilise Luton's economic, social and environmental resources efficiently and sustainably including appropriate mitigation within the limited physical land capacity of the borough whilst ensuring the permanence of the Green Belt.

11.34 Strategic Objective 11: To safeguard and ensure the prudent use of natural resources, increase energy and water efficiency and encourage and promote the use of renewable energy sources to help adapt to climate change, and manage pollution, natural and land use operational hazards, avoid inappropriate development in areas at risk of flooding, secure improvements in air and water quality and ensure effective waste management.

Key Issues

11.35 The River Lea is a key asset and a key piece of infrastructure running through the town. It is providing a natural wildlife corridor with habitats and natural features (associated with its flood plain) as well as opportunities for recreation and quiet enjoyment.

11.36 The flood plain risk maps developed by the Environment Agency set out the degrees of flooding risk to land uses and activities. The likelihood of flooding events, potentially increased by climate change, presents constraints on development in the town and, in particular, the town centre. The predominant risk of flooding in Luton, however, stems from surface water sources as a consequence of rapid increase of impermeable surfaces in town in the 1960s without concurrent upgrading of the sewer system. Water quality may also be an issue because of the sensitivity of the chalk aquifer affecting parts of Luton, therefore there

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is a need for sustainable drainage systems to address this issue and have regard also to policy LLP38.

11.37 Much of the River Lea is culverted, particularly within the town centre, but this infrastructure is ageing and is in need of remediation or replacement to avoid risk of collapse and flooding. When undertaking remediation or replacement works, opportunities should be sought to de-culvert or naturalise the channel.

Policy approach

11.38 Local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk and water supply and demand considerations (NPPF paragraph 94). They should take account of climate change over the longer term, including factors such as flood risk (NPPF paragraph 99). Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, it should be made safe without increasing flood risk elsewhere (NPPF paragraph 100) and give priority to the use of sustainable drainage systems (NPPF paragraph 103).

11.39 Local Plans should be supported by strategic flood risk assessment and include policies to manage flood risk from all sources and ensure that flood defence contributes towards "good ecological status" as required by the Water Framework Directive. Local Plans should apply a sequential, risk-based approach to the location of development to avoid, where possible, flood risk to people and property and manage any residual risk, taking account of the impacts of climate change, by applying the sequential test (NPPF paragraph 100). If necessary, the exception test (NPPF paragraph 100) should be applied and, should this be the case, a Level 2 SFRA will be required that should improve the quantity/ quality of data available in those areas

requiring the exception test. This should ensure that decisions regarding the safety and impact of the proposed developments can be made on robust data.

11.40 Local Plans should safeguard land from development that is required for current and future flood management (NPPF paragraph 100) and use opportunities offered by new development to reduce the causes and impacts of flooding.

11.41 Where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, opportunities should be sought to relocate vulnerable development elsewhere.

Evidence base

11.42 The Luton Strategic Flood Risk Assessment Study 2013 (in partnership with the Environment Agency) reviews flood risk from all sources and provides guidance for site specific flood risk assessments. The SFRA and its recommendations should be referred to by all developers and applicants in interpreting policy LLP36 requirements, before submitting development proposals within or adjacent to Luton. In particular, there are area specific recommendations for discharge and surface run off rates for Houghton and Lewsey Brook. It recommends that planning applications for developments in Lewsey Farm, Parkside (up to Marsh Farm) and Limbury should submit a Flood Risk Assessment that considers flooding from the sewer system and the consequences of a failure of the drainage system through blockage due to rapid overloading of sewer systems in these areas during storms. The SFRA further requires:

- flood risk assessments (FRAs) for all scenarios identified in Table 11.1 in the SFRA that would not automatically trigger Environment Agency consultation;

- that FRAs are prepared for any planning application for developments of 5 dwellings or more or for areas greater than 0.5ha;
- developers to consult with the Environment Agency for all planning applications within 20m of watercourses;
- that FRAs prepared for developments conform to national policy and the additional elements identified;
- that where new development is proposed that incorporates riparian areas, the developer should include, where necessary, plans for the improvement of river channels and flood defences within their ownership and demonstrate how the channels and/or flood defence will be maintained over the lifetime of the proposed development; and
- emergency plans should be formulated to accompany FRAs for all 'more and highly vulnerable' developments as well as 'less vulnerable' developments with greater than 10 people working/living at the site. The emergency plans should be allied to those developed by LBC.

11.43 Critical Drainage Areas (CDAs) are defined in Luton's Surface Water Management Plan (SWMP) (2012) and comprise areas of Luton that are potentially subject to flooding from any or all of surface water, river, brook, sewer overflow or ground water. The SWMP can be found on the Council's website.

11.44 The Luton Local Flood Risk Management Strategy (LLFRMS) states the Council's approach to management of flood risk from all sources, in its capacity as the Lead Local Flood Authority. The LLFRMS also refers to CDAs and contains requirements related to SuDS. The LLFRMS can be found on the Council's website.

11.45 The Luton Water Cycle Strategy Study Update 2015 (prepared in partnership with the Environment Agency and water utilities) updates information on water supply and water treatment capacity.

11.46 The recommendations of the SuDS Manual (CIRIA C697) should also be referred to.

11.47 The Thames River Basin Management Plan provides additional detail on objectives for the River Lea and its catchment, including the aims of the Water Framework Directive and the approach to de-culverting the river.

Policy LLP36 - Flood Risk

- A. The risk and impact of flooding will be minimised through:
- directing new development to areas with the lowest probability of flooding;
 - ensuring that all new development addresses flood resilience, the effective management of flood risk including opportunities for appropriate dry access for emergency vehicles;
 - ensuring that development does not increase the risk of flooding elsewhere, including cumulative impact on adjoining and surrounding land and in the wider catchment; and
 - ensuring wider environmental benefits of development in relation to flood risk and contribute towards delivering "good ecological status".

The suitability of development proposed in flood zones will be assessed using the sequential test and, where necessary, the exception test which will require a Level 2 SFRA. A sequential approach should be used at site level.

B. A site specific flood risk assessment (FRA) is required for the following developments:

- i. proposals of one hectare or greater in Flood Zone 1;
- ii. all new development (including minor developments and change of use) in Flood Zones 2 and 3;
- iii. Critical Drainage Areas (as defined in Luton's Surface Water Management Plan);
- iv. where a proposed development or change of use to a more vulnerable class may be subject to other sources of flooding.

Appropriate mitigation and management measures must be implemented.

C. All development proposals must be assessed against the Luton Water Cycle Strategy (WCS) and consider recommendations of the Strategic Flood Risk Assessment and Luton Local Flood Risk Management Strategy to address locally significant flooding including:

- i. that FRAs are prepared for any planning application for developments of 5 dwellings or more or for areas greater than 0.5ha;
- ii. developers consult with the Environment Agency for all planning applications within 20m of watercourses and ensure that a 8 m wide undeveloped buffer is maintained alongside the river channel of main rivers and 5 meter buffer along ordinary water courses.

D. All new development shall be required to provide a drainage strategy and those over 100 dwellings must also provide a site specific WCS. Developments will be expected to incorporate multi-functional sustainable

drainage systems which, where feasible, should address water efficiency and rainwater harvesting. SuDS must ensure that run-off rates are attenuated to greenfield run-off rates in accordance with Luton's Sustainable Drainage Advice. Higher run off rates would need to be justified and the risks quantified. Where SuDS are implemented, a plan for their long-term maintenance will be required.

The Council will encourage development to reduce the overall flood risk, where possible, through the design and layout of schemes that replace flood plain and enhance natural forms of drainage (this could include, but is not limited to, floodplain creation, green roofs, surface water storage, removing culverts, and barriers to flow).

The Council will work with the Environment Agency in the management of flood risk to ensure that any risk of flooding is appropriately mitigated and the natural environment is protected in all new development. All development within 8 metres of a main river will require a flood defence consent from the Environment Agency.

Sustainable Energy

Strategic Objectives:

The Local Plan policy on Climate change, carbon reduction and sustainable energy needs to help deliver the following linked objectives:

Strategic Objective 2: To utilise Luton's economic, social and environmental resources efficiently and sustainably including appropriate mitigation within the limited physical land capacity of the borough whilst ensuring the permanence of the Green Belt.

Strategic Objective 6: Reduce social, economic and environmental deprivation, particularly where it is spatially concentrated, by taking priority measures to reduce unemployment, improve skills and education and renew housing, community and environmental conditions.

Strategic Objective 8: Improve accessibility, connectivity, sustainability and ease of movement to, from and within the borough.

Strategic Objective 11: To safeguard and ensure the prudent use of natural resources, increase energy and water efficiency and encourage and promote the use of renewable energy sources to help adapt to climate change, and manage pollution and natural and land use operational hazards, avoid inappropriate development in areas at risk of flooding, secure improvements in air and water quality and ensure effective waste management.

Key Issues

11.48 Government policy aims to stimulate the development of renewable energy sources wherever they have prospects of being economically attractive and environmentally acceptable. The Climate Change Act 2008 set the country's emission reduction targets. The "legally binding" targets are a reduction of least 80% by 2050 (against the 1990 baseline).

11.49 It also mandates interim 5-year budgets. The first three are as follows:

- Budget 1 (2008-12): Total cap 22% below 1990 baseline
- Budget 2 (2013-17): Total cap 28% below baseline
- Budget 3 (2018-22): Total cap 34% below baseline

11.50 The European Union has its own emissions reduction target to which the UK contributes. This currently stands at 20% by 2020 though this may be raised to 30%. This target helps to direct the European Union Emission Trading Scheme.

11.51 All new non-residential developments over 1,000 square metres will be required to achieve the 2013 BREEAM "Good" standard or equivalent. New non-residential developments below this threshold will also be encouraged to meet this standard. Conditions will be attached to planning permissions, requiring submission of final code certificates and post construction BREEAM certificates (as appropriate), and such conditions will not be discharged until compliance has been satisfactorily demonstrated.

11.52 The rationale behind energy requirements are set out in Building Regulations (following the Government's Housing Standards Review - and subject to the government's review of energy standards) and BREEAM is to secure commitments to CO2 reduction in line with the proposed trajectory of phased amendments to the Building Regulations while ensuring that broader themes, including water conservation, flood risk, air quality, waste management and biodiversity, are addressed. The most commonly expected effects of a changing climate on Luton's built environment include:

- increased risk of subsidence (e.g. in Farley Hill and Stopsley);
- reduced thermal comfort of occupants (especially from overheating in summer); and
- increased damage to property and infrastructure.

Policy approach

11.53 Government policy aims to increase the use and supply of renewable and low carbon energy and the responsibility on all communities to contribute to renewable energy generation or low carbon sources. There should be a positive strategy to (1) design policies and identify locations that maximise renewable and low carbon energy development while ensuring that adverse impacts including cumulative landscape and visual impacts are mitigated; (2) provide supporting

infrastructure to encourage such sources; (3) support community-led initiatives including proposals via neighbourhood planning; and (4) identify opportunities to connect development to decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers (NPPF paragraph 97).

11.54 In determining planning applications, new development will be encouraged to exceed building regulations by following guidance in Policy LLP37C 'Energy Hierarchy'. It should also take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption (NPPF paragraph 96).

11.55 Reducing the need for primary materials, reusing and recycling can save money and lead to better resource efficiency. The earlier this is considered in any planned development, the greater and more achievable the options are. In turn, this should lead to more sustainable development being designed and built. The detailed benefits of this approach are described in more detail in the supplementary planning document, 'Managing Waste in New Developments'.

11.56 Trees, shrubs and woodland provide a range of ecosystem services, such as carbon capture and storage, filtration of airborne pollutants, noise and vibration. They also play an important part in temperature regulation thereby reducing heat island effects. Their role in mitigating climate change and pollution is therefore not insignificant (cumulatively) and should be an early consideration in formulating development proposals.

Policy LLP37 - Climate change, carbon and waste reduction and sustainable energy

The Council will support development proposals that contribute towards mitigation, and adaptation to climate change through energy use reduction, efficiency, and renewable, and decentralised energy.

- A. New residential development will be encouraged to exceed the national standards set out in Building Regulations on carbon and energy performance. The energy hierarchy set out under LLP37 C provides principles on how Building Regulations could be achieved and exceeded.
- B. All new non-residential developments over 1,000 square metres will be required to achieve the 2013 Building Research Establishment Environmental Assessment Method (BREEAM) 'Good' status".
- C. Energy Hierarchy:
 - i. consider reducing energy and water demand;
 - ii. consider energy generation from low and zeros carbon sources on site;
 - iii. consider decentralised energy networks and generation; and
 - iv. consider off-site solutions, retro fitting, and carbon reduction schemes.
- D. All residential developments will achieve a water efficiency standard of 110 litres per person per day because Luton is in an area of water stress.

Waste

The Council encourages an overall reduction in the amount of waste generated, treated and disposed of to reduce the need for land for waste management. Proposals that are likely to generate significant volumes of waste through development or operational phases will be required to include a waste audit as part of the application.

Pollution and Contamination

Strategic Objectives

11.57 Strategic Objective 2: To utilise Luton's economic, social and environmental resources efficiently and sustainably including appropriate mitigation within the limited physical land capacity of the borough whilst ensuring the permanence of the Green Belt.

11.58 Strategic Objective 11: To safeguard and ensure the prudent use of natural resources, increase energy and water efficiency and encourage and promote the use of renewable energy sources to help adapt to climate change, and manage pollution and natural and land use operational hazards, avoid inappropriate development in areas at risk of flooding, secure improvements in air and water quality and ensure effective waste management.

Key Issues

11.59 The borough is a heavily developed town with, unavoidably, some bad neighbour uses giving rise to dust, vibration, noise smells and litter from a range of sources (including food outlets and industrial and construction activities), and has an industrial legacy and many brownfield sites could harbour contaminants. In addition, the town has chalk aquifer ground source protection zones and the River Lea - all of which are sensitive to potential development and building operations and commercial and industrial activities and processes that might give rise to pollution.

