

Green Horizons Park Evidence 1

Green Horizons Park = GHP. Luton Rising = LR. Luton Borough Council = LBC.

Stop Luton airport Expansion have a number of challenges over the statements on the subject of Green Horizons Park. We suggested in our Relevant Representation the size of the amended footprint size now means that it can be built on previously-developed or 'brownfield' belt land to the West of the airport. Allowing Wigmore Valley park to be retained, and possibly a redesign of the expansion to save the County Wildlife Park. The public were never consulted on the re naming and re-sizing exercise.

Application document 01114, Luton Rising Planning Statement.

Green Horizons Park (GHP), formerly New Century Park (planning application LBC ref: 17/02300/EIA), is a proposed high quality mixed-use business park to the east of the airport, which includes the construction of a new access road (referred to in the planning application as Century Park Access Road (CPAR)) connected to Airport Way to the west of the airport. It comprises of office space (Class B1), warehouse and industrial space (Class B2 and B8), mixed employment space (Class B1/B2/B8), a hotel (Class C1), café space (Class A3); energy recovery centre (sui generis), internal access roads, car parking, landscaping and associated works including earthworks, utility diversions, sustainable drainage systems, tree removal and tree protection.

Evidence RR paragraph SLAE believe that GHP can be accommodated elsewhere in the town, as it's footprint is now smaller than New Century Park. Document 000812 Table 2.1. States that the land use, Non-agricultural fields (set aside for GHP (formerly known as New Century Park), and other habitat has an approximate area of 47ha, which is larger than identified for Wigmore Valley Park (41.6ha (District Urban Park and Garden and Natural and Semi-Natural Green space)).

SLAE were unable to find the land sizing of GHP in the application documents and would appreciate if Luton Rising can identify where this information can be found or make this information available. Broken down by the business park (by each phase), excluding the airport access road (AAR), and the green / open space. In document 000678 the construction compound is identified at approximately 1,000sqm.

Evidence GHP a & b. SLAE believe that the business park can be located to the west of the airport on previously-developed or 'brownfield' land. This previously-developed or 'brownfield' land was identified in the SIFTs, but not considered for New Century Park and can now be for the smaller GHP footprint. **Evidence GHP c & d.** GHP business park could also be built at Butterfield Green (05/01653/VARCON) which was originally (85-acre, 340,000 m²) a mixed use development including an innovation centre technology village, park and ride, university campus, hotel, relocated petrol filling station, cemetery extension and is now a Business & Technology Park and when completed offer up to one million square feet of office space in a parkland setting. London Luton Airport is situated approximately 4 miles to the south of the park and less than a ten minute drive.

Evidence GHP c: <https://www.butterfieldbusinesspark.co.uk/> (accessed 21-8-23)

Evidence GHP d: Quad2, NOW ON-SITE, 100,000 SQ FT MAXIMUM BUILDING SIZE, 80,000 SQ FT SPECULATIVE SCHEME COMPLETED

<https://hbd.co.uk/scheme/butterfield-business-park/> (accessed 21-8-23)

SLAE ask the inspectorate to visit the Butterfield Green industrial area (if not already visited) to determine this space. **Evidence GHP e.** Although SLAE prefer any development to be built on previously-developed or 'brownfield' land, we also believe that GHP could also be built on other park land in Luton, such as Legrave, Wardown, Lewsey Parks, Dallow Downs, Stockwood Park, and the land at Stopsley (old Luton Regional Rec Ground). Having read and listened to those supporting the expansion speak about jobs at the Open Floor Hearing 1/2, we think that Legrave, Wardown, Lewsey parks and Legrave Common would be better suited to deliver the estimated 3,200 GHP jobs and due to their locations provide better opportunities for those wards associated with deprivation and low skilled workers.

If not already done so, we ask the Inspectorate to visit Legrave, Wardown and Lewsey parks to determine if GHP is better suited there.

Evidence GHP e Overview and Scrutiny Board 22/11/21, Page 16.

PUBLIC OPEN SPACE OF RECREATIONAL VALUE

SITE/AREA NAME	Hectares
Stockwood Park	106.9
Wigmore Valley Park	41.44
Luton Regional Rec Ground	39.41
Legrave 'Common' (includes Waulud's Bank)	32.57
Lewsey Park (includes Ravenhill Way)	27.42
Dallow Downs (includes Bluebell Wood)	25.96
Legrave Park	24.02
Wardown Park	19.89

Document 000831

2.1.3 Overall, Luton suffers from higher rates of deprivation than other parts of the ETS Study Area. According to the Index of Multiple Deprivation 2019, Luton was the 52nd most deprived local authority out of 317 in England. For measures of education deprivation and income deprivation, it ranked even lower at 45th and 49th respectively. Within Luton there are pockets of deprivation. 27% of Luton's neighbourhoods (defined by Lower Super Output Areas, a standard statistical area used by the Office of National Statistics) are within the 20% most deprived LSOAs in the country (Ref 2.vi), and 28% within the 20% most deprived for income. Some pockets of deprivation can be seen across the ETS Study Area. Specifically, there are higher levels of deprivation in urban areas such as Stevenage, Hemel Hempstead, Hatfield, Bletchley, Bedford and Letchworth, including employment deprivation as well as education, skills and training. **Many of these areas have high transport costs for accessing areas with quality jobs, compounding the issue. Despite high quality FE colleges and universities in the area,** there are still communities without access to the skills and training support they need to access good work. However, on the whole, the wider study area sees relatively lower levels of deprivation.

Evidence GHP f, g, i In the 2019 indices of multiple deprivation in Luton the wards of Dallow, Northwell and Biscot are particularly mentioned. Section two of document 000831

also covers this topic and SLAE cannot understand why the council and Luton Rising are placing so much emphasis on the airport and expansion to create jobs and improve the standard of living for Luton residents, by one company (Luton Rising), one area (South, i.e. the airport,) the proposed developments on the land by Junction 10 of the motorway, when other areas of Luton need economic benefits more. For example if I was out of work or low-skilled living in central, northern, eastern areas of Luton I'd want my ward areas to provide employment, so that I could work, shop and live locally in my ward. Getting to the airport involves private and public transport all of which comes with a cost. Taking and parking a car costs money or risks the wrath of residents surrounding the airport if parked on streets (Raynham Way). Able to park up in a street and then walk to the DART increases the distance a car can be parked away from the airport. Jobs in the workers ward area more often than not enables walking and cycling, saving on costs and also providing health benefits, reducing long term health costs and reliance on the NHS. Shops (lunch etc) at the airport tend to be more expensive than shops in the workers ward area, another saving. Is it just SLAE that can see a common sense approach to jobs and economic benefits nearer to a workers home? 3,200 jobs elsewhere in Luton is just a 'no brainer' and in these days of 'work from home' will suit more. SLAE touched upon the susceptibility of aviation in our Relevant Representation and support the 3,200 Green jobs, but not at Wigmore Valley Park.

Evidence GHP m The December 2021 CIPFA report in section 2. Background paragraph 7 states, *'Analysis by the Centre for Cities found this year that the Luton economy was particularly vulnerable as a result of the pandemic. Luton has the 7th highest number of furloughed workers, 32,000 jobs at risk and the 8th highest claimant counts for cities and large towns in the UK. The Centre for Cities concluded that Luton was the second most vulnerable town economy post-Covid, in part due to its reliance on the airport and on vehicle manufacturing.'* This supports the view that LBC should reduce its reliance on the airport and justifies SLAE's stance that GHP should not be located on Wigmore Valley Park.

Evidence GHP f 2019-indices-of-multiple-deprivation-in-luton

Evidence GHP g Northwell,

https://www.luton.gov.uk/Community_and_living/Lists/LutonDocuments/PDF/ward-profiles/wp-northwell.pdf (accessed 21/8/23)

Evidence GHP h Biscot,

https://www.luton.gov.uk/Community_and_living/Lists/LutonDocuments/PDF/ward-profiles/wp-biscot.pdf (accessed 21/8/23)

Evidence GHP j Dallow,

https://www.luton.gov.uk/Community_and_living/Lists/LutonDocuments/PDF/ward-profiles/wp-dallow.pdf (accessed 21/8/23)

Evidence GHP m CIPFA - Department for Levelling Up, Housing and Communities Local Government Finance Review – LUTON BOROUGH COUNCIL

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1039116/CIPFA_local_government_finance_review_-_Luton_Borough_Council.pdf (accessed 22-8-23).

Green Horizons Park 2.

Document 000974, 001109 and others.

3.172 This article clarifies the application of planning permissions granted under Town and Country Act 1990 (1990 Act) and the powers and rights exercised under the Order and the authorised development approved under the Order. With the exception of paragraph (1), the drafting of this article is bespoke to the Order to address particular existing planning permissions which are relevant to the Proposed Development and to address any potential uncertainty that may result from the Supreme Court's recent decision in Hillside Parks Ltd v Snowdonia National Park Authority [2022] UKSC 30. That judgment relates to planning permissions granted under the Town and Country Planning Act 1990. It holds that, unless there is an express provision otherwise, where development has taken place under one permission, whether another planning permission may lawfully be implemented depends upon whether it remains physically possible to carry out the development authorised by the second permission in light of what has already been done under the first permission.
and

3.172. The draft Development Consent Order [TR020001/APP/2.01], submitted with the application, makes provision for managing the interface for the implementation of Green Horizons Park and the Proposed Development. Following the decision of the Supreme Court in the judgment of Hillside Parks Ltd v Snowdonia National Park Authority [2022] UKSC 30 specific drafting has been included in the draft DCO to deal with any inconsistency between the Green Horizons Park permission and the Proposed Development to ensure that the Green Horizons Park planning permission does not become unimplementable.

<https://www.supremecourt.uk/cases/uksc-2020-0211.html>. (accessed 20/08/2023).

SLAE understands that this judgement is for residential properties and the developer appears to have submitted planning permission for all changes, which appears to us that LR have applied a different application of the ruling comprising of office space (Class B1), warehouse and industrial space (Class B2 and B8), mixed employment space (Class B1/B2/B8), a hotel (Class C1), café space (Class A3); energy recovery centre (sui generis), internal access roads, car parking, landscaping and associated works including earthworks, utility diversions, sustainable drainage systems, tree removal and tree protection. There are no houses being built as part of GHP.

Document 000941

18.6.7 Because the Green Horizons Park development is dependent on the Airport Access Road (AAR) for access, it has not been appropriate to include the traffic associated with that development in the 'Do Minimum' scenario; however, this does distort the 'Do Something' scenario because the changes include the Green Horizons Park traffic as well as the additional airport related traffic, thereby exaggerating the increase in traffic on the highway network. Furthermore, the Proposed Development will include some of the land that was assumed to form part of the Green Horizons Park development, therefore the scale of development that will be delivered in practice is likely to be less than the total consented.
SLAE are unable to comment on the following paragraph in document 000941 as its meaning is not clear. Please can LR re-write in clear understandable English and we will comment?

Document 000680.

1.1.2 The Energy Statement has two functions:

- a. To inform the size and scale of assets (such as the grid connection, on and off-site generation) included in the Proposed Development, and which will serve the wider airport development, (including Luton DART and Green Horizons Business Park) which whilst outside this application, may be supplied by assets within the application boundary.
- b. To inform the scenario assessment of 'with' and 'without' development within the ES. The impact assessment explores only those loads and forms of generation that are within the Order Limits (the red line boundary of the application) and which are additional to current loads, and which are the subject of this application.

Does any part of the a&b points in paragraph in 1.1.2. in document 000680 draw power from the grid? Will the application impact the surrounding ward residents? During construction and each the operation of each phase? Will ward residents experience power black outs?

Document 000987

4.7.2 Since the 2019 statutory consultation, several changes have been made to the Proposed Development, due to a range of factors including Brexit, Covid-19 and responses to the consultation. The key changes to the fully built-out scheme are:

- a. inclusion of AAR – The AAR, is included as part of the application. Uncertainty as to if and when this road could be delivered through Luton Rising's New Century Park (now Green Horizons Park) planning permission, because of the changed economic situation caused by the Covid-19 pandemic, led to the decision to include a slightly modified version of the road within the application proposals. This provides the certainty required that the road can be delivered ahead of time. This is important as it will be relied upon for access to the expansion area east of the existing airport.

Evidence GHP n, p, q. r We don't think that paragraph is correct and that Covid-19 was not the cause of not delivering the AAR, we understand it's because the Council did not have the money to fund the road.

Evidence GHP n

<https://stoplae.org/new-century-park-cpar-terminal-2-access-road/#more-5839> (accessed 22-8-23).

Evidence GHP p 4. Barriers to development

https://www.semlep.com/modules/downloads/download.php?file_name=1660 (Accessed 22-8-23).

Evidence GHP q LBC Overview and Scrutiny Board, 3. GHP. page 321.

Evidence GHP r - LBC page 10, paragraph starting, "EY had provided an update on the Council's".

Document 001116

5.12.2 As the volume of passengers and flights using the airport grows, there will be a need for additional hotel accommodation within the vicinity of the airport. An additional 125 bedroom hotel is planned as part of the Green Horizons Business Park and there are other new hotels planned in the vicinity of the airport, providing of the order of 570 additional bedrooms.

Evidence OFH f. Document 000827 5.12.2 An additional 125 bedroom hotel, Document 001117 7.5.39 An additional 145 bedroom hotel. 125 or 145 beds, please clarify?

Is there the need for more hotel accommodation in Luton?

Evidence: <https://www.bedfordshirelive.co.uk/news/bedfordshire-news/plan-demolish-icon-hotel-luton-6702999> (accessed 21-8-23)

22-2-2022. Plan to demolish Icon Hotel in Luton and replace with flats would be 'great loss to the town'
The hotel would be replaced with an 18-storey block of flats and commercial units

Evidence: <https://www.lutontoday.co.uk/news/politics/we-have-too-many-hotels-in-luton-hoteliars-anger-at-plans-for-rival-in-student-village-2866719> (accessed 21-8-23)

27-4-2020. We have too many hotels in Luton': Hoteliers' anger at plans for rival in student village
Controversial plans for a new hotel in Luton's 'student village' will be decided by the council's development control committee tomorrow (Thursday).

Document 001114

5.8.7 The Green Horizons Park development would not be implemented in full as per that planning permission (see Section 6.7 below). Funding for other related projects in Luton will be provided. Replacement pitches were being delivered through the Green Horizons Park permission.

Where will the replacement pitches be? Why is this statement in the DCO? Is this statement just application filler?

Document 001114

8.3.20 LLP3 on the Luton Town Centre Strategy Part A(iii) adds "hotels, and leisure uses to maintain and enhance the (retail) regional role of the town centre". To complement this, the Luton Hotel Study (July 2015) provides evidence that "there is a need for an extra hotel room requirement of potentially 1,830 rooms by 2030 predominantly related to aviation and business travel in the vicinity of the airport". LLP3ii refers to Century Park (now Green Horizons Park) development as a mixed aviation related B1b-c, B2 and B8, small scale ancillary service uses and hotel use.

Why does the DCO application have many references to the facilities that GHP will offer under the local planning agreement? Is this just padding out the application?

Document 000748

Airport Access Road

6.9.2 The section of the Airport Access Road (AAR) from Airport Way to Percival Way was part of a planning application submitted for Green Horizons Park. This area was subject to two previous site investigations, (Ref. 49) and (Ref. 54) the soil analysis results from which have never been formally assessed. An indication of the likely significant impacts was included in the **Chapter 17** of the Environmental Statement [TR020001/APP/5.01] for Green Horizons Park (Ref. 61) which indicated there were localised asbestos contamination within the Made Ground and substantial Made Ground deposits encountered in the vicinity of Airport Way. The ES concluded following suitable mitigation there would be no significant effects but indicated additional ground investigation was required.

Why when the DCO application has cost £65 million has the soil analysis results never been formally assessed? An indication is cannot be good enough when there are so many facts and figures used in other parts of this application? Has the analysis been overlooked?

10.1.21 Leachate and groundwater monitoring results from the recent GI require further detailed assessment to confirm the initial findings from the Arup Green Horizons Park QRA.
Was a further detailed assessment ever done? If not, why not?

Green Horizons Park 3.

Document 000678

4.3.3.d. Construction Compound 4 (Green Horizons Warehouse): A self-contained site compound located within car parking area of the proposed NCP warehouse (Area 12). Compound area would be approximately 1,000sqm and would provide welfare facilities for site operatives, materials receiving and equipment storage and operative car parking; Before the AAR is built, how will traffic get to this site?

Evidence GHP s. *Luton Borough Council Local Plan 2011-2031, November 2017 (Ref. 11.20) The development of, and improved access to, the London Luton Airport Strategic Allocation, which includes Green Horizons Park (formerly New Century Park), are needed to serve aviation engineering, business and logistics related growth and some small scale B2 accommodation for local businesses.*

We are not sure if we have seen logistics related growth attributed to GHP elsewhere in the application documents?

Document 000816 - Existing Site

New Century Park (NCP), now known as Green Horizons Park (GHP), is located to the east of the airport. GHP is a mixed-use business park which includes the construction of a new access road (referred to in the planning application as Century Park Access Road (CPAR)). In other documents GHP is classed as a high quality mixed-use business park, can you explain in more detail what a high quality warehouse is? The same for industrial space (Class B2 and B8)?

Document 000812

2.4.36. c. Area C - The GHP Light industrial quarter (this area is safeguarded for Green Horizons Park development and not directly affected by the Proposed Development). What is a light industrial area, I thought it was a high quality industrial space?

8.3.40 The following embedded mitigation measures have been incorporated into the design of the Proposed Development:

d. The Green Horizons Park development (formerly New Century Park) for which planning permission was approved in June 2021 (LBC ref. 17/02300/EIA) included employment creation estimated at 3,200 jobs. The Proposed Development will affect the Green Horizons Park area and is reported under the displacement effects below. The design of the Proposed Development has sought to keep adverse effects to a minimum.

3,200 jobs are estimated and we ask LR to document the mitigation if these jobs don't materialise? SLAE cannot find the evidence in this DCO as to how they got to these numbers? Again, is this just DCO application filler?

8.3.42 The ETS [TR020001/APP/7.05] includes goals for the construction assessment phase in apprenticeships, local employment, and tendering contract opportunities to local companies, for example, small and medium sized enterprises. Tendered contracts can stipulate targets for appointed lead contractor firms. Liaison will be undertaken with existing education bodies in advance of the construction programme to advise on future skills requirements that can tailor with the construction skills forecast. A number of existing

*operators have bespoke training programmes – such as easyJet Academy. It is anticipated that a Workplace Charter for employers, defined in the **ETS [TR020001/APP/7.05]**, will be developed to work towards a set of agreed objectives that will include a focus on local employment and training initiatives.*

Will the easyjet Academy advise on future skills requirements that can tailor with the construction skills forecast? Could LR please advise where on the easyjet web site the Academy relating to construction jobs can be found?

8.3.46 The proposed hotel would promote airport-related guests to use public transport including Luton DART, facilitate improved service for passengers taking early morning and late evening peak departures and arrivals, increase four-star options for potential guests, reduce private vehicles and shuttle buses on nearby roads, increase the airport's profile with conferencing facilities and provide several employment opportunities.

Can LR provide more detailed information, i.e. the number of private vehicles and shuttle buses that will be reduced?

*In paragraph 8.12.21 As part of the Proposed Development, an area of Wigmore Valley Park would be lost and open space of a greater area would be provided to the east of the existing green space at Wigmore Valley Park, south of Darley Road (as shown on **Figure 14.11** of the **ES [TR020001/APP/5.03]**). Key facilities built as part of the extant Green Horizons Park planning consent to the north would be retained in this area and would remain fully accessible to the public throughout the construction period. Overall, the impact of the closure and re-provision of Wigmore Valley Park represents a minor beneficial impact for users of the park. The Open Space Assessment in **Appendix C** provides a full discussion of this matter.*

Can LR explain in detail how a reduction in the current Wigmore Valley Park open / green space available leads to a greater area of open / green space? SLAE cannot work out the maths, unless an area greater than the loss, is returned from brownfield land to open / green space. A new Wigmore Park can be greater when it purchases adjoining existing open / green / farming land in Hertfordshire, however excluding a name, overall it's a loss. SLAE would like to know how during construction activities that the car parking spaces will remain available only for users of the park?

Evidence GHP k *8.12.22 This Open Space Assessment also considers the legal tests set out in sections 131 and 132 of the Planning Act (2008) which make provision for special parliamentary procedure to apply where a development consent order authorises the compulsory acquisition of land, or rights over land, forming part of open space. The assessment of the replacement open space proposals demonstrate section 132 (3) applies, therefore, the special parliamentary process referenced in section 132 (2) is not engaged. Furthermore, section 131 is not engaged.*

SLAE seek clarification on this paragraph? When reading sections 131 and 132 of the planning Act (2008), it does not refer to agricultural land (documents 000781, 000658, which is clearly classified.

Evidence GHP k

<https://www.legislation.gov.uk/ukpga/2008/29/schedule/12/paragraph/16?view=extent#extent%3Dengland> (accessed 22/8/23).

15 Section 131 applies as if—

(a)in subsection (1), for “, open space or fuel or field garden allotment” there were substituted “ or open space ”, and

(b)in subsection (12), for the words from “common” to “1981” there were substituted—
““common” includes any town or village green;

“open space” means any land laid out as a public garden, or used for the purposes of public recreation, or land which is a disused burial ground;”.”

16 Section 132 applies as if—

(a)in subsection (1), for “, open space or fuel or field garden allotment” there were substituted “ or open space ”, and

(b)in subsection (12), for the words from “common” to “1981” there were substituted—
““common” and “open space” have the same meanings as in section 131 (as modified by paragraph 15 of Schedule 12);”.”

*8.12.23 Key mitigation measures relevant to health and community effects are summarised in Section 13.8 of **Chapter 13** of the ES [TR020001/APP/5.01]. These include measures to reduce noise impacts notably to establish a noise envelope (GCG Appendix C [TR020001/APP/7.08]), provision of replacement open space (Appendix C of this document), landscape management at Wigmore Valley Park and where practicable, the Proposed Development would be designed to avoid or reduce adverse effects on other road and public transport users through measures that are targeted at encouraging greater use of those modes of travel that have less environmental impact (e.g. extending the Luton DART). Embedded and good practice mitigation measures of particular relevance to the health and community assessment identified in the following topics have also been taken into account for the assessment: **Chapter 7** Air Quality, **Chapter 11** Economics and Employment, **Chapter 14** Landscape and Visual, **Chapter 16** Noise and Vibration, **Chapter 18** Traffic and Transport of the ES [TR020001/APP/5.01], and **Appendix 5.2** Light Obtrusion Assessment, and **Appendix 4.2** CoCP of the ES [TR020001/APP/5.02].*

Please explain as we struggle to understand why visitors to the park would use the Dart to get to the Park? Also we cover in our Pavilion, Skate Park and children's Play park Written Representation the parking issues that will be faced by non airport, GHP or employees visiting those facilities.

Green Horizons Park 4.

Document 000657

Public Open Space land subject to acquisition

*12.1.6 The land currently designated as public open space is within the eastern part of the Main Application Site. This land is principally arable but includes also WVP, a designated District Park and area of public open space. WVP is recognised to form part of the Luton Green Infrastructure Network (Ref 12.1), is used for dog walking and recreation, and includes mown open grassland, scrub grassland, woodland, allotments, a play park, skate park, car park and a pavilion building. **The Pavilion has been disused for a number of years.** The total existing area of open space within the Order limits subject to permanent acquisition covers an area of 35.9ha.*

Document 001114

4.8.7 Improvements to Wigmore Valley Park as part of the Green Horizons Park proposals include refurbishment and extension to the Wigmore Valley Park Pavilion building as well as replacement children's play areas and skate park.

SLAE suggest that these improvements could have been made years ago and have submitted a Freedom of Information request to LBC which is expected to be returned on the 18th September to find out why, and evidence will be submitted shortly after that date. SLAE believe this to be a deliberate lack of investment and maintenance with WVP, Pavilion and children's play area.

Document 001114

5.8.8 The DCO proposals include establishing a Community Trust to run and maintain Wigmore Valley Park and funding may be provided to the Trust through the section 106 obligation(s). This may also include the habitat creation land beyond the park.

SLAE ask LR to change the "may be" into a "will" to indicate LR commitment, otherwise it means nothing and would be viewed as an application filler. This would also be seen as being a genuine "Good Neighbour".

5.9.9 However, it is anticipated that some elements of Green Horizons Park will still be implemented under that planning permission, and these will be subject to future Reserved Matters / approval of details submissions to LBC. It may also be necessary for some elements of Green Horizons Park to be amended having regard to the Proposed Development, and these would be subject to separate applications under S73 / S96a of the Town and Country Planning Act 1990 (ref 5.2) as appropriate.

As asked for in our OFH1 verbal statement, we ask the inspectorate / government that Luton Development Management Committee not be able to make planning decisions on airport expansion. **Evidence RR c** Anne Donelans statement evidences how decisions are made, and that all airport planning applications are approved suggests that the works that fall under paragraph 5.9.9 are already pre-approved.

Green Horizons Park 5.

Document 000758

Table 2.1: CSM for Human Health Receptors requiring further DQRA.

PCL No.	Phase applicable to (see key)	Source	Pathway	Receptor	Qualitative Assessment of Risk	Justification of Qualitative Assessment of Risk
<i>On-site</i>						
1	DEV	Ground gases from former landfill e.g. methane	Migration into future buildings and aviation apron resulting in build-up of gases	Users of future development – public/airport operatives/Green Horizons Park users (formerly New Century Park) - risk of explosion	Very High	The GQRA (Ref. 2) (Appendix 17.2) of the ES [TR020001/APP/5.02] indicated that the Characteristic Situation (CS) is 2 to 3. However further DQRA is required to understand the gassing conditions.
13	DEV	Waste in former landfill	Inhalation of vapours	Users of future development – public/airport operatives/Green Horizons Park users	LOW	There are no generic assessment criteria for assessing soil gas vapour concentrations. Therefore, PCLs associated with soil gas vapours require further DQRA.
14	Dev		Inhalation of airborne contaminants/ dust/ asbestos fibres and microorganisms	Users of future development – public/airport operatives/Green Horizons Park users	Low	Further assessment is required to establish the mitigation measures with respect to asbestos fibres, considered with DQRA.
33		Contaminants in Made Ground (car	Inhalation of soil derived dusts/asbestos fibres	Users of future development – public/ airport workers/users of Green Horizons Park	Low	Further assessment is required to establish the mitigation measures with respect to asbestos fibres, considered with DQRA.
37	Dev		Inhalation of vapours	Users of future development – public/ airport workers/users of Green Horizons Park	Moderate/ Low	There are no generic assessment criteria for assessing soil gas vapour concentrations. Therefore, PCLs associated with soil gas vapours require further DQRA.

SLAE believe that further and satisfactory DQRA must be carried out before the inspectors come to a decision on the DCO application. How can they make a decision when those working at GHP could be gassed, inhale vapours, breath in contaminants, dust/ asbestos fibres and microorganisms, and be exposed to a the risk of explosion, despite the qualitative assessment of risk. SLAE suggest that the council offices are re-located to GHP and let them sample what they propose on others. Walk the walk, not talk the talk. What happens if people die as a result of working at GHP, it's a bit late to then state that the application said 'low risk'?

Table 2.2: PCLs which do not require further assessment but required consideration in the ORS (Ref. 4) (**Appendix 17.5** of the ES [TR020001/APP/5.02]).

PCL No.	Phase applicable to (see key)	Source	Pathway	Receptor	Qualitative Assessment of Risk	Justification of Qualitative Assessment of Risk
7	DEV	Waste in former landfill	Direct contact e.g. dermal contact, soil ingestion	Users of future development – public/airport operatives/Green Horizons Park users	low	The GQRA (Ref. 2) (Appendix 17.2) of the ES [TR020001/APP/5.02] indicated there was very few exceedances and the risk to future users Proposed Development is low. The future development will comprise buildings & hard standing, therefore there is unlikely to be any contact with land filled wastes. However, given the heterogeneous nature of landfills and the lack of engineered cover system, it should be assumed that measures will be required, particularly in landscape areas to prevent direct contact with the waste.
10	Dev	Waste in former landfill	Direct or indirect contact with radionuclides – incurring radiation dose by indirect dose received from ingestion of radium (or other alpha emitting contaminated material) or direct risk from contact with beta emitters such as Carbon-14 or Caesium-137	Users of future development – public/airport operatives/Green Horizons Park users	low	The recent GI included testing for radionuclides, which indicated levels observed were consistent with background levels (see Section 10.1.3 in GQRA (Ref. 2) (Appendix 17.2) of the ES [TR020001/APP/5.02]). However, given the heterogeneous nature of landfills and the lack of engineered cover system, it should be assumed that measures will be required, particularly in landscape areas to prevent direct contact with the waste.
22	DEV	Leachate in former landfill2 2 The source of the leachate in assumed to be the landfill waste material	Direct contact e.g. dermal contact	Users of future development – public/airport operatives/Green Horizons Park users	Low	The GI undertaken indicates there is likely to be limited leachate present. The future development will be buildings and hard standing and is likely to include an engineered cover layer and leachate control system, therefore there is limited potential for contact with any leachate in the landfill.
30	Dev	Contaminants in Made Ground (car park, capping material)	Direct contact e.g. dermal contact, soil ingestion	Users of future development – public/airport workers/users of Green Horizons Park	Low	The GQRA (Ref. 2) (Appendix 17.2) of the ES [TR020001/APP/5.02] indicated there was very few exceedances and the risk to future users of the Proposed Development is low. The future development will comprise buildings & hard standing, therefore there is unlikely

						to be any contact Made Ground. However, given the heterogeneous nature of landfills and the lack of engineered cover system, it should be assumed that measures will be required, particularly in landscape areas to prevent direct contact with the Made Ground.

Same questions as those asked on Table 2.1.

Table 7.1: Updated human health CSM

PCL No.	Phase applicable to (see key)	Source	Pathway	Receptor	Qualitative Assessment of Risk	Justification of Qualitative Assessment of Risk
<i>On-site</i>						
1	DEV	Ground gases from former landfill e.g. methane	Migration into future buildings and aviation apron resulting in build-up of gases	Users of future development – public/airport operatives/ Green Horizons Park users- risk of explosion	Moderate	High concentrations of bulk landfill gases (carbon dioxide and methane) were recorded within the waste but there are low or negligible standpipe emission flow rates, indicating low/very low rates of continuing biodegradation of residual organic matter. A methane/carbon dioxide of CS4 (maximum) is considered protective – many parts of the site might be only CS2 or CS3. Gas protection measures are required in proposed buildings consistent with those detailed in Section 6 of this document and BS8485
13	dev	Waste in former landfill	Inhalation of vapours	Users of future development – public/airport operatives/Green Horizons Park users	low	The GI provided sufficient information to characterise the potential risks from soils vapours. No elevated soil vapours identified during DQRA assessment which could be considered to pose a risk to the future development. Post earthworks monitoring will be undertaken to confirm assessment. A detailed monitoring strategy is included in the ORS (Ref. 4) (Appendix 17.5) of the ES [TR020001/APP/5.02]. If elevated concentrations are detected post earthworks the need for specific mitigation measures to prevent vapour intrusion into buildings should be reassessed.
14	dev	Waste in former landfill	Inhalation of airborne contaminants/ dust/ asbestos fibres and microorganisms	Users of future development – public/airport operatives/Green Horizons Park users	low	The future development will comprise buildings & hard standing, therefore there is unlikely to be any contact with land filled wastes. However, given the heterogeneous nature of landfills and the lack of engineered cover system, it should be assumed that measures will be required, particularly in landscape areas to prevent generation of dusts which may contain asbestos fibres.
33	dev	Contaminants in Made Ground (car park, capping	Inhalation of soil derived dusts/asbestos fibres	Users of future development – public/ airport workers/users of Green Horizons Park	low	The future development will comprise buildings & hard standing, therefore there is unlikely to be the potential for generation of soil derived dusts. However, given the heterogeneous nature of landfills and the lack of engineered cover system, it should be assumed that measures will be required, particularly in landscape areas to prevent generation of dusts which may contain asbestos fibres.