11.60 There are potential concerns with the stability of land across Luton. Of particular concern are chalk hills and scarp slopes and areas where clay overlies chalk. In these areas, sink-holes may appear where the chalk base has eroded but is concealed by a clay cap.

11.61 The town also has an Air Quality Management zone adjacent to the M1 corridor. A further AQMA was declared in the Town Centre in 2016, but there are no other AQMAs in the area. Poor air quality in Luton is largely as a result of large volumes of traffic and associated congestion. Industry is a secondary source. Nitrogen dioxide is present in elevated concentrations, which has led to the declaration of the AQMA(s).

Policy approach

11.62 Government policy requires development plans to include policies to minimise waste and pollution (NPPF paragraph 7, bullet 3 and paragraph 17, bullet 7).

11.63 The planning authority should prevent both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; and remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate (NPPF paragraph 109).

Policy LLP38 - Pollution and Contamination

Pollution

Evidence on the impacts of development will need to demonstrate whether the scheme (individually or cumulatively with other proposals) will result in any significantly adverse effects with regard to air, land or water on neighbouring development, adjoining land, or the

wider environment. Where adverse impacts are identified, appropriate mitigation will be required. This policy covers chemical, biological, and radiological contamination and the effects of noise, vibration, light, heat, fluid leakage, dust, fumes, smoke, gaseous emissions, odour, explosion, litter, and pests.

- A. Development should provide for the satisfactory disposal of surface water to deliver water quality improvements to receiving water courses and aquifers where feasible and, together with waste water disposal, should not be detrimental to the management and protection of water resources. In all cases, development must be carefully built, operated, and closed in such a manner so as to ensure there are no long-term pollution problems.
- B. During construction and operation, appropriate measures will be required to prevent the deposit of mud or other debris on or within public highways and water bodies from vehicles using the site.

Contaminated land

- C. For proposals on or affecting contaminated land, a site assessment must be carried out to establish the full nature and extent of the contamination.

Contaminated land is used to describe land polluted by:

- heavy metals like arsenic, cadmium, and lead;
- oils and tars;
- chemical substances and preparations, e.g. solvents;
- gases;
- asbestos; and
- radioactive substances.

...but may include other hazardous matter of chemical or biological origin.

It is defined as land where substances could cause:

- significant harm to people or protected species; and/ or
 - significant pollution of surface waters or groundwater (including Source Protection Zones).
- D. If contamination is found, remediation measures are to be agreed by the Council with reference to the Contaminated Land Statutory Guidance (April 2012), that such measures are carried out on site where this is viable and that such measures are completed prior to development.
 - E. Planning permission will be granted for the development or reuse of land that is unlikely to be affected by contamination but not for schemes that could:
 - i. expose the occupiers of the development, or users of domestic gardens, or neighbouring land to an unacceptable risk;
 - ii. threaten the structural integrity of any existing or proposed building on, or adjoining, the site;
 - iii. lead to the contamination of any watercourse, water body, or aquifer; or
 - iv. cause the contamination of adjoining land or allow the contamination of the development site to continue.

Land stability

Development must be sensitive to local ground conditions and land stability. It must be appropriate for existing conditions and ensure that the future stability of land is protected.

12 Infrastructure Delivery, Monitoring and Review of the Local Plan

Infrastructure and Developer Contributions

Strategic Objectives:

The Local Plan policy on infrastructure delivery and developer contributions helps to deliver the following linked objectives:

Strategic Objective 2: To utilise Luton's economic, social and environmental resources efficiently and sustainably including appropriate mitigation within the limited physical land capacity of the borough whilst ensuring the permanence of the Green Belt.

Strategic Objective 5: To improve the built and natural environment to deliver quality places, through high quality and sustainable design taking into account the landscape, setting and character of the town and neighbourhoods within it's national (i.e. AONB) and local landscape settings, including heritage assets and providing safe environments which help to reduce crime and the fear of crime.

Strategic Objective 7: To safeguard and enable new community, educational and cultural facilities to be delivered and expanded to meet the needs of a growing and diverse borough.

Strategic Objective 8: Improve accessibility, connectivity, sustainability and ease of movement to, from and within the borough.

Strategic Objective 10: Improve, protect and enhance biodiversity of natural areas within the town, including the quality, accessibility, health and recreational value of green space, the River Lea Corridor, the Chilterns Area of Outstanding Natural Beauty (AONB), the Areas of Great Landscape Value (AGLV) and Areas of Local Landscape Value (ALLV) and their connectivity.

Key Issues

12.1 From April 2015, national regulations will prevent the pooling of more than 5 separate contributions through section 106 of the 1990 Town and Country Planning Act. The Community Infrastructure Levy (CIL) is the new mechanism through which contributions will be pooled from April 2015.

12.2 Recent viability testing suggests that CIL is not currently viable in the borough. CIL will need to be revisited when viability evidence suggests that market conditions have improved enough for implementation.

12.3 The borough may have to implement compulsory purchase powers for infrastructure provision that can be resource demanding and lengthy. This power will be used as a last resort, because the Council's preferred approach to any land assembly will be through negotiation.

12.4 Public sector assets will have to be rationalised, which is again a lengthy process due to political and internal pressure from competing services within the local authority.

12.5 Planning conditions will need to be more focused and there could be more reliance on these as the traditional s106 tariff-based system is wound down. Planning conditions are, however, generally preferred to planning obligations as they are a simpler mechanism.

12.6 SEMLEP can provide sub-regional funding through a bidding process that requires multi-council support. Central Government funding, however, through DfT and CLG, may be reduced and so more schemes might need to go through approval systems such as the National Infrastructure Scheme process, which is resource intensive. The loss of the New Homes Fund to LEPs is another revenue stream reduction.

12.7 Pressure will arise from permitted development rights - including office to dwelling conversions - not contributing to infrastructure provision.

Policy approach:

12.8 The following documents have been used as sources of evidence in developing the policy to ensure robustness:

- Paragraph 173 of the NPPF identifies the need for Local Plans to be deliverable paying particular regard to viability. It states "Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable".
- The NPPF does not define 'infrastructure' however for the purposes of CIL. Infrastructure is defined by the Planning Act 2008 (as amended) as roads and other transport facilities, flood defences, schools and other educational facilities, medical facilities, sporting and recreational facilities and open spaces. This is broadly the definition of types of infrastructure the Local Plan makes provision for and is set out in more detail through the Infrastructure Delivery Plan (IDP).

- 2010 Community Infrastructure Levy Regulations as amended.
- Community Infrastructure Levy Guidance.
- PAS - A steps approach to infrastructure planning and delivery June 2009.

Policy LLP39 - Infrastructure and Developer Contributions

- A. The Local Planning Authority will support development proposals that provide or adequately contribute towards the infrastructure and services needed to support them, which will be delivered using the following approach:
- i. testing the capacity of existing infrastructure and, where there is insufficient capacity, securing the timely provision of improvements or additional provision;
 - ii. infrastructure provision or improvements should be provided on-site as an integral part of a development wherever possible and appropriate;
 - iii. where off-site measures are needed, or on-site provision is not possible, planning obligations will be needed to secure the necessary provision or a financial contribution towards provision; and
 - iv. where a contribution towards other infrastructure improvements or provision is needed and viable, this will be achieved through planning obligations, planning conditions and/ or Community Infrastructure Levy.
- B. Any on-site provision or financial contribution should:

- i. meet the reasonable costs of provision to support the development or offset its impact;
- ii. be related to the size and type of each development and the nature of the improvements required; and
- iii. take account of the cumulative impact of requirements on the viability of development, especially where the development meets a particular local need or provides particular benefits.

The Local Planning Authority will support the improvement or development of locally and regionally important infrastructure where needed to serve existing or new development required through this Plan, or to secure long term supply, provided that the need for such facilities is consistent with other policies within this Plan.

The Monitoring Strategy

12.9 The key aim of the monitoring strategy will be to provide a regular test of whether the local strategic objectives of the Plan are being met or some harm is being inadvertently caused. This will be achieved through the use of clusters of indicators that together provide a full understanding of the outcomes of the Plan, relative to each of the strategic objectives.

12.10 The Sustainability Appraisal supporting the Local Plan has suggested indicators based upon the significant effects that may be related to future development outcomes. As far as possible, these will form the core of the monitoring indicators to be considered. These will be added to by the use of existing nationally or locally available datasets to report development outputs and outcomes in line with the principle of "count once, use many times".

12.11 The indicator clusters will in turn be reported within the Authority's Monitoring Report (AMR). It is the aim of this document

to tell the local story of what is being provided and where. It will also report on the local context over a range of topics, including housing and employment. In writing the AMR, particular attention will be paid to the PAS guidance document, *"Monitoring that matters: towards a better AMR"* and any other such guidance that may become available.

12.12 The proposed monitoring regime can be found in Appendix 8.

Managing a Supply of Housing Land

12.13 Appendix 5 of this Plan sets out further details for monitoring delivery of the housing requirement of 8,500 dwellings (425 dwellings per annum). Based on an annual requirement of 425 dwellings per annum, there has been a shortfall in completions of 98 dwellings between 2011 and 2016. The aim is to recover this shortfall over the period 2016-21- i.e. at 445/year x 5 = 2,223 dwellings.

12.14 Table 1 of Appendix 5 indicates that Luton Borough Council does not have a record of persistent under-delivery at the point the Local Plan was adopted. The buffer will be reviewed annually.

12.15 The Housing Land Supply position of around 5.30 years' supply at April 2017 (based on the details contained in Appendix 5) is calculated as shown in the table below. Recalculation of the housing requirement (including the need to address any remaining shortfall) and updating of the housing trajectory will only be undertaken once the most recent data for housing completions in future monitoring years have been formally reported in the SHLAA or AMR.

12 . Infrastructure Delivery, Monitoring and Review of the Local Plan

Housing Land Supply Calculation

Luton Local Plan 2011-2031 (Sedgefield Method) (5% Buffer) (April 2017-base)							
Target	8,500						
Average annual target	425						
Requirement 2011-16 (5yrs)	2125	Delivery 2011-2016 (5yrs)	2027	Shortfall			-98
Financial Year	Forecast Delivery	5-years rolling forecast delivery	Sedgefield Annualised 5yr (425 + (Shortfall / 5))	Annual Target once shortfall addressed	5-years Total	5-year requirement plus 5% buffer	Amount of land supply (years)
2016/17	875		445				
2017/18	436		445	-			
2018/19	486		445	-			
2019/20	480		445	-			
2020/21	577		445	-			
2021/22	475	2454	-	425	2203	2314	5.30

Review of the Local Plan

12.16 During the public examination hearings into the Local Plan held from 2016 to 2017, a number of issues were highlighted for specific attention in the next review of the Local Plan. Several of these matters were pressing issues tending towards an early update. Policy LLP40 requires that the next full review of the Local Plan should be submitted for public examination by mid-2021. This balances the need for urgency on some matters, for example a review of school provision, but also giving time to allow the potential for local plans within neighbouring areas to be progressed following the completion of the Joint Growth Options Study. The Growth Options Study is particularly important in helping address Luton's unmet housing needs across the wider Housing Market Area. There are several areas where technical studies to inform the review can progress much earlier; examples being the reviews of school provision and the review of the Town Centre Development Framework.

Policy LLP40 - Review of the Local Plan

The Local Planning Authority will bring forward a full review of the plan. This will commence before the end of 2019 with submission of the review for examination by mid-2021. Specific matters to be addressed by the review include the following issues:

- To address the outcomes of the Growth Options Study and decisions in neighbouring local plans about how and where Luton's unmet housing needs will be provided for including implications for transport infrastructure, as appropriate.
- The objective assessment of housing needs including a reassessment of migration trends and projections.
- The capacity to accommodate housing within Luton.
- The outcomes of separate Luton and Central Bedfordshire Functional Economic Market Area (FEMA) studies.
- A full assessment of the need for school places over the plan period taking into account planned housing growth, the availability of school places to meet that need and steps to ensure sufficient school places are made available, including as appropriate through the allocation of land to allow the expansion of existing schools and/or the provision of new schools.
- Provision for the relocation of Luton Town Football Club.
- Retail needs of the Borough and how they will be provided for.
- Strategy and policies for the town centre.

- ix. Uses and policies relating to the strategic allocation at Power Court (Policy LLP9).
- x. Uses and policies relating to the strategic allocation at South of Stockwood Park (Policy LLP5).
- xi. The allocation and delivery of a park and ride facility at the strategic allocation at South of Stockwood Park (Policy LLP5).

The full review of the plan will take into account the outcome of any relevant planning applications, including in relation to Power Court (Policy LLP9) and South of Stockwood Park (Policy LLP5).

Appendix 1 Glossary

Affordable Housing	Housing that is accessible to households who cannot afford to rent or buy homes generally available on the open market. It includes social rented and intermediate tenures. Intermediate housing is housing at prices or rents above those of social rent but below market prices or rents.
Amenity	A positive element or elements that contribute to the overall character or enjoyment of an area. For example, open land, trees, historic buildings and the relationship between them, or less tangible factors such as tranquillity.
Authority Monitoring Report (AMR)	A report prepared by councils that can include data reported on line as it emerges over a year as well as a report assessing progress with and the effectiveness of the Local Plan and its documents.
Aquifer	The special underground rock layers that hold groundwater, which are often an important source of water for public water supply, agriculture and industry.
Area of Outstanding Natural Beauty (AONB)	An area with a statutory national landscape designation, the primary purpose of which is to conserve and enhance natural beauty. Together with National Parks, AONBs represent the nation's finest landscapes (Countryside & Rights of Way Act 2000). AONBs are designated by Natural England. Luton lies within the northern end of the Chilterns AONB, which was designated in 1965. Whilst little of the designated area lies within the borough boundary, it needs to be recognised that development within the town can have an impact on the AONB beyond.
Area of Great Landscape Value (AGLV)	This was a previous local policy designation to conserve the natural beauty of locally recognised landscapes of importance considered to be of similar landscape quality (but of less weight to AONBs) or having a specific local character. However, AGLV policy was abolished with Structure Plans by the government, and local authorities must undertake Landscape Character Assessments in order to designate and protect areas of local landscape importance (see LLI). Former AGLV designations existed on attractive and rare chalk downland at Dallow Downs and the escarpment near Bradgers Hill. Two areas between the borough boundary and the southern edge of London Luton Airport were similarly designated as part of a larger locally important landscape area extending south into Hertfordshire along the Lea Valley.
B1 - B8 use classes	A 'use class' is the grouping together of similar land uses. B1 is Business, which includes offices, research and development, light industry appropriate in a residential area; B2 is General Industrial (excluding incineration, chemical treatment, landfill or hazardous waste); B8 is Storage or Distribution, which includes open air storage.

Biodiversity	The variety and range of plant and animal life, encompassing genetics, species and ecosystems.
Car Club	An arrangement, usually provided by a commercial organisation, whereby residents who are Car Club members can hire a vehicle parked in their area at discounted rates for short or long periods.
Car Sharing	Where people who are travelling to the same or nearby destinations share a vehicle. This can be either through informal arrangements between colleagues or through a formal database such as 'Liftshare'. Some employers offer this.
Brownfield land	A term for land that has been previously developed with a permanent structure.
Building Research Establishment Environmental Assessment Method	Commonly abbreviated to BREEAM. A tool to measure the environmental performance of new and existing non-residential buildings. It is regarded by the UK's construction and property sectors as the measure of best practice in environmental design and management and is a voluntary standard.
Chilterns AONB	See AONB.
Coalescence	The merging or coming together of separate towns or villages to form a single entity.
Community Strategy	A strategy prepared by a local authority to improve local quality of life and aspirations, required under the Local Government Act 2000.
Community Facility	Public, private and third sector provision facilities (including those within educational establishments with shared use and public access) that provide for the health and well-being, social, educational, spiritual, recreational, leisure and cultural needs of the community. Most D1 (non-residential institutions) and D2 (assembly and leisure) uses fall within this definition. Some uses may qualify where they function as a community hub, such as a pub that supports teams in sports leagues. B (employment) and C (residential) use classes are not considered to be community facilities.
Conservation Area	An area of special architectural or historic interest, including groups of buildings, and which needs its character or appearance to be protected, preserved or enhanced.
Conurbation	A large urban sprawl, often densely populated, formed by the growth and coalescence of individual towns or cities.
County Wildlife Site (CWS)	Areas of land that are important for their wildlife. They are locally designated, following assessment of the quality and value of potential sites by a panel of specialists according to criteria from Natural England and DEFRA.
Demand Management	The application of strategies and policies to reduce car travel demand or to redistribute it.
DEFRA	Department of Forestry and Rural Affairs.

Appendix 1 Glossary

Density	A measure of the intensity of the use of land. For houses, it is calculated on the basis of the number of dwellings per hectare.
Development	Development includes any new building operation in, on or over the land including any subsequent redevelopment and any change of use.
Evidence Base	The information and data gathered by local authorities to justify the “soundness” of the policy approach set out in the Local Plan. It includes studies of the physical, economic and social characteristics of an area.
Flood Risk Assessment (FRA)	An assessment of the likelihood of flooding in a particular area so that development needs and mitigation measures can be carefully considered.
Green Belt	A designation of land around certain cities and built up areas which aims to keep this land permanently or largely undeveloped. The purposes of the green belt is to check unrestricted sprawl, prevent neighbouring towns from merging, safeguard countryside from encroachment and preserve the setting and special character of historic towns. Green belts are defined in a local planning authority’s development plan.
Greenfield Land	Land or a site, usually farmland, that has not previously been developed and include allotments.
Greenfield Runoff Rate	This is the surface water runoff rate from a site before development, or the existing site conditions for brownfield redevelopment sites.
Green Space	<p>Accessible Green Space is accessible to the local community (see Open Spaces Strategy) and Green Infrastructure (See Green Infrastructure Strategy) can include accessible green space and private green space. Typologies that come under Green Space can include:</p> <ul style="list-style-type: none"> • Parks and gardens, providing accessible high quality opportunities for informal recreation and community events. • Natural and semi-natural green spaces, including urban woodland and trees, providing opportunities for wildlife conservation and biodiversity. • Green corridors, which can be used for walking, cycling or horse riding, and giving opportunities for wildlife migration. • Outdoor sports facilities, which encourage participation in sports such as football, rugby, tennis, bowls, golf and athletics. • Amenity green space, giving opportunities for informal activities close to home or work and enhancing the appearance of residential areas. • Provision for children and young people, designed for play and social interaction.

	<ul style="list-style-type: none"> • Allotments and community gardens that include opportunities for residents and users who wish to do so to grow their own produce. • Cemeteries, giving opportunities for quiet contemplation and promoting wildlife conservation.
Guided Busway	Buses that are steered for part or all of their routes by external means, usually on a dedicated track.
Gypsies and Travellers	The Gypsy and Traveller accommodation needs are assessed as part of housing need and enables sites to be identified in order to meet the current and future housing needs for this specific group, which includes travelling showpeople.
Hectare	A unit of land equivalent to 10,000 square metres. One hectare is approximately equal to 2.47 acres.
Heritage asset	A building, monument, site, place area or landscape identified as having a degree of significance meriting consideration in planning decisions. Heritage assets are valued components of the historic environment. They include designated heritage assets such as Listed Buildings and World Heritage Sites as well as assets identified by the local planning authority (including local listing).
Highways England	A Government company charged with operating England's motorways and major A roads. This includes modernising and maintaining the highways, manage and help prevent incidents on England's motorways through the Traffic Officer service.
Historic Parks and Gardens	A park or garden of special historic interest. Grade I, II* or II as designated by English Heritage.
Index of Multiple Deprivation (IMD)	This calculates the level of deprivation of a ward using a set of indicators focussing on income, employment, health & disability, education, skills & training, barriers to housing & services, living environment and crime. It is used to help identify areas for regeneration.
Infrastructure	A general term used for the basic facilities, services and installations needed for the functioning of a community such as health and recreation facilities, water, sewerage, electricity, schools, post offices, airports, roads and other utilities.
Key Diagram	A diagram illustrating the spatial strategy of a local planning authority's Local Plan.
Local Development Scheme (LDS)	The local planning authority's programme or timing for the preparation of Local Development Documents.
Local Landscape Importance (LLI)	Former Area of Great Landscape Value (see AGLV) policy was abolished with Structure Plans by the government, and local authorities must undertake Landscape Character Assessments in order to designate and protect areas of 'local landscape importance'. Former AGLV designations existed on attractive and

Appendix 1 Glossary

	<p>rare chalk downland at Dallow Downs and the escarpment near Bradgers Hill. Two areas between the borough boundary and the southern edge of London Luton Airport were similarly designated as part of a larger locally important landscape area extending south into Hertfordshire along the Lea Valley. Within Luton, these areas are retained as of 'local landscape importance' (LLI). Additional LLI are the Hart Hill area part of a steep hillside rising above the River Lea characterised by mature trees (a significant landscape feature visible from much of the southern part of the town) and Stockwood Park, a large area of eighteenth century 'romantic' landscaping (prominent from the M1 motorway and providing a quality southern approach to the town).</p>
Local Plan	<p>The plan produced by the local planning authority under the current Localism Act (and Plan making regulations) which can comprise of a document with a key diagram, policies map and a list of policies with supporting text setting out how much, when and where development will take place e.g. housing, employment, infrastructure such as transport and delivery of strategic allocations of land for such purposes.</p>
Locally significant Flooding	<p>Locally significant flooding' is defined in the Luton Local Flood Risk Management Strategy (LLFRMS) as a set of thresholds that, if reached or exceeded, would trigger the carrying out of a formal investigation by the Council into a flooding incident. The thresholds are quantified in the LLFRMS in terms of human health, economic activity and environmental impact.</p>
Local Strategic Partnership (LSP)	<p>Non-statutory and multi-agency partnerships bringing together at a local level different parts of the public, private and voluntary sectors, allowing different initiatives and services to support one another so that they can work together more effectively with one key objective to improve the quality of life in that area.</p>
Local Transport Plans (LTPs)	<p>This strategy is prepared under the guidance of the Transport Act 2000, setting out the transport strategy for the district for improving local transport.</p>
Luton Dunstable Busway	<p>A guided busway operating along a former disused railway line linking Luton town centre with Dunstable and Houghton Regis town centres.</p>
Master Plans	<p>Sets out the proposals for space and land-use and matches these to a framework for investment and implementation.</p>
Mixed Use	<p>Provision of a mix of complementary uses, such as residential, community and leisure uses, on a site or within a particular area.</p>
Modal Shift	<p>The process of encouraging people to move from one transport method (e.g. the car) to another (e.g. buses).</p>
National Planning Policy Framework	<p>The government has set out its key planning principles and policies in a national framework to guide preparation of Local Plans and development management decisions.</p>
Older people's housing	<p>Accommodation serving the needs of people of retirement age.</p>

Original dwelling	This is the principal/main dwelling within a curtilage before any subsequent alteration or extension which has increased its size/volume.
Policies Map	Illustrates the spatial extent of policies of a Local Plan.
Pre-Submission Consultation Statement	A schedule setting out the consultation responses received during a statutory consultation period on the Local Plan.
Previously Developed Land (PDL)	Land that is or has been occupied by a permanent structure and associated fixed-surface infrastructure.
Principal dwelling	This is the principal/main dwelling within a curtilage before any subsequent alteration or extension which has increased its size/volume.
Real Time Information	Electronic display giving up-to-the-minute information about public transport arrivals and departures.
Regeneration	The economic, social and environmental renewal and improvement of urban and rural areas.
Regional Spatial Strategy / East of England Plan	Regional Plans were abolished by the Coalition Government in 2012/13.
Registered Common Land and Access Land	Three areas of Registered Common Land exist within the borough. These are The Moor, which is a relic of the ancient Great Moor, which served as the sole recreational space for Lutonians until the 1860s, and Bell's Close and Pope's Meadow, which were granted to the town as compensation for the loss of part of the Great Moor following construction of the Midland Railway. These became part of People's Park, which was the first public park to be created in Luton. Each of these sites has historic heritage, landscape and biodiversity value, and is registered as a commons under the Commons Act (1965) and as access land under the CROW Act (2000).
Registered Parks and Gardens	Luton contains two parks that English Heritage has included on its 'Register of Parks and Gardens of Special Historic Interest in England'. They are Wardown Park to the north of the central area, and Putteridge Bury on the north east edge of the town, which lies mostly within Hertfordshire. Such parks are considered by English Heritage to make a significant contribution to the richness of the local scene in terms of green space and nature conservation. Inclusion on the list requires Local Authorities to make provision for the protection of the historic environment in their policies and their allocation of resources.
Renewable energy	Renewable energy is from sources that occur naturally and repeatedly in the environment, for example from the wind, water flow, tides or the sun.
Section 106 Agreements	Legal agreements between a planning authority and a developer, or undertakings offered unilaterally by a developer, that ensure that certain extra works related to a development are undertaken.

Appendix 1 Glossary

Sites of Special Scientific Interest (SSSI)	These are statutorily protected sites that comprise the country's best wildlife and geological sites.
Spatial Planning	Spatial planning goes beyond traditional land use planning to integrate policies and programmes that influence the nature of places and how they can function, such as delivering sustainable development.
Statement of Community Involvement (SCI)	The Statement of Community Involvement sets out the processes to be used by the local authority in involving the community in the preparation, alteration and continuing review of all local development documents and development control decisions.
Strategic Housing Land Availability Assessment (SHLAA)	An assessment of land for housing to demonstrate that the local authority has a continuous 5 year supply of deliverable sites for housing and a 15-year supply of potential sites for housing.
Strategic Housing Market Assessment (SHMA)	Sets out the local authority's objective housing needs split by tenure (e.g. social rented housing, intermediate housing and market housing) and is output according to local authority and housing market areas. It promotes an approach to assessing housing need and demand.
Strategic Allocations	A site over a certain size threshold identified in the Local Plan and allocated on the policies map for development of a certain use or mix of uses.
Supplementary Planning Documents (SPDs)	Elaborates on policies or proposals in the Local Plan and gives additional guidance.
Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA)	The SA/SEA is central to the planning system. Its aim is to take an objective view of sustainable development through the integration of social, environmental and economic considerations.
Sustainable Community Strategy (SCS)	A document produced by the local authority and key local partners, which sets out the long-term vision for the town. The Local Plan is a key implementation tool for some of the objectives of the SCS.
Sustainable Communities	A sustainable community is an organic vibrant environment where people will want to live and work now and in the future.
Sustainable Development	The purpose of the planning system is to contribute to the achievement of sustainable development. There are three dimensions to sustainable development: economic, social and environmental. Sustainable Development, according to Resolution 42/187 of the UN General Assembly, is meeting the needs of the present without compromising the ability of future generations to meet their own needs.
Sustainable Drainage Systems (SuDS)	A system for surface water managing run-off with the aim of reducing flooding, improving water quality and protecting the environment.

Town and Country Planning (Local Development) (England) Regulations 2012	The formal Government regulations that define how the LDF is produced.
Transport Hub or Mode	A location where passengers can change to different modes of transport.
Transport Assessment and Transport Statement	This is a package of information and a statement in support of a planning application that sets out the detail of traffic impacts on the road network and any mitigation required.
Travel Plan	Is a package of actions designed by a workplace, school or other organisation to encourage safe, healthy and sustainable travel options.
Urban Extension	Involves the planned expansion of a city or town and can contribute to creating more sustainable patterns of development when located in the right place, with well-planned infrastructure including access to a range of facilities, and when developed at appropriate densities.