		<i>material)</i>				
37	dev	<i>Contaminants in Made Ground (car park, capping material)</i>	<i>Inhalation of vapours</i>	<i>Users of future development – public/ airport workers/users of Green Horizons Park</i>	<i>Moderate/ Low</i>	<i>The GI provided sufficient information to characterise the potential risks from soils vapours. No elevated soil vapours identified during DQRA assessment which could be considered to pose a risk to the future development. Post earthworks monitoring will be undertaken to confirm assessment. A detailed monitoring strategy is included in the ORS (Ref. 4) (Appendix 17.5) of the ES [TR020001/APP/5.02]. If elevated concentrations are detected post earthworks the need for specific mitigation measures to prevent vapour intrusion into buildings should be reassessed.</i>

Same questions for table 7.1 as for table 2.1.

Inconsistencies: Where GHP is mentioned in documents and an acronym is used, the meaning of the acronym is not found in all Glossary's.

Evidence WR GHP f

2019 Indices of Multiple Deprivation Summary

October 2019

Luton 2019 Index of Multiple Deprivation

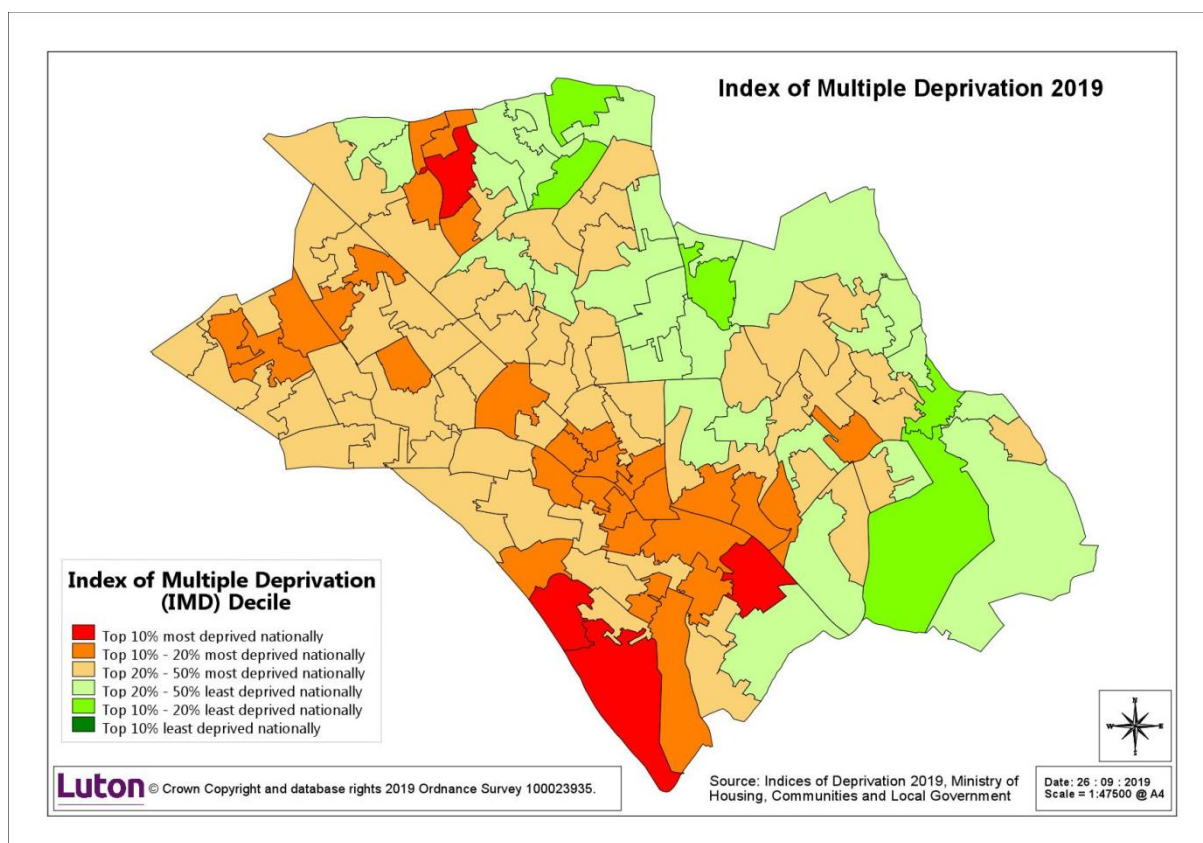
Executive Summary

- the Indices of Multiple Deprivation ranks relative deprivation amongst areas in England
- Luton is currently ranked the 70th most deprived out of 317 local authorities, in 2015 Luton was ranked the 59th most deprived area from 326 local authorities. Therefore Luton is less relatively deprived than in 2015
- the proportion of areas in Luton in the top 10 per cent most deprived parts of the country has fallen with Luton having four output areas in the top ten per cent most deprived. These are in Northwell, South and two in Farley. Previously Luton had nine areas in the top ten per cent
- Luton's highest deprivation rankings are in the Barriers to Housing and Services (25th), income deprivation affecting older people (43rd) and crime (58th) indicators, with the highest (least deprived) ranking in the Living Environment (120nd)

IMD 2019

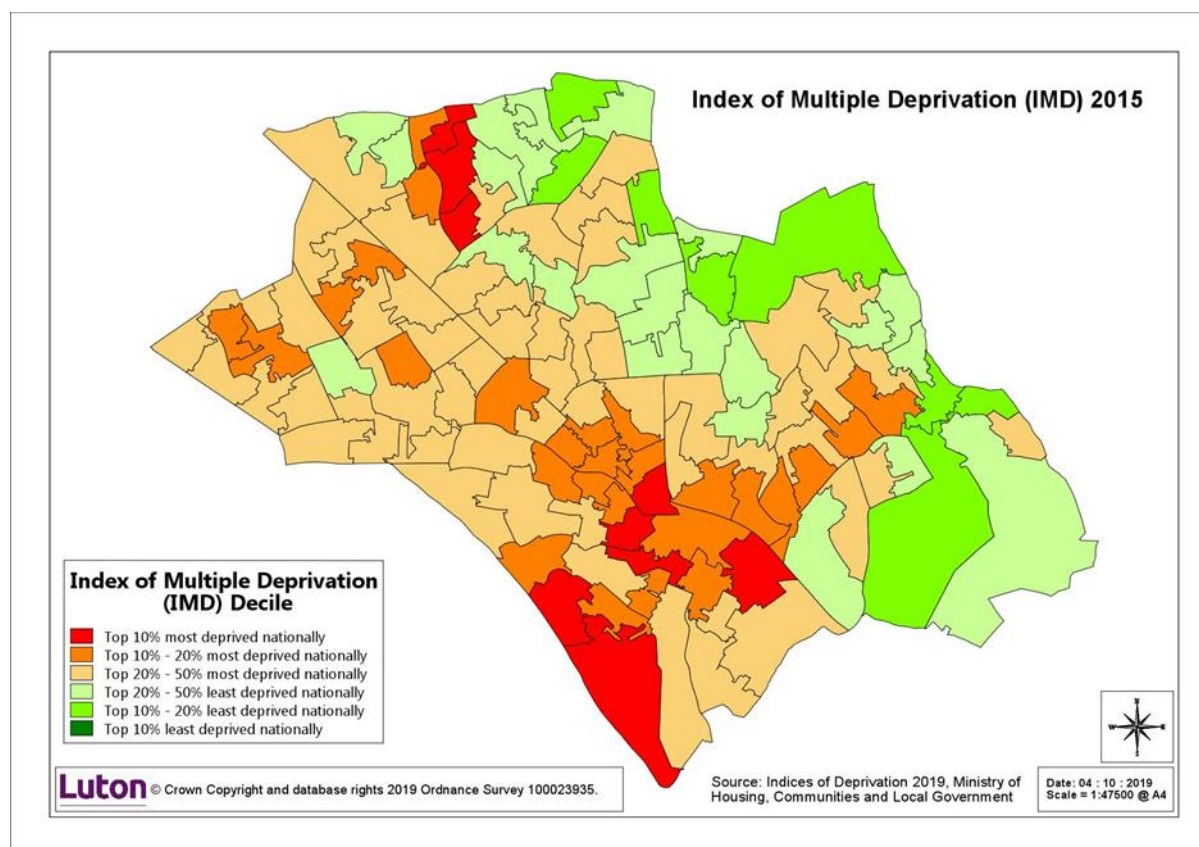
The Ministry of Housing, Communities & Local Government published the Indices of Multiple Deprivation for 2019. These indices show relative deprivation for all 317 local authorities and the 32,844 lower layer statistical output areas (LSOA) of England. The categories are barriers to housing services, crime, education, employment, health and living environment. There are also supplementary indices measuring income deprivation amongst children and older people: the Income Deprivation Affecting Children Index and the Income Deprivation Affecting Older People Index.

Map 1: 2019 Index of Multiple Deprivation for Luton by LSOA



Luton has four areas in the top 10 per cent most deprived areas in the country, two of these are in Farley with one each in South and Northwell.

Map 2: 2015 Index of Multiple Deprivation for Luton by LSOA



Map 2 shows the 2015 Indices of Deprivation where Luton has nine output areas in the top ten per cent most deprived areas in the country. Three of these are in Northwell, two in Farley and South wards and one in Biscot and Dallow wards. Comparing the 2015 and 2019 indices shows that Luton has become relatively less deprived.

Table 1: Comparison of ranks for 2004-2019

(where 1 = most deprived and 317= least deprived 2019, 326 = least deprived in 2010 and 2015 and 354 in 2007 and 2004)

	2004 rank	2007 rank	2010 rank	2015 rank	2019 rank
Local Concentration is the population weighted average of the ranks of a district's most deprived LSOAs that contain exactly 10% of the district's population.	134	120	112	114	122
Extent is the proportion of a district's population living in the most deprived LSOAs in the country. This aims to portray how widespread high levels of deprivation are in a district.	95	85	74	57	72

Income Scale is the number of people who are income deprived. These aim to indicate the numbers of people experiencing income deprivation.	69	55	63	58	66
Employment Scale is the number of people who are employment deprived. These aim to indicate the numbers of people experiencing employment deprivation.	82	78	87	103	115
Average of Ranks - Population weighted average of the combined ranks for the wards in a district. This summarises the district as a whole, including both deprived and less deprived wards.	103	86	60	40	52
Rank of Average Scores - Population weighted average of the combined scores for a district. This also summarises the district as a whole, taking into account the complete range of scores across the district.	101	87	69	59	70

Luton's relative deprivation ranking had been rising from 103 in 2004 to 59 in 2015. Luton's deprivation ranking improved in 2019 with a ranking of 70.

Table 2: Luton IMD Sub-Component Rankings

	2015 rank	2019 rank
Employment	103	115
Income Scale	58	66
Education	101	75
Health	85	85
Crime	24	58
Barriers to Housing & Services	15	25

Living Environment	104	120
Income Deprivation Affecting Children	66	81
Income Deprivation Affecting Older People	45	43
Percentage of LSOAs in most deprived areas nationally	7.4%	3.3%

Luton has the highest relative deprivation ranking in the 'Barriers to Housing and Services' with a ranking of 25th from 317 local authorities. Luton has the lowest rank in the 'Living Environment' category with a ranking of 120th. The proportion of areas in the most deprived areas in the country fell from 7.4 per cent in 2015 to 3.3 per cent in 2019.

The IMD data can be accessed in the following link:

<https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

*For further information on this topic, contact the Business Intelligence Team at:
Research.Intelligence@luton.gov.uk*

Evidence WR GHP m

Department for Levelling Up, Housing and Communities

Local Government Finance Review – LUTON BOROUGH COUNCIL

December 2021

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Executive Summary

This report provides our assessment of the Luton Borough Council's (LBC) current financial position including how successfully the authority has reduced its former reliance on income from London Luton Airport (the airport), the deliverability of its savings plans, its efficiency in delivering services under financial pressure, the state of the authority's reserves, and its financial management and capacity. It also considers the financial resilience of the Council in particular by the examination of its medium-term financial plan and transformation activity and the scope for raising additional monies through capital receipts from asset sales.

We have reported in detail separately on the financial and governance issues arising from the relationship between LBC and its airport owning subsidiary (London Luton Airport Limited – LLAL). This report considers these issues only from the position of their impact on the Council's finances. Our key findings are summarised below.

Key findings

- The key pandemic related financial pressure on Luton's general fund revenue budget has been the drop in its income from its airport-owning subsidiary as a result of the collapse in air travel during lockdown. The fall in income from loss of dividends from its subsidiary represents more than 28% of Luton's annual core spending power. By April 2022 LBC will have lost planned dividend income of more than £49m.
- The Council recognised the need to address this threat to achieving a balanced budget relatively early (July 2020) passing an emergency budget and taking a number of steps to prevent the threat through a mixture of savings, use of reserves and potential capitalisation.
- The extent to which the Authority will need to draw on the agreed £35m (2020/21) and applied for £15m (2021/22) capitalisation directions is still to be decided as the level of stabilisation funding the Authority requires to inject into its airport subsidiary and the extent of delivery of savings becomes clearer over the coming weeks/months and the parties have agreed a settlement agreement around force majeure and special force majeure. The Authority has earmarked monies to pay the cost of the capitalisations from the additional interest payments it expects from its subsidiary as a result of the stabilisation package.
- Whilst the Council drew temporarily on its funding equalisation reserve to help balance the budget, the Council's general reserve has not been used to balance the revenue budget and the position on the general reserve has continued to remain strong (9% of the net budget) compared to comparable authorities whilst levels of specific reserves have been increased to reflect continuing uncertainty using one-off unexpected gains such as through PFI refinancing.
- The Council's medium term financial plan has removed dependence on dividend income from its airport subsidiary and no dividend is assumed in base budgets up until the end of 2024/25. However, debenture and rental income continues to be built into the baseline budgets whilst the subsidiary continues to be in a position to make these payments to the Council.
- Luton is funding a stabilisation plan for the airport to cover any risks associated with the fluctuations in passenger numbers via the injection of additional preference share finance into its subsidiary, estimated in August 2021 at £20m. It is therefore seeking as

far as possible to solve the financial issues at the airport through capital injection. It has built the additional interest payments for this borrowing required into its future base budget. These payments are more than covered (generating a modest margin on loans) by the receipt of interest from the airport subsidiary.

- The Authority has earmarked £2m per year from the additional debenture interest that will be generated by its lending to the airport subsidiary as part of the stabilisation package to pay the additional interest and capital cost of £1m to £2m per year of the capitalisation directives.
- LBC's auditors have not yet issued their opinion on the Authority's 2018/19 and 2019/20 accounts. They require additional assurances on 'going concern' and post-balance sheet events in regard to the level of exposure the Council expects to take on through its airport subsidiary stabilisation package, the recoverability of the debenture loans issued by the Council, whether aspects of spend on airport access and other improvements can be treated as adding capital value and the scale of borrowing relative to the overall value of ownership of the airport to the Council. The Authority is still in the process of providing information to their auditors. It will be important that Luton follow proper accounting practice and make appropriate provisions should any doubts emerge in these areas.
- The Council has accepted the need for stronger governance over its commercial operations through establishment of a shareholder interest board with appropriate expertise and independence and at the time of writing, proposals are being tabled at Council meetings in mid-August 2021.
- The Council's airport subsidiary is currently donating £7 million per year to third sector bodies delivering non-statutory but key services including early intervention and prevention services and cultural and leisure services. If in future years the airport subsidiary is unable to make these payments, this may add additional financial pressure on the authority and call in the short term on the reserves.
- Achieving the balanced current budget and MTFP depend heavily on savings. As part of its emergency budget the services planned to deliver £21m of savings over 20/21 and 21/22 and it is assumed savings will cover a further gap of £7.5m in funding to 23/24.
- The gross savings targets are supported by short-term contingencies to phase the delivery of each year's programme over a two-year period. However, these contingencies currently cover some 65% (£5.5m) of expected savings. Use of contingency in this way may reduce short-term motivation to deliver and it will be important that contingencies are not used indefinitely or in the longer-term to mask shortfalls in delivering sustained savings to baseline budgets.
- The Council has delivered savings of £38 million since 2019/20 but some 22% of savings planned in the three financial years since 2019/20 (£8.4m) have not yet been delivered and almost £4m of this dates from the financial year before last.
- The savings shortfall represents some 70% of the current (Q1 2021) gross total service pressures on the Council's general fund budget.
- The Authority is actively tracking delivery of the savings programme. The tracker currently shows a red or amber risk rating for some 22 out of 28 savings projects (but only four are red). Some of these projects will be rated in this way because savings will be delivered later than planned, rather than because the savings will never be delivered. Items on the savings tracker with an amber risk rating will be accommodated as planned through the Equalisation Risk Reserve. Whilst creating a level of contingency within the overall annual budget is prudent, we do question whether this creates the right cultural behaviours.

- The Council has achieved some considerable savings and efficiencies in the current savings round and made some difficult decisions. These include a senior management reorganisation that realised £0.5m per annum. It has also started to charge for its green waste collection.
- However, some of the largest potential unachieved individual savings involve decisions on projects or schemes that the Authority has found difficult to take and which some elected members hesitate to implement such as the £1.6m rationalisation of its community cultural and leisure estate. The Authority is considering community asset transfer for some sites and the work required to bring these proposals to the Council's Cabinet are developing.
- The Council has rationalised a significant number of assets in recent years, but this has tended to focus on certain building types (namely office portfolio, Children's, and Adults).
- The Property and Facilities Management services have a clear asset strategy and plan for delivering the strategy. However, they hold a larger than needed number of accommodation and operational sites and have on occasion struggled with implementing some rationalisation projects due to lack of support by some members. At the same time their capital programme has not always reflected the asset related capital bids.
- Capital spend on the estate has not kept pace with requirements and as the condition of assets has deteriorated resulting in higher revenue costs to maintain them.
- The Authority has a mature corporate risk management strategy and supporting monitoring. It has identified the key risks as being (i) not achieving the savings proposals, (ii) the potential costs of implementing savings turning out to be greater than estimated and (iii) spend on social care and homelessness exceed their service budgets.
- Service leads told us that achieving the budgeted savings will become increasingly difficult without some service reengineering, investment and additional senior leadership capacity.
- The CIPFA resilience index highlights that pre-pandemic Luton had a slightly higher per head total service spend (£1.72k compared to average of £1.51k) with the higher spending concentrated on adult and children's social care, housing, environmental and regulatory services compared with its statistical neighbours, and these are areas for the authority to consider further rationalisation.
- The Council has planned actions to contain some of the pressures on budgets which in previous years have been a cause of financial pressure, including adult social care, families and homelessness. Nevertheless, risks continue with additional demand associated with the pandemic likely to add pressure.
- Since June 2020 the senior leadership team have started to develop their thinking on a new target operating model for the Authority. They have developed design principles and acknowledged the need to identify new approaches to help achieve their aims but there is a great deal of work still to do to develop a shared view of the implications for changes in the ways of doing things and how they are to be achieved. We also recognise that the significant work (and the draw on existing resources) may be under-estimated.
- There is a considerable amount of change activity within the Council driven by the emergency budget, new ways of working as a result of the pandemic and the new strategic plan. Some live projects are being drawn together with target operating model development and other proposed transformational projects into a "Future Ready" high level plan.
- There is a £9.5m reserve for invest to save projects and we were told there was a £1m investment budget this year to develop further "Future Ready" projects. But this is still work in progress and there is a great deal of work to be done to develop costs and benefits

realisation plans, prioritise and integrate the costs (both capital and revenue) and savings generated into the MTFP.

- We found strong officer understanding, leadership and grip of the issues facing the Authority and recognition of the need to take the actions taken amongst those members to whom we spoke.
- In common with other local authorities Luton finds it difficult to recruit qualified staff within its Finance department. The Director of Finance Section 151 officer is highly experienced and knowledgeable across the range of financial issues facing the Authority. However, he is stretched and has not been supported by a deputy for more than 15 months. This works against shared financial understanding and leadership across the Authority. There is scope to improve the Finance function's analytical and modelling capacity as well the commercial expertise available within the Authority.
- A reorganisation of corporate level leadership has contributed savings but the shrinkage in capacity may impact on the delivery of transformation activity.

Key conclusions

The Council has been proactive in managing the unprecedented financial pressures that arose as a result of the loss of income from the commercial operations of its airport subsidiary and in making some hard decisions in order to realise savings.

Whilst there is still some fluidity in the situation as the Council finalises the exact terms of its stabilisation package for its airport subsidiary, Luton achieved financial stability by obtaining early member approval for an emergency budget and planning, applying for capitalisation directions and delivering additional savings to make up some of the shortfall in income. The Council's leadership team is to be commended for taking such a proactive approach.

There is still risk attached to the delivery of the Medium-Term Financial Plan, not least in the light of the large shortfalls in savings to date and the yet to be identified further savings required to fund the spending gap to April 2024.

Long term financial sustainability depends on the local authority successfully realising more transformational change. Luton is developing its plans for more fundamental change and members will need to continue to support some of the hard decisions that will be involved in making further rationalisations and working in new ways.

In our experience, transformation change requires changes to the culture of the organisation and to the way of doing things. This takes significant amounts of senior management effort. Having the right transformation programme team in place (in the relative centre) is one thing and we acknowledge the work the Council has undertaken to date. However, developing a platform of longer-term sustainable change, supported by a culture change, across the organisation that can be measured, is a significant task requiring much from senior officers for a sustained period into the future. The Future Ready programme, building more capacity in Finance, along with other key interventions such as another review of what the Council could achieve through further property disposal will increase the Council's ability to improve its underlying structural financial issues in the medium to longer term.

We set down below the key recommendations arising from our review. A separate set of more detailed recommendations covering capital receipts and asset management are contained at page 33.

Key recommendations

Number	Recommendation description	Timescale
Capitalisation, Commercial and Borrowing		
1	Prioritise corporate effort to reduce the current backlog £7m shortfall in savings.	<i>6 months</i>
2	Continue to actively monitor the savings programme, paying particular attention to those that require sustained corporate leadership and which should not be left to individual services to deliver such as the rationalisation of the community leisure and cultural estate and the transport review.	<i>6 months</i>
3	Plan to identify alternative savings to cover those that are risk rated red.	<i>3 months</i>
4	Undertake a formal benchmark analysis and review of service costs against Luton's local authority statistical neighbours to identify areas for potential further efficiency and improvement.	<i>6 months</i>
5	Develop a savings plan which aligns more closely with the MTFP, covering 2022/23 and identifies as early as possible the savings that are expected to contribute to filling the £8m spending gap in the MTFP.	<i>3 months</i>
6	Develop a MTFP covering 5 years which considers a range of funding scenarios (e.g. optimistic; realistic; pessimistic) and then is explicit about the assumptions made and how they will be stress tested	<i>3 months</i>
7	Review the policy of the use of service specific and general contingencies to cover savings shortfalls and whether they are working to delay decision-making.	<i>6 months</i>
8	Whilst recognising the need for an agile approach, identify more clearly the investment requirements behind the Future Ready Programme, the timing of the expected benefits including savings and develop clearer links with the MTFP showing more explicitly how Future Ready will contribute to the Authority's financial sustainability.	<i>6 months</i>
Governance and Oversight		
9	The Authority, as the sole owner and lender to the airport needs to further strengthen its governance around the airport.	<i>3 months</i>
10	Ensure the proposed shareholder group's terms of reference provide for the necessary oversight it requires to represent a shareholder's perspective as well as setting out the parameters, policies and boundaries that the Council, as shareholder has established for its subsidiary companies	<i>1 month</i>
11	Ensure the proposed Shareholder Board has sufficient and relevant commercial financial expertise and support to provide appropriate independent scrutiny and challenge of its subsidiaries	<i>3 months</i>
12	In view of the scale of increase in planned borrowing required for the airport stabilisation package and its impact on the Council's balance sheet, financial gearing and risk, approval by the Executive and Full Council of the final business case should be	<i>1 month</i>

	accompanied by a full review and approval of the Annual Borrowing Strategy and the impact on prudential and treasury indicators.	
13	Prioritise the recruitment of a Deputy Director of Finance, Revenue and Benefits with the expectation of an appointment within the next two months and develop a formal training and succession plan to cover the risk of losing the experience of the current Service Director, Finance, Revenues and Benefits.	<i>3 months</i>
14	Review ways in which the capacity of the corporate leadership team can be increased so as to allow more impetus for transformation.	<i>3 months</i>
15	Strengthen the financial analysis and modelling capacity available to support the individual services as well as the Shareholder Board.	<i>3 months</i>
Assets		
16	Commission an independent review of the estate covering rationalisation opportunities including the revenue and maintenance issues as well as the implications of the capital programme. An independent review could facilitate the discussions with all stakeholders and help realise the rationalisation opportunities that have been identified.	<i>6 months</i>

1. Purpose of this review

Introduction

The purpose of this report is:

- To provide an assessment of the Luton Borough Council's (LBC) financial management and management of risk, deliverability of savings plans, and efficiency in delivering services.
- To provide assurance that as a local authority that received Exceptional Financial Support from the Department in the financial years 2020/21 and has applied for further support for 2021/22, LBC has taken appropriate steps to improve their financial sustainability.
- To provide support to LBC in the form of recommendations and performance requirements to ensure they achieve this objective.

An additional review has been undertaken to understand and provide assurance on LBC's arrangements with its airport subsidiary. This report covers the relationship with the airport in as far as its impacts on the LBC's income, borrowing and financial sustainability in the short and medium terms.

Methods used to gather data

Evidence was collected by CIPFA with support of Peopletoo between 15 July 2021 and 2 August 2021 involved the following methods:

- Semi-structured interviews. On-line interviews were conducted with key officers (including the CEO, Section 151 Officer, Corporate and relevant service delivery leads) the Leader of the Council and Chairs of the Finance Committee and Audit and Governance Committees and with external and internal audit. Details are at Appendix 1.
- Document review. The Council provided documents and working papers on key financial and non-financial issues with a particular focus on those related to budget setting and financial management and planning.
- Benchmarking. A comparison of Luton against other statistical neighbour Councils.

Analysis involved a triangulation of data from the different sources. Key information and conclusions have been discussed with the Chief Executive Officer and the Section 151 Officer.

Scope restrictions

This report is based on the fieldwork completed within the time frame for the review. It was not a comprehensive audit of the Council's finances. As a consequence, the conclusions do not constitute an opinion on the status of the Council's financial accounts.

We are reporting separately on the position in respect of LBC's relationship with the airport.

2. Background

Luton and its key challenges

The town is situated next to the M1 motorway and is just ten miles from the M25. Luton has three railway stations, providing access to Central London within 30 minutes, as well as direct journeys to the Midlands and the South Coast of England. Luton is also home to the UK's fifth largest airport, up until the pandemic providing flights to more than 70 destinations across Europe, the Middle East and North Africa for up to 18 million passengers per year.

Luton has an estimated population of 213,100 people and is as densely populated as many London boroughs. The estimated population of Luton has fallen slightly for three consecutive years, with around 1,800 less people living in the town than in 2016. Luton has one of the youngest populations in the country, with more than a third of residents being below the age of 25 and around a fifth below the age of 16.

Luton is a super-diverse town, with no single ethnic origin accounting for a majority of the population. Approximately 45% of the population are White British, with 30% of Asian ethnicity, 10% Black and 10% from other White backgrounds. Luton has many long-established diverse communities of Pakistani, Bangladeshi, Indian, African Caribbean and Irish origins.

The Centre for Cities has compared Luton to its five most similar European cities in size and industrial structure. Luton comes relatively high in its group on productivity (GVA per worker) but tends to rank at the bottom of many other indicators including employment and skills.

Prior to COVID-19 Luton's economy had been performing relatively well:

- A strong local economy worth £7.5 billion.
- GDP per head growing faster than national average.
- Employment had been growing, especially at the airport.

However, there were also considerable underlying challenges:

- 7th highest rate of child poverty in UK.
- Economic inactivity higher than national average.
- An estimated one in 5 jobs not paying living wage.
- Only 34% of Luton jobs management and professional compared to 46% nationally.

Analysis by the Centre for Cities found this year that the Luton economy was particularly vulnerable as a result of the pandemic. Luton has the 7th highest number of furloughed workers, 32,000 jobs at risk and the 8th highest claimant counts for cities and large towns in the UK. The Centre for Cities concluded that Luton was the second most vulnerable town economy post-Covid, in part due to its reliance on the airport and on vehicle manufacturing.

Luton Borough Council

Luton is one of the smaller unitary authorities, covering 40 km and created in 1997. The Council is made up of councillors from 19 wards. Luton operates a cabinet system formed from members of the majority Labour party. The Council has been led since 2007 by Hazel Simmons (OBE), who was previously Deputy leader and Chairs of Leisure and of Equalities.

Robin Porter took over as Chief Executive at the Council in May 2019. Prior to this he was Deputy Chief Executive and Corporate Director for Customer and Commercial Services and also lead for the Council's Airport Company LLAL. The Council re-organised its officer corporate leadership team in 2020 in response to the need to deliver savings. Service delivery is split across three corporate divisions each headed by a corporate director: Inclusive Economy; Children, Families and Education and Population Wellbeing. A further Corporate Director serves as Chief Executive Officer for London Luton Airport Ltd. This structure now aligns with the Council's corporate priorities. It is a member of the East of England Local Government Association.

Luton Council's priorities

In 2020, the Council agreed a new vision for Luton called "Luton 2040" which is an ambitious plan to transform a whole range of place and people-based aspects of the town. The vision reflects the impact on the town of the pandemic and seeks to develop a town built on fairness and social justice where no-one has to live in poverty, and all can thrive. This vision is underpinned by five strategic priorities:

- Securing a strong economic recovery from Covid-19, which protects jobs, incomes and businesses and enables us to build a more inclusive economy.
- Protecting the most disadvantaged in our town by prioritising services and interventions that focus on prevention, alleviate the impact of poverty and reduce health inequalities.
- Making Luton a child-friendly town, where our children and young people grow up feeling happy, healthy and secure, with a voice that matters and the opportunities they need to thrive.
- Becoming a greener and more sustainable town, to meet our long-term ambition to be carbon neutral and climate resilient by 2040.
- A strong and empowered community supporting fairness, equality and local pride and speaking with a powerful voice.

Luton funding base

The Council has a low tax-base. Most of the properties are in either band A or band B. As a result, each 1% increase in Council tax brings only £0.73m per year. The Council is currently ranked 52nd of all unitary councils (out of 57) in terms of average council tax per head of population. When compared to the average of its immediate neighbouring councils (Bedford, Central Bedfordshire and Milton Keynes) the council tax per population is substantially lower.