Appendix 2 Parking and Cycling Standards

Maximum Car Parking Standards

Use Class	Description	Standard (Maxima)
A1	Retail - Food (over 1,000sq.m.)	Standard to be considered on individual merits, subject to Council approval
A1	Retail - Non-Food (over 1,000sq.m.)	
A1	General Retail (under 1,000sq.m.)	
A2	Offices (Business & Professional)	1 space per 30sq.m.
A3 to A5	Cafes, Restaurants, Public Houses, Wine Bars etc	1 space per 30sq.m.
B1	Business Use	1 space per 30sq.m.
B2	Industry	1 space per 30sq.m.
B8	Warehousing, Storage & General Distribution	1 space per 50sq.m. or 1 space for full time equivalent staff, whichever is lower
C1	Guest Houses/Hotels	1 space per bedroom + appropriate standards for ancillary uses + 1 per 2 full time equivalent staff parking
C2	Hospitals	Will need to reflect current hospital provision - consultation needed
C2	Nursing Homes	Space as follows:
		7 - 10 residents - 4
		11 - 15 residents - 5
		16 - 20 residents - 6
		21 - 25 residents - 8
		26 - 30 residents - 10
		+ 1 space per bedroom for live-in staff
C3	Dwellings	
	4+ bedrooms	3 spaces per dwelling (or lower depending on accessibility)
	2/3 bedrooms	2 spaces per dwelling (or lower depending on accessibility)

Appendix 2 Parking and Cycling Standards

Use Class	Description	Standard (Maxima)
	1 bedroom	1 space per dwelling (or lower depending on accessibility)
C3	Sheltered Housing	1 space for the house manager 0.19 for 1 bedroom 0.44 for two bedrooms 0.08 spaces per apartment for visitors
D1	Secondary Higher/Further Education Establishments and Adult Training Centres	1 space per 2 staff + 1 space per 15 students (total, not full time equivalent) on all developments
D1	Medical & other health practices	4 spaces per consulting room + 1 space per 2 staff
D1	Pre-school Play and Nursery Provision, Primary Schools	1 space per 2 staff
D2	D2 Uses not individually listed below	Standard to be considered on individual merits, subject to Council approval
D2	Cinemas	
D2	Conference Facilities	
D2	Sports Stadia (with over 1,500 seats)	
SG	Hostels and HMOs	1 space per 4 rooms and, in any case, not more than existing provision if converted from a dwelling
SG	Launderettes	1 space per 30sq.m.
SG	PHV Offices	1 space per 30sq.m. + 1 space per 2 cars based at premises
SG	Theatres	1 space per 5 fixed seats; and 3 disabled bays or 6% of total capacity; adequate turning and loading facilities; space for 1 coach or a 16.5m lorry; otherwise standards to be considered on individual merits subject to Council approval.

General notes

- For those developments where there is no adopted parking standard, the amount of parking required will be determined by the Council having regard to the transportation policies and objectives set out in this Local Plan.

Appendix 2 Parking and Cycling Standards

2. The standards set out above will be the maximum permitted in new developments in Luton. However, in accordance with Policy LLP32 of this Local Plan, the Council will limit parking for new development in the central area to that which is essential for operational purposes, and may seek to reduce the maximum standard in other areas highly accessible by public transport.
3. The minimum size of a standard parking bay is 2.4m x 4.9m.
4. The floor space in all cases refers to the gross (external) floor area.
5. For mixed-use schemes, the parking requirement will be calculated separately for each use.
6. Where developments require servicing by goods vehicles, sufficient space for their standing and manoeuvring should be provided. Schemes should be designed to allow vehicles to enter and leave the site in forward gear.
7. In all uses likely to generate coach traffic, e.g. hostels, education establishments, sports facilities and theatres, schemes should provide adequate off-street facilities for coaches, including picking-up and setting-down points, manoeuvring space and parking spaces. Schemes should be designed to allow vehicles to enter and leave the site in forward gear.
8. **Disabled parking spaces:** In all developments providing 5 or more car parking spaces, a minimum of 1 bay or 5% of the total capacity (whichever is greater) should be designated and reserved for disabled users. Spaces should be a minimum of 3.6m x 4.9m and conveniently located close to the entrance of buildings.

Minimum Cycle Parking Standards

Use Class	Description	Standard (Minima)
A1	Retail - Food (up to 250sq.m.)	1 space per 5 staff
A1	Retail - Food (250 - 500sq.m.)	1 space per 10 staff
A1	Retail - Food (500 - 1,000sq.m.)	1 space per 10 staff + 1 space per 250sq.m.
A1	Retail - Food (over 1,000sq.m.)	1 space per 10 staff + 1 space per 150sq.m.
A1	Retail - Non-Food (under 1,000sq.m.)	1 space per 10 staff (on site at one time)
A1	Retail - Non-Food (over 1,000sq.m.)	1 space per 10 staff (on site at one time) + 1 space per 350sq.m.
C3	Residential - blocks of flats	1 space per unit for the first 10 units; 1 space per 5 units for the remainder
D1	Infant/Primary schools	1 space per 4 staff (on site at one time) + 1 stand (mix of cycle and scooter parking per 4 pupils/students (on site at one time)

Appendix 2 Parking and Cycling Standards

Use Class	Description	Standard (Minima)
D1	Secondary Schools/Higher & Further Education Establishments/Adult Training Centres	1 space per 10 staff 1 stand per 8 staff (on site at one time) + 1 space for 4 pupils (on site at one time)
	Other non-residential developments attracting significant numbers of the public	Cycle parking for the public to be agreed with the Council, in addition to staff parking in accordance with the above standard

General notes

1. The cycling 'spaces' to be provided above requires some form of stand to which the cycle can be securely chained.
2. Cycle parking should be conveniently located for users, offer security and be subject to surveillance during use. Wherever possible, it should be under cover.
3. In accordance with Policy LLP32 of this Local Plan, consideration should be given to the provision of storage, which should include showering facilities for employees choosing to cycle.
4. Developers should take account of the need for cycle storage in the design of new residential schemes.

Appendix 3 Employment Sites: Categories A & B

List of Key Employment Areas Category A

Name	Description
Butterfield Green Technology Park (STRATEGIC ALLOCATION)	37.3 ha Strategic scale site part completed (circa 30%) with remaining greenfield plots ready to develop for high quality uses in line with Policy LLP7 in a prominent location with frontage onto the A505, good quality environment and very modern, good quality buildings with low vacancy but relatively remote location and much land available.
Junction 10a South of Stockwood Park (STRATEGIC ALLOCATION)	14 ha Strategic scale, undeveloped site (includes north and south of Newlands Road) near the airport and accessed off J10A to the M1. Proposed B1(a) office park and Park and Ride.
Napier Park (STRATEGIC ALLOCATION)	25 ha Strategic scale development site cleared for mixed use employment (B1 and B2) housing and commercial accessed via London Luton Parkway station and Kimpton Road and the A1081 dual carriageway New Airport Way - M1 Junction 10A.
Wigmore Employment Area/ Century Park (STRATEGIC ALLOCATION)	42.6 ha Strategic scale undeveloped site for mixed B1(a), B1(b), B1(c), B2, B8 adjacent to London Luton Airport - a strategic route access has been designated to serve this site from the airport estate via Wigmore Valley Park, which will tie this strategic development into the A1081 dual carriageway New Airport Way and with access to services and labour, and London Luton Airport.
Power Court (STRATEGIC ALLOCATION)	7.21 ha Large strategic town centre industrial estate part cleared, allocated for mixed use retail, residential and B1 business to extend the town centre shopping area, access off the A505 ring road 4km from junction 10a (M1) and Luton rail station and guided bus interchange.
Airport Executive Park	3.7 ha Medium sized site with high profile location next to London Luton Airport; access off A505 with units in good condition, good environment and low vacancy. B1(a), B1(c), B2, B8.
Barratt Industrial Park	3.5 ha Well connected site near the airport and on A505 with fairly modern units, and no obvious vacancy. B1(a), B1(c), B2, B8.
Bilton Way	9.6 ha Large well established industrial estate, good quality buildings predominantly B1/B2 and B8 mix of uses - some quasi retail trade and Vauxhall servicing located 2 km from junction 11 (M1) via A505.
Bramingham Business Park	2 ha Pleasant industrial park, access directly on the A6, 6km from junction 11 (M1), modern 1980s/1990s mix of good buildings and B1/B8 uses with no vacancies.

Appendix 3 Employment Sites: Categories A & B

Name	Description
Camford Way	10.3 ha Very large busy industrial estate on the norther edge of Luton, 4.6 km from junction 11 (M1) via A5228, buildings generally in good condition and some units needing upgrade investment B1/B2 and B8 mix with some sui generis Cash & Carry.
Capability Green	Large successful premium business park accessed via M1 Junction 10a, high quality B1 (a) accommodation in proximity to London Luton Airport.
Chapel Street [CASTLE QUARTER]	0.19 ha Town centre 1980s B1 office and mixed retail building in good condition, 3.5km from junction 10a (M1), designated within Luton Town Centre Strategy policy LLP3 (Castle Quarter - mixed use residential retail and leisure) and conservation area, fully occupied.
Commerce Park	3.6 ha Relatively close to the M1 Junction 11 with increasing profile and accessibility due to its location beside guided bus route; fairly modern units with low vacancy B1(a), B1(c), B2, B8.
Cosgrove Way	10.1 ha Large site with high profile beside the M1 near Junction 11 but limited access via rural roads; large, reasonably modern units and low vacancy. B1(a), B1(c), B2, B8.
Craddock Road	5.0 ha High profile site near A505 and close to M1 Junction 11 with larger modern units and low vacancy. B1(a), B1(c), B2, B8.
Crescent Road (West)	2.1 ha Good accessibility by road and rail, located next to the route of the inner ring-road and hosting a rail-served aggregates depot (safeguarded by the joint Minerals & Waste Local Plan). Low density but low vacancy. B2, B8.
Dalroad Employment Area	5.7 ha Near M1 J11 via A505 with some large, modern units on a spacious site with low vacancy B1(a), B1(c), B2, B8.
Dencora Way Employment Area	1.8 ha Poorer road links to M1 but in well-established employment area with well-maintained, if older, units in good environment and low vacancy. B1(a), B1(c), B2, B8.
Electrolux Oakly Road	2.2 ha High quality B1 office and B2 manufacturing premises with B8, 1.2 km from junction 11 (M1), fully occupied.
Finway Industrial Estate	6.8 ha Large site near M1 J11 via A505 with reasonably modern units in good condition in well-established industrial location and low vacancy. B1(a), B1(c), B2, B8.
Firbank	3.24 ha Existing industrial estate, well established in larger employment area 2.5 km from junction 11 (M1) via A505, mixed B1/B2/B8, quality of buildings mixed with some poor, fully operational and occupied.
Guildford Street (Alexon Building & Hat Factory)[CREATIVE QUARTER]	0.15 ha Town Centre mixed use pre-war and post-war refurbished premises, B1/and non B class D1/residential/retail, 4.5 km from junction 10a (M1), fully occupied, subject to Creative Quarter policy LLP11 regeneration for mixed residential use, adjacent to conservation area.

Appendix 3 Employment Sites: Categories A & B

Name	Description
Inkerman Street	0.55 ha Town Centre office and industrial block, 4.5km junction 10 a of M1 via the A505, mix of B1/B8 and commercial A1-A5 uses in modern 1980s good buildings but with older 1950s buildings needing refurbishment, some vacancies.
Jansel House	0.6 ha Located on the A505, this is a reasonably modern office block in good condition, with good access to local services. B1(a).
Kimpton Road A	3.04 ha Existing industrial site 3.3 km from junction 10a (M1) via east Luton corridor A505 dual carriageway, B1/B2/B8 uses in buildings in good condition no obvious vacancies.
Kimpton Road B	1.5 ha Prominent visible location adjacent to the airport, Vauxhall (IBC) and Napier Park, mixed site offices, print works, distribution, car dealership, 3.5 km from junction 10a (M1) via east Luton corridor A505 dual carriageway, good quality buildings, site part cleared included within Napier Park development.
Kimpton Road C	15.71 ha Large bespoke Vauxhall (IBC) manufacturing plant prominent and visible close to the airport and Napier Park, 3.5 km from junction 10a (M1) via east Luton corridor A505 dual carriageway, B1/B2/B8 uses in good quality buildings and plant - fully occupied.
Kingsway	1.11 ha Existing industrial area, linear form, 2.5 km from junction 11 (M1) via A505, mix B1/B2/B8 uses in reasonable buildings, cramped operation but reasonable parking, some vacant units.
Osbourne Road Employment Area	7.0 ha Large site on A505 with modern buildings and good environment occupied by single company with ample parking provision and adequate public transport access. B1(a).
Laport Way (Note:includes Commerce Park)	13.6 ha Prominent large industrial estate, B1/B2/B8 uses adjacent to employment cluster, 2.5 km from junction 11 (M1) via A505, majority of units fairly modern, some vacancies.
Liverpool Road	0.96 ha Town Centre office blocks (2-3 storey), 4.5 km from junction 10a (M1) via A505, mixed 1980s B1 office premises in good condition with older (2 storey) in fair condition some recently refurbished, no vacancies.
Luton Enterprise Park	2.9 ha Developed industrial park, 4.3 km from junction 11 (M1), north edge of Luton mix of B1/B2 and B8 uses, buildings in good condition, low vacancy.
Park Avenue Trading Estate	5 ha Well established industrial estate 4km from junction 11 (M1) north Luton, B1/B2 and B8 mix with new/modern and older mix of units good/reasonable condition, some vacancies.
Percival Way Industrial Area	6.3 High profile location on A505 beside London Luton Airport with good public transport, moderate units and environment but low vacancy. B1(a), B1(c), B2, B8.
Plaza 668	0.35 ha 1970s refurbished office block beside A505 and Stopsley district centre. Good road access and adequate parking. No sensitive