Luton has historically been relatively grant-dependent since it has a higher-than-average relative need, and a lower-than-average council tax income per dwelling. As a result, the old, needs-related grant system gave it above average levels of grant. Hence the Council has become more dependent on income from business rates and self-funding via its subsidiary companies, rents, charges and investment income.

In 2020/21 commercial returns, just from the airport, made up some 28% of the authority's revenue streams. This is equivalent of £506.32 precept on a Band D property – 33% higher than the current precept.

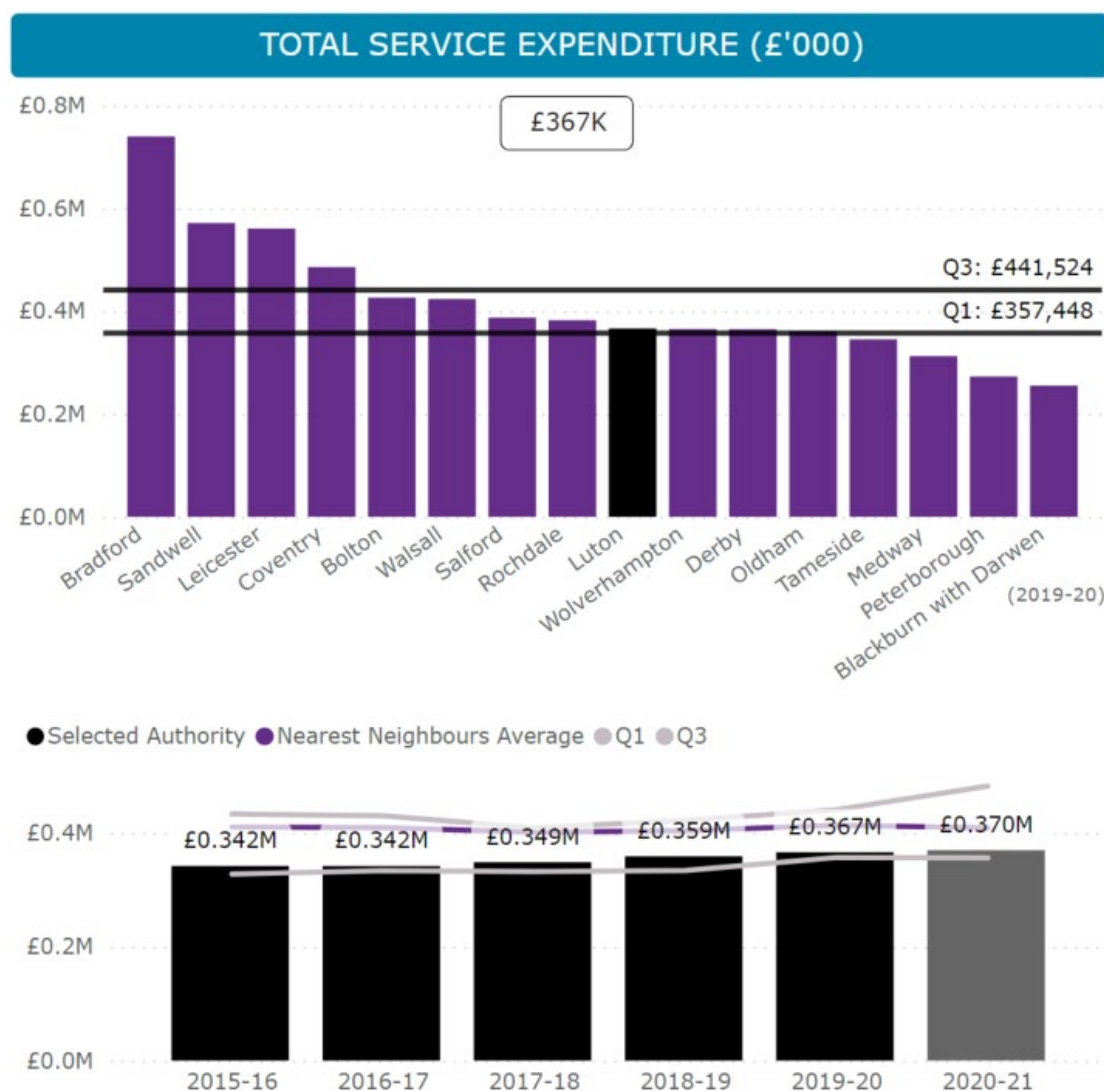
3.The current financial position

In this section we analyse LBC's current financial position. We consider its financial performance before the pandemic and the extent to which it was already under pressure. We then consider the factors that led to the capitalisation request and the steps the Council has taken to stabilise its financial position. These steps include primarily a savings programme and action to prevent financial pressures in areas of historic overspending. We also consider the position on the Authority's reserves and the affordability for the Council of the financial package required to stabilise the authority's Airport subsidiary.

Past financial performance

For 2019/20 the year prior to the pandemic spend the budgeted Luton total service expenditure (which also includes police, housing and fire and rescue services) was £367,000 (Figure 1). This puts it slightly above average compared to its near statistical neighbours.

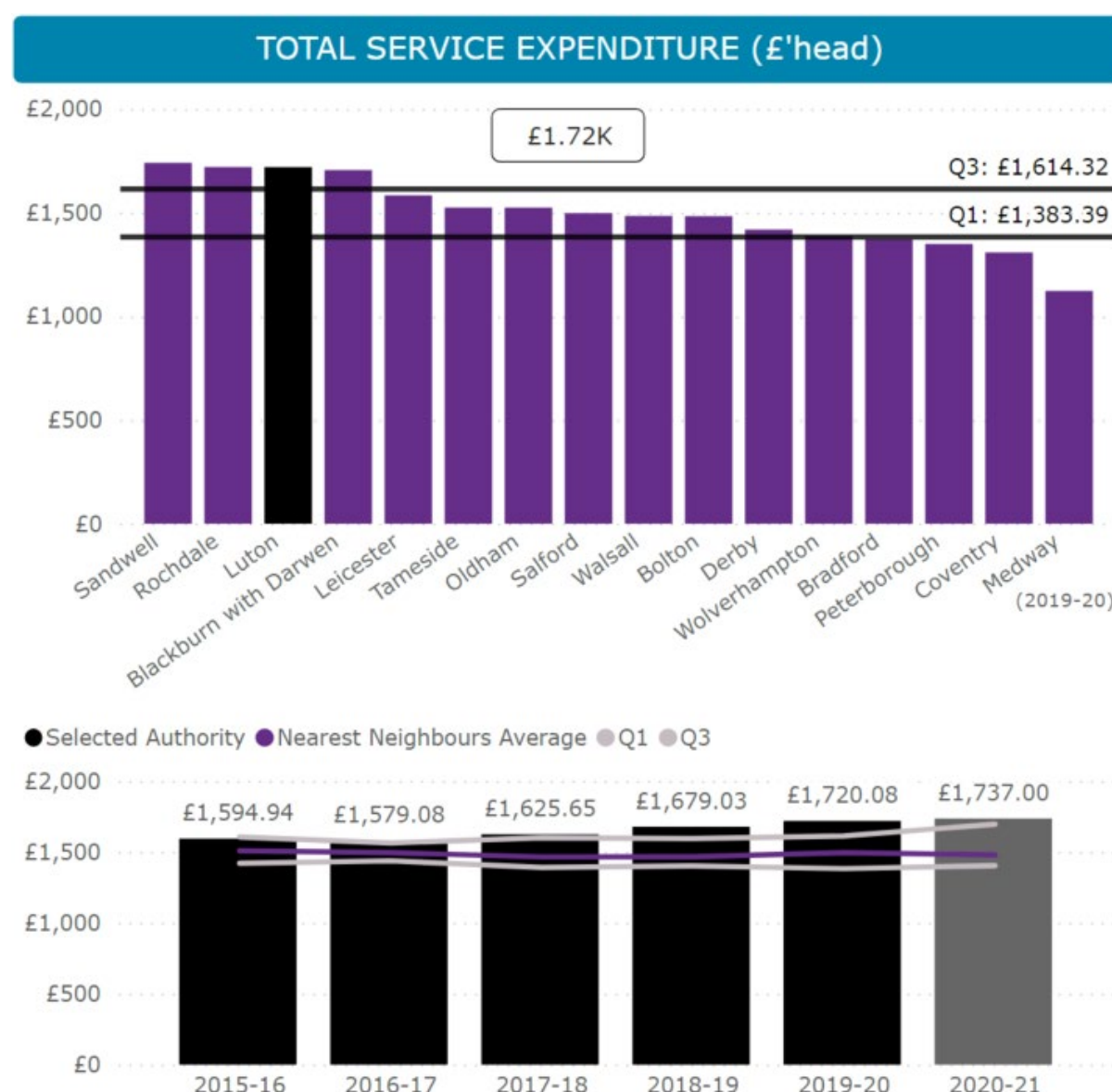
FIGURE 1 : TOTAL SERVICE EXPENDITURE AT LUTON



Its 2019/20 outturn was broadly in line with the budget. However, there were overspends of £4.7m in Children's and Families social care and £3.5m on the Homelessness budget including temporary accommodation (we examine how these shortfalls are being addressed at page 15). These were offset by savings on Treasury Management and the use of contingency. There have been longstanding pressures within the Council on temporary accommodation, property and construction and children's social care. However, we understand that the Council is now implementing a new strategy to reduce homelessness.

The CIPFA Resilience Index helps to highlight areas where the level of costs as a percentage of net revenue expenditure are high when compared with Luton's statistical neighbours. Its total service expenditure per head at £1,737 is relatively high (Figure 2).

FIGURE 2 : SERVICE EXPENDITURE BY HEAD LUTON



Contributing to this are higher per head spends on children's social care, housing, environmental and regulatory services. It has lower spend per head than its statistical neighbours on planning, public health and cultural and leisure services. The latter is in large part funded by its airport subsidiary.

The Council has a good track record over several years of setting a balanced budget. A clear policy was approved by the Council for both the 2020/21 and 2021/22 budgets to achieve a balanced budget and meet the requirements of the Local Government Finance Act 2002 and to set a medium-term financial plan demonstrating how that position would be maintained up until 2023/24.

Dependence on income from London Luton Airport

Before the pandemic Luton Borough Council had an income stream over a number of years that was dependent on the financial performance of its airport-holding subsidiary. This income takes at least three forms: dividends from its 100% ownership of the subsidiary, the net interest payments from the loans it makes from the subsidiary and other airport-related rental income collected by the subsidiary (e.g. income from commercial property as part of the airport's commercial real estate portfolio).

This income has grown significantly over time. In 2012/13 it was just £7.6m. By 2020/21 LBC was depending on £43.7m. This is equivalent to some 28% of LBC's core spending power. In addition, its airport subsidiary was making voluntary payments of circa £7m to £11m in the years pre-pandemic to third sector organisations within Luton delivering non-statutory but key cultural and other services. In the current financial year, these payments are forecast to have fallen to around £7m.

Emergency budget and capitalisation requests

Luton recognised the impact of Covid and the collapse in its airport income in June 2020 with an emergency budget approved by the Council in July 2020. The key pressures on the budget and the major changes in the amended budget at this stage are as shown in Figure 3.

FIGURE 3 : MAIN CHANGES TO SPENDING LINES AS A RESULT OF EMERGENCY BUDGET

Budget Change	Cost or (Saving) (£m)
Reduction in LLAL Dividend for 2020/21	16.0
COVID-19 loss of income – net, after Government reimbursement	3.5
COVID-19 additional spend – net, after Government reimbursement	2.0
Children's Services Ofsted improvement plan	1.7
Reduced revenue costs of Capital Programme	-1.0
Total Additional Net Costs	22.2
Savings and Use of Reserves	
Additional Savings Proposals 2020/21 total	-16.9
Use of one-off Reserves to balance budget	-5.3
Total of budget reductions and use of reserves	-22.2

So the Authority went into the pandemic with some usual financial pressure on Children's Services including the need to fund an Ofsted improvement plan and faced some additional

pandemic-related costs that were not fully reimbursed by central government. These would have probably been manageable without outside assistance. However, the key gap in the budget was caused solely by the loss of the dividend income from its subsidiary.

Subsequent to the emergency budget it became apparent that the airport subsidiary would not be able to pay LBC the dividend outstanding for 2019/20 creating an additional outturn gap for 2019/20 of £19m. LBC applied for a potential capitalisation directive in July 2020 to cover £35m of revenue expenditure in 2020/21 and £14m 2021/22. The Council and the airport have agreed that future dividend payments will be suspended until it is assumed that passenger numbers return to pre-pandemic levels in 2024/25.

The capitalisation amounts requested were made at a time of considerable uncertainty about the scale of loss of income at the airport, the cost of stabilising the financial position of the airport subsidiary and the settlement of any Force Majeure negotiations with the operator, the likelihood of seeking approval for the savings outlined in the emergency budget and the extent to which the additional pandemic-related costs of local authorities would be covered by central government.

Currently the Authority consider they will need to draw on £15m of the capitalisation agreed for 2020/21. They consider they may need to draw on the £14m agreed for 2021/22, depending on the final shape of the agreement between the airport subsidiary and the airport operator (these negotiations will not be completed until circa September 2021). If the capitalisation for 2021/22 is not approved, the local authority will have to call on reserves and make further revenue provisions over the next few years to replenish those reserves. This will add further to the financial pressures arising from the need to make savings during this period. The Council has a balanced budget for 2021/22 and unless there are significant adverse fluctuations in the LLAL finances, as result of COVID-19, then the Council does not anticipate drawing down the £14m capitalisation. However, based on the latest COVID-19 risk assessment, the Council would like this facility to remain available should it be required.

Need for savings to balance the budget

Over the eight years leading up to the pandemic Luton had made £156m of savings. The breakdown by category is show in Figure 4 below.

FIGURE 4 BREAKDOWN OF PREVIOUS SAVINGS BY CATEGORY

Savings Category	£m
Process & efficiency improvements	47.002
Trading & Commercial	32.056
Changes to organisational structures and responsibilities	26.768
Procurement & Commissioning efficiencies	25.904
System/service redesign to customers	24.827
Total savings	156.557

Luton had budgeted for total savings of £16m in its 2019/20 budget and entered 2020/21 with a shortfall of £3.9m. In its July 2020 emergency budget, it committed to finding an additional £16.9m savings to balance the 2020/21 budget and £5.9m to be delivered in 2021/22. These savings were planned to be delivered over two years and with any gap to be funded by drawdown from the funding equalisation reserve up to £10.372m in 2020/21 and £3.047m in 2021/22.

The Q1 2021/22 position on the achievement of these planned savings is shown in figure 5 below. It shows that c80% of forecast savings have been achieved. However the programme is so ambitious that this leaves forecast shortfalls in gross savings of £8.4m over the three-year period. Use of a delivery contingency reduces the net shortfall to less than £3m. This scale of contingency needs to be phased out as soon as possible.

FIGURE 5 : SAVINGS PLANNED AND DELIVERED

	2019/20	2020/21	2021/22	Total
Total Savings Programme	£15.817m	£16.899m	£5.889m	£38.605m
Delivered to Date	£11.818m	£15.328m	£3.041m	£30.151m
Gross Forecast Shortfalls Q1	£3.999m	£1.571m	£2.848m	£8.418m
Use of Delivery Contingency	-£1.971m	-£1.265m	-£2.276m	-£5.512m
Net Impact on Q1 Forecast	£2.028m	£0.306	£0.572m	£2.906m

Some £13.4m worth of specific projects are being monitored and tracked. A significant number of these are forecasting shortfalls in savings delivery. Key material savings initiatives that are risk rated red or amber on the authority savings tracker include:

- £1.6m from rationalising the Community, Leisure and Cultural estate.
- £0.75 from review of in-house transport.
- £ 0.9m from increase in rent collection rates.

Some of the planned savings appear to have been unrealistic to include in the first place. This includes a reduction in Highways staffing targets which are now assessed to have threatened delivery of statutory responsibilities. Indeed, at the time of writing we have been told that the Council is planning to re-invest in these services to improve its streetscape services.

Some of the savings on the tracker must also remain in doubt until the local economy returns to its former strength. These include business rate enforcement savings (£0.17m) and additional income from parking (£0.115m).

Adequacy of actions to address specific service budget pressures

In this section we consider the underlying pressures in those council services which have traditionally spent more than their budgets, the actions that have been taken to address potential overspending and the risks if any they represent to the current financial position. These services are Children's Services, Adult Social Care and homelessness.

Children Services

To address the long-term children-related budget pressures in Luton a detailed programme-based approach has been developed between Children, Families & Education. The Luton Families programme is bringing together all the children's services in a recurrent deficit position and through a contribution of invest to save projects is planning to reduce the deficit. The placement and commissioning workstream has reduced expenditure in 2020/21, fostering and edge of care and workforce related workstreams along with the newly created social work academy are revising plans to deliver further cost avoidance in 2021/22 and future years.

We were told that the new Edge of Care service is supporting 12 young people at present and that good progress has been made in fostering with the key aim to reduce the number of residential placements. A sufficiency strategy has been developed supported with a real emphasis on building a robust approach to contextual safeguarding.

However, population projections indicate a continuous reduction in under 10s, but the 10-19 age group peak in 2025/ 2030 before decreasing which may create a further pressure in the medium term.

The emergency budget last summer allocated savings of £2m to Children and Families. As part of the emergency budget plans were put in place to close children centres and create integrated Hubs. This has delivered £1.2m in year savings although some monies have been reinvested into the hubs. The authority is confident in achieving the remaining required savings in this financial year.

The key risks are:

- The Service is putting in place strategies to reduce placement expenditure around Edge of Care and increasing in house fostering. However, population projections show in the medium term a spike in the number of 10–19-year-olds, which in the short to medium term could put the service under continued pressure.
- There is always a risk that expenditure will increase when a service is rated as inadequate, pressures come from challenges recruiting quality social workers, over reliance on agency and poor practice in placement planning.
- If the Council/Service can get these things under control they have a chance to manage within their budget but suggest this is early days. These buildings blocks are being put in place, but it is too early to tell how robust these building blocks are and if they will stand up to further pressure.

Adult social services, temporary accommodation and homelessness

Cumulative forecast financial growth pressure in Adult Social Care is forecast at £3.9m in 2022/23, £5.6m in 2023/24 and £7.6m in 2024/25. In the past the service has managed pressure within the Improved Better Care Fund and precept monies but is concerned that this may not be enough in the future as the Service runs out of areas where savings can be delivered. The key areas of concern and risks to future financial sustainability are demand

for Mental Health services, impacts of poor post-Covid health and the resilience of the local provider market.

The Service was required to make savings of £4.5m over 2 years as part of the emergency budget. ASC is on track to deliver some of this saving with £1.7m coming through a restructure of provider services. However, two areas with identified savings - debtors and income and transport are not on track. We were told that some of the activity required to deliver these savings fell outside the remit of the service and there was a case for responsibility for delivery of the Transport savings sitting corporately. The project is currently subject to the review of the Council wider Transport offer.

£1m of savings could be at risk if the Council has to meet the cost of “discharge to assess”. Health has voiced that this should be met from the IBCF (£7.3m 2021/22), but these monies have all been allocated and are mainly funding core services.

A project to reduce overspend on the temporary accommodation budget by releasing savings of £2m per annum by reducing the number of households in temporary accommodation has had some effect with the budget currently forecast to be underspent by £1.4m. A project to increase the rent collection rate dating from 2019/20 and recover outstanding sums is covered by contingency of £0.4m. Debt has in fact increased and collection rate is 85.6% compared to 95% target due in large part to the impacts of the pandemic.

The homelessness budget was over budget by more than £2m in 2019/20 and 202/21. The Council believe the delivery of the Housing and Homelessness strategy is key to managing the increase in demand in homelessness costs. More than 84% of the Council residential properties are at band C or below. There is a lack of properties in Luton designed for larger families.

The Council's capital programme includes borrowings to finance the acquisition of residential properties which the council expects will help to reduce the overspend over time. The Council will aim to encourage the development of properties which are valued at band D and above in order to meet the growing demand and also to ensure that the mix of properties is fairly balanced. The Council has been acquiring properties in order to meet the demand for such properties and hence reduce the level of overspend in the homelessness budget.

The key risk in this area is that Adult Social Care service is a volatile area with unpredictable demand and remains a risk to stability in 2021/22 with additional demand associated with the pandemic likely to add pressure.

Borrowing and capital programme affordability

Prior to the pandemic and the need to put together a stabilisation package at the airport, Luton already had higher levels of external debt than many of its statistical neighbours. (Although these neighbours do not own an airport which is regarded as part of national transport infrastructure.) It was borrowing about half a billion pounds. Figure 6 below shows that the cover ratio (the level of borrowing compared to the reserves of the Authority) showed a higher risk than most of its statistical neighbours and that that risk had risen between 2017/18 and 2019/20.

FIGURE 6 : RATIO OF EXTERNAL DEBT TO RESERVES

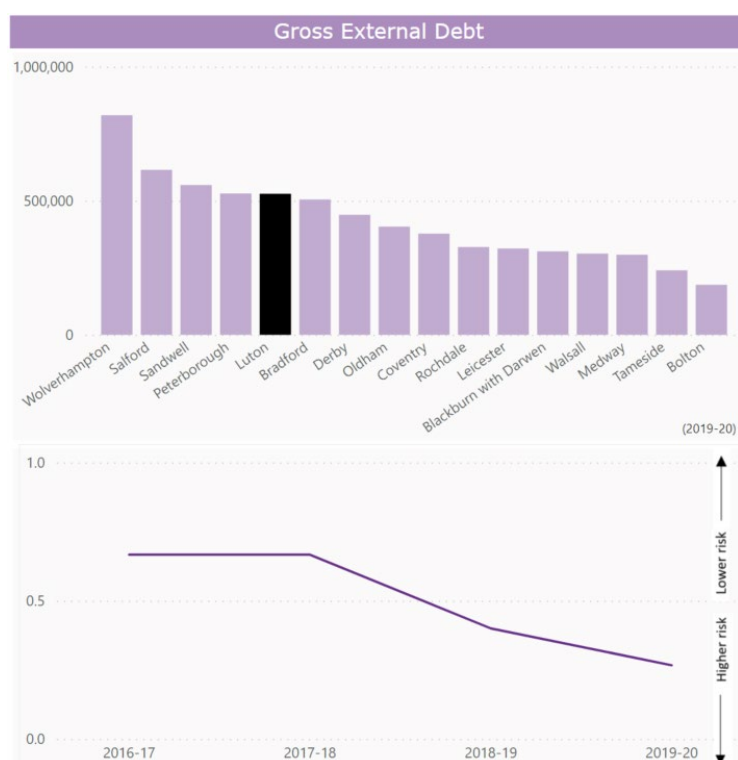


Figure 7 shows the Council planned a 31% increase in the level of borrowing last financial year to reach £0.658 billion. It is planned to rise further in 2021/22 to £0.775bn. Gross interest on borrowing is also planned to rise from £10.3m pa to £14.28m between 2019/20 and 2020/21. Interest paid by the airport subsidiary to the council grows from £16m to £31.2m

FIGURE 7 : RISE IN BORROWING 2020/21

Year End Resources	01/04/2020 Actual £'000	31/12/2020 Estimate £'000	31/03/2021 Estimate £'000
Total Investments*	43,480	41,789	30,000
Borrowing			
Short Term Borrowing (Other LAs)	70,000	99,000	72,000
PWLB / EIB	381,696	381,696	537,696
Money Market (including LOBOs)	48,600	48,600	48,600
Total Borrowing (31st March position)	500,296	577,896	658,296

*Actual investment figures will differ from the accounts because the table excludes investments in subsidiaries

This rise in borrowing is accounted for by the heavy schedule of capital expenditure (£358m over a three-year period) primarily to fund the London Luton Direct Air to Rail Transport (DART), Bartlett Square, the Airport Planning Strategy, Foxhall Homes but also most substantively to cover the potential loan and investment in shares at the airport as part of the stabilisation and recovery plan.

All the borrowing is externally financed and has no direct call on the general revenue fund account. And whilst the interest the local authority pays on the borrowing is a call on the account, these financing costs are more than offset by the interest earned on the debenture loans and rental income which are calculated at more than £100m over the next three years.

Luton operates a minimum revenue provision (MRP) policy which requires it to create provision for debt to be repaid for new borrowing using the annuity method based on the expected life of the assets being borrowed.

However, where the Council make secured capital loans such as those being made to the airport subsidiary, it does not charge MRP. This is because the stated aim of the MRP is to make prudent provision, which is to ensure that debt is repaid over a period broadly commensurate with the period over which the capital expenditure provides benefits. If the loan is properly secured and repayable over or at the end of the period in which it provides benefits, then the loan repayment ensures that the debt is repaid, and MRP would double-up the provision.

LBC's auditors have not yet issued their opinion on the Authority's 2018/19, 2019/20 and 2020/21 accounts. They require additional assurances on going concern and post-balance sheet events in regard to the level of exposure the Council expects to take on through its airport subsidiary stabilisation package, the recoverability of the debenture loans issued by the council, whether aspects of spend on airport access and other improvements can be treated as adding capital value and the scale of borrowing relative to the overall value of ownership of the airport to the Council. The Authority is still in the process of providing further information to their auditors as they finalise the stabilisation package and settlement of Force Majeure.

It is important that Luton follow proper accounting practice and make an appropriate provision should any doubt emerge about whether the loans to the airport subsidiary are properly secured.

In view of the scale of increase in planned borrowing required for the airport stabilisation package and its impact on the Council's balance sheet, gearing and risk, officers should consider whether approval by the Executive and Full Council of the final business case should be accompanied by a full review and approval of the Annual Borrowing Strategy, including scrutiny of the impact on movements of the prudential and treasury indicators. Such revisions should also take into account any potential increases in the airport's capital schemes including DCO and DART.

Use of reserves

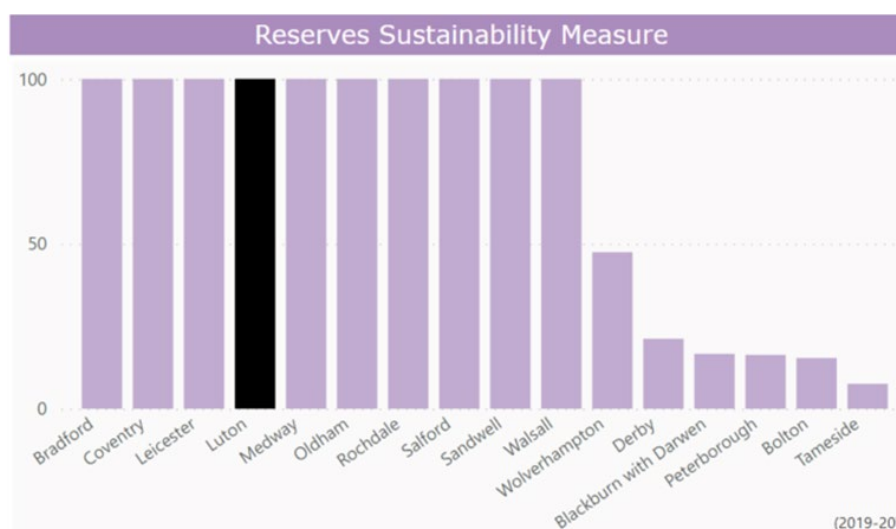
The Authority has set its minimum level for the general reserve in line with the CIPFA code of practice as shown in Figure 8 over.

FIGURE 8 RISK ASSESSMENT USED TO DETERMINE LEVEL OF GENERAL RESERVE

Risk Assessment of Reserves	Probability	Amount p.a.	Reserve
General Reserve inc. future liabilities		£	£
Risk of call on reserves from overspend in excess of contingency	0.1 p.a. for 5 years	500,000	2,500,000
Collection Fund risks – appeals/demolitions/council tax support caseload/collection risks on the introduction of universal credit	0.1 p.a. for 5 years	5,000,000	2,500,000
Minimum working capital requirement in view of the range of financial risks facing the Council			5,000,000
Contingency for Revenue funding loss, loss of trading contracts and potential costs arising from any unforeseen events			4,000,000
Total			14,000,000

The CIPFA Reserves Sustainability Measure provides a measure of how long (in years) it will take for a council to completely denude its reserves, if they continue to use reserves at the same rate as in the previous three years. Figure 9 shows that unlike some of its statistical neighbours this is not a risk at Luton.

FIGURE 9 RESERVES SUSTAINABILITY INDEX LUTON COMPARED TO OTHER LOCAL AUTHORITIES 2019-20



The Authority has a number of earmarked reserves. The balances as at 31/03/21 are shown in Figure 10. The Council's level of earmarked reserves, as reported in the CIPFA Resilience Index, is positioned slightly below average when compared with other unitary authorities.

FIGURE 10 : RESERVES AT LUTON AS AT MARCH 2021

<u>Reserves : General and Earmarked</u>	Bal. as at 31 Mar 2021
	£000
Butterfield Profit Share Reserve	1,195
Cremator Mercury Emissions Reserve	652
Funding Equalisation Reserve	14,880
General Reserve	14,021
Insurance Reserve	3,228
Interest Equalisation Reserve	4,853
Invest to Save Reserve	9,450
Investment Reserve	221
Local Partnership	10
Luton Investment Framework Reserve	1,137
Major Projects Reserve	8,362
Neighbourhood Governance Reserve	403
Pensions Reserve	6,874
Planning reserve	62
Property and Commercialisation Sinking Fund Reserve	4,720
Public Health Reserve	1,546
Reorganisation Reserve (Monitoring Balances)	1,479
Service Provision reserve	6,073
Specific Risk Management reserve	2,970
Welfare Reform & Recession Reserve	1,471
Grand Total	83,609

Luton has used its funding equalisation reserve to balance its revenue account during 2020/21 but has earmarked funds to replenish it. Figure 11 shows that Luton has taken steps to increase its earmarked reserves rather than deplete them since the pandemic to reflect the continuing uncertainty and risk.

FIGURE 11**Reserves Position over last 5 years**

	2016/17 £M	2017/18 £M	2018/19 £M	2019/20 £M	2020/21 £M
General Fund Balance	14.021	14.021	14.021	14.021	14.021
Earmarked reserves	46.05	46.843	56.154	64.827	69.588
Total	60.071	60.864	70.175	78.848	83.609

4. Financial resilience

In this section we consider two of the key issues that will impact on longer-term financial resilience at the Council. The first is the robustness of the medium-term financial plan and the second the maturity of the Council's plans to achieve more transformational change and structural cost reduction.

Robustness of the Medium-Term Financial Plan

Luton's current medium term financial plan only covers the two future financial years to April 2024. Luton argues that it is difficult to forecast beyond that time frame in the light of the pandemic and the uncertainty arising from the Fair Funding Review and the next Spending Review.

The general principles underpinning the strategy are:

- To maintain a balanced budget position which is robust, affordable and sustainable without the ongoing use of reserves, and as part of the budget process, to set a medium-term financial plan demonstrating how that position will be maintained.
- Any use of reserves in the short-term has to be replenish over the medium term.
- Spending plans will be aligned with the Council's aims and objectives and also the Luton 2040 vision.
- The Council will maintain a prudent level of reserves on an ongoing basis. The level of reserves have to be increased to reflect the change in the level of risks as the Council embarks on expanding its commercial activities.
- Revenue and Capital budgets will be continually reviewed and modified where necessary to ensure that resources are used effectively and targeted to achieve key objectives and offers value for money.

Figure 12 over shows the three-year summary of the Authority's net budget before income and grants. The Authority has budgeted for a net growth (£11.2m) in service budgets. This is in line with reasonable assumptions about inflation and other pressures. The MTFP assumes the net impact of underlying business rate growth is in line with inflation, the equalisation method protects the Council against loss from the new system and the top-up and safety net arrangement continue. (Note the line for income from LLAL in Figure 12 should not reference dividends as these are not being built into base budgets during the period covered.)

FIGURE 12

MTFP Three Year Summary	2020/21	2021/22	2022/23	2023/24
Net Service budgets inc capital financing costs	178.96	184.48	182.77	182.29
Increases in costs and net growth - unavoidable	5.52	0.55	9.92	8.85
Net service costs	184.48	185.03	192.68	191.15
Interest payable & Treasury Management	15.03	16.93	19.23	19.74
Capital Financing costs and MRP	-15.02	-14.50	-12.54	-11.09
Specific grants S31 and NHB	-5.70	-8.14	-4.98	-4.64
Reserves and Contingency	-2.88	8.13	6.46	5.60
Total before Income and Grants	175.90	187.44	200.86	200.75
Income from LLAL - dividend, interest and rent	-26.22	-30.98	-31.57	-34.07
Additional Income other inc residential investment	-1.01	-0.97	-0.97	-0.97
Total after Income and before Grants	148.67	155.50	168.32	165.72

Figure 13 shows the how the authority intends to fund net expenditure after income and grants. From 2021/22 no dividend from LLAL has been included in LBC's MTFP.

FIGURE 13

MTFP Three Year Summary	2020/21	2021/22	2022/23	2023/24
Net Expenditure	148.67	155.50	168.32	165.72
Funding:				
RSG - assumed replaced by B Rates Top Up	-10.70	-10.93	-10.93	-10.93
Business rates	-32.61	-31.99	-33.61	-34.28
Business rates Top Up inc previous RSG	-14.56	-14.51	-14.80	-15.09
Business rates Growth	0.00	0.00	0.00	0.00
Adult Social care - Precepts	-6.94	-9.14	-11.37	-13.60
Improved Better Care Fund & Social care Grant	-11.87	-11.87	-11.87	-11.87
Total Government Grant	-76.69	-78.44	-82.59	-85.79
Council Tax	-71.98	-73.25	-75.33	-77.47
Council Tax LCST Grant	0.00	-1.54	0.00	0.00
Total Council Tax and Grants	-148.67	-153.23	-157.92	-163.26
Budget Gap as above	0.00	-2.26	-10.39	-2.46
Savings identified as per tracker		2.26	5.41	0.00
In Year gap over the next two years	0.00	0.00	-4.99	-2.46
Cumulative Gap next two years	0.00	0.00	-4.99	-7.45

The plan has the following assumptions and associated risks:

- Full delivery of savings in the current year.
- The base budget being supported by further cumulative savings over the two years to the scale of £7m.
- Continued support from central government for any impact as a result of the pandemic in 2021/22 and future years, compensation for loss in sales fees and

charges, compensation for loss in council tax and business rates and assumes continued flexibility for raising income through precepts.

- Successful delivery of significant projects and investment in both commercial and residential properties largely dependent on the state of the market.
- Continued central funding of the gap in social care spending should it arise.
- Additional interest payments from further debenture loans made as part of the airport stabilisation package which has not yet been finalised.
- Uncertainty about the cost of making the level of change that will be required to make the budget reductions necessary.

The plan acknowledges that the figures included are a single point in a range of potential outcomes and that the level of savings required each year could vary by £2m per year either way.

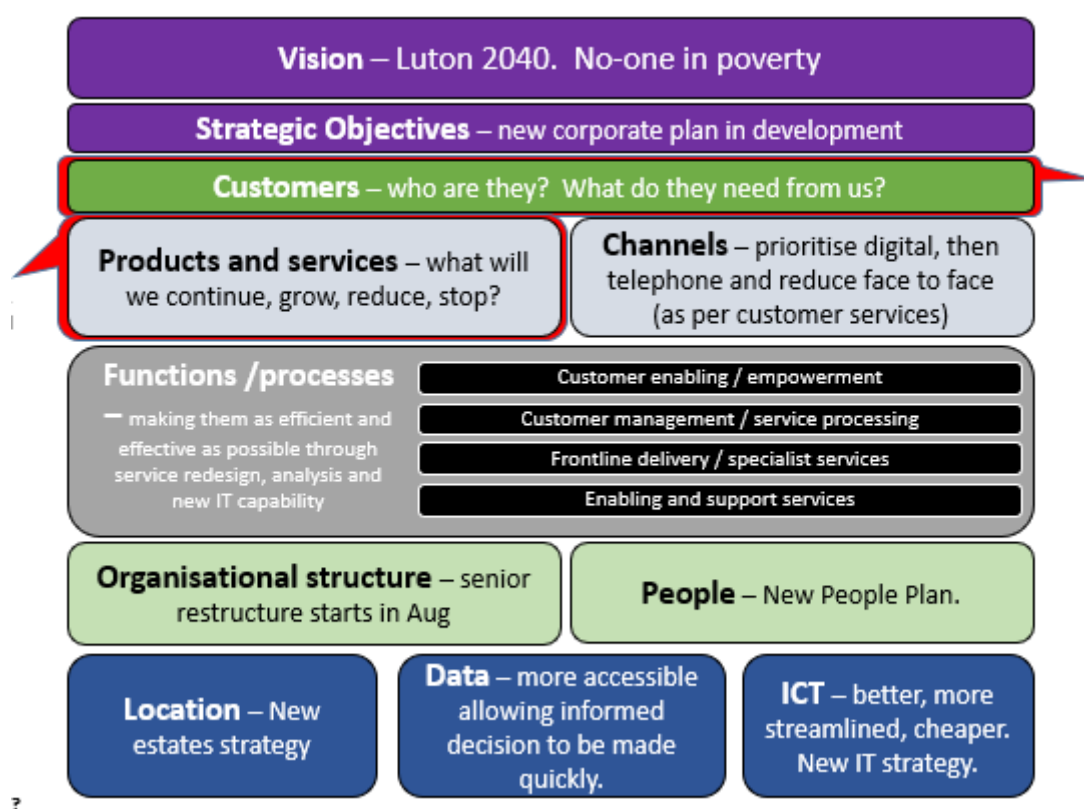
Transformation planning and activity

Luton acknowledges the diminishing returns likely to accrue from attempting to deliver further savings by salami slicing individual service budgets and that future efficiencies and associated savings must be realised through more radical and transformational activity.

The pandemic and emergency budget have given additional impetus to the consideration of more fundamental change at the Authority and the development of new transformation activity. A “Future Ready” Board made up of key senior officers and chaired by the Corporate Director of Inclusive Economy meets monthly and reports into the Corporate Leadership Team on a quarterly basis and also into elected members (via Finance Review Group Scrutiny Committee) on a quarterly basis.

In June 2020 the Board considered the Authority’s target operating model. With demand and expectation rising and budget falling, they recognised the need to identify new variables and approaches to help it achieve its aims. It developed some design principles and key descriptors to articulate their future state and identified the need to move more towards a more holistic and person-centred operating model (See Figure 14.)

FIGURE 14 TARGET OPERATING MODEL DEVELOPMENT



Since then, the Board has absorbed work to implement the target operating model into a high-level Forward Plan. This plan sets out a timeline for development of the target operating model through business case development for new pipeline projects together with those projects which are already live and reflected in the savings programme (Human Resources end to end redesign, Passenger transport and temporary accommodation reduction) and fresh enabling projects on agile office development, unified communications and constitutional change.

There is clearly a great deal of work to do to make some of the more enabling projects concrete. And there appears to be some reliance on ideas coming up through services and IT business partners rather than it being driven more at a corporate level. The Finance Director told us a budget of £1m was available to support the programme and we note there are £9.5m of funds in a transformation reserve but there is a lack of transparency over the level of resource being devoted to transformation and invest to save.

There are a number of considerable challenges for the authority to overcome if the Forward programme is to achieve its potential:

- There is no clear overall resource need or investment budget which inhibits planning and prioritisation.
- The reliance on existing stretched corporate leadership team to lead and deliver.
- Shortage of project managers to take forward some of the projects.
- The reliance on a strategic partner (Civica) to help deliver much of the improvements in the target operating model through IT change.
- Gaining the support of elected members to some of the new ways of working and the constitutional changes.

5. Financial management capacity and expertise

This was not the focus of the review at Luton, and we did not have an opportunity to examine the quality of business cases which would have provided an indication of the quality of financial analysis and presentation within the Council. Neither were we able to interview any of the budget managers so we are unable to come to a judgement on their quality and the bearing this might have on the robustness of budget setting and the level of budget control. So, the following brief observations are based solely on our interviews with key council officers, members and external audit.

The Council's finance function contains some 65 staff. But given that most services in Luton continue to be delivered in-house there is a large demand for financial service support. The function currently provides financial services and support to the authority's commercial subsidiaries (under separate agreements and based on rate cards) as well as the local authority.

Dev Gopal is the Service Director, Finance, Revenues and Benefits and Section 151 Officer. We found the Service Director to be extremely knowledgeable and experienced across the range of local authority activity. This extends to the local authority's commercial operations and plans. He has a private sector background and has previous commercial expertise before joining LBC.

However there has been no deputy service director in post for more than 16 months and the Director can only call on three other finance officers to support corporate or non-service specific issues. This means that the Director is stretched and there is a risky concentration of knowledge and corporate financial memory. There is a need for more shared financial leadership across the authority. Indeed, a number of those we interviewed commented that they would like more business partnering support from Finance in the future, and that, from a senior finance perspective, the team is stretched.

The Authority should therefore determine to recruit a suitable candidate for the deputy post. It should develop a succession plan for the Finance Director and develop training plans for staff within the authority to mitigate the risk from concentration of leadership in one person. It should also consider how to improve the commercial skill sets of its staff and consider the recruitment of an additional finance/commercial adviser for the proposed shareholder interest board.

Although the function is centralised and the service's business partners report through Finance, Revenues and Benefits, the corporate directors and service leads to whom we spoke were very content with the quality of the financial expertise and support they received. However, there is sparse covering of the finance business partners and managers. There are capacity issues at this level and without further resource in this area, the increased potential for Finance to punch above its weight will be lost and this would have consequences in savings delivery and support to the transformation programme.

6. Council assets and capital receipts

Summary of main findings

This section of the report considers the Council's property and FM arrangements.

- The Council has rationalised a significant number of assets in recent years, but this has tended to focus on certain building types (namely Office portfolio, Children's, and Adults), and therefore there remains opportunity to release further assets. Particular focus should be given to the Green Estate, Community, Leisure and Culture.
- There have been several assets recommended for disposal by the Property and investment service which have been rejected by members, despite there being a strong financial case.
- Whilst the office portfolio has seen reductions in recent years, this should be further reviewed. This should be supported by a wider agile/hybrid working programme to facilitate more flexible working arrangements for LBC staff.
- The Leisure and Cultural estate is heavily subsidised, and whilst not in scope of this review, these services require further exploration with a view to developing a clear service strategy. This should inform asset disposals.
- Revenue budgets are significantly overspending. However, this is a consequence of there being insufficient revenue budgets to maintain the asset portfolio currently held.
- The LBC investment portfolio is performing well and generates significant revenue for the Council. No further purchases are currently planned.
- The Service have a clear asset strategy and plan for delivering the strategy. However, they have on occasion struggled with implementing some projects due to member hesitancy.

The nature of the assets owned by the council

The total number of assets, based on the 2020-2023 Asset Management Plan, is summarised in Figure 15:

FIGURE 15 ASSET NUMBERS BY TYPE

Asset Type	Number	Asset Type	Number
Offices*	5	Adults	4
Depot	1	Children's	5
Leisure	7	Educational Support	2
Cultural	6	Schools***	77
Community	8	Third Sector	7
Green Estate**	170	Industrial	2
Car Parks	14	Retail	9
Investment	33		
TOTAL NUMBER OF ASSETS			350

*Whilst the Council uses 10 Office buildings, it should be noted 3 are the same asset, whilst a further 2 are leased. Therefore, it would be more accurate to say the Council uses 6 offices.

**The Green Estate includes assets such as Open Spaces, Playing Fields, Pavilions etc.

*** Of the 77 schools, 18 of these were academies

When the plan was produced in 2019, the average occupancy rate of Council offices was 63%, which was up from 60% in 2015 when the previous asset management plan was developed. This would be considered below benchmark rates, but the Service argue that this will increase post-COVID. This is linked to the future intentions of the office portfolio, with the Council planning to exit a further site in full in the coming years.

Equally, the Children's and Adults portfolio would also be considered concise, with minimal scope for further reductions. Significant work has been completed in these areas in recent years and is far more advanced than other councils. This has been aligned to the strategies of these services at Luton with work completed to change the provision of day services etc.

From 2013 as a whole, the Council has had minimal success with Community Asset Transfers (CATs). However, more recently, the service has managed to transfer three sites to community ownership. Due to the success of these CATs there are now additional transfers in the pipeline and which are well supported by elected members.

Post-COVID, many councils are reviewing the agile/hybrid working strategies in an attempt to further rationalise the estate. The Council does use sign-in software and the intention will be to review utilisation once staff begin to return to work. This should inform the office strategy and may facilitate a quicker exit from several office buildings.

Since 2013 when the first strategy was created, the Council has made significant strides in the development of its investment portfolio and has purchased a number of assets held solely to generate revenue income for the Council. However, it should be noted that the acquisitions programme has since been closed in 2019 with no further purchases currently intended.

The Council hold 33 investment assets in total, separate to those associated with the airport. As of 2019 these were valued at £93m, and generated income after costs of c£6.8m, a yield of c6.7% which would benchmark well. 88% of the 33 sites are in the Southeast region, with a strong focus on Luton.

Each asset is assessed at least annually by reference to a SWOT (strengths; weaknesses; opportunities; threats) analysis. A Property Investment Manager is responsible for execution of the strategy, reporting to the Service Director of Property & Construction.

There is some scope for a small rationalisation of the investment portfolio, with several opportunities being presented in recent months such as the Galaxy Centre – this is discussed in more detail below.

Adequacy of estimates for capital receipts

As per the Asset Management Strategy, a clear indication is identified for each asset by the Service which identifies their preference for whether to dispose/retain/refurbish. Equally, where a disposal is identified, the Service also highlight what their preference is for disposal, for example either to lease out, demolish, CAT, transfer to Foxhall Homes etc.

This reflects the work that the Service perform to appraise each asset and make an assessment on the most favourable method of disposal. However, disposals, particularly in the city centre, are prejudiced against sale to private buyers which are likely to be converted to residential. The Service cited several examples (such as Unity House) where assets have been sold and have been converted to poor quality residential accommodation, often resulting in building control and social issues.

Many sites which are disposed of have been transferred to Foxhall Homes, as there is a shortage of Housing in the Borough and therefore the sites (c5) have been sold for re-development, with at least 30% categorised as affordable housing. Where sites are transferred to Foxhall, they are purchased at a market rate. Likewise, where profits are generated by Foxhall a dividend is paid back to the Council which is likely to occur for the first time in 21/22.

However, it is clear that, on occasion, some asset transfers to Foxhall which have been recommended by the Service, have not been supported by senior officers or members. For instance, an example was cited of St Monica's, whereby the Service recommended that this asset would be transferred to Foxhall and therefore generate a capital receipt, only for members to decide to transfer to a third tenant.

Feasibility of any additional asset disposals

As per the 2020-23 asset management plan, several additional buildings have been earmarked for disposal. A high-level appraisal of these assets would suggest all disposals have been put forward based on a logical appraisal of their future use and which would generate the most value for LBC.

However, it should be noted that several of the suggestions in the 2020-23 plan are brought forward from the previous asset management plan in 2016-19 which would place doubt on whether these disposals will be delivered in full. Of particular note are potential developments at Lewsey, the Golf Club and Wandon Park.

Whilst there have been significant successes with the asset disposal programme identified in the 2016-19 plan, the revenue savings projected were cashed in full at the start of the project. Consequently, where assets have not been disposed of, this has placed significant strain on remaining revenue budgets with repairs and maintenance budgets consistently over-spending by c£1m a year.

The Lewsey Park Redevelopment Project would involve the rationalisation of six assets comprising of a Sports Park, Swimming Pool, Community Centre, Pavilion, GP Surgery, and Learning Centre into a single site. The development is expected to fulfil numerous Council objectives in terms of its Local Plan, which includes regeneration, co-location of services, health integration, quality of public realm, improved space and housing need. This initiative also links in with a number of local and national strategies.

The vision looks at resolving the poor layout, improving the visibility of the centre, increasing and improving the quality and financial viability of services and bringing community health and wellbeing to the forefront of the development. However, it is understood that this proposal, which would deliver significant revenue savings and avoid capital expenditure (on maintenance) has met significant pushback from stakeholders.

Likewise, in partnership with the Parks Service, the Property and Infrastructure team have suggested the CAT transfer of the Golf Course which is cited to benefit from a c£300k per annum subsidy from the Council. The transfer/sale of this asset has been consistently not supported by senior stakeholders and members.

No values/estimates have been provided at this stage on the savings/potential capital receipts to be generated from the assets earmarked for disposal in the plan.

Whilst historically the Property and Infrastructure service have been tasked with generating a certain level of capital receipts, this is no longer the case and there are no longer any targets attached to the disposals programme. Whilst the Service continue to action a disposals programme, there is limited requirement on them to do so, other than to alleviate pressure on revenue budgets and future capital spend.

Indeed, more recently, a lack of pressure to generate capital receipts was cited, and which is evidenced by several examples. Whilst some are referenced elsewhere, a further opportunity arose recently during 2020 whereby Shroeders, who own the leasehold at the Galaxy Centre, approached the Council with an offer to buy the freehold for c£2m. The Property team acted in good faith, undertaking due diligence on this offer to confirm whether this was value for money. This was confirmed by an independent valuation, and the Service recommended the asset for disposal. However, this was rejected by members and some senior members. It is felt that this offer is a 'one-off' as the opportunity has arisen due to the unique circumstances brought on by Covid. Therefore, the opportunity is likely to have, or will soon, pass.

Equally, historically the Property and Infrastructure service had clarity on the use of capital receipts, and how this was recycled back into the service through the capital maintenance programme. In line with common practice, unless a capital receipt is ring fenced towards a project then it goes towards the reduction of the total level of borrowings. The same approach applies to treasury management savings.

The Service do have up to date condition surveys in place which were recently completed in c2018. This highlighted the backlog maintenance across all sites, and which was profiled against the following priorities: Priority **1** (urgent works), **2** (essential works within years 1 and 2) or **3** (desirable works required within years 3 to 5). The requirements for each Priority were as shown in Figure 16.

FIGURE 16

Portfolio	Priority 1	Priority 2	Priority 3	Total
Operational Buildings – 2018	£0m	£2.38m	£7.00m	£9.38m
%	0	25.4	74.6	100

The Service cited that they had been due to spend c£10m in capital maintenance schemes in 2020/21. However, as a consequence of COVID, this was significantly curtailed, with a spend closer to £1m. The works not completed in 2020/21 have been pushed back rather than be cancelled.

It was suggested that there have been some recent issues and alterations to the schemes which can be capitalised by the Service, with Finance implementing recommendations following an audit. Whilst the Service were of the belief this may have been risk averse, or unnecessary, it was identified that the new process for determining whether a scheme could be capitalised, was correct. This has however put extra strain on revenue budgets.

Asset management

As referenced elsewhere, the Service has an up-to-date Asset Management Plan which identifies the key projects which will be progressed over 2020-23. This new plan replaces the ones from 2016-19. There are several key projects identified in the plan including:

- Redevelopment of 2 surface car parks in to residential.
- Redevelopment of car park/library/cinema into leisure and office space.
- New multi-storey car park.
- Whipperly ring, new residential and retail.
- Lewsey Sport Park, consolidating various in to one purpose-built facility.
- Expand Inspire Sports Village to include community centre and office space.
- Football ground converted to residential.
- Tidy tips to replace old facility.
- CAT transfer of golf club .
- Culture Trust and Active Luton – no specific project is referenced, however does identify that a solution is required given the c£3m per annum subsidy paid by the Council. Both the Culture Trust and Active Luton currently only pay a peppercorn rent and no maintenance costs.

Despite the successes across 2013-2020 (See below), and the lack of a capital receipts target, there remains a clear focus on asset disposals whether through CAT transfer, sale, or as part of a wider regeneration project. This highlights that not only is there a clear strategy with what the Service are trying to accomplish, but also how this informs a clear plan with several key projects already identified.

There is a clear process for progressing asset decisions, with papers being taken to an Assets Board and which are then presented to members.

To support asset management, the Service uses the K2 (Tribal) software. The K2 software has all the required functionality, which is needed to successfully manage an asset portfolio, including commercial portfolio management (rent reviews, valuations, lease events etc.) and facilities management (helpdesk, compliance, reactive repairs etc.). However, whilst the K2 system has all the necessary functionality what is most important is whether the Service uses the system correctly. This has not been tested as part of this review.

What assets has the Council sold in the last three years to mitigate financial pressures?

As part of this review, LBC supplied a list of all assets which had been disposed of between 2013-2020. This included the below:

- 1x Car Park (sold to Foxhall).
- 1X Children's Centre (Let to nursery).
- 4x community centres (2x CATS, 1x Foxhall, 1x market sale).
- 5x Day Care centres (2x sold to Foxhall, 1 redeveloped, 1 market sale, 1x let).
- 1x homeless shelter (CAT).
- 2x libraries (1x market sale, 1x lease terminated).
- 7x offices (4x lease terminated, 1 market sale, 2x to let).
- 1x pupil referral (sold to Foxhall).
- 2x scout huts (sold to tenant).
- 3x sports pavilions (2x demolished, 1x mothballed).
- 1x visitor centre (open market sale).

The above highlights that LBC have been particularly successful in rationalising offices, day centres, and community centres. However, only a 3x cultural or leisure sites (2x libraries and 1x visitor centre) that have been rationalised over a seven-year period, suggesting that there remain key opportunities in these areas. This is a view which is shared by the Property and Infrastructure team.

Likewise, whilst the Service have been successful in 3x CATs, this should be a continued area of focus, and it is understood that there are a several sites in the pipeline. A review of the green estate should also include the playground strategy as 59 separate sites maintained by the Council would benchmark high.

As referenced throughout section 6, there have been several opportunities for further asset disposals which would have generated further capital receipts which have not been progressed as a consequence of member decisions, leading to their rejection.

Revenue expenditure

The service's revenue repairs and maintenance budgets have consistently overspent over the last 10 years. In 2011/12 the budget was £1.7m whilst the spend was £2.15m. By 2019/20 the budget had reduced to £1.52m, with a spend of £2.51m. It should be noted that the budget had at one point fallen to as low as £1.24m in 2018/19.

As referenced elsewhere, the main reason cited for the budget overspend is that budgets have been reduced in line with proposed asset disposals, only for the disposals to be rejected following consultation. This has left the service with a requirement to maintain the same number of assets, with less budget.

As capital spend has not kept pace with requirements, the condition of assets has deteriorated, resulting in higher revenue costs to maintain them.

Whilst detailed benchmarking has not been possible to perform given the scope of this review, the actual spend on planned/reactive maintenance would broadly be in line with RICS cost per m2 benchmarks, which highlights that budgets are insufficient. However, if looking at reactive maintenance alone, LBC spend above the benchmark figures. Further work would be required to understand whether this is linked to deteriorating assets (likely), or inefficient contracts (unlikely).

The Service have access to an array on contracts for the delivery of Hard and Soft FM services which are monitored closely including the time reaming on the contracts. Cleaning is delivered externally by 2 separate contractors (3 lots), Caretaking/Security is delivered internally, whilst Hard FM is delivered through a combination of external suppliers and the internal Building and Technical Services team.

Building and Technical Services, whilst traditionally a Housing DLO, also perform Building Fabric and Electrical reactive repairs across LBC's operational portfolio. The service was recently benchmarked with the review finding the hourly rate was very competitive.

Detailed recommendations on capital receipts and asset management

Number	Recommendation description	Timescale
1	<i>To progress a detailed review, and implementation of progress to agile and hybrid working practices underpinned by clear strategy and project management. Consider how this impacts on office sites.</i>	6 months
2	<i>To progress the CATs and other potential disposals already identified, with particular priority given to Stockwood Golf Club to reduce c£300k subsidy.</i>	3 months
3	<i>More detailed review of investment portfolio and divest from sites with lower yields, although opportunity is not expected to be significant.</i>	6 months

4	<i>Attached to the above, a final review of the Galaxy centre should be considered. This could generate a £2m Capital receipt as recommended by the Property Service.</i>	<i>1 month</i>
5	<i>Dependent on level of capital required, potential to review future use of Apex House which could be sold rather than leased out.</i>	<i>6 months</i>
6	<i>A new capital receipts target should be set for the Property and Investment team.</i>	<i>1 month</i>
7	<i>Greater clarity is required regarding the generation of capital receipts, and how these are then allocated to schemes. Likewise, a capital maintenance budget should be communicated to the Property team.</i>	<i>1 month</i>
8	<i>Confirm the capitalisation of schemes to ensure this is compliant and being followed accurately.</i>	<i>3 months</i>
9	<i>Significant work is required on the service strategies for both Active Luton and the Culture Trust to inform disposals.</i>	<i>6 months</i>
10	<i>Whilst not in scope of our work, a review into Active Luton is recommended given the significant subsidy paid (c£3m) by the Council, and the £4m received from the airport.</i>	<i>6 months</i>
11	<i>Where asset disposals deliver revenue savings, consideration should be given to reallocating these to the repairs and maintenance budgets to reduce the overspend.</i>	<i>6 months</i>



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Evidence WR GHP q

Notice of Meeting

Overview and Scrutiny Board

Date : Monday, 28 February 2022

Time : 18:00

Place : Council Chamber
Town Hall, Luton

Councillors : Pedersen (Chair) Franks
T. Malik (Vice-Chair) J. Hussain
Vacancy (Vice-Chair) G. R. Javed
Abid Moore
Abley Nicholls
P. Chapman Wynn
Choudhry

Quorum: 3 Members

Eunice Lewis [REDACTED] Email [REDACTED] [@luton.gov.uk](mailto:[REDACTED]@luton.gov.uk)
[Livestream Meeting Link](#)

PURPOSE

To provide an overarching function to oversee and scrutinise any matters relating to general services for Luton residents not otherwise covered by any other sub-committees and to advise/ make recommendations to inform and enhance Executive's decisions and help in the development of policies.

This meeting is open to the public and you are welcome to attend.

For further information, or to see the papers, please contact us at the Town Hall:

🏠 **IN PERSON**, 9 am to 5 pm, Monday to Friday, or

☎ **CALL** the Contact Officer (shown above).

An induction loop  facility is available for meetings held in Committee Room 3.

Arrangements can be made for access to meetings for  disabled people.

If you would like us to arrange this for you, please call the Contact Officer (shown above).

NOTE:

Members of the public are entitled to take photographs, film, audio-record and report on all public meetings in accordance with the Openness of Local Government Bodies Regulations 2014. People may not however act in anyway considered to be disruptive and may be asked to leave. Notice of these rights will be given verbally at the meeting, as appropriate.

EMERGENCY EVACUATION PROCEDURE

Council Chamber:

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

AGENDA

<i>Agenda Item</i>	<i>Subject</i>	<i>Page No.</i>
1	Apologies for Absence	
2	Minutes	
	1 - 19 January 2022	7 - 16
3	Chair's Update Chair to report on issues since the last meeting.	
4	Disclosures of Interest Members are reminded that they must disclose both the existence and nature of any disclosable pecuniary interest and any personal interest that they have in any matter to be considered at the meeting unless the interest is a sensitive interest in which event they need not disclose the nature of the interest. A member with a disclosable pecuniary interest must not further participate in any discussion of, vote on, or take any executive steps in relation to the item of business. A member with a personal interest, which a member of the public with knowledge of the relevant facts would reasonably regard as so significant that it is likely to prejudice the member's judgment of the public interest, must similarly not participate in any discussion of, vote on, or take any executive steps in relation to the item of business. Disclosable pecuniary interests and Personal Interests are defined in the Council's Code of Conduct for Members and Co-opted members.	
5	Urgent Business The Chair to report on any business which is considered to be urgent and which should be discussed at the meeting in accordance with Section 100B(4)(b) of the Local Government Act 1972 and to determine when, during the meeting, any such business should be discussed.	
6	References from committees and other bodies Reports	
7	Corporate Performance Report Q3 (Report of the Deputy Director, Public Health & Service Director, Healthcare, Public Health, Commissioning & Procurement)	17 - 60

8	Luton Tree Policy and Tree Management Strategy (Report of the Service Director, Neighbourhood Services)	61 - 140
9	Development of the Council's Social Justice EDI (Report of the Service Director, Citizen, Engagement & Legal Services)	141 - 148
10	Moving Traffic Contraventions (Report of the Service Director, Neighbourhood Services)	149 - 151
11	Powers Requiring Drivers to Switch Off Engines (Report of the Service Director, Neighbourhood Services)	152 - 154
12	Draft Housing Strategy Covering Report (Report of the Head of Housing & Development)	155 - 192
13	Employment And Skills Strategy Report (Report of the Service Manager, Economic Growth & Skills)	193 - 288
14	Luton Rising LLAL Annual Business Plan 2022.23 (Report of the Service Director, LLAL & Monitoring Officer)	289 - 329
15	OSB Work Programme 2021-2022 And Executive Forward Plan March 2022 (Report of the Service Director, Citizen, Engagement & Legal Services)	330 - 337
16	Local Government Act 1972, Part VA To consider whether to pass a resolution under Section 100A(4) of the Local Government Act 1972 to exclude the public from the meeting during consideration of any item listed above if it is likely that if members of the public were present during those items there would be disclosure to them of exempt information falling within the Paragraphs of Part1 of Schedule12A to the Local Government Act 1972.	

Private - Luton Rising LLAL Annual Business Plan 2022.23

- Paragraph (1) - Information relating to any individual.
- Paragraph (3) - Information relating to the financial or business affairs of any particular person (including the authority holding that information).

Overview and Scrutiny Board Meeting

Minutes

19 January 2022 at 6.00pm

Present:

Councillor Pedersen (Chair); Councillor T. Malik (Vice-Chair), Councillors: Abid, Agbley, P. Chapman, Choudhry, Franks, G. R. Javed, J. Hussain, Moore, Nicholls and Wynn.

01 Minutes of Meeting 22 November 2022 (Ref 2.1)

That the minutes of the meeting held on 22 November 2021 be taken as read, approved as a correct record and the Chair be authorised to sign them.

02 Chair's Update (Ref 3)

The Chair advised of the outcome of the reference regarding "The Protection of Parks and Green Spaces") to the Executive at the Board's request at the last meeting. The recommendation was discussed at the Executive's meeting on 10 January 2022 as follows:

OSB's recommendation was "The Overview & Scrutiny Board recommends the Executive to seek the identification of those parks and green open spaces which are of the greatest social value and those which are at risk and to start a process of gradually, over as many years as necessary, progressing deed of dedication arrangements with Fields in Trust with a ultimate aim of protecting all Luton parks and green open spaces from development.)"

(Outcome – The recommendation was noted by the Executive.)

Resolved: That the Chair's update regarding the recommendation to Executive on Parks and Green Open spaces be noted.