Appendix 3 Employment Sites: Categories A & B

Name	Description
	adjoining uses and building in good condition with low vacancy. B1 offices.
Portland Road (Depot)	4.36 ha Mixed B2/B8 employment depot, includes Council recycling and industrial uses within a strategic scale employment area, 2.5 km from junction 11 (M1) via A505, large and small industrial units, run down appearance but no obvious vacancies.
Premier Business Park	1.6 ha Very modern units in well landscaped site with ample parking provision, in prominent industrial location. B1(a), B1(c), B8.
Proctor Way	1.8 ha Existing site with cleared area for development and mix of airport related uses adjacent to London Luton Airport, 4km from junction 10a (M1) via A1081 dual carriageway, buildings present are older but high quality aviation related office and industrial mostly within airport boundary and cleared site outside boundary.
Progress Park	0.70 ha Well established industrial estate, north west edge of Luton 4 km from junction 11 (M1) via A5228, mix of B1/B2/B8 uses in modern and refurbished units, low vacancy.
Prospect Way	6.2 ha Employment Area High profile location beside London Luton Airport and on A505 with relatively modern office units and no obvious vacancy. B1(a), B1(c).
Scott Road	2.6 ha Prominent well established industrial estate, B1/B2 and B8 mix, north edge of Luton 4km from junction 11 (M1), managed good quality 1980s units, only 2 vacancies.
Sedgwick Road/ Progress Way	13.6 ha Very large site with mix of modern/refurbished units in prominent industrial location. Limited access to M1 via rural roads but low vacancy. B1(a), B1(b), B1(c), B2, B8.
SKF	8.14 ha Large bespoke SKF plant (UK) on north edge of Luton 4.3 km from junction 11 of M1 via A5228, older 1950s industrial unit buildings generally in good condition for mix B1/B8 uses no vacancies.
Selbourne Road Industrial Area	4.17 ha Existing linear B1/B8 employment site immediately adjacent railway line, within strategic employment area, 2 km from junction 11 (M1) but via busy residential roads; some non B use, mixed stock of units, lower quality environment but few obvious vacancies.
Sundon Business Park	2.6 ha Limited access to M1 J11 via rural roads but well maintained, managed site in established industrial location with modern units and no vacancy. B1(a), B1(c), B8.
Sundon Industrial Estate	2.5 ha Limited access to M1 J11 via rural roads and with older industrial units in good condition but in established industrial location with low vacancy B1(a), B1(c), B2, B8.
Urban HIVE, Luton Enterprise Park	0.81 ha Existing industrial estate, northern edge of Luton 4.3km from junction 11 (M1) via the A5228, mix B1/B2/B8 in modern good quality units, no vacancies.

Appendix 3 Employment Sites: Categories A & B

Name	Description
Vauxhall North of Napier Park	11.26 ha Existing B1/B8 vehicle manufacturing plant near Napier Park and employment cluster close to the airport, 3.8km from junction 10a (M1), direct access off A1081 dual carriageway New Airport Way, dated bespoke plant premises in reasonable condition, fully occupied.
Vauxhall Way Trailer Park	14.57 ha Large high profile B1/B8 employment land site predominantly used for surface parking and opens storage, mixed B1/B2 and storage, between key employment area and the airport, 3.5km from junction 10a via A1081 dual carriageway New Airport Way, no obvious vacancies.
Waller Avenue	2.61 ha B1/B8 Employment site, 2 km from junction 11 (M1) via residential roads, mix non B uses, BT telephone engineering centre, motor transport, storage, waste transfer operations, reasonable quality buildings, good quality office frontage buildings, reasonable, no vacancies.
Wigmore Place	1.8 ha Prominent good quality 1980s B1 office in block (close to the airport) sub divided into smaller units , on the eastern side of Luton, 6km from junction 10a (M1) via east Luton corridor dual carriageway, some floorspace being marketed.
Wingate Road	1.16 ha Existing cluster of 3 separate industrial B1/B2/B8 uses, in a strategic employment area 2 km from junction 11 (M1) via local residential roads, cramped operationally or for expansion, mix reasonable and poor properties, evidence fully occupied.
Willowgate Trading Estate	2.3 ha Medium sized site with M1 access via rural roads and mix of modern and older units in established industrial location and with no vacancy. B1(c), B2, B8.

List of Employment Areas Category B

Name	Description
Abbeygate Business Centre	0.2 ha Small B1 industrial site on edge of Luton town centre with good local road access, 4.5 km from junction 10 (M1), borders an employment cluster with some residential uses nearby, 1970s buildings in run down state and need refurbishment, many vacancies.
Albion Road	0.2 ha Small edge of centre site with good local road and public transport and town centre services, 4.1 km from junction 10 (M1), adjoined by commercial uses with residential estate across road, older units in reasonable condition and fully occupied. B1/C3.
Arundel Road	0.95 ha Existing employment site within large strategic employment area, 2 km from junction 11 (M1) via residential roads, mix of B1/B2 uses and vehicle repairs in 1950's and 1970s buildings, in reasonable condition for B1 retention, fully occupied but non B uses present may indicate lack of demand.

Appendix 3 Employment Sites: Categories A & B

Name	Description
Brunswick Street (HIGH TOWN MASTERPLAN)	0.32 ha Medium sized site occupied by 1890s office building and attached warehouse/storage shed, all in good condition and occupied. Good local road access although distant from strategic routes and access to town centre public transport and services. Within established industrial area and appears to function adequately. B1/B8.
Burr Street (HIGH TOWN MASTERPLAN)	0.8 ha Medium sized industrial site in an established industrial location near Luton rail station and town centre transport and services. Good local road access to site with adequate on-site parking and service yard areas. Good quality units on site and all occupied.
Bus Depot Dunstable Road	3.18 ha Employment site 1.4 km from junction 11 of M1 via A505, mix predominantly Arriva Bus Depot and car dealership, buildings in reasonable condition, car dealership showroom vacant.
Crescent Road (East)	2.8 ha Good accessibility by road, located next to the route of the inner ring-road. Significant areas of land have been demolished and cleared while other parts now support community and leisure uses. B1(a), B1(b), B1(c), B2, B8.
Dudley Street (HIGH TOWN MASTERPLAN)	0.3 ha Small edge of centre site with older buildings and car park. Poor road access but close to public transport. Adjoins some residential uses in mixed use area. Low quality buildings only partly occupied. B1/C3.
Eaton Green Road	2.3 ha Undeveloped car park site in high profile location beside London Luton Airport with good access to A505/M1, with good public transport and close to local services. Separated from residential areas but close to airport noise. B1-B8.
Empress Road	0.1 ha Existing small employment site, non B classes (car repairs) remaining adjacent to redeveloped industrial land within forming new flattened developments, 2 km from junction 11 (M1), constrained site, poor buildings in disrepair, some vacancies.
Castle Quarter (CASTLE QUARTER)	1.38 Mixed use B1 office and non B uses site within the town centre 4 km from junction 10a (M1) access of the A505 ring road, designated in the Local Plan Luton Town Centre Strategy Policy LLP3 (Castle Quarter - mixed use residential, retail and leisure), vacancies on eastern section of site part cleared.
Chaul End Lane (South)	0.6 ha Large warehouse unit near M1 and adjoining A505 junction. Limited local road access and distant from services but adjoins guided bus way and retail park opposite. Potential constraints from some adjoining residential uses but unit occupied and in good condition. B1-B8.
Collingdon & Liverpool Road	0.58 ha Mixed area B1 office/B8 and student accommodation within town centre. 4.5 km from junction 10a (M1) via the A505 town centre ring road, public transport nearby but only the Liverpool Road site has adequate on-site parking, mix of 1980s office premises in good condition and older industrial units in need of refurbishment and some vacancies.

Appendix 3 Employment Sites: Categories A & B

Name	Description
Concorde Street (HIGH TOWN MASTERPLAN)	0.1 ha Edge of centre small office site with good local road access, limited parking on site but good access to public transport. Close to local services and within employment cluster with small amount of residential development adjoining. Low profile office location but reasonable quality building and no vacancy. B1.
Crescent Road (East)	0.8 ha Employment site split into two, close to town centre, adjacent to railway and Crescent Road safeguarded aggregates depot/railhead, 4km from junction 10a (M1) via A505 ring road/dual carriageway, B1/B8 post war industrial and pre-fab office buildings, non B uses D1, sui generis, not fully occupied.
Cumberland Street (CASTLE QUARTER)	0.29 ha Employment site B1/B2/B8 mix, designated in the Local Plan Luton Town Centre Strategy policy LLP3 (Castle Quarter - mixed use residential, retail and leisure), off the A505 ring road 4 km from junction 10a (M1), mix of poor/rundown and reasonable quality buildings, but fully occupied.
Flowers Estate	0.28 ha Industrial estate, close to the edge of the town centre, 3 km from junction 10a (M1) via A505 ring road, B1/B8 mix of use in 1980s buildings of reasonable condition but cramped site operationally.
Frederick Street	0.24 ha Older industrial block B1/B8 in residential area within walking to town centre/station, accessed off residential roads 5.5. Km from junction 11 of M1, Victorian industrial buildings, some post-war infill in adequate condition and occupied.
Gillam Street (HIGH TOWN MASTERPLAN)	0.1 ha Small cleared site in existing employment area near town centre and railway station. Reasonable local road access and services/public transport nearby but unlikely to attract new employment development in this location. C3.
Greenwood Court Industrial Area	0.42 ha Small B1(a), B1(c), B8 industrial estate in low profile residential area, 5.5 km from junction 10 (M1) via A5228 and good public transport access, tight parking/cramped operation but reasonably modern small units in good condition, some vacancy.
High Town Road	0.5 ha Small office site on edge of town centre with good local road access, 4.8 km from junction 10a (M1), public transport accessibility and ample parking on site. Adjoining uses not incompatible with offices. Offices reasonably modern, in good condition, some units appear vacant and suitable to meet future needs. B1.
Hitchin Road	0.04 ha A small site in industrial area used for vehicle repair. Reasonable local road access but no off street parking. Near new three storey block of flats but separated by road. Older building in poor condition but occupied and meets local needs. B1/C3.
Holly Street	0.67 ha Industrial estate, edge of town centre, 3 km from junction 10a (M1) via A505 ring road, mix B1/B8, modern within pre-war brick industrial buildings some in good and some in poor condition needing refurbishment, many vacant units.

Appendix 3 Employment Sites: Categories A & B

Name	Description
King Street	0.66 ha Mix of pre and post war buildings in A1-A5 use with B1, active frontages within the town centre abutting the A505 ring road 3.5 km from junction 10a (M1), conservation area (Policy LLP30) mix of adequate and older buildings potentially attractive needing refurbishment, part allocated for housing.
Leagrave Road	3.34 ha Older 1940s to 1970s mixed cement works/industrial buildings/site some in poor repair on A579, 2.5 km from junction 11 (M1), with limited parking on-site and fair public transport. Adjoins railway line, forms a safeguarded concrete/sand batching facility (joint Minerals & Waste Local Plan) in residential area near some local services. Mainly older units containing vehicle repair uses, some in poor condition but no apparent vacancies and functioning well. B1c/B2.
Langley Terrace	0.72 ha Industrial estate south of town centre A505 ring road, 3 km from junction 10a (M1), mix B1/B8 split into 3 sites, some pre-war but mostly post-war industrial units, poor quality in need of refurbishment, operationally cramped site, low vacancy.
Manor Road	1.6 ha Existing industrial estate, reasonable location good access 4 km from junction 10 a (M1) via A505/ring road and the town centre. Mix of B1/B8 uses, suffers from a high number of vacancies and some units in poor condition. Suitable for employment but needs investment, flood zone 2 restrictions.
Mill Street	0.08 ha Small B1 office block located within the town centre, 4.5 km from junction 11 (M1) via A505 ring road, post-war office building, slightly run down state, non B uses present, partially vacant.
Moreton Park	0.9 ha Medium sized B1/B2 industrial estate, part vacant, with low profile in mainly residential area with residential uses on all sides, 5.5 km from junction 10a (M1) via A5228 but site access is off constrained residential road with parking on both sides. Site slopes steeply and contains small 1970s industrial units in reasonable condition with quite high vacancy, no obvious marketing.
141 New Bedford Road	0.42 ha Industrial estate, B1/B8 uses in residential setting, access onto A6 via town centre roads and 4.8 km from junction 11 (M1) small site constrained operations, poor quality buildings need refurbishment, no apparent vacancies.
New Town Trading Estate	0.43 ha Existing B/B8 industrial estate 400 m south of the town centre, 3 km from junction 10 a (M1) cramped parking, some 1980s industrial units in adequate condition some poorer older buildings in need of refurbishment some vacant units and land.
Sarum Road	0.15 ha Royal Mail sorting office, B1/B8, 2 km from junction 11 (M1) via residential roads, older buildings in moderate condition, site vacant and part cleared.
Sunrise Estate	0.3 ha Small site with older buildings and limited local road access 5.5 km from junction 11 (M1) via A5228 - A505, adequate parking to rear but with difficult access, adjoining residential uses but separated by car park, most units 1940s-1950s are in fair condition and largely

Appendix 3 Employment Sites: Categories A & B

Name	Description
	occupied and site meets local needs but some units in poor condition B1/C3.
Taylor Street (1) (HIGH TOWN MASTERPLAN)	0.2 ha Small vehicle repair site in cluster of employment uses on edge of town centre. Adequate local road access and proximity to public transport. 1970s premises in good condition and fully occupied. Adequate to meet local needs. B1.
Taylor Street (2) (HIGH TOWN MASTERPLAN)	0.1 ha Small vehicle repair site in employment area near town centre. Reasonable road access but no on-site parking, but near NCP car park. No sensitive uses adjoining but buildings in poor condition and one out of two vacant. B1/B2.
Telmere Estate	0.43 ha Small industrial B1/B2 site 400 m south of the town centre and 3 km from junction 10a (M1) close to the A505 but accessed via constrained roads; adjoined by housing on 3 sides; contains reasonably modern small industrial units some in poor condition and several units vacant.
York Street (1) (HIGH TOWN MASTERPLAN)	0.3 ha Small vehicle repair site in cluster of employment uses on edge of town centre, 4.8 km from junction 10 (M1) via busy residential roads and A505 and proximity to public transport, 1970s premises in reasonable condition and fully occupied suitable for B1 local needs, within High Town Strategic Allocation (Policy LLP10) involving sustainable residential -led mixed use including small scale offices/workshops.
York Street (2) (HIGH TOWN MASTERPLAN)	0.1 ha Plant hire site on edge of town centre with limited local road access as access to Hitchin Road is restricted resulting in circuitous route via Taylor Street and Brunswick Street. Contains 1970s buildings in reasonable condition and open storage within employment cluster and largely occupied. B1-B8.

Appendix 4 Housing Allocations

Potential capacity in dwellings as of April 2016

Site Name	Potential Capacity (#dwellings)
Guardian Industrial Estate	77
Oxen Industrial Estate, Oxen Road	48
Land at Caleb Close	181
Car Parks on Dunstable Place	41
Car Park off Telford Way	39
Dalroad Industrial Estate	32
69 Felstead Way	59
The Windsor Castle, 12 Albert Road	41
14 Cardiff Road	0 (site developed prior to adoption)
27-37 Chapel Street	30
21-25 Chapel Street	39
13-31 Dunstable Road	124
Land opposite Whitbread House, Flowers Way	168
Luton Town Football Club, Kenilworth Road ¹	59
Midland House, 41 King Street	0 (site developed prior to adoption)
Crescent House, 1-5 Latimer Road	80
Land & buildings at Castle Street/ Oxford Road and Park Viaduct	0 (site developed prior to adoption)
Land to the west of Newlands Road	392
Land at Stockingstone Road ²	56
The Laurels, Ely Way	14
Westlea Old Peoples Home, 121 High Street	0 (site developed prior to adoption)
27A Upper George Street	26

Appendix 4 Housing Allocations

40-58 Collingdon Street	88
Car park adjacent to 95 Maple Road East	49
Bramingham Centre, Weltmore Road	51
2 to 32 Beechwood Road	15
10 to 12 Caleb Close	24
146 to 158 Park Street	0 (site developed prior to adoption)
Whitbread House, Flowers Way	96
Land at the Orchard Centre, Strangers Way ³	27
Unity House, 111 Stuart Street	101
38a Wingate Road	15
26-30 Cardiff Road	0 (site developed prior to adoption)
Wesley House, 19 Chapel Street	0 (site developed prior to adoption)
Britannia Estate ⁴	294

Footnotes:

1. Luton Town Football Club, Kenilworth Road - in addition to the new housing, around 7,500 sq. m. of public open space to help address the shortfall in provision in the locality, including play facilities, will be provided. Development will not commence until Luton Town Football Club has relocated to a new site.

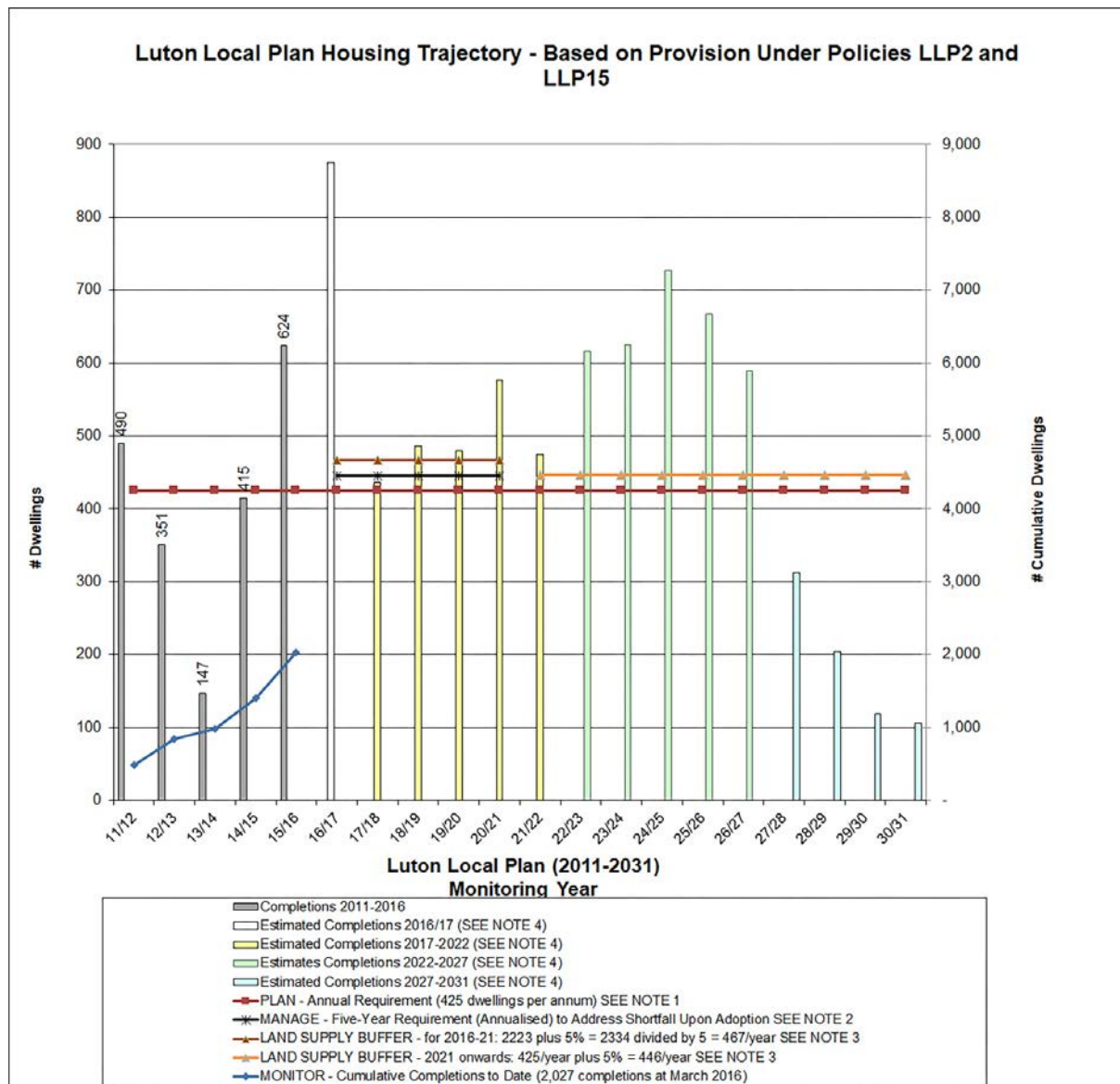
2. Land at Stockingstone Road- The indoor bowls facility, outdoor bowls facility and ancillary parking provision should be retained or replaced within the allocation site with equivalent or better provision in terms of quantity and quality as part of the redevelopment of the site. Alternatively, these facilities would need to be replaced off-site with equivalent or better provision in terms of quantity and quality in a suitable location capable of serving existing users. Provision will need to be made for the bowls clubs to be given acceptable security of use and for any replacement facility to be completed and operational prior to the development of new housing commencing on the site.

3. Land at the Orchard Centre, Strangers Way - prior to the new housing being developed, the playing fields must be re-provided (or equivalent enhancements made to existing facilities) elsewhere in the borough.

4. Britannia Estate - the allocation allows for housing on a part of Britannia Estate and the balance of the site will remain in employment use.

Appendix 5 Housing Trajectory

Figure 1: Luton Local Plan 2011-2031 Housing Trajectory



Notes:

1: PLAN (red line) - this is the plan requirement of 8,500 divided by the 20 years of the plan period 2011-31 = 425/year

2: MANAGE (black line) - this shows the annual requirement from 2016-2021 to recover the shortfall of 98 specifically from the period 2011-2016. This was calculated as follows: the 5 year requirement 2011-16 is $425 \times 5 = 2125$. In this period there were 2,027 completions leaving a shortfall of 98. The intention is to recover this in the next 5 years: $2125 \text{ plus } 98 = 2223$ divided by 5 = 445/year

3: For the purposes of calculating housing land supply, the Five-Year Requirement will be subject to the addition of a buffer for choice and flexibility. Addition of the buffer shown on the trajectory above is calculated as follows:

- for 2016-21: $2223 \text{ plus } 5\% = 2334$ divided by 5 = 467/year
- from then on 425/year plus an assumed buffer of 5% = 446/year

Appendix 5 Housing Trajectory

The application of a 5% buffer within these calculations is based on the position at the time of the 2016 SHLAA. Table 1 of Appendix 5 (see below) indicates that Luton Borough Council did not have a record of persistent under-delivery at the point the Local Plan was adopted. The size of the buffer will be reviewed each year. The buffer is dependent on circumstances so is not fixed over the plan period.

4: The detailed schedule of sites informing this housing trajectory is provided by the Luton Strategic Housing Land Availability Assessment - July 2016. The trajectory will be updated based on the latest monitoring information and reported in subsequent versions of the Strategic Housing Land Availability Assessment and the Authorities Monitoring Report (AMR).

Table 1: Record of Historic Dwelling Delivery against Relevant Housing Targets for the Period 2001 to 2016

Record of Historic Dwelling Delivery Against Relevant Housing Targets for the Period 2001 to 2016

Year	Net Dwelling Gain	Annualised requirement	Performance Against Relevant Annual Target	Performance over Period for Relevant Target ¹	Annualised residual requirement (from 2011 based on 8,500 dwelling requirement)
2001	220	347	-127	10	-
2002	229	347	-118		-
2003	171	347	-176		-
2004 ²	557	347	210		-
2005/06	566	347	219		-
2006/07	409	200	209	487	-
2007/08	478	200	278		-
2008/09	422	360 ³	62	-48	-
2009/10	386	360	26		-
2010/11	224	360	-136		-
2011/12	490	425	65	-98	422
2012/13	351	425	-74		426
2013/14	147	425	-278		442
2014/15	415	425	-10		444
2015/16	624	425	199		432
Total - Cumulative Completions and Performance Against Targets	5689	5340	349		

Performance Indicator	
+	Dwelling completions exceed annual requirement based on relevant target
-	Dwelling completions below annual requirement based on relevant target

Relevant Target	
Luton Local Plan 1991 - 2011 (Period 1991-2006)	5,200
Luton Local Plan 1991 - 2011 (Period 2006-2011)	1,000
East of England RSS 2001 - 2021 (As Split by 2010 SHMA)	7,200
Luton Local Plan 2011-2031	8,500

¹ Figures may not sum exactly due to rounding of average annualised requirement

² Luton Borough Council data for 2001 to 2004 is reported by Calendar Year

³ East of England RSS as split by 2010 SHMA - <http://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/Local%20Plan/Housing/HOU%20003.pdf>

Appendix 6 External Amenity Space Standards

External Amenity Space Standards
For flatted developments a minimum of 5sq.m. of private outdoor space should be provided for 1-2 person flats and maisonettes and an extra 1sq.m. should be provided for each additional occupant.
Private outdoor spaces should have level access from the home.
The minimum depth and width of all balconies should be 1500mm.
Where private outdoor space is not achievable due to plot size or character this should be provided in the form of communal amenity space, grassed or hard surfaced with some landscaping.
For new dwellinghouses provision of an enclosed rear garden of 90sq.m. should be made other than units of 1-2 bedrooms where a lesser area will be considered. Smaller enclosures could also be acceptable, having regard to the character of the area and design of the house, in any event the area shall not be smaller than 45 sqm.
Dividing walls or fences between individual house plots shall be of a solid form of construction and of a height not less than 1.8m for a distance of not less than 4.6m from the main rear wall of the dwelling.
NOTE: Flat occupiers generally do not seek or expect the same level of garden amenity space as house dwellers. Nevertheless, an enclosed area of communal amenity/play space should normally be provided where feasible.

Appendix 7 Transport Assessments, Transport Statements and Travel Plans

1 This appendix sets out the thresholds and information requirements for developments requiring Transport Assessments or Transport Statements together with statements and Travel Plans.

2 Developers and applicants will need to agree in advance with the relevant Highways Authorities (including Highways England if required), the scope, content and standard of any Transport Statement or Transport Assessment that is to be submitted in support of any planning application.

Transport Assessments

3 Developers will be required to submit Transport Assessments and identify mitigation measures relating to new proposals and re-development schemes if the proposed development meets any of the following criteria:-

- i. non-residential developments of 500 square meters and above;
- ii. residential developments of 50 units and above;
- iii. any development likely to generate 100 or more vehicle movements per day;
- iv. non-residential development likely to employ 100 or more people;
- v. any activity likely to generate 10 or more deliveries per day;
- vi. any development, irrespective of scale, likely to generate trips at peak times in congested areas;
- vii. any development likely to generate trips at night in residential and/or other sensitive areas;
- viii. any development likely to rely on unsafe access;
- ix. any development likely to adversely affect the urban fabric, for example by requiring access in a conservation area; and
- x. any development having an impact on traffic flows on trunk roads.

4 Transport Assessments should include the following information:

- a description and analysis of the existing transport conditions;
- details of the expected (economic, environmental and social) impact of the proposed development on the local transportation system;
- a Travel Plan detailing the proposed approach to mitigate the expected impact of the proposed development on the local transportation system;
- details of existing and proposed journeys to and from the proposed development site by all modes of transport (both vehicular and pedestrian);
- a construction management plan; and
- details of proposed loading areas, arrangements for manoeuvring, servicing and parking should cross reference any scale drawings and plans.