03 South East Midlands Enterprise Partnership (SEMLEP) Annual Report (Ref 7)

The Chief Executive of SEMLEP, Hilary Chipping, delivered a PowerPoint presentation regarding SEMLEP's annual update and advised the Board of SEMLEPs activities in the SEMLEP area in the past year with particular focus to Luton. She said it had been another challenging year for local authorities and the partnership and most people had spent another year working from home. She added that it had been great working with colleagues' throughout the last year and hopefully 2022 would turn out a better year for everyone.

Updates

Currently the work of SEMLEP cover all of Northamptonshire which had recently been divided into 2 unitary authority areas; West Northamptonshire and North Northamptonshire; Bedford, Central Beds, Luton and Milton Keynes. This area with a population of 1.7 million over 77,000 businesses most small or medium size businesses with a GVA of over £50billion, was significant in terms of the economic opportunities available including having four Universities across the area namely; University of Bedfordshire with a campus in Luton, Cranfield University, Northampton, and the Open University.

Economic Recovery

SEMLEP as a private, public partnership with a focus on delivering sustainable economic growth work with all the Local Enterprise Partnerships, 38 in total in the whole country. SEMLEP worked very closely with local authorities partners right from the beginning of the pandemic to ensure that partnership working continue in order to share information and developing strategies for the economic recovery plan. There were 3 phases: survive, stabilise and grow. The lockdown period had particular impact in Luton because of the closed Airport and hospitality sector which brought significant challenges to Luton. Members were informed that the economic Strategy which brought together the extensive evidence based work for the whole area had now been published on the website. The Strategy had been themed around the foundations of productivity and looking at how to deliver productivity efficiently with focus on ideas, innovation, and commercialisation including clean growth. It aimed at supporting people with a focus on those who had been made redundant or those who lost their jobs.

Infrastructure

Infrastructure funding was coming to an end with a £265 million local growth fund programme completing in 2022.

Business Environment

The Chief Executive reported that the SEMLEP growth hub with business advisers who worked with local businesses providing support and advice. Last year SEMLEP supported many local small businesses in the Luton area especially as the UK exited the EU to enable people to continue to export goods also with a focus on businesses that were able to scale up.

Place

Place had been absolutely vital in terms of community access on natural environment and looking at the town centre and the economic recovery strategy would enable inclusive growth, that services could be reached by vulnerable groups across the demographics with emphasis on inclusiveness.

Governance

SEMLEP was clear about the importance of good governance which in line with its assurance framework. The Board had representatives from the 6 unitary authorities in the SEMLEP area. The Leader of Luton Council was also a member and SEMLEP work with some of LBC's senior officers. The makeup of the Board was inclusive of representatives from the private sector including the Vice Chancellor of the University of Bedfordshire. Members were informed that

equality and diversity was at the heart of their activities and work plan. SEMLEP was open to scrutiny by the local authorities' members.

Delivery of Activities in Luton

A lot of businesses in the Luton area continue to receive support from SEMLEP and so much work had been delivered through the growth hubs projects some of which was still been funded through the EU grant. Although it was soon to come to an end in a year's time, March 2023. This grant had a particular focus on the scale up business proposals. Another scheme was the skills development with a funded programme called Peer Network.

Members were further advised of the support rendered by SEMLEP to Luton businesses;

- Support offered to 223 businesses
- 81 businesses attended workshops
- 32 businesses were supported through the growth hub project,
- 21 were engaged in the Peer Network initiatives
- Kick start grants were awarded

Skills support to the people of Luton

SEMLEP had a skills team partly funded by the Careers & Enterprise Company coordinating work with the schools across the SEMLEP area. The Skill Strategy was aimed at encouraging young people to gain the sort of experience, qualification and competencies that they require in order to enter the work force locally. Advice and guidance to young people to ensure awareness of available activities and how they could gain access and opportunities through apprenticeship schemes, attending local college or gaining a qualification at University level. One key thing that worked very well was encouraging young people through direct engagement of people who worked in a particular field or sector. For a young person, to hear directly about what was involved for them to have a job in an area which they might not have thought about, was inspirational to them. SEMLEP was pleased to describe that in Luton, SEMLEP had funded a careers hub embedded into Luton Council, and provided additional useful and valuable results. There was an allocation of £110K a year for the staffing and activity of this Careers hub specifically aimed at Luton. This hub was regarded as being in the Top 3 in England.

Luton was also represented on the SEMLEP skills and Advisory panel which reported directly to the Department for Education to influence national policy on skills.

Getting Building Funds

- SEMLEP received £27.3million into the SEMLEP area.
- £4.5million was awarded to Barnfield College from this fund and the project will complete in 2022

Local Growth Fund

This was expected to come to conclusion in March 2022 but there would be a few projects delivery until the next financial year. In the Luton area there had been some significant business growth;

Luton Hat District – This had been an amazing success story

- Nearly £4million invested into it
- 71 jobs created so far,
- Had over 2 thousand square meters of commercial floor space with some exciting new business in this vibrant area located closely to the Luton Station.

Houghtonn Brook Flood Relief Scheme

This project received £1million investment. This was vital in terms of reducing flood risk for 119 businesses and 535 homes in Luton.

Morton House (Kblock)

Had been renamed and working with the new Luton Rising to create new skills and business hub which will be built to high environmental standards. It was planned that this would deliver space for 200 new jobs for Luton.

Community Grants

This was small programme but vitally important. They were smaller grants of about £10-20k which aimed at voluntary community sector and social enterprise. This grant also supported individuals who were unemployed or economically inactive with help to access training back into work. It addressed community needs reaching out to many people in the community.

Looking to the Future

There were fantastic opportunities in Luton, the Airport had been through difficult times but travel and hospitality was now beginning to pick up. Over the next couple of years, passenger numbers would increase in Luton and Luton would be able to deliver and increased passenger numbers in an environmentally friendly way and no doubt there were huge opportunities in delivering a sustainable Airport. From a SEMLEP perspective, LEPs have been under review in the last year and it was hoped that the Levelling Up White Paper that the government plan to publish in the next week would tell more about the future direction of SEMLEP and growth hubs. SEMLEP would hope that the Government would continue to support the LEPs and that SEMLEP would be able to work with local authorities in its area and colleagues in terms of collaboration and hopefully adding value to support inclusive sustainable economic growth.

In respect of the Oxford Cambridge Arc, SEMLEP had worked across the whole area with other LEPs and had delivered an economic prospectus last year. At the moment the Government was rethinking the Arc.

A Member of the Board commended the report stating that it was very informative. He stated that people in Luton were fearful that they would be left out of the Arc discussions although the Council and other organisations were very anxious to play its part. He asked whether there was an assurance that these organisations including the Council would have the opportunity to be involved in the discussions.

In response the Chief Executive stated that everyone was awaiting the government's next steps, especially in relation to the Spending Review last October. The central area of the Arc which cover the same geographical area as SEMLEP placed the Arc in a really exciting position for funding. However, in the government's plan, reference had not been made to the Arc and in fact there was no mention of the Oxford-Cambridge Arc in the last Spending Review. All involved had been waiting for the government to give clarity on the Arc but this did not in any way indicate that there had not been opportunities going on. Various working groups had been established with focus on environment economic and, infrastructure which she led on. There was also a lot of work on sustainable aviation that the council was involved in. Luton Airport had a key role in this including a group called the Oxford-Cambridge Arc, Virtual Institute of Aviation. She said there was a meeting earlier this week and Luton Airport was very keen to benefit from all the research by the universities around sustainable aviation and research into new sustainable fuels such as hydrogen. She said that a lot would depend on how the local authorities would want to respond to the government regarding the Arc. This could provide huge opportunities for everyone to work together and to demonstrate how much this whole area had to offer and Luton in particular should be very much be part of this initiative. There would be a meeting on 28 January of all the LA Leaders to have discussions around some agreement on how to move things forward with this project.

In response to a question about SEMLEPs involvement with some organisations that were trying to secure the much needed improvement to Luton town centre and the railway station, Members

were informed that SEMLEP had been a great supporter of the need to invest in Luton and the railway station for many years. At the moment the direct funding programme managed by SEMLEP would be coming to an end and England Economy Heartland had been looking at priorities for a transport investments where there were opportunities for investment in the Luton Train Station.

A Member stated that the growth hub and support to Luton businesses was largely reliant on EU funding which would end in March 2023. He asked what would happen after that.

SEMLEP does receive EU funds but also funds from other Government departments. There could be other opportunities of funding for next year. It was very much hoped that the funding would continue from BEIS so that SEMLEP could continue to provide the direct support for businesses its area. If not then the Board would need to consider options.

Responding to the issues of equality and diversity Members were informed that at the beginning of the pandemic it was identified that the health impact of the pandemic was falling on people unequally and in particular the ethnic minority communities as well as the elderly and people with existing health conditions, etc. SEMLEP recognised the need for inclusivity to be embedded into the economic recovery strategy. The only way to do this was to embed inclusion into SEMLEP's activities and to ensure the monitoring of people who were going through delivery and to double check that all the different communities who needed support in order to be able to recover were within reach. This was one of the areas identified in 2020 submission to the Committee giving assurance that there was a need to strengthen that area of work. Last year Members were advised that this was a piece of work being developed and during this year a lot of work had taken place to progress this agenda. SEMLEP had looked at data in terms of the growth hub activities and in particular so the Peer Network already mentioned looking at the profile of people going through the Peer Network, what was their gender, by age, by ethnicity, by disability, etc. Again looking across services and skills to ensure that marketing styles were delivered in accordance to the need of the community or whether there was need to do things differently. This is a continuous learning process, reviewing data and then tweaking to focus on the issues born out of the pandemic. There had been a lot of staff training so everyone was aware of the equality and diversity roles in their jobs and these had been embedded into the SEMLEP Board.

Members commended the report and showed recognition to all the activities and support that SEMLEP had taken in this area and especially having placed equality at the centre of their activities.

Resolved: (i) That the report be noted and that the Board's thanks to SEMLEP be recorded;

(ii) That SEMLEP be requested to report back in 12 months' time.

05 Low Traffic Neighbourhood (Ref 8)

The Principal Transport Planner, presented the report of the Service Director Sustainable Development regarding Low Traffic Neighbourhood Ref: 8. He was joined by the Service Manager, Strategy and Sustainability and the Service Manager, Highways.

The Principal Transport Planner informed Members that this report had been provided at the request of the Board to provide an overview on low traffic neighbourhood that had been delivered by other local authorities outside of Luton. The content of the report set out the potential impact of low traffic neighbourhood and some of their benefits in terms of improving liveability and designing spaces and places for people as opposed to cars.

In respect of the recommendation as set out in the report, if the Board was minded to support low traffic neighbourhoods trial, their comments and views would be reported to the Executive. He

stated that the council could work closely with local members on exploratory work and investigation into areas which could benefit from the introduction of the low traffic neighbourhoods. The planned proposal included restricting vehicle access at certain points but would allow people to walk and cycle through them.

Responding to questions, Officers advised that low traffic neighbourhoods were largely deployed through physical barriers (planters and bollards). The local authorities who had delivered this type of scheme used a mix of physical barriers and ANPR cameras. In some of the point closures, camera enforced modal filters provided access to certain classes of vehicles, e.g. street cleansing, refuse vehicles, emergency services but do not allow private vehicle users to travel through them.

Camera enforcement of point closure was currently not a possibility in Luton. However, the Department for Transport has started the process of laying regulatory changes that will enable local authorities to adopt powers under part 6 of the Traffic Management Act. If adopted, this would allow local authorities outside London to enforce moving traffic contraventions. He informed members of the Board that Officers plan to bring a report to the Board to discuss the implications of these changes for Luton.

In response to a question asking why the pilot areas were chosen, the Officer explained that Luton roads mirrored some of the characteristic of street patterns found in London boroughs i.e. in the case of Greenwich and Waltham forest. Oxfordshire was specifically reviewed to give a non-London Borough authorities feel.

In response to a question regarding the definition of 'priority' and 'non-priority' vehicles allowed access through camera enforced point closures, the Officer explained that these decisions would be discretionary. He added that the purpose of low traffic neighbourhoods was to reduce vehicle use, particularly for short trips. A high percentage of journeys made by car in Luton are those travelling under 2 kilometres by car. He added that some authorities had used Experimental Traffic Regulation Orders (ETRO) to manage LTN schemes. A Member commented that in London, schemes like this were intended to improve air quality. There was a view that the move towards low emission vehicles might substitute the need for a Low Traffic Neighbourhood, as air quality would have improved.

In response to a question, Officers advised that whilst cleaner air was one of the benefits of low traffic neighbourhoods, it was not considered the only beneficial objective expected from the scheme.

A Member stated that the council could look at the number of vehicles in one household which was currently a major problem, one household could own up to 4,5, and or 6 vehicles littering the whole street. Officers concurred.

In response to a question, Officers further explained that those authorities that implemented LTNs failed because of lack of local support for the scheme. A member stated that residents in his ward felt that they no longer had interest in any consultations carried out by the council, as their views were never considered in the final decision. Members were critical of a lot of consultations carried out by the council stating that many of those consultations were not carried out in a robust way.

Following comments, statements and questions from members, the Officer explained that the report, as much as possible, tried to be transparent and honest about the opportunities and challenges of delivering Low Traffic Neighbourhoods. Officers accepted that there were challenges in the delivery of these schemes and there had been protests in London against the delivery of the Low Traffic Neighbourhoods. The report also identified schemes that had been successful and ultimately reduced vehicle use and rat running. Ealing Council removed some of its low traffic neighbourhood schemes, but given enough time traffic would or could be reduced both inside the low traffic neighbourhood and on the boundaries so, this report and examples of Ealing

and Wandsworth was just to reflect the reality that Low Traffic Neighbourhoods could be contentious if not delivered correctly. Some of the London schemes were delivered as part of short term active travel funding which meant that they didn't have enough time to engage properly with residents about the design of the scheme, which then had negative consequences. The Council was currently undertaking some survey work on the Local Cycling and Walking Infrastructure plan and high response rates being sought. As part of this survey officers would take on board any detailed feedback and comments, to inform the final plan.

A Member asked if there was possibility for the schools to be part of the exclusion as previously discussed for example, Puttridge High Schools had to be experienced to be believed and this would be a good way in testing the water on some of this.

Responding to some of the questions, comments and statements, Officers explained that in some ways LTNs was similar to 'school street' schemes and it had been the council's intentions to deliver some of these schemes with schools. It was planned to work closely with head teachers, but there had been challenges in terms of the resources required to enforce road closures and discussions were ongoing with schools. There were three traffic exclusion zone schemes which the council had tried to set up but school staff were not able to support the council to ensure that they were maintained. Officers would go back and review these schemes but it was disappointing that a lot of time and efforts had been invested in planning.

The Portfolio holder, councillor Roche stated that discussions around these proposals were still ongoing. He said the council had agreement but because of lack of resources they were unable to accept, so basically this was still on the table. The council would be going back to consultation. In relation to the issues expressed by members of the Board around consultation, he was of the opinion that also that the council's consultation was not sufficient especially with the engagement on ground. He said he would be willing to work with Councillor Wynn about the issues he had expressed concerning his ward. Should the council push the scheme without the consent of local people, it may not work and this was what had happened in some of those London Borough. The other thing was about the high percentage of people who use their cars for trips that were less than 2 kilometres in the town. He said that his focus was to reduce the traffic and there would be other strategies to try and help that work. This being a pilot scheme the Portfolio holder stated that he would be happy to work with Councillor Wynn on his ward.

Members were of the opinion that the consultation process needed improvement and that participation in the consultation process was essential. A Member stated that sometimes a pilot may not be as successful as expected but that this scheme seemed to have been successful in certain areas in the country and had been welcomed particularly by the resident who lived in areas where the scheme had been successful.

Councillor Franks made a proposal by way of recommendation to the Executive:

That the Executive note the findings of the report and request officers work with members to identify an area that may benefit from the introduction of a pilot LTN to understand the level of support.

Members agreed the proposal and commended the reporting officer for a very elaborate report.

Resolved: (i) That the report (Ref 8) be noted and that the Board's thanks to the Principal Transport Planner be recorded.

(ii) That the Executive note the findings of the report and request officers work with members to identify an area that may benefit from the introduction of a pilot LTN to understand the level of support.

06 Article 4 Direction Commercial Business and Services Uses to Residential conversion Butterfield (Ref 9)

The Team Manager Planning Policy presented the report of the Service Director Sustainable Development Ref: 9, regarding Article 4 Direction currently in place at Butterfield Business and Technology Park, Stopsley and Capability Green Business Park in light of legislative changes as outlined in the report. The proposal would aid the continuing protection of these key employment site allocations which play a vital role in accommodating economic growth and increasing employment opportunities in accordance with the adopted local plan.

The Team Manager explained that specifically, the proposal was in relation to changes to the use classes order in 2020 which resulted in the amalgamation of retail, commercial uses such as office, light industrial and some leisure and commercial use into one class. The class E, commercial business and service uses was combined with the general permitted development order in 2021 which created a new commercial development right for people to move from class E to residential use subject to certain exclusion and conditions. Essentially the existing Article 4 direction were due to expire after the 31 of July 2022 and needed at this time to be updated. In Butterfield it was being proposed that a slightly larger area be covered to cover the entire allocation as in the adopted local plan.

The report sought the views of the Board and their support that the new Article 4 directions should be brought in on 1 August 2022 at the conclusion of the existing ones. Members were informed that the proposal would carry some risks of compensation because the changes were being carried out within the 12 months period of being made and confirmed.

Following brief debate and discussions about the options and the proposal as outlined in the report, Councillor Franks proposed;

That the Executive be advised that the Overview and Scrutiny Board:

- a) welcome the introduction of these Article 4 directions;**
- b) encourage the Executive to seek ways of extending Article 4 Directions to other areas of town.**

In response to questions, Officers explained that the Council was currently looking at the town centre to have Article 4 direction in place. This work stream was taking place now and planned for consideration in April 2022. Also, looking at the employment area designated as A and B Class, this work stream would be a new area to look at. Furthermore, the council would be looking at employment and retail after reviewing the town centre and the surrounding areas in April, Officers anticipate this would be ready for consideration in June 2022.

Councillor Wynne supported and seconded the proposal by councillor Franks. He said that the council should be looking at the widest possible area for this type Article 4 direction because there should be the least conversion of offices into substandard residential space around the town. These should be brought to control within the council's planning department rather than having it tossed on councillors.

The Chair commended the report and proposal as outlined in addition to the proposal made by Councillor Franks, which was also supported unanimously by the Board.

That the Executive be advised that the Overview and Scrutiny Board:

- a) welcome the introduction of these Article 4 directions;**

- b) encourage the Executive to seek ways of extending Article 4 Directions to other areas of town.**

Resolved: (i) That the report Ref: 9 regarding Article 4 Direction Commercial Business and Services Uses to Residential conversions, Butterfield Business, technology Park and Capability Green be noted and supported, and that the Board's thanks to Officers be recorded.

(ii) That the Executive be advised that that the Overview and Scrutiny Board:

- a) welcome the introduction of these Article 4 directions;**
b) encourage the Executive to seek ways of extending Article 4 Directions to other areas of town.

07 Driver Vehicle Licensing Agency (DVLA), Powers untaxed and abandoned vehicles (Ref 10)

The Neighbourhood Operations Manager, Neighbourhood Delivery Inclusive Economy, presented the report Ref: 10 regarding Driver Vehicle Licensing Agency (DVLA), Powers untaxed and abandoned vehicles which was for information only.

The report outlined the council's legal responsibilities and provided an insight into the processes used when dealing with various vehicle issues such as:

- Untaxed (unlicensed)
- Abandoned
- Vehicles with no MOT
- Uninsured

The council had a statutory duty to deal with abandoned vehicles within its own area but this however, was a complex area of work and incorrect decision could lead to damaging claims financially and reputational legal implications for the council. The council's processes and procedures had developed over time reflecting best practice.

In relation to untaxed vehicles DVLA had advised that there could be a monthly average of 12689 potentially untaxed vehicles in Luton. This would facilitate the need to re-examine the council's current model and officers would be working with DVLA on a targeted enforcement campaign to reduce the number of untaxed vehicles on the roads.

A Member stated that he was pleased to hear that the council could remove abandoned vehicles not on the highway but on private land.

A Member requested for clarity on the action about abandoned vehicles as outlined in paragraphs 6 and 7 of the report and in response, the Officer explained that it was definitely a contributing factor in the council's action. Considering whether a vehicle was taxed or not, could be an indicator but on the face of it, more information was necessary because there were vehicles which may seem to be taxed but had been abandoned. There were situations where the council had disposed of vehicles with tax on them, so it really would depend on the threshold, if high risk and abandoned the council would inspect. If there were any other circumstances such as anti-social behaviour associated with the vehicle or anything else, inspection would be carried out. Each was judged on its own merits and depending on the information received on the vehicle.

A Member stated that the Fire Service actually had the power to remove vehicle which they believe were of a significant arson risk and said that this could be helpful for the council in some circumstances when dealing with abandoned vehicles.

Members commended the report.

Resolved: That the report (Ref 10) regarding Driver Vehicle Licensing Agency (DVLA), Powers untaxed and abandoned vehicles be noted and that the Boards thanks to the Officer be recorded.

08 OSB Draft Work Programme 2021-22 & Executive Forward Plan (Ref: 11)

Members considered the work programme and agreed the following:

- 1) Banning of Estate agents boards – OSB meeting on 11 April 2022
 - To address issues illegally placed estate agents notice boards in Luton
 - They are being banned in other places – best practice
- 2) NEW - Luton Rising Group (LLAL) Consultation on and adoption of the Airport business plan 2022/27 (Mark Turner) – OSB 28 February 2022.

Resolved: That the Democracy and Scrutiny Officer be instructed to include the below items on the work programme:

Banning of Estate agents boards – OSB meeting on 11 April 2022

- To address issues of illegally placed estate agents notice boards in Luton
- Best practice from other local authorities and towns where they were being banned.

NEW - Luton Rising Group (LLAL) Consultation on and adoption of the Airport business plan 2022/27 (Mark Turner) – OSB 28 February 2022.

(Meeting ended @ 7.30pm)

Committee:	Overview and Scrutiny Board
Date of Meeting:	28 February 2022
Subject:	LBC Corporate Performance Report 2021-22 Quarter 3
Report Author:	Deputy Director of Public Health and Service Director Healthcare, Public Health, Commissioning and Procurement
Contact Officer:	Aurora Dunn Performance Analyst Adults Performance Team
Wards Affected:	All

Purpose

1. Report monthly, quarterly and annually on a set of key indicators and outturns against the Council's key objectives.

Recommendations

2. OSB is recommended to note the Quarter 3 2021-22 outturn on performance.

Background

3. Performance is monitored and discussed at CLMT, Overview and Scrutiny (OSB); and Executive prior to headlines being published to staff and citizens to provide a transparent picture of how we are doing.
4. Officers within the Council's Business Intelligence team attend DMTs regularly to discuss the details of the performance indicators and outcomes. The indicators and targets identified within this report cover the outcomes that matter to local people and meet the strategic needs identified by the Council in its corporate and service plans.
5. Covid-19 and the lockdown measures have had a severe and sustained impact on services across the Council; including a rising demand on services, decreased footfall, postponement of exams, staff self-isolating and delayed service delivery. This impact is still being felt, however, the Council is beginning to see a rise in performance again with the easing of lockdown restrictions and services adapting to the challenges and new ways of working.
6. The Corporate Performance Report has been developed into a more automated process. Rather than the data being copied across by a third party, services now input their data and commentary directly into the report. This not only serves to increase reporting efficiency, but it also gives services an opportunity to view and understand corporate performance on a wider level, rather than only their respective areas.
7. Provisional measures centred on the 'Reducing Carbon Emissions' strategic priority, are under development, and the outline of these can be viewed in the report.
8. Going forward, data from the Luton Insight's dashboard will be included within the report in order to provide a more in depth understanding of performance and changes within the town. This will include data at ward level.

Report

9. The purpose of this report is to provide Overview and Scrutiny Board and Executive with the current performance against LBC's key priorities, measured by a selection of performance indicators. The performance report consists of two elements:

Corporate Performance Summary (this document): providing headline commentary under the six council priorities from the Luton Investment Framework.

Corporate Performance Report, which includes an index of all performance indicators supporting the Council priority areas, providing current performance, and commentary.

Proposal/Options

10. The performance management framework has been developed to ensure a clear strategic link and golden thread from the high level priorities the Luton 2040 plan, to specific tasks and actions within team plans and individual staff Personal Performance Appraisals. The indicators and targets being reported will ensure the Council is achieving its overall goals and priorities.

Appendix

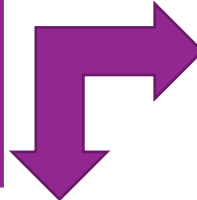
11. Appendix A – PI report
12. Appendix B – PowerPoint Presentation

List of Background Papers - Local Government Act 1972, Section 100D

Luton Council

Corporate Performance Dashboard

Please click on strategic priority box to visit that page



Making Luton a child-friendly town, where our children and young people grow up feeling happy, healthy and secure, with a voice that matters and the opportunities they need to thrive.



Ensuring wellbeing and growth - maintain health and safety standards and a robust workforce

To be presented at:

CLMT: 27/01/2022
Overview and Scrutiny Board: 28/02/2022
Executive: 07/03/2022

Protecting the most disadvantaged in our town by prioritising services and interventions that focus on prevention, alleviate the impact of poverty and reduce health inequalities.



A strong and empowered community supporting fairness, equality and local pride and speaking with a powerful voice.



Highlight report

Performance Outlook

Performance is good: At least 95% target achieved
 Performance is satisfactory but requires corrective action: Within 10% of target
 Performance requires serious action: More than 10% outside target

Green

Amber

Red

Becoming a greener and more sustainable town, to meet our long-term ambition to be carbon neutral and climate resilient by 2040.



Securing a strong economic recovery from COVID-19, which protects jobs, incomes and businesses and enables us to build a more inclusive economy.



Luton

Produced by: Business Intelligence - Luton Council

Introduction

What is the Corporate Performance Report?

The corporate performance report compiles and presents both quarterly and annual service data, which allows performance to be monitored and discussed at CLMT, Overview and Scrutiny (OSB), and Executive prior to headlines being published to staff and citizens.

The indicators and targets identified within this report cover the outcomes that matter to local people and meet the strategic needs identified by the Council in its corporate and service plans. Its purpose is to provide a transparent picture of how Luton Council is performing.

The corporate performance report ties in to the strategic priorities outlined in Luton 2040 report, which examines poverty and child poverty, among other areas.

Covid-19 & Corporate Performance:

Covid-19 and the lockdown measures have had a severe and sustained impact on services across the Council; including a rising demand on services, decreased footfall, postponement of exams, staff self-isolating and delayed service delivery. This impact is still being felt, however, the Council is beginning to see a rise in performance again with the easing of lockdown restrictions and services adapting to the challenges and new ways of working.

Changes to the Report:

Going forward, data from the Luton Insight's dashboard will be included within the report in order to provide a more in depth understanding of performance and changes within the town. This will include data at ward level.

New measures have been developed around the 'Improving Children's Lives' strategic priority. These include:

- % Attendance in Primary Schools (published dfe data which is published in arrears)
- % Attendance in Secondary Schools (published dfe data which is published in arrears)
- No. of Children and young people who are neither on school roll nor being educated elsewhere in Luton (term to date)
- No. of pupils currently registered to Elective Home Education (academic ytd)
- No. of pupils permanently excluded (academic ytd)
- % of Children Attending Good & Outstanding Schools (primary, secondary and special)

Officers have developed the 'Reducing Net Carbon Emissions' strategic priority tab. The following measures have been agreed with services, and will be presented in future reports:

- Biodiversity: Total number of trees managed by the council (annual measure)
- Biodiversity: % of county wildlife sites with positive conservation management (annual measure)
- Biodiversity: Volunteer engagement in conservation activities - number of sites improved (quarterly measure)
- Biodiversity: Volunteer engagement in conservation activities - number of participants (quarterly measure)
- Biodiversity: Volunteer engagement in conservation activities - number of volunteer hours (quarterly measure)
- Biodiversity: Area of habitat/grassland improved for biodiversity (annual measure)
- Transport: Usage of fuel by fleet (litres) (quarterly measure)
- Buildings: Total gas/electricity in corporate buildings (kWh) (quarterly measure)
- Buildings: Total gas/electricity in schools under service contract management (kWh) (quarterly measure)
- Buildings: Total water usage (m3) (quarterly measure)

Numerators and denominators for each of the percentage measures will be included in the report going forward. Those that are currently missing will be added in the following quarter.