Transport Statements

5 Transport Statements are required for developments that fall below the criteria thresholds for Transport Assessments but which do have transport implications for the local or strategic road network. The need for Transport Statement may be determined through pre application discussions or subsequent Development Management consultations.

6 Transport Statements will contain similar information to that required for Transport Assessments but relevant and proportionate to the nature and scale of the development, sufficient to assess its transport impacts, any required mitigation measures and arrangements to implement that mitigation.

Travel Plans

7 Travel Plans contain a package of measures to encourage the use of alternatives to single-occupancy car-use. A Travel Plan can offer real benefits, not only

to the organisation and its employees, but also the community and environment that surrounds it. Typically, the plan will include initiatives such as car sharing, car clubs, discounted public transport tickets, cycle parking or a personalised plan for the journey. Travel Plans will be specific to the location and should take into account the nature of the business, existing travel behaviour and the types of journey that occupiers make.

8 Developers will be required to submit Travel Plans with planning applications for development where the proposed development meets any of the following criteria:

- i. retail, community and leisure facilities in excess of 1,000sq.m. gross floorspace;
- ii. offices and other B1 uses in excess of 2,500sq.m. gross floorspace;
- iii. sports stadia or other facilities with 1,500 or more seats or people capacity;
- iv. smaller developments comprising employment, shopping, leisure, community and service activities that would generate significant amounts of travel in, or near to, locations where the borough council has adopted specific local initiatives and targets for the reduction of road traffic, of the promotion of public transport, walking and cycling;
- v. new and expanded school facilities that would be accompanied by a School Travel Plan which promotes safe cycle and walking routes, restricts parking and car access at and around the school, and includes on-site changing and cycle storage facilities; and
- vi. where a Travel Plan would help to address a particular local traffic problem associated with a planning application, which might otherwise have to be refused on local traffic grounds.

9 Travel Plans should include the following information:

- Benchmark travel data including trip generation databases.

- Information concerning the nature of the proposed development and the forecast level of trips by all modes of transport likely to be associated with the development.
- Relevant information about existing travel habits in the surrounding area.
- Proposals to reduce the need for travel to and from the site via all modes of transport including enhancing the use of existing, new and improved public transport services and facilities for cycling and walking by users of the development and by the wider community (including possible financial incentives).

10 Travel Plans may also require, where appropriate, parking strategy options having regard to parking standards.

11 Travel Plans will also specifically require developers to demonstrate:

- i. that adequate arrangements have been made for the implementation and monitoring of the Travel Plan having regard to the benchmarking data; and
- ii. how the occupiers of the development will comply with these arrangements.

Appendix 8 Monitoring Framework

Appendix 8 Monitoring Framework

Objectives	Policy	Target	Indicator/s	Reported within	Action
Open Space and Natural Environment					
SA Objectives 1 and 10 Also Plan Policies LLP1, 3 - 5 and 9	LLP28, 29	Prevent change to nationally designated sites of biodiversity or geological interest	Net area of land identified as or potentially of tier 1 importance by Natural England lost = <5% from 2011.	AMR Every 2 years	Review policy with interim position of 0% loss.
SA Objectives 2 and 10	LLP29	Prevent change to the area of national and local landscape areas	Net area of land of national or local landscape value lost = < 5% from 2011.	AMR Every 2 years	Review policy with interim position of 0% loss.
SA Objectives 1 and 10 Also Plan Policies LLP1, 3 - 5 and 9	LLP28, 29	Manage change to the total area of locally designated sites	Area of sites with unique habitat by type within the Borough lost = 0%. No more than 5% of CWS or DWS land by area to be lost from 2011.	AMR Every 2 years	Review policy with interim position of 0% loss.
SA Objectives 2 and 10	LLP8, 10, 11, 27	Manage loss of open space and non-designated natural greenspace	Net area of land of open space or non-designated natural greenspace lost from existing sites without replacement = 0%. A positive net gain on site within the following allocations: Napier Park, High Town (all areas), Creative Quarter.	AMR Every 2 years	Revise and strengthen policy if loss is anything other than exceptional.
SA Objective 2 and 10	LLP3	Enhance the River Lea	Net reduction in the length of the River Lea running through culverts within the Town Centre.	AMR Every 5 years	N/A
Housing Provision					
Strategic Objectives 2 and 3	LLP15	Ensuring new housing meets the needs of the Borough in terms of net gain, mix of type, size and tenure	Net additional dwellings completed between 2011 - 2031 = 8,500	AMR Annually	Develop monitoring of delivery against the demand for Council Housing in Luton, taken from the waiting list as at 1st April 2014, is as follows: 1 Bedroom 2387

Appendix 8 Monitoring Framework

Objectives	Policy	Target	Indicator/s	Reported within	Action
					<p>2 Bedroom 2791</p> <p>3 Bedroom 1204</p> <p>3 + Bedroom 234</p> <p>In addition, there were 966 families in temporary accommodation.</p>
Strategic Objectives 2 and 3	LLP15		<p>Sites to deliver a mix of house types and sizes in line with that recommended by the most recent housing market assessment.</p> <p>The mix to be assessed against completions and the 5-year supply (% by type) and plan period (total number).</p> <p>See Appendix 5 for methodology for calculation of the 5-year supply.</p>	AMR Annually	<p>If the mix reported within the AMR completions/ projections point towards an oversupply of one or more types then refuse permission for similar elements within new or refreshed schemes. Where there is under supply in any type or size we will work to encourage developers towards the required mix.</p>
Strategic Objectives 2 and 3	LLP16	Ensuring new housing meets the needs of the Borough in terms of net gain, mix of type, size and tenure	Either 20% on-site provision or equivalent financial contribution for off-site provision for all qualifying sites.	AMR Annually	<p>Refuse permission for schemes yielding less than 20% when the number of permitted schemes within the 5 year supply failing the target exceeds 10%.</p> <p>Evidence of improved viability will trigger a refresh of housing policy. An interim provision of 25% will be sought pending any review.</p>
Strategic Objectives 2 and 3			Affordable element to deliver a mix of house types and sizes in line with that recommended by the current housing market assessment. The mix to be assessed against the 5-year supply (% by type) and plan period (total number).		<p>If mix reported within the AMR completions/ projections point towards an oversupply of one or more types then refuse permission for that element of a scheme. Where there is under supply in any type or size we will work to encourage developers towards the required mix.</p>

Appendix 8 Monitoring Framework

Objectives	Policy	Target	Indicator/s	Reported within	Action
Strategic Objective 3	LLP2	9,300 dwellings 2011-31	(1) Provision made within neighbouring local plans to meet Luton's housing shortfall. (2) Record of activity under the Duty to Co-operate.	AMR annually	Through the Duty to Cooperate
Strategic Objective 3	LLP2	9,300 dwellings 2011-31	Analysis of allocated sites to measure: (1) distance to Luton's administrative boundary. (2) whether the site has public transport accessibility to Luton by a direct service that has a frequency of two services per hour.	AMR annually	Through the Duty to Cooperate
Strategic Objective 3	LLP16	5,500 dwellings 2011-31	Record No of affordable homes to meet Luton's unmet needs	AMR	Through the Duty to Cooperate
Luton's Economy					
Strategic Objectives 1, 2 and 6	LLP1, 2, 13, 14	Retain Luton's role as a place for economic growth and opportunity; utilise Luton's resources efficiently and sustainably; take priority measures to reduce unemployment, improve skills and education.	Net land lost from key employment areas safeguarded for B class uses or smaller unidentified B use employment prior to equivalent gain on allocated sites = 0%.	AMR Annually	N/A
			Net land lost from key employment areas safeguarded for B class uses or smaller unidentified B use employment will not be greater than net land gained through development. Measure through annualised target the gain of 8,000 B-class jobs and 10,000 non-B class jobs.	AMR Annually	Net loss of employment land should trigger a refresh of the ELR and a policy review.
			Amount of land identified for B class uses lost from strategic allocations = 0%. Warehousing floorspace over 500sq.m. delivered away from the preferred locations and exception site = 0%.		N/A

Appendix 8 Monitoring Framework

Objectives	Policy	Target	Indicator/s	Reported within	Action
Historic Environment					
Strategic Objectives 5 and 10	LLP30	To improve the built and natural environment to deliver quality places	Heritage assets lost through development = 0%. Heritage assets at risk = 0. Up to date schedules of Luton's Designated Heritage Assets and locally listed heritage assets.	AMR Every 2 years	N/A
Sustainable Transport					
Strategic Objectives 1, 4 and 8	LLP31	Ensure an integrated, safe, accessible and more sustainable transport system.	Land safeguarded for strategic infrastructure lost to alternative development = 0%.	AMR Annually	N/A
	LLP3, 15, 31		Density of housing within the town centre, neighbourhood and district centre boundaries to be 75dph or 50% greater than that surrounding the centre (to 300m or 5 minute walking distance of the centre boundary).		Failure to consistently achieve this should trigger a review based on each centre.
			Length of new cycle routes adopted.		If no net gain in cycle routes results after 5 years then review policy to guarantee provision on safeguarded routes.
Strategic Objectives 3, 4 and 8	LLP32	Ensure a proportionate number of car parking spaces to support the growth of the town	Developments complying with the maximum car parking standards = 95% of schemes.	AMR Annually	If the threshold is exceeded in any year then review policy with starting point of total compliance.
Climate Change					
Strategic Objectives 2 and 11	LLP36	Minimise the risk and impact of flooding	No. of proposals unaccompanied by greenfield run-off rate SuDS = <1% per annum.	AMR Annually	Review policy if target exceeded
			No. Of dwellings permitted in Flood Zones 2 or 3 = 0%.		Review policy if no. of dwellings permitted is above 0.
Strategic Objectives 6 and 11	LLP37	Adaptation to and mitigation of climate change	Kilowatt-hours of energy designed for use within developments.	AMR Every 2 years	Review policy if not consistently delivered through planning conditions.
Town Centres					

Appendix 8 Monitoring Framework

Objectives	Policy	Target	Indicator/s	Reported within	Action
Strategic Objectives 4, 6 and 8	LLP22	Establish an effective network of town centres to serve as the heart of local communities	Amount of non-A1 retail frontage at ground floor level in primary Town Centre and District, Neighbourhood and small shopping parade frontages to be no greater than 10, 25 and 50% respectively.	AMR Every 2 years	Strengthen policy. For local shopping parades undertake regular viability and vacancy surveys.
			Retail floorspace developed outside existing town centres = 0%.		N/A
Health					
Strategic Objectives 10 and 11	LLP38	Safeguarding and improving Air Quality	AQMAs recording pollution in excess of air quality objectives = 0. No. of applications permitted against advice of Environmental Protection Team = 0.		Action - refer to air quality monitoring reports. Review policy if any application is permitted against EPT advice.
Education					
Strategic Objectives 6 and 7	LLP24	Provide for the capacity required for primary and secondary education	Pending the review of all education facilities a Primary and Secondary to be built on and south of the Brache by 2020.	AMR Annually	If not achieved review policy; check for significant effects against other plan policies and borough-wide strategies.

Appendix 9 Replaced Minerals and Waste Policies

The following policies from the Bedfordshire and Luton Minerals and Waste Local Plan (2005) have been replaced by the Luton Local Plan (2011-2031).

Minerals and Waste Policy	Topic	Replacement Policy
W4	Waste minimisation	LLP37
W5	Management of wastes at source: waste audits	LLP37
W22	Safeguarding existing sites	LLP1
GE1	Matters to be addressed in planning applications	LLP1, LLP31, LLP33, LLP37, LLP38
GE5	Protection of green belt land	LLP4
GE7	Protection of the Chilterns Area of Outstanding Natural Beauty	LLP29
GE8	Protection of areas of great landscape value	LLP29
GE9	Landscape protection and landscaping	LLP29
GE10	Protection / enhancement of trees and woodland	LLP28
GE11	Protection of sites of national nature conservation importance	LLP28
GE12	Protection of sites of nature, geological/ geomorphological and conservation interest	LLP28, LLP29
GE13	Species and habitat protection and enhancement	LLP28
GE14	Archaeology	LLP30
GE15	Statutorily designated historic buildings and sites	LLP30
GE16	Local historic buildings, conservation areas and historic environment sites	LLP30
GE17	Pollution control	LLP38
GE18	Disturbance	LLP38
GE19	Flooding	LLP36
GE20	Water resources	LLP38
GE21	Public rights of way	LLP29
GE22	Transport: alternative means	LLP33
GE23	Transport: suitability of local road network	LLP31

Appendix 9 Replaced Minerals and Waste Policies

Minerals and Waste Policy	Topic	Replacement Policy
GE25	Buffer zones	LLP1, LLP38

The following policies from the Bedfordshire and Luton Minerals and Waste Local Plan (2005) are not being replaced by the Luton Local Plan (2011-2031) as they are not relevant to the borough.

Minerals and Waste Policy	Topic	Reason
W16	Landfill gas	No new landfill schemes are identified for Luton during the plan period
W17	Land raising*	Applies to the disposal of waste (landfill) of which no new schemes are identified for Luton during the plan period
GE2	Restoration / improvement of Marston Vale	Outside the borough
GE3	Environmental Improvement of the Greensand Trust area	Outside the borough
GE4	Environmental improvement of Ivel and Ouse Valleys (The Ivel and Ouse Countryside Project)	Outside the borough
GE6	Protection of best and most versatile agricultural land.	There are no plans to protect agricultural land within the borough (other than where covered by environmental designations or other policy concerns)
GE24	Ancillary minerals and waste developments**	Relates more to environmental impact from major minerals and waste activities, of which no new or expanded facilities are identified for Luton during the plan period
GE26	Restoration	No mineral extraction or waste landfill sites proposed within the borough
GE27	Aftercare	No mineral extraction or waste landfill sites proposed within the borough

Footnotes:

*Proposals that include land-raising (with or without the use of waste material) will be determined in-line with the policies of this plan and with consideration to site-specific and exceptional circumstances.