Area	Indicator	Reporting officer	Authorising manager	Corporate director
Protecting the Disadvantaged	No. of Cases Prevented from Becoming Homeless	Nazakat Ali	Colin Moone	Carolyn Kus
	No. of Homelessness Open Cases	Nazakat Ali	Colin Moone	Carolyn Kus
	% of Homelessness Acceptances	Nazakat Ali	Colin Moone	Carolyn Kus
	No. of Homelessness Acceptances	Nazakat Ali	Colin Moone	Carolyn Kus
	No. of Homeless Households Allocated a Permanent Offer Through the Housing Register	Nazakat Ali	Colin Moone	Carolyn Kus
	No. of Affordable New Homes Completed	Claire Astbury	Colin Moone	Carolyn Kus
	Proportion of Registered Care Services: Good or Outstanding	Usman Iftikhar	Maud O'Leary	Carolyn Kus
	ASCOF Adults in Contact with Secondary Mental Health Services Who are in Employment	Usman Iftikhar	Maud O'Leary	Carolyn Kus
	(A) Gap in Life Expectancy Inequality at Birth	Edward Holmes	Sally Cartwright	Carolyn Kus
	(A) Gap in Healthy Life Expectancy Between Men & Women	Edward Holmes	Sally Cartwright	Carolyn Kus
	(A) Prevention Indicator 1: Smoking	Suliman Rafiq & Rushna Alam	Elizabeth Elliott	Carolyn Kus
	(A) ASCOF Proportion of Carers Who Reported That They Have as Much Social Contact as They Would Like	Usman Iftikhar	Maud O'Leary	Carolyn Kus
	(A) ASCOF Proportion of Users Who Reported That They Have as Much Social Contact as They Would Like	Usman Iftikhar	Maud O'Leary	Carolyn Kus
	(A) % of Physically Active Adults	Matthew Hudson	Matt Corder	Carolyn Kus
	(A) % of People Referred Who Need No, or Reduced, Care Support Following Period Reablement	Usman Iftikhar	Maud O'Leary	Carolyn Kus
COVID-19 Economic Recovery	No. of London Luton Airport Passengers	Michelle Griffin	Mark Turner	Graham Olver
	Unemployment Rate	Edward Holmes	Sinead McNamara	Nicola Monk
	Unemployment Rate (No.)	Edward Holmes	Sinead McNamara	Nicola Monk
	Unemployment Claimant Count	Edward Holmes	Sinead McNamara	Nicola Monk
	Unemployment Claimant Count (No.)	Edward Holmes	Sinead McNamara	Nicola Monk
	No. of Learners Enrolled on Adult Learning Courses	Debbie-Poole Hunt & Merielle James	Sinead McNamara	Nicola Monk
	No. of People Assisted to Move Closer to the Job Market Through 'Passport to Employment'	Debbie-Poole Hunt & Merielle James	Sinead McNamara	Nicola Monk
	No. of Apprentices Employed by Luton Council	Debbie-Poole Hunt & Merielle James	Sinead McNamara	Nicola Monk
	Apprentices as a % of the workforce	Debbie-Poole Hunt & Merielle James	Sinead McNamara	Nicola Monk
	Town Centre Vibrancy: Town Centre Footfall (millions)	Edward Holmes	Sinead McNamara	Nicola Monk
	% of Influenceable Council Spend Through Procurement with Local Suppliers (6 Monthly)	Freya Griffin	Catharine Southern	Nicola Monk
	No. of Influenceable Council Spend Through Procurement with Local Suppliers (6 Monthly)	Freya Griffin	Catharine Southern	Nicola Monk
	Timeliness of Benefits: New Claims	Nigel Robinson	Dev Gopal	Robin Porter
	Timeliness of Benefits: Changes	Nigel Robinson	Dev Gopal	Robin Porter
	Employment in Luton: No. of Jobs, Labour Force Survey, includes self employed	Edward Holmes	Sinead McNamara	Nicola Monk
	(A) Employment in Luton: No. of Jobs BRES	Edward Holmes	Sinead McNamara	Nicola Monk
	(A) Employment in Luton: Average Salary Luton Workplace Earnings	Edward Holmes	Sinead McNamara	Nicola Monk
	(A) Luton Businesses Measures: No. of Businesses	Edward Holmes	Sinead McNamara	Nicola Monk
	(A) Luton Businesses Measures: Business Start Up	Edward Holmes	Sinead McNamara	Nicola Monk
	(A) Aviation, Automotive, Manufacturing & Engineering No. of Jobs	Edward Holmes	Sinead McNamara	Nicola Monk
	(A) Aviation, Automotive, Manufacturing & Engineering No. of Jobs & Gross Value Added (GVA)	Edward Holmes	Sinead McNamara	Nicola Monk

Improving Children's Lives	% in EET (16-18 years)	Pam Crawley	Caroline Dawes	Amanda Lewis
	No. in EET (16-18 years)	Pam Crawley	Caroline Dawes	Amanda Lewis
	No. of First Time Entrants in YOS (rate per 100,000)	Troy Hutchinson	David Collins	Amanda Lewis
	No. of Social Care Referrals	Ruhala Chowdhury	Allison Parkinson	Amanda Lewis
	No. of Newly Approved Foster Carers	Ruhala Chowdhury	Allison Parkinson	Amanda Lewis
	No. of Children With an EHCP	Sharon Smith	Paul Senior	Amanda Lewis
	% of EHCP Issued Within 20 Weeks, Excluding Exceptions (academic ytd)	Sharon Smith	Paul Senior	Amanda Lewis
	% Attendance in Primary Schools (published dfe data which is published in arrears)	Sharon Smith	Paul Senior	Amanda Lewis
	% Attendance in Secondary Schools (published dfe data which is published in arrears)	Sharon Smith	Paul Senior	Amanda Lewis
	No. of Children and young people who are neither on school roll nor being educated elsewhere in Luton (term to date)	Sharon Smith	Kathy Sears	Amanda Lewis
	No. of pupils currently registered to Elective Home Education (academic ytd)	Sharon Smith	Paul Senior	Amanda Lewis
	No. of pupils permanently excluded (academic ytd)	Sharon Smith	Paul Senior	Amanda Lewis
	% of CYP Who are Classified as NEET & Have an Education, Health & Care Plan (16-18 years)	Pam Crawley	Caroline Dawes	Amanda Lewis
	No. of CYP Who are Classified as NEET & Have an Education, Health & Care Plan (16-18 years)	Pam Crawley	Caroline Dawes	Amanda Lewis
	% of Children Attending Good & Outstanding Schools (primary, secondary and special)	Sharon Smith	Paul Senior	Amanda Lewis
	(A) Rate of Proven Offending	Troy Hutchinson	David Collins	Amanda Lewis
	(A) Prevalence of Obesity Among Children: Reception Yr	Suliman Rafiq & Rushna Alam	Elizabeth Elliott	Carolyn Kus
	(A) Prevalence of Obesity Among Children: Yr 6	Suliman Rafiq & Rushna Alam	Elizabeth Elliott	Carolyn Kus
Reducing Net Carbon Emissions	(A) Attainment: KS2 RWM (at expected & above)	Sharon Smith	Paul Senior	Amanda Lewis
	(A) Attainment: KS4 Maths & English Level 5+	Sharon Smith	Paul Senior	Amanda Lewis
	(A) Tree Canopy Cover in Luton (Hectares) (5 Yearly Basis)	Jane Conway	Steve Battlebury	Nicola Monk
	(A) % of Local Sites Where Positive Conservation Management Has Been or is Being Implemented	Trevor Tween	Steve Battlebury	Nicola Monk
	(A) No. of Rail Passengers to Luton Station	Edward Holmes	Sinead McNamara	Nicola Monk
	(A) Rate of Cycling & Walking, Residents Taking a Journey at Least Once a Week	Edward Holmes	Sinead McNamara	Nicola Monk

Ensuring Wellbeing & Growth	% of Housing Stat Compliance Completed Within Timescale: Fire Safety Checks	Tim Keogh/Abid Qureshi/Abdul Kahir	Colin Moone	Carolyn Kus
	% of Housing Stat Compliance Completed Within Timescale: Gas Checks	Tim Keogh/Abid Qureshi/Abdul Kahir	Colin Moone	Carolyn Kus
	% of Housing Stat Compliance Completed Within Timescale: Electrical Checks	Tim Keogh/Abid Qureshi/Abdul Kahir	Colin Moone	Carolyn Kus
	% Corporate of Stat Compliance Completed Within Timescale: Fire Safety Checks	Stephen Parrott	Roger Kirk	Nicola Monk
	No. Corporate of Stat Compliance Completed Within Timescale: Fire Safety Checks	Stephen Parrott	Roger Kirk	Nicola Monk
	% Corporate of Stat Compliance Completed Within Timescale: Gas Checks	Stephen Parrott	Roger Kirk	Nicola Monk
	No. Corporate of Stat Compliance Completed Within Timescale: Gas Checks	Stephen Parrott	Roger Kirk	Nicola Monk
	% of (BAME) Employees Reflecting Our Communities	Anne Davies/Andrew Williams	Jodie Yandall	Nicola Monk
	No. of (BAME) Employees Reflecting Our Communities	Anne Davies/Andrew Williams	Jodie Yandall	Nicola Monk
	% of (BAME) Senior Employees Reflecting Our Communities	Anne Davies/Andrew Williams	Jodie Yandall	Nicola Monk
	No. of (BAME) Senior Employees Reflecting Our Communities	Anne Davies/Andrew Williams	Jodie Yandall	Nicola Monk
	% of All Roles Covered by Agency Workers	Christine King/Andrew Williams	Jodie Yandall	Nicola Monk
	% of Vacancies Covered by Agency Workers	Christine King/Andrew Williams	Jodie Yandall	Nicola Monk
	% of Vacant Roles	Christine King/Andrew Williams	Jodie Yandall	Nicola Monk
	Staff Turnover Rate	Christine King/Andrew Williams	Jodie Yandall	Nicola Monk
	Amount of Council Tax Collected (millions)	Nigel Robinson	Dev Gopal	Robin Porter
	Total Business Rates Due & Total Business Rates Collected (millions)	Nigel Robinson	Dev Gopal	Robin Porter
	(A) % Corporate of Stat Compliance Completed Within Timescale: Electrical Checks	Stephen Parrott	Roger Kirk	Nicola Monk
	(A) % of Decent Streets - Litter	Alex Greene	Sarah Hall	Nicola Monk
	(A) Gender Pay Gap (Corporate)	Kathy Williams	Helen Ginty	Nicola Monk

Headline Summary

What's working well

The number of passengers through the airport increased from 1,850,214 in Quarter 2, to 1,884,736 in Quarter 3.

Despite a high demand for change claims, performance is within target levels (10.80).

The rate of homeless applications to acceptances rose slightly from 12% in Quarter 2, to 14% in Quarter 3, but remains below the target and England Average of 25% of total decisions. Remaining below the target indicates positive performance, as it means that fewer people are being registered as homeless.

The number of homeless households allocated a permanent offer through the housing register increased from 45 in Quarter 2, to 51 in Quarter 3.

The proportion of registered care services rated good or outstanding stands at 71%.

The percentage of corporate statutory compliance checks have either maintained or improved

The percentage of housing statutory compliance checks have either maintained or improved

Indicators to note

In Quarter 3, 99 people were assisted to move closer to the job market through 'Passport to Employment'. This is less than the quarterly target of 150 and it is unlikely that the full year target of 600 will be met this year due to low referrals from the DWP.

Apprentices as a percentage of the workforce currently stands at 1.13%, which is less than the quarterly target of 2.3%.

The number of apprentices employed by Luton Council has fallen short of the quarterly target of 46, with a Quarter 3 figure of 10.

There has been a slight increase in footfall between Quarter 2 (2.25) and Quarter 3 (2.62), however, figures are still below target.

65.9% of Education, Health and Care Plans were issued within 20 weeks (excluding exceptions). Whilst this figure is low, it is an improvement from the previous quarter (21.1%).

The number of newly approved foster carers has increased from 2 in Quarter 2, to 7 in Quarter 3. While this is an improvement, it is unlikely that services will reach the year end target of 25.

The number of cases prevented from becoming homeless measure is unlikely to reach the year end target of 370. Current performance: Q3 - 49, YTD - 230.

The number of affordable new homes completed (18) has fallen short of the quarterly target (25).

Protecting the Disadvantaged

(Protecting the most disadvantaged in our town by prioritising services and interventions that focus on prevention, alleviate the impact of poverty and reduce health inequalities)

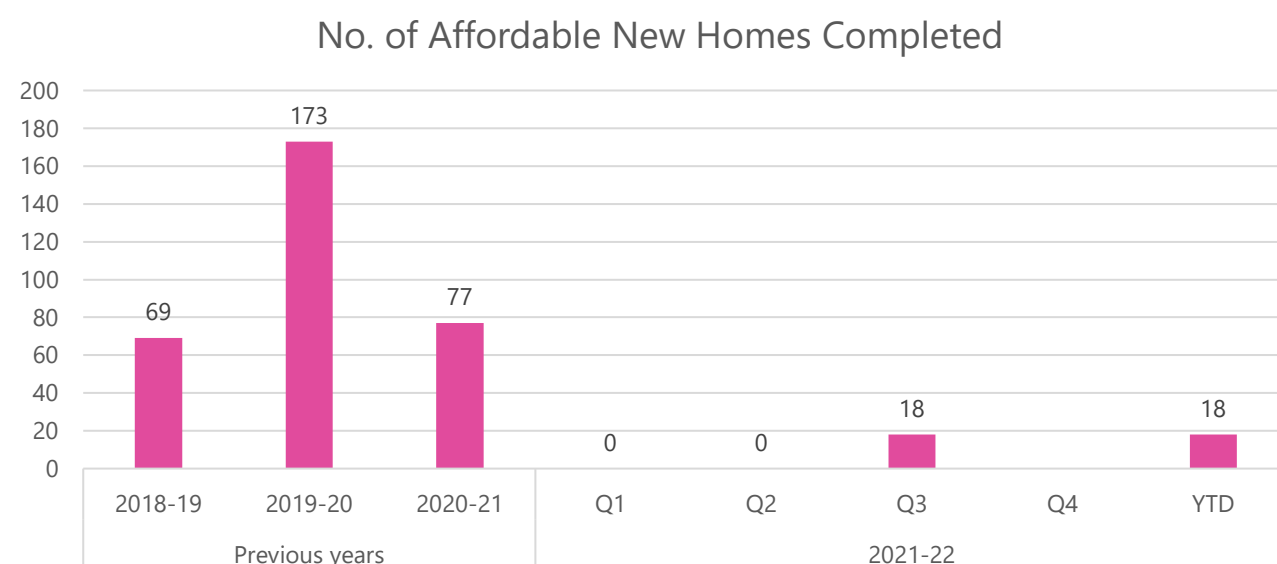
	Previous years			2021-22					Current Quarter (Q3)		Target		Time period	Reporting frequency	Good performance is	Current RAG Status
	2018-19	2019-20	2020-21	Q1	Q2	Q3	Q4	YTD	Numerator	Denominator	Qtrly	Annual				
No. of Cases Prevented from Becoming Homeless	208	189	517	87	94	49		230	n/a	49	n/a	370	Oct-Dec 21/22	Q	n/a	🟡 R
No. of Homelessness Open Cases	1686	2285	2312	328	456	576		576	n/a	576	n/a	n/a	Oct-Dec 21/22	Q	n/a	
% of Homelessness Acceptances	11%	13%	19%	20%	12%	14%		15%	58	366	25% of total decisions		Oct-Dec 21/22	Q	H	😊 G
No. of Homelessness Acceptances	198	306	432	65	44	58		167	n/a	58	n/a	n/a	Oct-Dec 21/22	Q	H	
No. of Homeless Households Allocated a Permanent Offer Through the Housing Register	164	232	147	53	45	51		149	n/a	51	45	180	Oct-Dec 21/22	Q	H	😊 G
No. of Affordable New Homes Completed	69	173	77	0	0	18		18	n/a	18	25	100	Oct-Dec 21/22	Q	L	🟡 R
Proportion of Registered Care Services: Good or Outstanding		68%	75%	68%	72%	71%		71%	n/a	n/a	100%	n/a	Oct-Dec 21/22	Q	H	😊 G
ASCOF Adults in Contact with Secondary Mental Health Services Who are in Employment	11%	8%	13%	13%	14%	data due: Feb 2022		14%	data due: Feb 2022	data due: Feb 2022	10%	n/a	Oct-Dec 21/22	Q	H	😊 G
Gap in Life Expectancy Inequality at Birth	2009-13 M: 8.5 F: 4.8		annual measure, data published: Public Health not confirmed release date						n/a	n/a	n/a		2021/22	A	n/a	
Gap in Healthy Life Expectancy Between Men & Women	2009-13 M: 13.0 F: 15.0		annual measure, data published: Public Health not confirmed release date						n/a	n/a	n/a		2021/22	A	n/a	
Prevention Indicator 1: Smoking	16.0%	16.8%	data due: Feb 2022	annual measure, data published: Dec 2022					n/a	n/a	11%		2021/22	A	L	🟡 R
ASCOF Proportion of Carers Who Reported That They Have as Much Social Contact as They Would Like	31.5%			annual measure, data published: Jul-Sept 2022					n/a	n/a	n/a		2021/22	A	n/a	
ASCOF Proportion of Users Who Reported That They Have as Much Social Contact as They Would Like	44.9%	42.5%		annual measure, data published: not yet confirmed					n/a	n/a	n/a		2021/22	A	n/a	
% of Physically Active Adults	56.6%	57.7%		Sport England publish twice annually May - June and November - January 2022					n/a	n/a	n/a		2021/22	2A	n/a	
% of People Referred Who Need No, or Reduced, Care Support Following Period Reablement	87.4%	78.4%	76.0%	annual measure, data published: May 2022					n/a	n/a	n/a		2021/22	A	n/a	



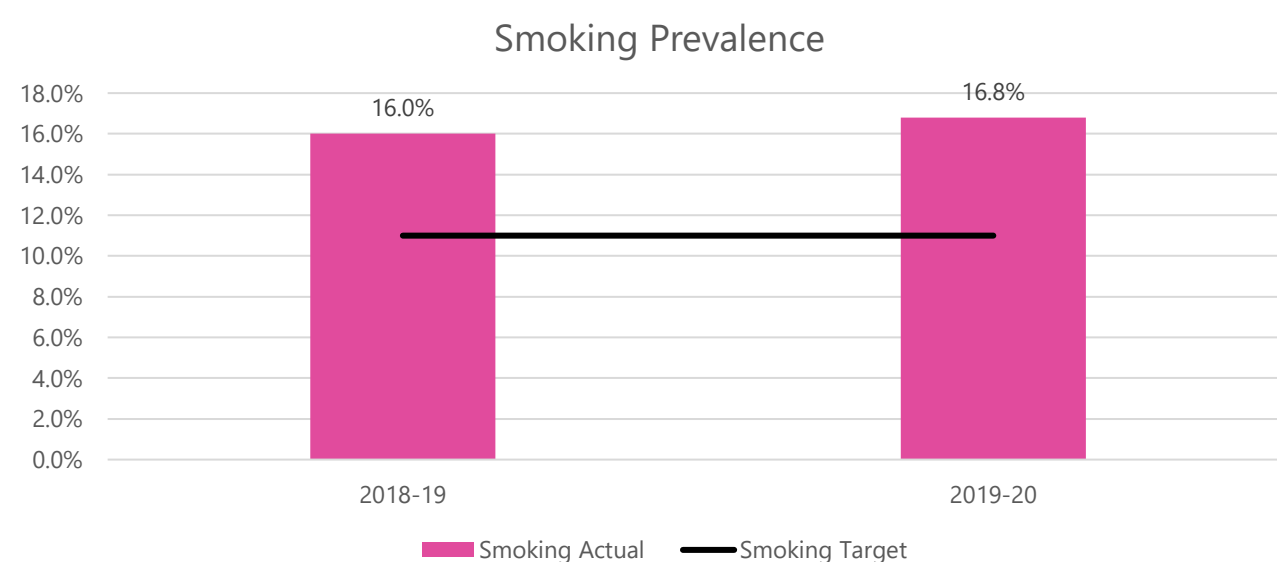
Target Outcomes

- Better and more equal healthy life expectancy for residents across Luton.
- More of our households will live in good quality and secure housing.
- More of our families will be financially sustainable and fewer will experience being in crisis.
- Greater support for mental wellbeing and reduced social isolation for people of all ages.
- A safer community with fewer cases of domestic abuse, serious violence and drug and alcohol related harm.

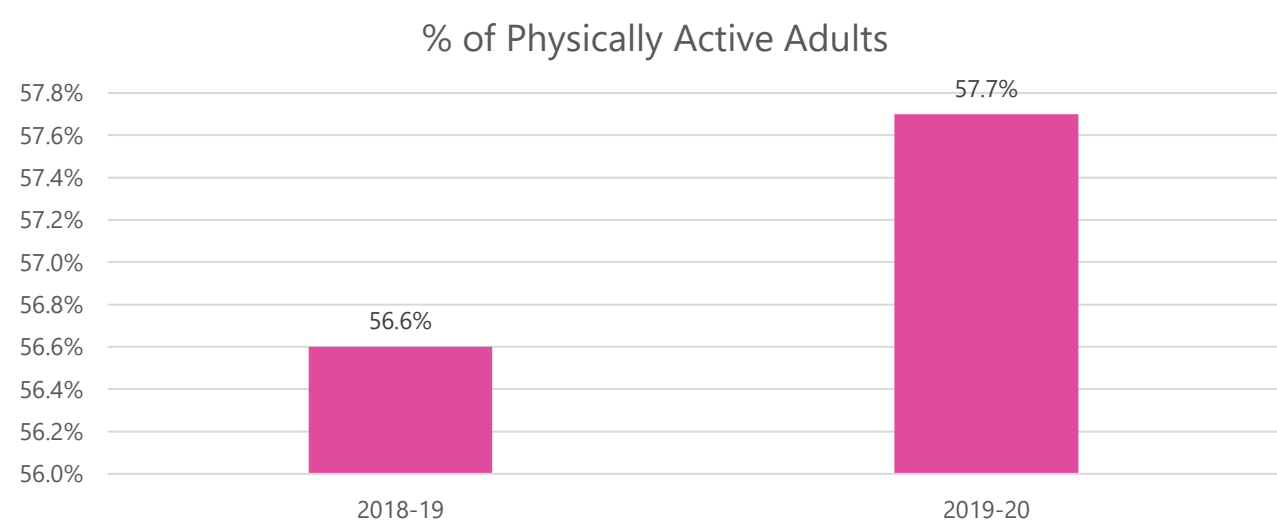




Name of Officer Filling in Commentary:	Claire Astbury	Date:	21/01/2022
40 affordable homes have started on site this year and the number of homes to be completed by the end of the year is 43 (25 anticipated in Quarter 4). The service had anticipated the completion of an additional 52 homes which have now delayed into 2022/23. There are four main sources of affordable homes: council housebuilding, Foxhall homes, housing association-led schemes and affordable homes secured through planning agreements. The service are working to improve the supply across all four.			

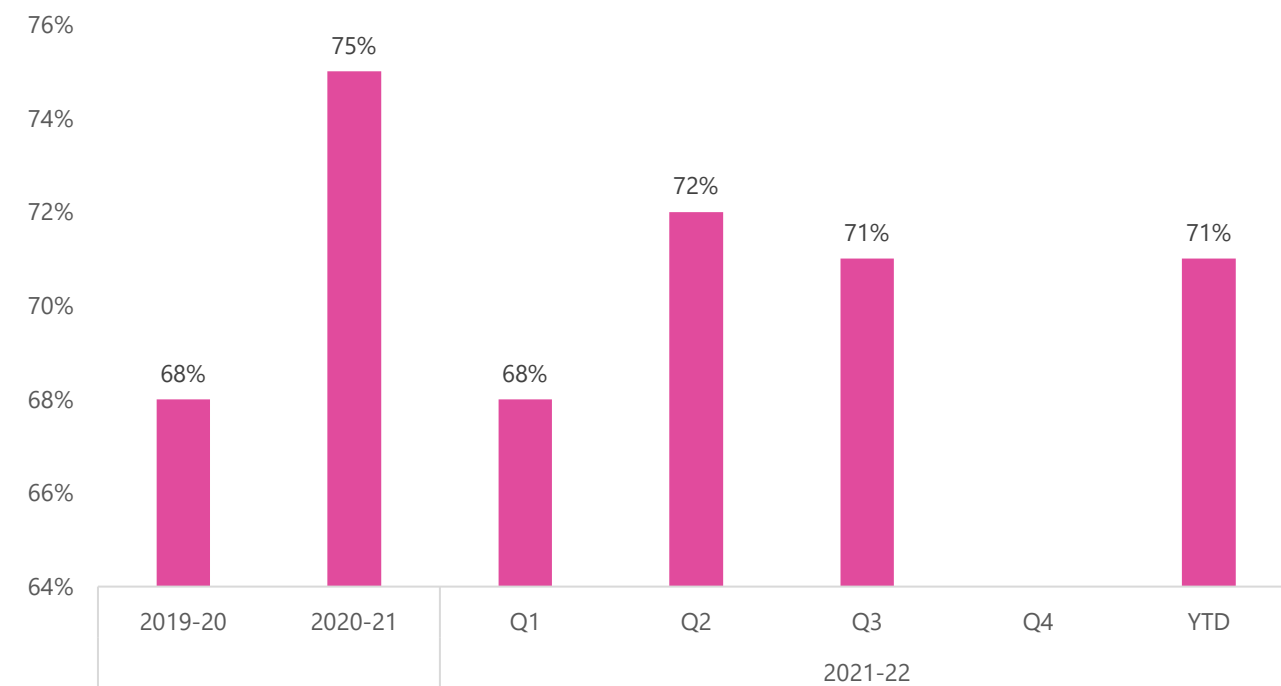


Name of Officer Filling in Commentary:	Suliman Rafiq	Date:	17/12/2021
Smoking prevention is a core part of the Tobacco Free Luton partnership that meets quarterly and interventions to prevent the uptake of smoking includes for example: • Working on reducing the impact of illicit tobacco with environmental health colleagues. Due to illicit tobacco being cheaper this is an important element to reduce prevalence • Working with schools on early intervention and prevention messages • Highlighting the risks of other products that are popular locally e.g. Shisha • Smoking forms part of the MECC (Making Every Contact Count) training delivered by Total Wellbeing Luton • Total Wellbeing Luton have attended various community events to encourage people not to start smoking It should also be noted that the most recent SHEU survey has shown very low levels of smoking with our Year 8 and Year 10 students however there is no consistent trend for this data so prevention needs to continually be addressed.			



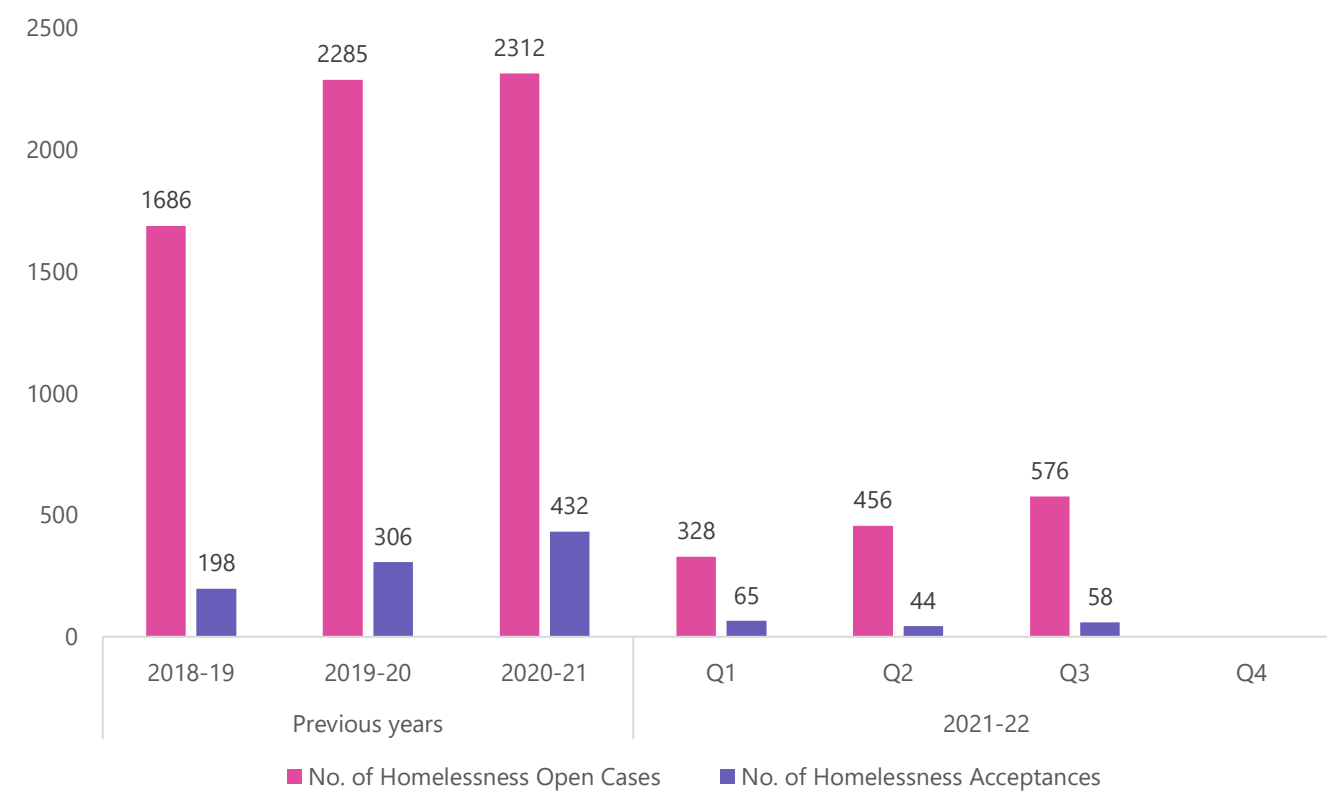
Name of Officer Filling in Commentary:	Matthew Hudson	Date:	17/01/2022
Locally, the latest Active Lives data, which was published in October 2021, highlights a significant decline in activity levels among Luton's adult population, with only 48% meeting the Chief Medical Officer's Activity guidelines. The level of activity and inactivity in adults across Luton remains significantly worse when compared with to the England average (Figure 5). The Active Lives survey shows activity levels were increasing nationally until the lockdown was introduced in mid-March 2020, resulting in a decline in activity levels. The proportion of population classed as active has dropped by 7.1%.			

Proportion of Registered Care Services: Good or Outstanding



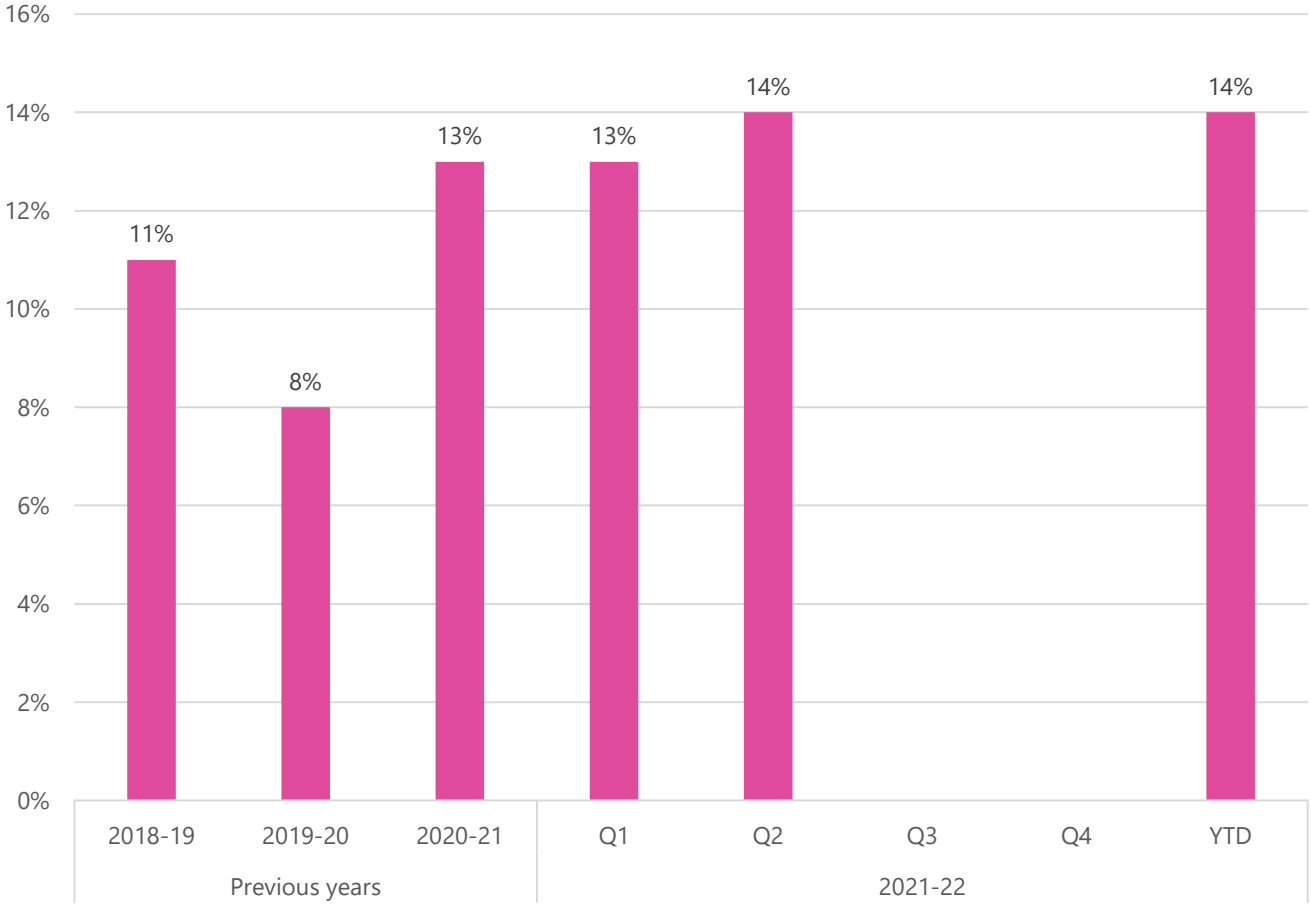
Name of Officer Filling in Commentary:	Elizabeth Hawkes	Date:	25/01/2022
The service is still monitoring the NHS Trackers to monitor outbreaks, PPE and staffing levels. Mandatory Vaccines for care homes was the 11th November, which was managed by the team liaising with care homes around exceptions status and impact on staffing levels. The vaccine legislation has now been initiated for the domiciliary providers, with the deadline for both vaccines being the 1st April 2022. The service is working closely with strategic domiciliary partners and spot partners to analyse the risks around potential staff shortages and working on supporting them with recruitment and retention through offering additional funding through the workforce and recruitment retention fund. Also by offering infection control rapid testing and vaccination funding. Although the service have not been able to meet the target of 100% of all CQC registered providers rated Good or Outstanding, the service have been proactive in initiating new systems and procedures to maintain the quality of the market. With the roll out of the Covid-19 vaccine, footfall with care providers will increase as the service starts to get back to BAU (business as usual). The service is anticipating an increase in concerns, safeguarding's and complaints as there are more eyes on services. The team have already started to plan for this increase in workload, by using the Public Health Covid Outbreak Management Fund, they have been successful in obtaining grants, however, due to the nationwide staffing issue in care it has been difficult to recruit. The service will continue to work with our partners, sharing best practice and information to ensure that quality in the market improves and more importantly is sustained, working with providers and staff to maintain the confidence, consistency and capability of care delivery in the local market.			

Homelessness Applications & Acceptances



Name of Officer Filling in Commentary:	Colin Moone	Date:	11/02/2022
In the establishment, there are 13 Housing Solutions Officers to undertake this work. Currently there are 10 of these officers in post, of which 6 are temporary staff and 1 about to leave. Case numbers are creeping up as a result of the very high homeless approaches across the year, particularly in recent months. The acceptance rate of 15% is exceptional. This, effectively, is ensuring that the temporary reduction target is more-or-less on target. With the current situation, with the team not fully recruited to and the large number of temporary staff in the team, this continues to be a stand-out level of performance across the Housing Service.			

ASCOF Adults in Contact with Secondary Mental Health Services
Who are in Employment



Name of Officer Filling in Commentary:	Usman Iftikhar/Jaikumar Shanmugasundaram	Date:	17/01/2022
Quarter 3 data will be available in late February 2022, as will the numerator and denominator. The measure is of improved employment outcomes for adults with mental health problems, reducing their risk of social exclusion and discrimination. Supporting someone to become and remain employed is a key part of the recovery process. Employment outcomes are a predictor of quality of life, and are indicative of whether care and supports personalised. Employment is a wider determinant of health and social inequalities. ELFT continue to perform well and above the annual target. The Quarter 2 figure of 14% is 4% above the annual target of 10%, so no concerns have been raised at this stage, but Luton continues to monitor this measure closely. Individual Placement and Support (IPS) is an evidence based supported employment model which involves integrating Employment Specialists within community mental health teams to help people with severe mental health conditions into paid employment. Service users receive individual support into paid employment based on their own choices and preferences. The IPS Employment Specialist works with the service user until they gain paid work and continues to provide support once they are in work. The IPS service in Luton started in 2019/20 with NHSE Transformation Funding and will expand further by 2023/24. Access to IPS is one of the key targets in the NHS Long Term Plan for Adult Severe Mental Illness. The ambition is: <i>'Through increasing access to IPS, the NHS will support an additional 35,000 people with severe mental illnesses where this is a personal goal to find and retain employment by 2023/24, a total of 55,000 people per year. This investment will support people to get back into or gain access to employment. It will improve outcomes and recovery for people, meaning they spend less time in hospital and live healthier, happier lives.'</i>			

	Previous years			2021-22					Current Quarter (Q3)		Target		Time period	Reporting frequency	Good performance is	Current RAQ Status
	2018-19	2019-20	2020-21	Q1	Q2	Q3	Q4	YTD	Numerator	Denominator	Qtrly	Annual				
No. of London Luton Airport Passengers	17.00	17.24	2.86	0.54	1.85	1.88		4.27	n/a	1.88	1.8	5.9	Oct-Dec 21/22	Q	H	😊 G
Unemployment Rate	5.2%	4.6%	7.6%	8.1%	8.5%	data due: Apr 2022		8.1%	n/a	n/a	n/a	n/a	Oct-Dec 21/22	Q	n/a	
Unemployment Rate (No.)	5,400	4,700	8,100	8,400	9,000	data due: Apr 2022		8,400	n/a	n/a	n/a	n/a	Oct-Dec 21/22	Q	n/a	
Unemployment Claimant Count	2.3%	3.4%	9.2%	8.3%	7.6%	7.1%		7.2%	9475	133825	n/a	n/a	Oct-Dec 21/22	Q	n/a	
Unemployment Claimant Count (No.)	3120	4515	12340	11165	10110	9475		9700	n/a	9475	n/a	n/a	Oct-Dec 21/22	Q	n/a	
No. of Learners Enrolled on Adult Learning Courses	5463	3529	1823	1701 (full year due Oct 2022)				1701	n/a	1701	n/a	n/a	Oct-Dec 21/22	Q	n/a	
No. of People Assisted to Move Closer to the Job Market Through 'Passport to Employment'	543	512	427	140	97	99		336	n/a	99	150	600	Oct-Dec 21/22	Q	L	😞 R
No. of Apprentices Employed by Luton Council	94	140	62	19	24	10		53	n/a	10	46	n/a	Oct-Dec 21/22	Q	H	😞 R
Apprentices as a % of the workforce	1.73%	1.92%	0.88%	0.89%		1.13%		1.13%	n/a	n/a	2.3%	n/a	Oct-Dec 21/22	Q	L	😞 R
Town Centre Vibrancy: Town Centre Footfall (millions)	14.90	14.09	7.85	2.31	2.25	2.62		7.18	n/a	2.62	3.5	15.0	Oct-Dec 21/22	Q	L	😞 R
% of Influenceable Council Spend Through Procurement with Local Suppliers (6 Monthly)		38.5%	37.4%	37.1%	40.6%	data due: Feb 2022		38.8%	n/a	n/a	50%	n/a	Oct-Dec 21/22	Q	M	😊 A
Timeliness of Benefits: New Claims	23.46	29.42	19.52	21.23	18.51	28.90		18.5	n/a	n/a	25	n/a	Oct-Dec 21/22	Q	M	😊 A
Timeliness of Benefits: Changes	12.61	9.93	7.76	10.28	7.83	10.80		7.83	n/a	n/a	12	n/a	Oct-Dec 21/22	Q	H	😊 G



Target Outcomes

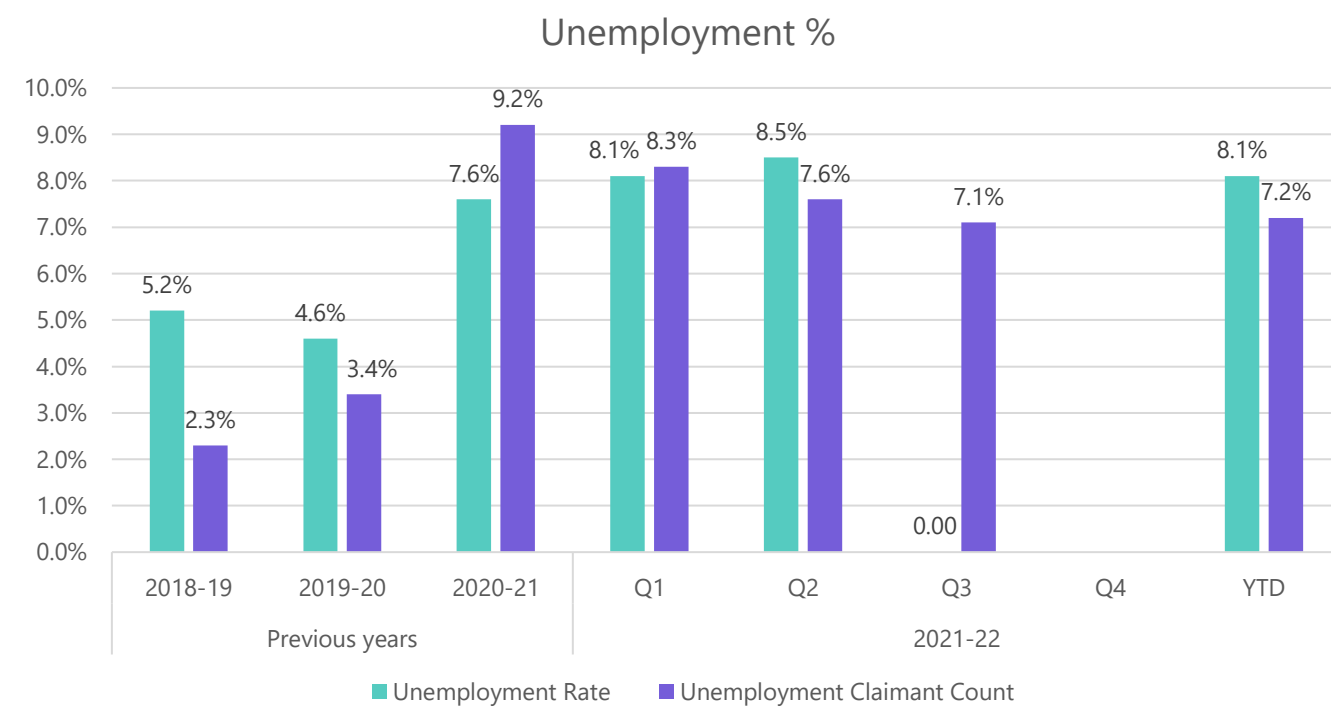
- A skilled workforce that meets the needs of local employers.
- More of our residents in high-value, well-paid jobs within Luton.
- Diversifying our economy by supporting and growing key sectors including the green economy, digital, creative industries, manufacturing and aviation.
- A thriving town centre with the right mix of office, retail, residential and leisure space.
- More money spent locally, with increased social value from the public sector and anchor institutions.



Employment in Luton: No. of Jobs, Labour Force Survey, includes self employed	98600	99000	98500	95900	96500	data due: Apr 2022		96500	n/a	n/a	n/a	n/a	Oct-Dec 21/22	Q	n/a	
Employment in Luton: No. of Jobs BRES	92000	93000	data due: Autumn 2022	annual measure, data published: Autumn 2022					n/a	n/a	n/a		2021/22	A	n/a	
Employment in Luton: Average Salary Luton Workplace Earnings	560.5	578.1	585.1	annual measure, data published: Oct/Nov 2022					n/a	n/a	n/a		2021/22	A	n/a	
Luton Businesses Measures: No. of Businesses	8615	8885	data due: Autumn 2022	annual measure, data published: Oct 2022					n/a	n/a	n/a		2021/22	A	n/a	
Luton Businesses Measures: Business Start Up	1455	1465	data due: Autumn 2022	annual measure, data published: Oct 2022					n/a	n/a	n/a		2021/22	A	n/a	
Aviation, Automotive, Manufacturing & Engineering No. of Jobs	23300	23550	data due: late 2022	annual measure, data published: Autumn 2022					n/a	n/a	n/a		2021/22	A	n/a	
Aviation, Automotive, Manufacturing & Engineering No. of Jobs & Gross Value Added (GVA)	2051	data due: late 2022	data due: 2023	annual measure, data published: 2024					n/a	n/a	n/a		2021/22	A	n/a	

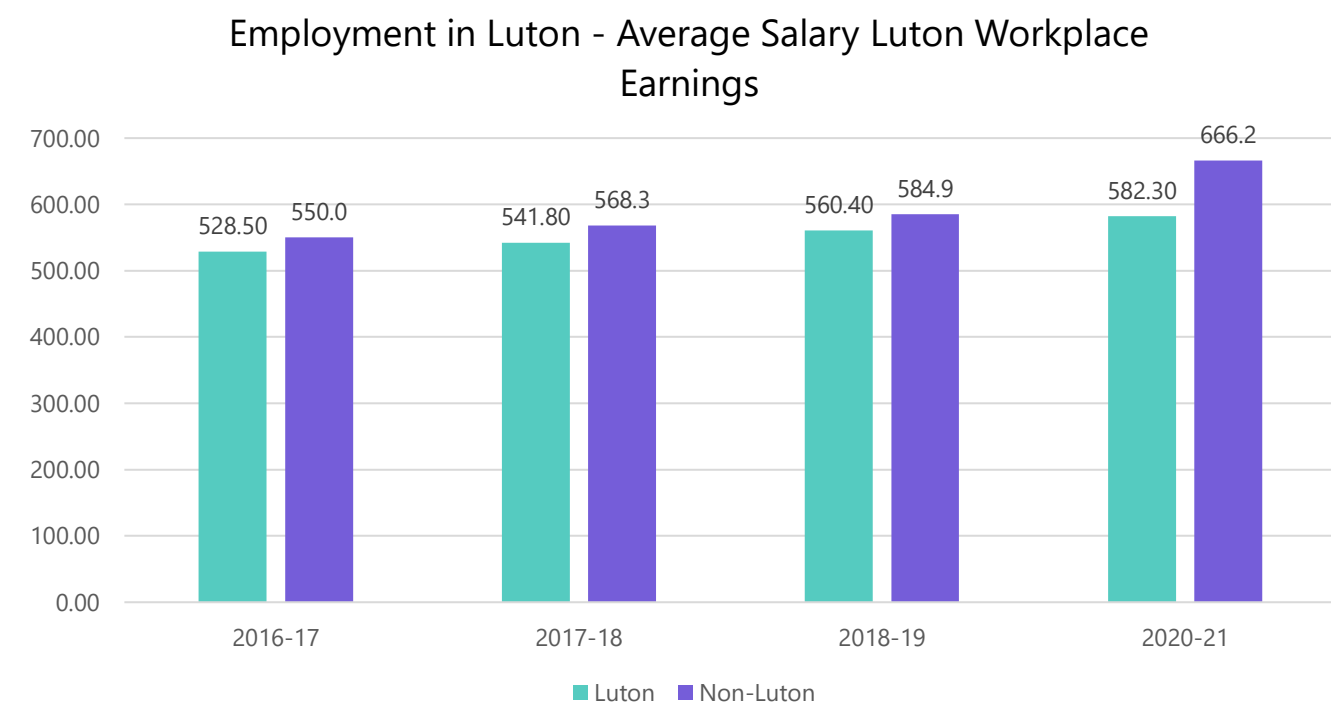


Name of Officer Filling in Commentary:	Michelle Griffin	Date:	25/01/2022
The third quarter has seen a significant improvement in passenger numbers relative to the same period last year. The roll-out of vaccinations against Covid-19 and the subsequent relaxation of restrictions on international travel have been met by a low but perceptible increase in consumer confidence. Although the Christmas period was impacted by the Omicron variant, passenger numbers were better than those for December 2020 and it is hoped that this will continue with the removal of the pre-departure testing for those returning to the UK who are fully vaccinated, and with this it the threat of quarantine other than in one's own home. Q1 Full Figure: (542,000) Q2 Full Figure: (1,850,214) Q3 Full Figure: (1,884,736) YTD Full Figure: (4,276,542)			



Name of Officer Filling in Commentary:	Eddie Holmes	Date:	12/01/2022

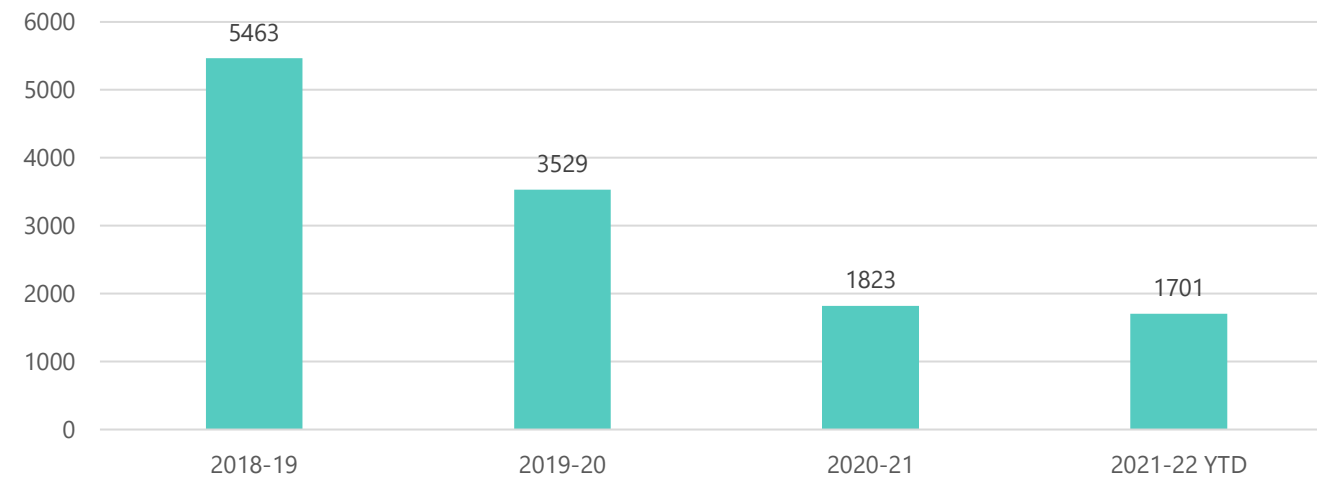
Unemployment in Luton has been severely impacted by the Covid-19 pandemic, with both the Labour Force Survey rate and the claimant count measure well above the national figure. In 2019, the claimant count rate for Luton was 2.3% and is now 7.1% for Quarter 3. The rate peaked at 9.2% in 2021, but has fallen in recent months with the easing of restrictions. The unemployment rate increased from 4.6% in 2020 to the current rate of 8.5% for Quarter 2. Quarter 3 data from the Labour Force Survey will be published by the Office for National Statistics in April 2022



Name of Officer Filling in Commentary:	Eddie Holmes	Date:	12/01/2020

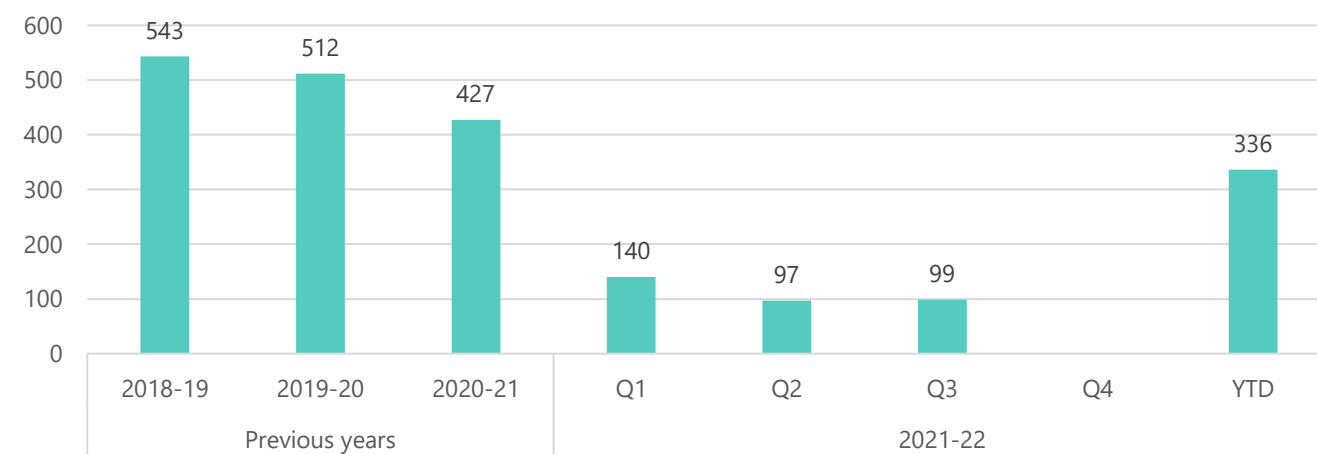
Those who work in Luton but don't necessarily live in Luton have a higher average salary than Luton residents, £666.2 per week compared with £582.3. According to this measure, average salaries increased between 2020 and 2021, although there is the possibility that this was caused by some lower earners dropping out of the labour market.

No. of Learners Enrolled on Adult Learning Courses



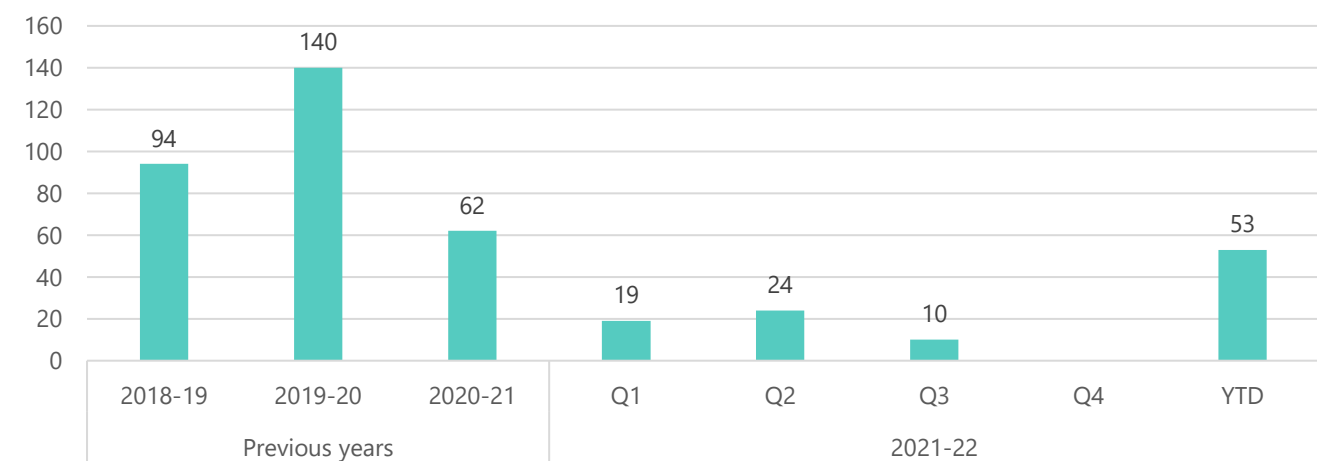
Name of Officer Filling in Commentary:	Merielle James	Date:	07/01/2022
This information is from the ESFA (Education and Skills Funding Agency). It shows all learning deliveries across the ESFA funded provision from 1st August 2021 to date. Adult Learning works in academic years rather than financial years (1st August - 31st July annually).			

No. of People Assisted to Move Closer to the Job Market Through 'Passport to Employment'

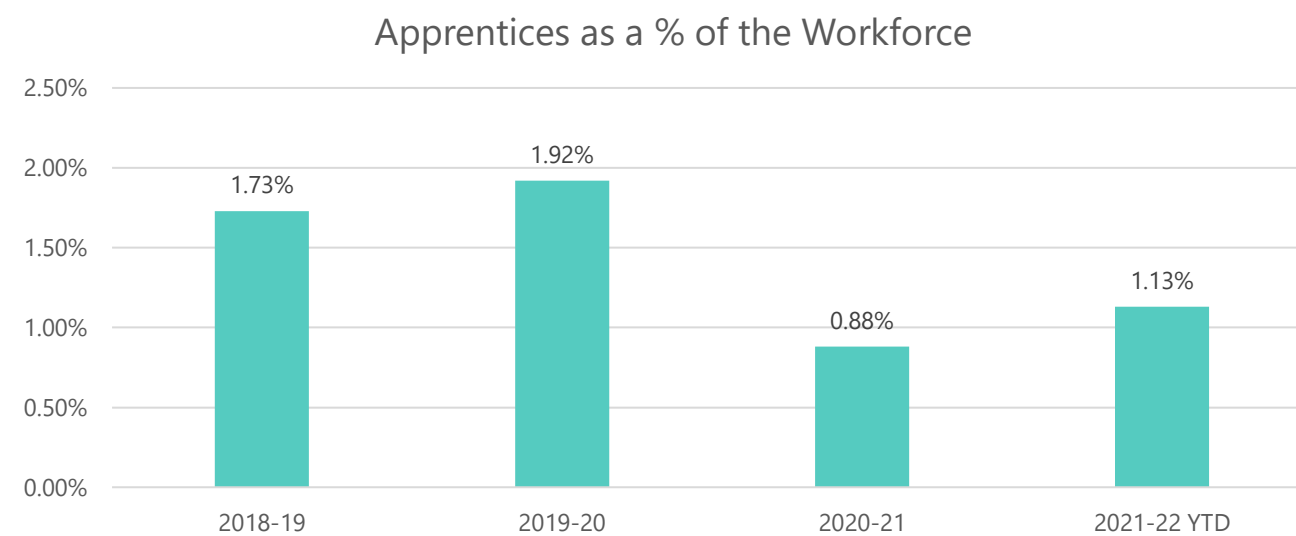


Name of Officer Filling in Commentary:	Martin Stein	Date:	24/01/2022
The numbers of DWP / JCP Universal Credit referrals to Passport to Employment programmes has dropped markedly, with only 2 being made in December 2021. The issue has been raised repeatedly with senior managment at Luton DWP. Furthmore, Passport to the Health Care Sector YTD attendance by referrals is also low at 66% (Passport to Health Sector). YTD completion rates for learners is high at 75% (Passport to Employment) and 69% (Passport to Health Sector).			

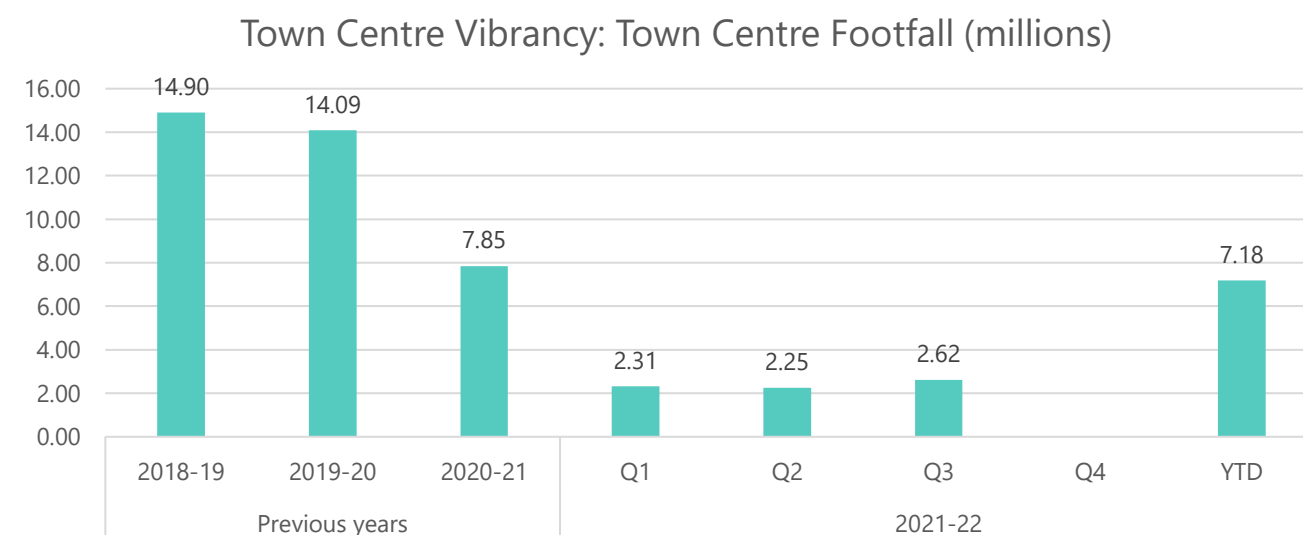
No. of Apprentices Employed by Luton Council



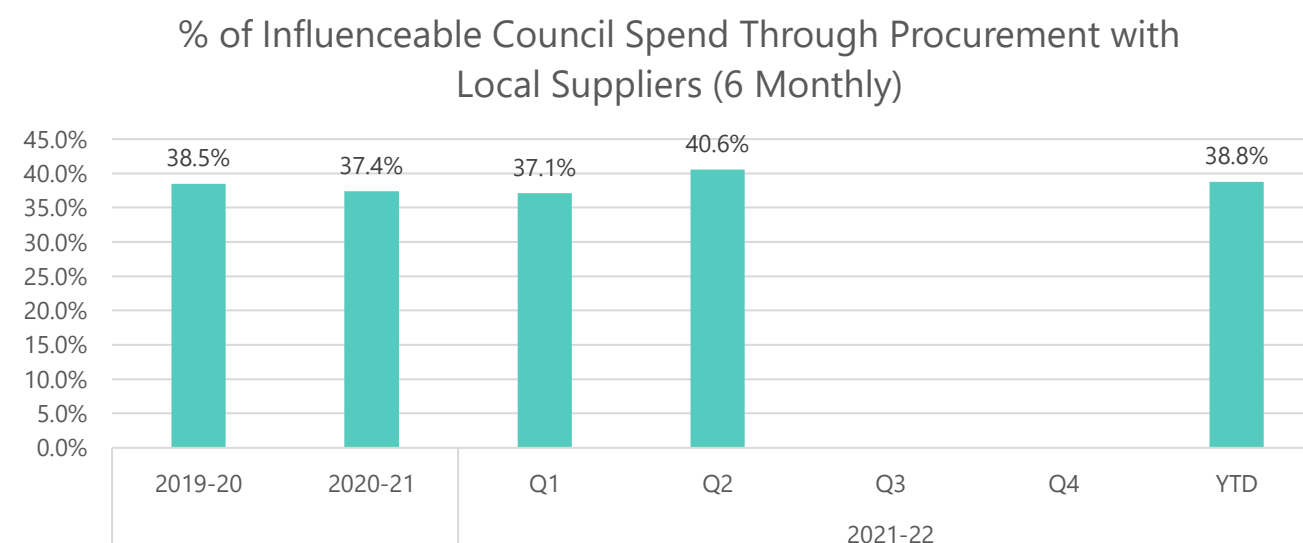
Name of Officer Filling in Commentary:	Martin Stein	Date:	24/01/2022
Apprenticeships last for approximately 12-48 months, depending on level and subject matter, and only a start and end date is recorded for these. The Quarter 3 figure, therefore, equates to the number of apprentice starts recorded between the months of October and December, not the total number of apprentices employed by Luton Council in that time period.			