** This ensures that development required in connection with a mineral or waste management site is limited to the duration of the main working and that restoration is carried out. If a waste site ceases operations in Luton, the site is likely to be redeveloped for other uses and this policy is considered unnecessary.

Appendix 10 Technical Evidence Studies

List of key technical evidence studies informing this plan

- Airport Surface Access Strategy, 2012-2017, London Luton Airport
- Air Quality: LBC maintains a number of Air Quality Monitoring documents, monitoring results across the borough as required by the Environment Act 1995. This evidence base includes the declaration paperwork of AQMAs.
- Archaeological Assessment of Strategic Housing Land Availability Assessment (SHLAA) and Potential Employment Sites, October 2013, Archaeology Team, Central Bedfordshire Council
- Bedfordshire and Luton Strategic Housing Market Assessment, March 2010, Savills
- Biodiversity Recording and Monitoring Centre (BRMC): please visit the BRMC website for information on biodiversity in Luton and Bedfordshire
- CABE Workshop, 10th May 2012
- Central Bedfordshire and Luton Historic Environment Record and Archaeology. Database maintained on behalf of both authorities and accessible from Central Bedfordshire Council's website
- Chilterns AONB Management Plan 2014-2019, A Framework for Action, The Chilterns Conservation Board
- Chilterns Building Design Guide, 2010, The Chilterns Conservation Board
- East of England Forecasting Model 'Luton Run' (June 2012) Oxford Economics
- East of England Plan, The Revision to the Regional Spatial Strategy for the East of England, May 2008, Government Office for the East of England. NB: The Regional Spatial Strategy was revoked in January 2013
- Employment Land Review and Town Centre office business re-use study (May 2013) Peter Brett Associates
- Employment Land Review Study, Final Report, March 2013, Nathaniel Lichfield & Partners
- Green Belt Review, Critical Friend Assessment, POSe, November 2013
- A Green Infrastructure Plan for Luton, March 2015, The Greensand Trust
- Greenspace Strategy Review, June 2014, The Greensand Trust
- Gypsy and Traveller and Travelling Showman Accommodation Needs Assessments, 2013, ORS
- Gypsy and Traveller and Travelling Showman Accommodation Needs Assessments, 2015, ORS
- Gypsy and traveller and Travelling Showman Accommodation Needs Assessment - Addendum to 2015 Final Report - January 2016 - ORS
- Gypsy and Travellers Sites, Site Identification Study, September 2015, Peter Brett Associates
- The Hat industry of Luton and its Buildings, October 2013, English Heritage
- A Healthier Future, Improving Health and Wellbeing in Luton 2012 - 2017, Luton Borough Council and Luton Clinical Commissioning Group
- High Town East Village Design Codes, 2009, Luton Borough Council
- Indoor Sports facilities Strategy and Action Plan 2105-2012, Final Strategy, January 2015, Knight, Kavanagh and Page
- Infrastructure Delivery Plan, October 2015, Luton Borough Council
- Landscape Character Assessments, 2014, Greensand Trust
- LBC Affordable Housing on Small Sites: Viability of Commuted Sums - May 2016, 3 Dragons
- Leisure Study, July 2015, White Young Green
- Level 1 Strategic Flood Risk Assessment, February 2013, Capita Symonds
- London Luton Airport, Revised Masterplan, September 2012, London Luton Airport Operations Limited
- Luton and Central Bedfordshire Strategic Housing Market Assessment Refresh, 2014, ORS
- Luton and Central Bedfordshire Strategic Housing Market Assessment, 2015, ORS

Appendix 10 Technical Evidence Studies

- Luton and Central Bedfordshire Sub Region Strategic Housing Market Assessment, 2012 Update, Savills
- Luton Borough Council Affordable Housing Viability Study, April 2013, Three Dragons
- Luton Borough Council, Prospectus 2013 -2016
- Luton Borough Council, Corporate Plan 2014-2017
- Luton Development Plan, Junction Mitigation Assessment, June 2015, AECOM
- Luton ELR - 2015 Employment Site Assessments (August 2015) Nathaniel Lichfield & Partners
- Luton Green Belt Study, September 2014, David Hares Landscape Architecture
- Luton Habitat Survey and Nature Conservation Strategy update, March 2014, BMRC /Wildlife Trust
- Luton High Town Master Plan, Supplementary Planning Document (2016)
- Luton Hotel Study (July 2015) White Young Green
- Luton Housing Market Area Study, 2015, ORS
- Luton Local Landscape Designation Appendices 1-3, 2014
- Luton Local Plan Junction Assessment, Technical Note, July 2014, AECOM
- Luton Local Plan: Initial Transport Evidence Base (SATURN Model) November 2013
- Luton Local Plan: Viability Assessment Update, Executive Summary, October 2013, Nationwide CIL Service
- Luton Local Plan - 2015 Pre-submission transport evidence - April 2016
- Luton Local Transport Plan, 2011-2026, March 2011, Luton Borough Council
- Luton Playing Pitch Strategy, 2014-2021, Knight, Kavanagh and Page (including Developer Contributions Supplementary Report)
- Luton Rights of Way Improvement Plan: Luton's Great Outdoors, July 2008, Catherine Bickmore Associates
- Luton Strategic Flood Risk Assessment Maps Part 1
- Luton Strategic Flood Risk Assessment Maps Part 2
- Luton Town Centre Development Framework, December 2004, Luton Borough Council
- Luton Town Centre Surveys, 2012, BMG, Luton Borough Council
- Luton Water Cycle Strategy, September 2015, Capita/AECOM
- Luton's Joint Strategic Needs Assessment, 2015, Luton Borough Council and Luton Clinical Commissioning Group
- Luton's Investment Framework. 2015-2035, Live Draft, Luton Borough Council
- Luton Local Flood Risk Management Strategy, 2015, Luton Borough Council
- Luton Local Plan: Viability Assessment , Executive Summary, November 2013, Nationwide CIL Service
- Managing Waste in New Developments, Supplementary Planning Document, Bedfordshire and Luton Waste Local Plan 2005, April 2006, Luton Borough Council and Bedfordshire County Council
- The Milton Keynes and South Midlands Sub-Regional Strategy, March 2005, Government Offices for East of England, East Midlands and South East of England
- Monitoring Report, December 2012, Luton Borough Council
- Nature Conservation Strategy for Luton, 1992
- Noise Action Plan, 2013-2018, August 2014, London Luton Airport
- Our Vision for Luton in 2026, Luton's Sustainable Communities Strategy, 2008
- Parking and Enforcement Plan, 2013, Luton Borough Council
- Plaiters' Lea Conservation Area, Luton Historic Area Assessment, June 2011, English Heritage
- Proposed Local Landscape Designations for Luton, June 2014, The Greensand Trust
- Rebuilding Biodiversity in Bedfordshire & Luton, Volume II: Biodiversity Characterisation, January 2007, Bedfordshire and Luton Biodiversity Partnership
- Rebuilding Biodiversity in Bedfordshire & Luton, Volume I, October 2006,

- Bedfordshire and Luton Biodiversity Partnership
- South East Midlands LEP Transport Strategy, March 2014, WYG
 - Strategic Economic Plan 2015-2020, April 2014, SEMLEP
 - Strategic Housing Land Availability Assessment (SHLAA), April 2014, Luton Borough Council
 - Strategic Housing Land Availability Assessment (SHLAA), April 2015, Luton Borough Council
 - Strategic Housing Land Availability Assessment (SHLAA), April 2016, Luton Borough Council
 - Surface Water Management Plan, 2012, Luton Borough Council
 - Sustainability Appraisal, 2014, Urban Edge
 - Sustainability Appraisal of the Luton Local Plan, Sustainability Report on the Proposed Submission Local Plan, September 2015, Urban Edge
 - Sustainable Travel Plan, 2011-2015, Luton Borough Council
 - Thames River Basin Management Plan, 2009, Department for Environment, Food & Rural Affairs and Environment Agency
 - Urban Panel Review Paper, CABI, October 2009

Appendix 11 Greenspace Standards

Typology of Greenspace	Current Requirement 2011 (Ha) Population 205,300	Current Provision (Ha)	Current Surplus/deficit (+-) (Ha)	Quantitative Standard
Amenity Greenspace	82.1	54.1	-28.04	4m ² /person
District Urban Park & Gardens	174.5	152.9	-21.6	8.5m ² /person
Neighbourhood Urban Parks & Gardens	154.0	102.2	-51.08	7.5m ² /person
Strategic Natural & Semi-Natural Greenspace	112.9	0	-112.9	5.5m ² /person
District Natural & Semi-Natural Greenspace	92.4	51.2	-41.2	4.5m ² /person
Local Natural & Semi-Natural Greenspace	236.1	147.5	-88.6	11.5m ² /person
Allotments	41.1	32.6	-8.4	2m ² /person
Green Corridors*	-	8.4	-	-
Churchyards & Cemeteries*	-	27.4	-	-
Small Amenity Greenspace of Local Importance *	-	6.2	-	-

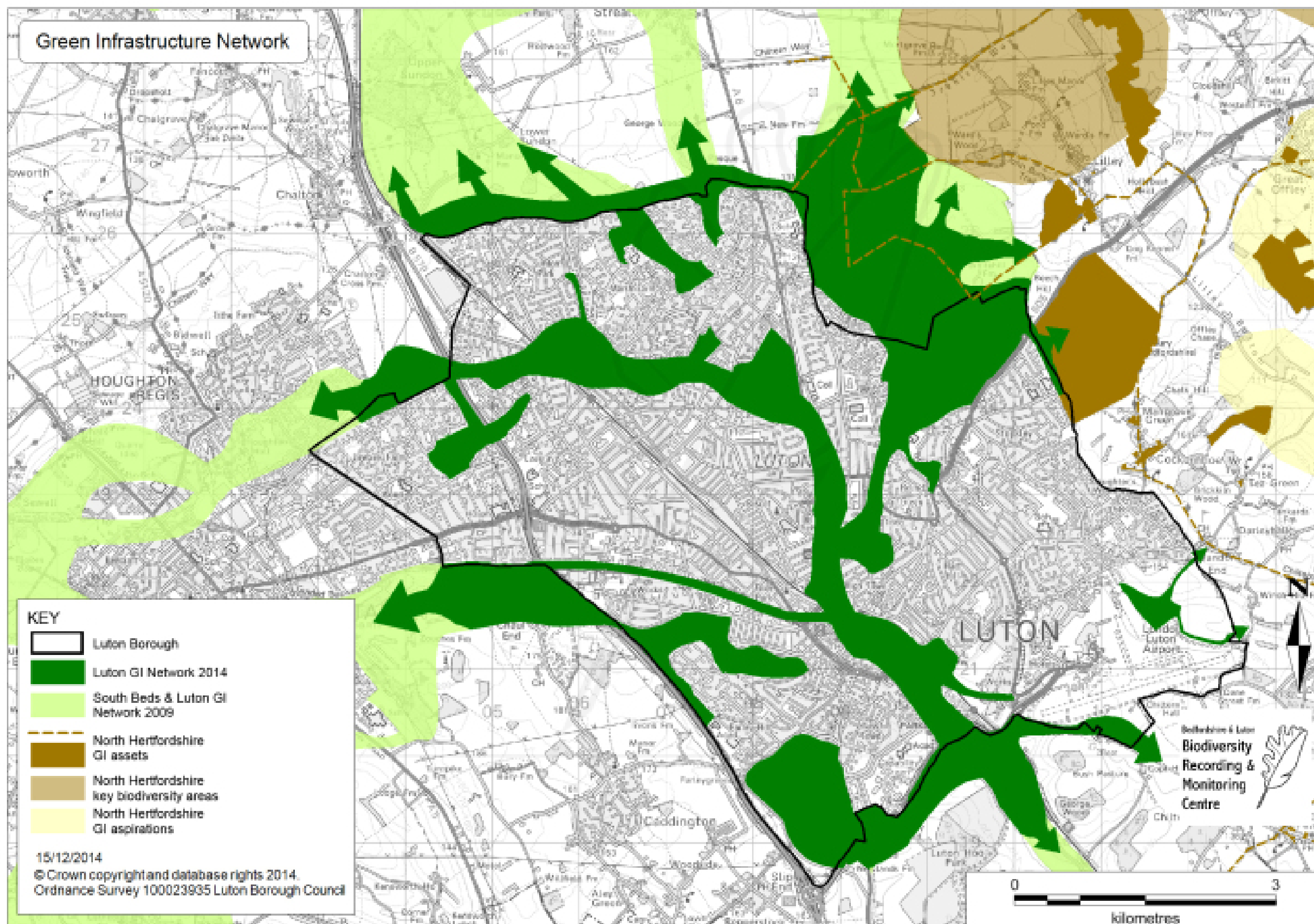
Footnote:

* for these typologies the Greenspace Strategy has not set minimum standards, hence calculations about current and future requirements are not shown. The calculated deficit or surplus will vary over time depending on growth in housing capacity within the borough and resulting population, losses and gains in green space with enhancement and developments and so should not be regarded as fixed but will be calculated according to the circumstances that prevail at the time.

Appendix 11 Greenspace Standards

Where the standards cannot be provided on-site, an equivalent off-site or financial contribution will be sought. The supplementary 'Developer Contributions' report for outdoor playing space requirements, should provide guidance on the standards applying to outdoor sport.

Appendix 12 Luton Green Infrastructure Network



Zone ID	Hectares
1A	40.32
1B	44.58
1C	21.31
1D	5.8
2A	31.24
2B	11.38
2C	2.66
3	2.14