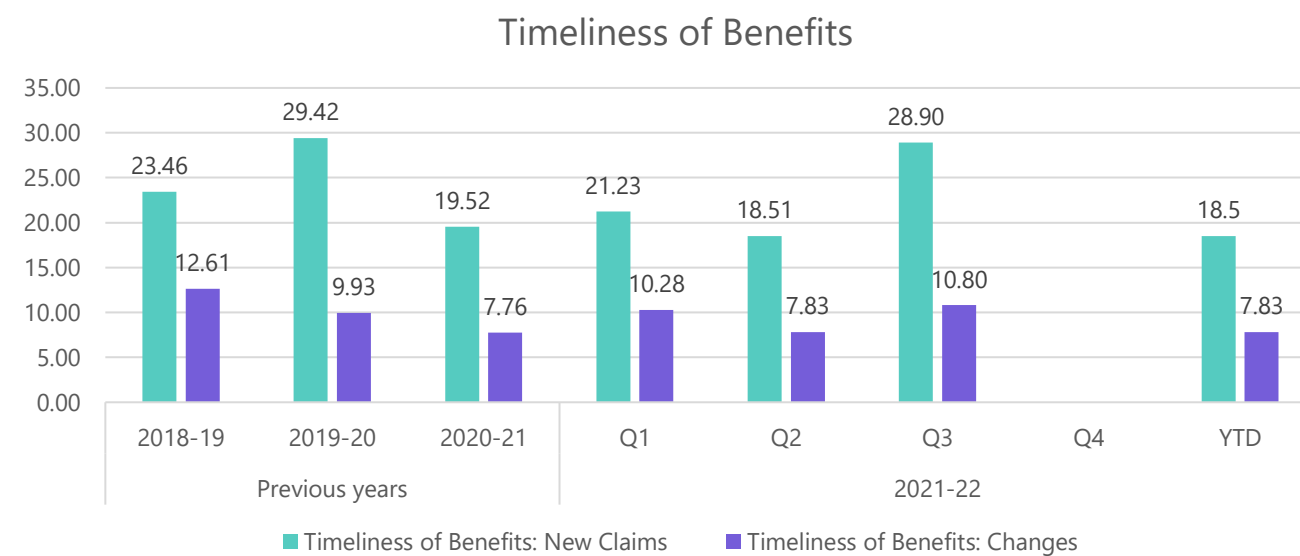
Name of Officer Filling in Commentary:	Martin Stein	Date:	24/01/2022
The Annual Public Sector Target of 2.3% of workforce 2017-2021 has been extended to 2022 by the Government. For 2020/21, Luton council figure of 1% is below the local government sector average of 1.2%. Despite falling back, Luton ranked in the top half of upper and single tier councils for both raw starts and performance against the public sector target.			



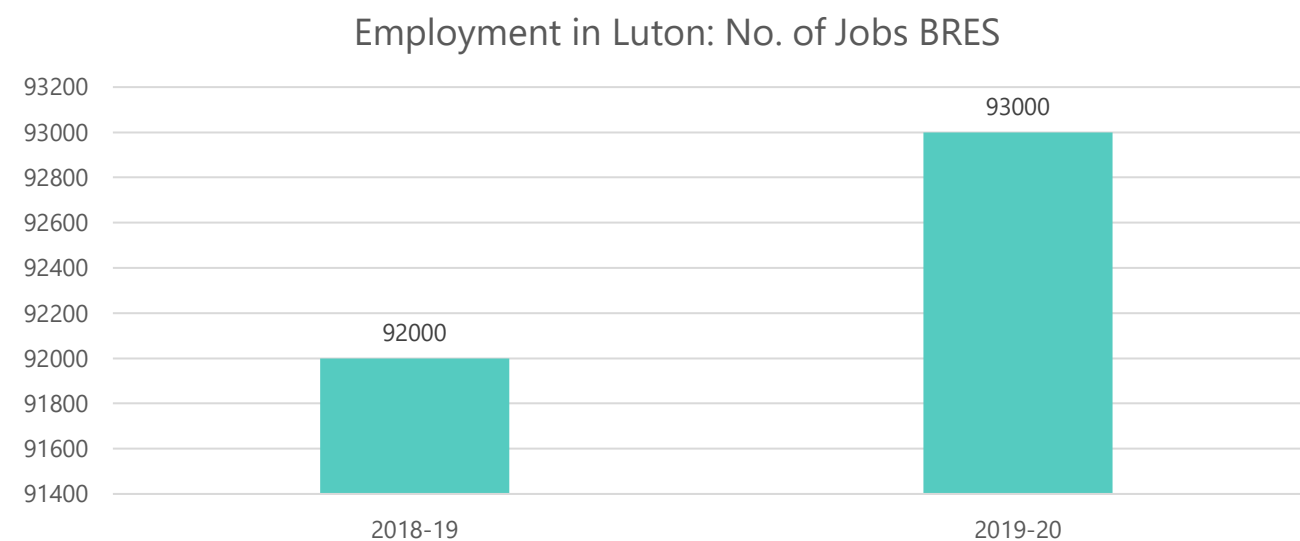
Name of Officer Filling in Commentary:	Eddie Holmes	Date:	12/01/2022
Please note that data for March 2021 and beyond are not directly comparable with previous data because the council changed footfall supplier in March 2021. Footfall had been increasing throughout 2020-21 with the easing of covid restrictions from 2.31 million in Quarter 1 to 2.62 million in Quarter 3. Footfall fell in December 2021 with the growth of the Omicron variant.			



Name of Officer Filling in Commentary:	Freya Griffin	Date:	10/01/2022
9.44% away from target, although this is an increase of 3.46% from Quarter 1. Reasons for not reaching the target include: Limitations of covid (e.g. hosting Meet the Buyer events, speed dating, training sessions for local businesses); Impact of covid and managing emergency procurements to ensure continuity of service; Refresh of local market to understand local suppliers required in light of Covid; Limitation of internal data systems in identifying market classifications (i.e. SME, VCS, BME etc.). Actions being taken to improve performance: Ensure all tenders have at least one local provider invited to bid where possible (i.e. where there is a market in the local area); Work closely with Economic Growth team to reach the local market and engage; Work to deliver training sessions for local, SME and VCS businesses to enable them to submit tender; Support 'speed dating' sessions with local businesses and promote future procurement opportunities; Increase 'Meet the Buyer' events and invite local businesses; Review existing contract data system to understand capability of reporting on local businesses .			



Name of Officer Filling in Commentary:	Nigel Robinson	Date:	12/01/2022
The service experienced a spike in demand towards the end of the third quarter due to the end of the furlough scheme and the implications from the onset of the omicron Covid-19 variant affecting household finances. This volatility had pushed new claim processing beyond target levels in the short term, however it is anticipated that processing times will recover within the coming months as overall benefit claim levels are falling. Again high numbers of changes of circumstances have been received during the third quarter which are prioritised to support customers and to reduce over-payments. These higher levels of activity have reduced performance gains made during the second quarter, but reflect the national situation in recovery from the Covid-19 pandemic.			

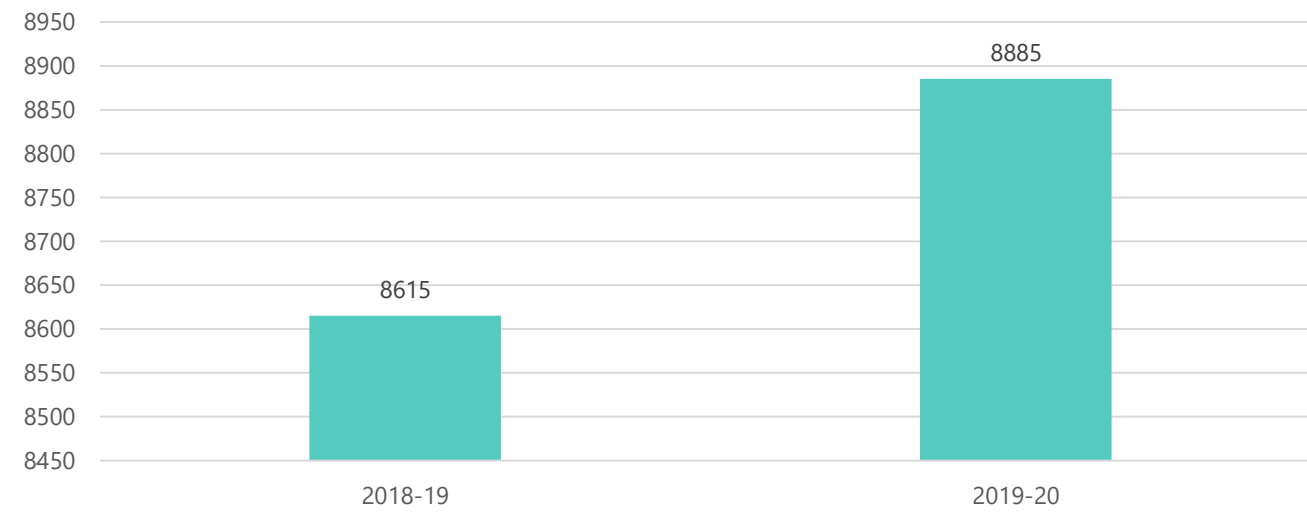


Name of Officer Filling in Commentary:	Eddie Holmes	Date:	12/01/2022
In 2020 there were 93000 employees in Luton which increased from 91,000 in 2019. Data for 2021 will be published in Autumn 2022.			



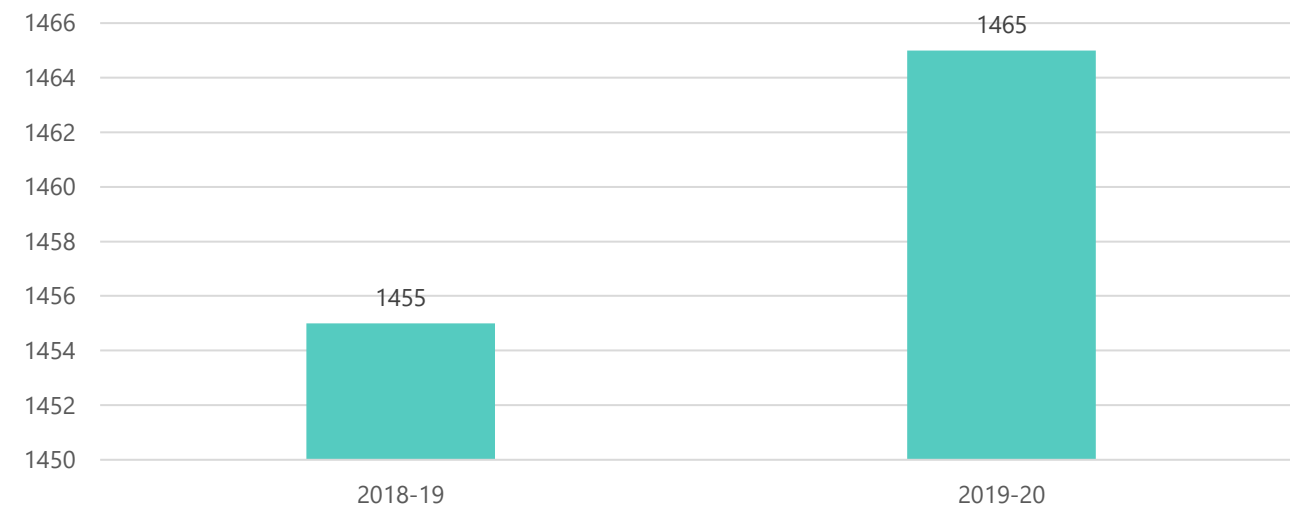
Name of Officer Filling in Commentary:	Eddie Holmes	Date:	12/01/2022
The Labour Force Survey measure of employment, which includes the self employed, recorded a fall in employment from 2019-20 to 2020-21. Employment has risen between 2021-22 Quarter 1 to Quarter 2 from 95,900 to 96,500. Q3 data are scheduled to be published in April 2022 by the Office for National Statistics.			

Luton Businesses Measures: No. of Businesses



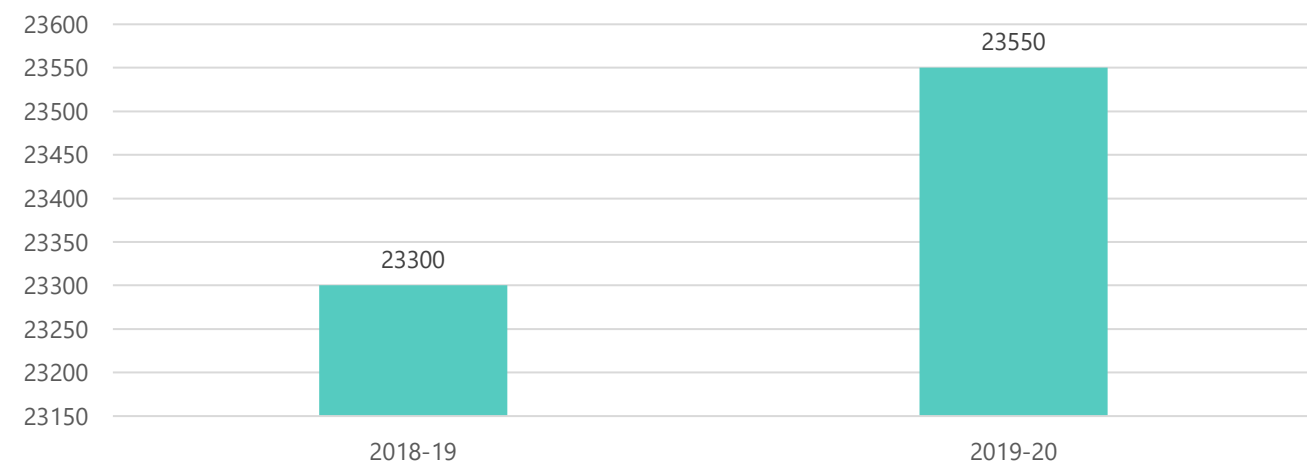
Name of Officer Filling in Commentary:	Eddie Holmes	Date:	12/01/2022
The number of businesses in Luton increased between 2019-2020 from 8615 to 8885. Data for 2021 will be published in late 2022.			

Luton Businesses Measures: Business Start Up



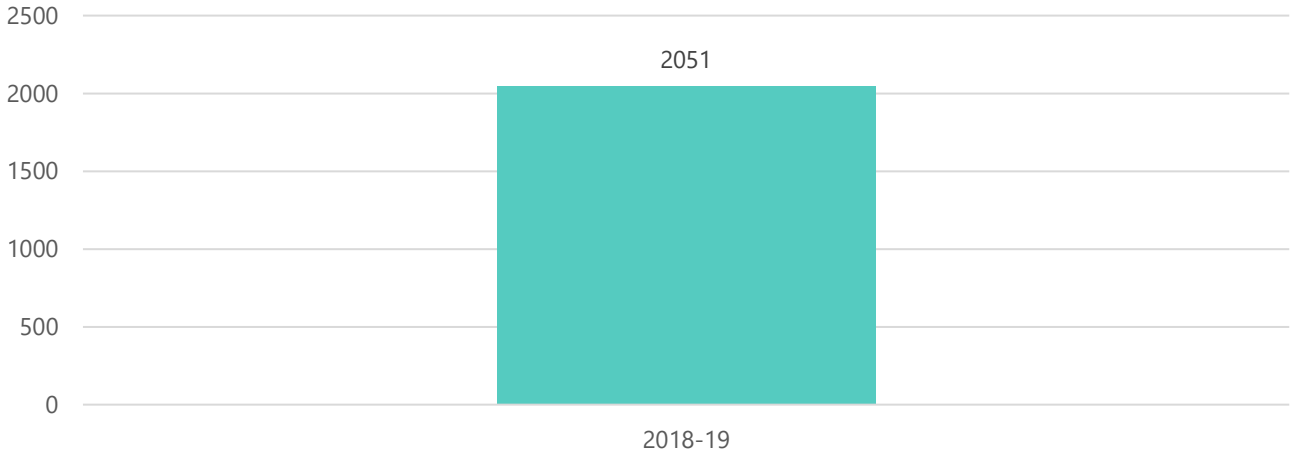
Name of Officer Filling in Commentary:	Eddie Holmes	Date:	12/01/2022
The number of business start ups in Luton was at a similar level in 2019 and 2020. Data for 2021 will be published in late 2022.			

Aviation, Automotive, Manufacturing & Engineering No. of Jobs



Name of Officer Filling in Commentary:	Eddie Holmes	Date:	12/01/2022
The number of jobs in manufacturing, aviation and the car industry was at a similar level in 2019 and 2020. Data for 2021 will be published in Autumn 2022.			

Aviation, Automotive, Manufacturing & Engineering No. of Jobs
& Gross Value Added (GVA)

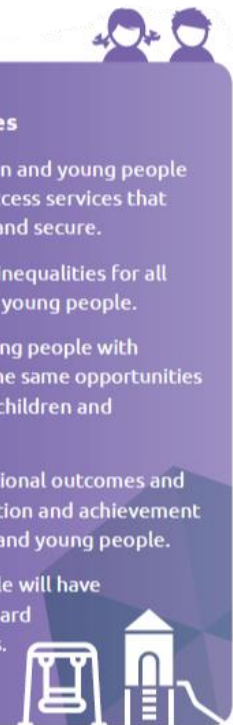


Name of Officer Filling in Commentary:	Eddie Holmes	Date:	12/01/2022
Gross Value Added (GVA) which is a measure of economic activity for the aviation, automotive and manufacturing industries was £2,051 million in 2019. Data for 2020 will be published in 2022.			

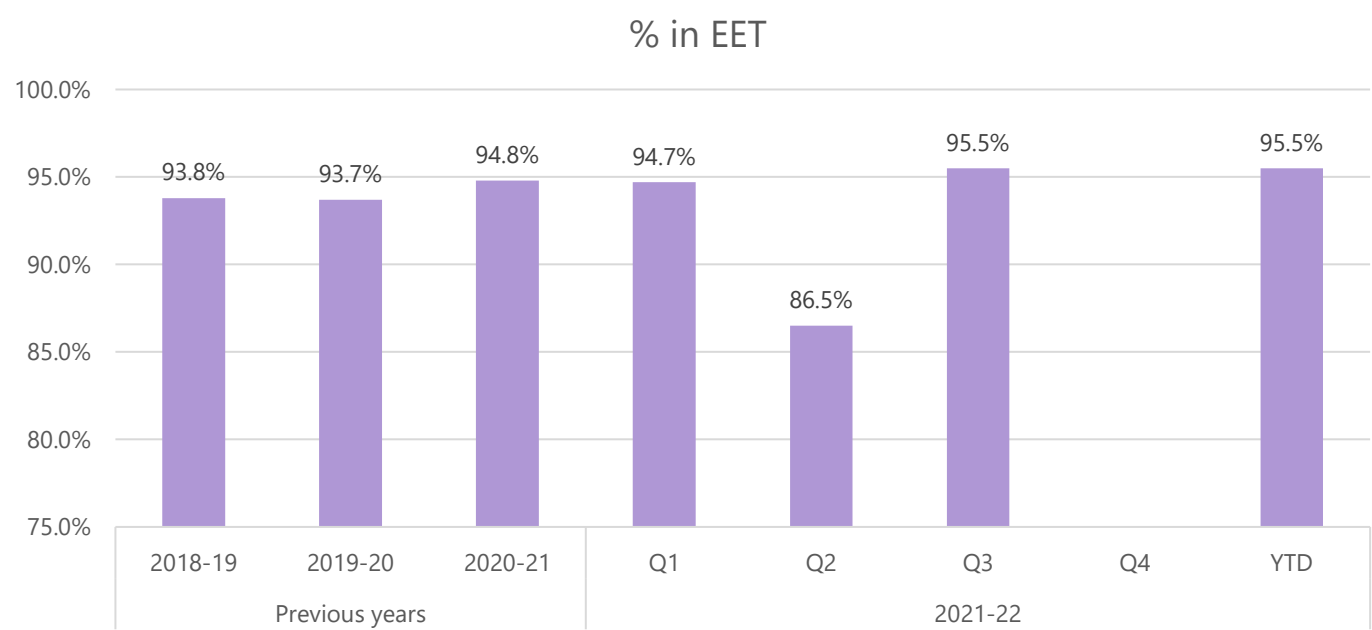
	Previous years			2021-22					Current Quarter (Q3)		Target		Time period	Reporting frequency	Good performance is	Current RAG Status
	2018-19	2019-20	2020-21	Q1	Q2	Q3	Q4	YTD	Numerator	Denominator	Qtrly	Annual				
% in EET (16-18 years)	93.8%	93.7%	94.8%	94.7%	86.5%	95.5%		95.5%	n/a	n/a	n/a	n/a	Oct-Dec 21/22	Q	n/a	
No. in EET (16-18 years)	4828	4894	5078	5118	4877	5378		5378	n/a	n/a	n/a	n/a	Oct-Dec 21/22	Q	n/a	
No. of First Time Entrants in YOS (rate per 100,000)	184	145	134	139	139	143		143	n/a	143	n/a	n/a	Oct-Dec 21/22	Q	n/a	
No. of Social Care Referrals	2455	2890	3247	706	1330	1917		1917	n/a	1917	n/a	n/a	Oct-Dec 21/22	M	n/a	
No. of Newly Approved Foster Carers	16	13	21	2	2	7		11	n/a	7	n/a	25	Oct-Dec 21/22	Q	L	R
No. of Children With an EHCP	1728	1896	1949	1942	1957	2067		2067	n/a	2067	n/a	n/a	Oct-Dec 21/22	Q	n/a	
% of EHCP Issued Within 20 Weeks, Excluding Exceptions (academic ytd)	58.7%	63.6%	68.4%	68.0%	21.1%	65.9%		65.9%	70	134	90.0%	90.0%	Oct-Dec 21/22	Q	L	R
% Attendance in Primary Schools (published dfe data which is published in arrears)	95.8%			96.3%				96.3%					Autumn and Spring Term 2021	Termly	H	G
% Attendance in Secondary Schools (published dfe data which is published in arrears)	94.5%			96.1%				96.1%					Autumn and Spring Term 2021	Termly	H	G
No. of Children and young people who are neither on school roll nor being educated elsewhere in Luton (term to date)		12	4	2	5	18		18	n/a	n/a	n/a	n/a	Academic ytd	Q	L	
No. of pupils currently registered to Elective Home Education (academic ytd)	223	251	371	374	384	366		366	n/a	n/a	n/a	n/a	Academic ytd	Q	n/a	
No. of pupils permanently excluded (academic ytd)	51	26	31	31	1	11		11	n/a	n/a	n/a	n/a	Academic ytd	Q	L	
% of CYP Who are Classified as NEET & Have an Education, Health & Care Plan (16-18 years)				6.5%	3.4%	3.4%		3.4%	8	232	n/a	n/a	Oct-Dec 21/22	Q	n/a	
No. of CYP Who are Classified as NEET & Have an Education, Health & Care Plan (16-18 years)				12	8	8		8	n/a	n/a	n/a	n/a	Oct-Dec 21/22	Q	n/a	
% of Children Attending Good & Outstanding Schools (primary, secondary and special)	69.4%	77.4%	77.4%	77.4%	77.3%	79.7%		79.7%	3	3	87.0%	87.0%	Oct-Dec 21/22	Q	H	A

Target Outcomes

- All of our children and young people will be able to access services that keep them safe and secure.
- Reduced health inequalities for all our children and young people.
- Children and young people with SEND will have the same opportunities as non-disabled children and young people.
- Excellent educational outcomes and increased aspiration and achievement for our children and young people.
- Our young people will have a voice that is heard and that matters.



Rate of Proven Re-Offending	39.8%	25.0%	37.0%	annual measure, data published: May 2022	n/a	n/a	n/a	2021/22	A	n/a	
Prevalence of Obesity Among Children: Reception Yr	11.7%	10.9%	data due: Mar 2022	annual measure, data published: Dec 2022	n/a	n/a	10.0%	2021/22	A	L	☹️R
Prevalence of Obesity Among Children: Yr 6	25.9%	27.0%	data due: Mar 2022	annual measure, data published: Dec 2022	n/a	n/a	20.0%	2021/22	A	L	☹️R
Attainment: KS2 RWM (at expected & above)	61.0%			annual measure, data published: Sept 2022 (provisional), Dec 2022 (final)	n/a	n/a	65.0%	2021/22	A	H	😊G
Attainment: KS4 Maths & English Level 5+	37.6%	43.3%	44.2%	annual measure, data published: Sept 2022 (provisional), Dec 2022 (final)	n/a	n/a	n/a	2021/22	A	n/a	

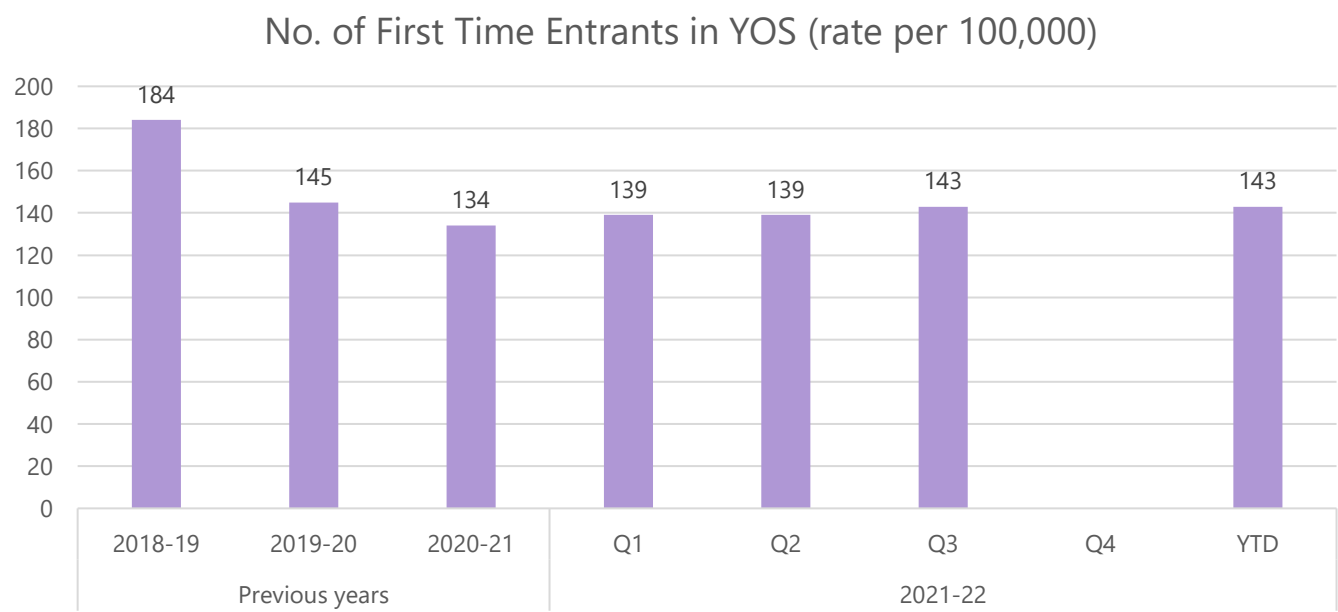


Name of Officer Filling in Commentary:
Sajda Rauf/Pam Crawley
Date:
10/01/2022

Luton Participation rate in December 2021 is at 95.5% up by 9% compared to the Quarter 2 figure. Compared to last year figure of 94.3% we are up by 1.2%. There is no indication from the current participation data if Covid-19 has presented significant challenges to young people, however, closer scrutiny of future predictions will need to include how economic and education disruptions on the young people might impact on participation during this academic year.

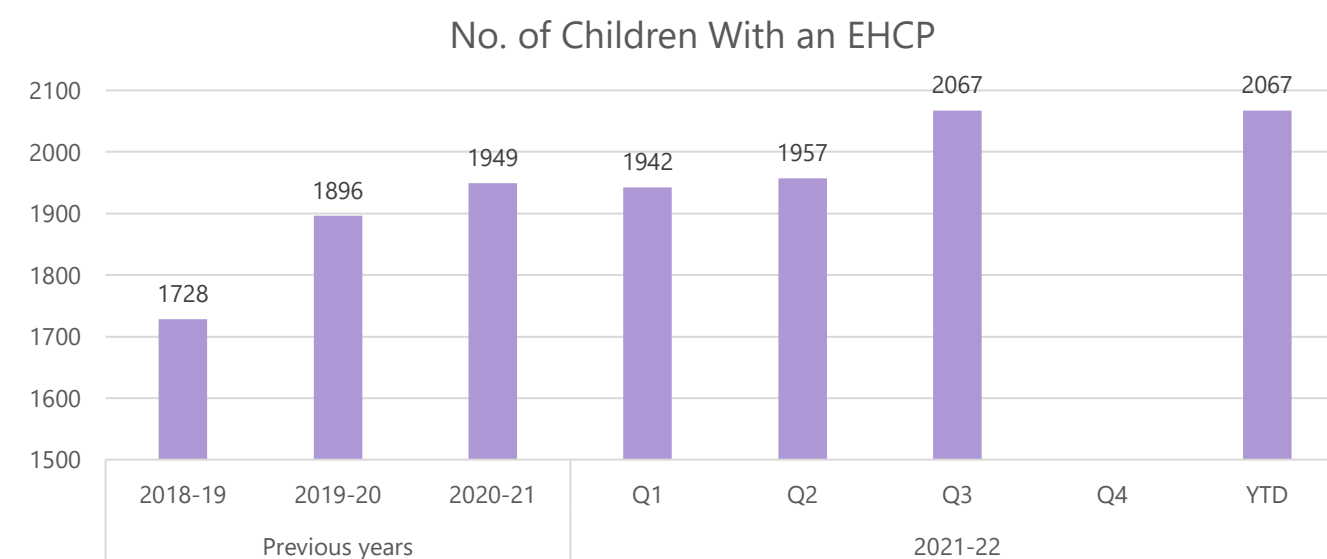
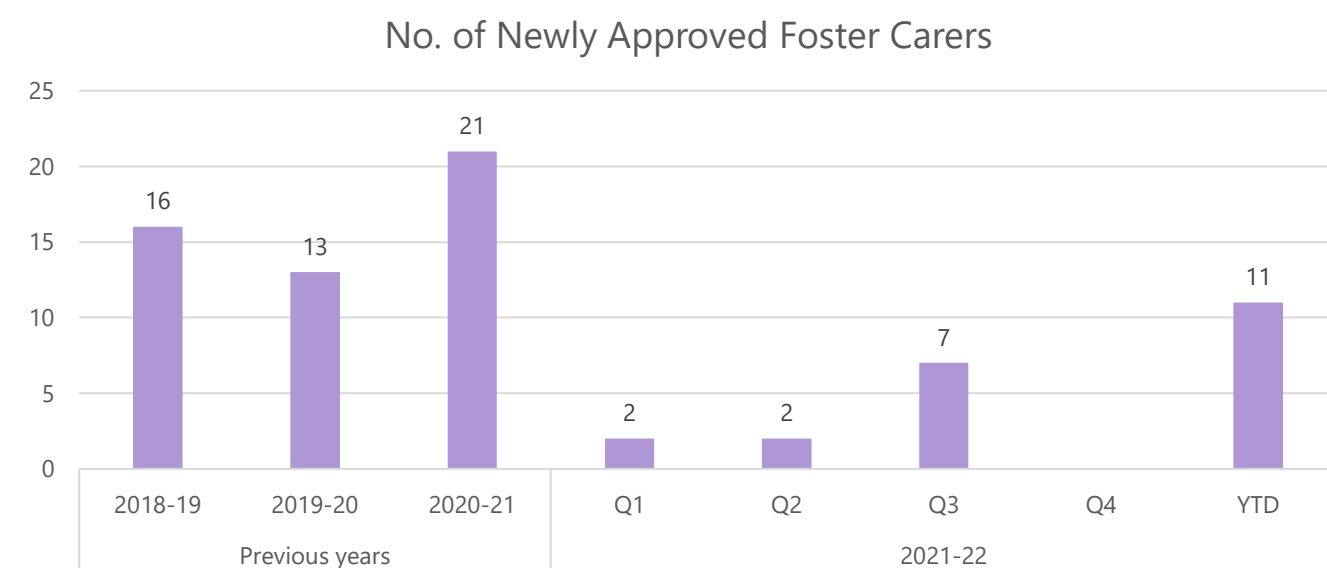
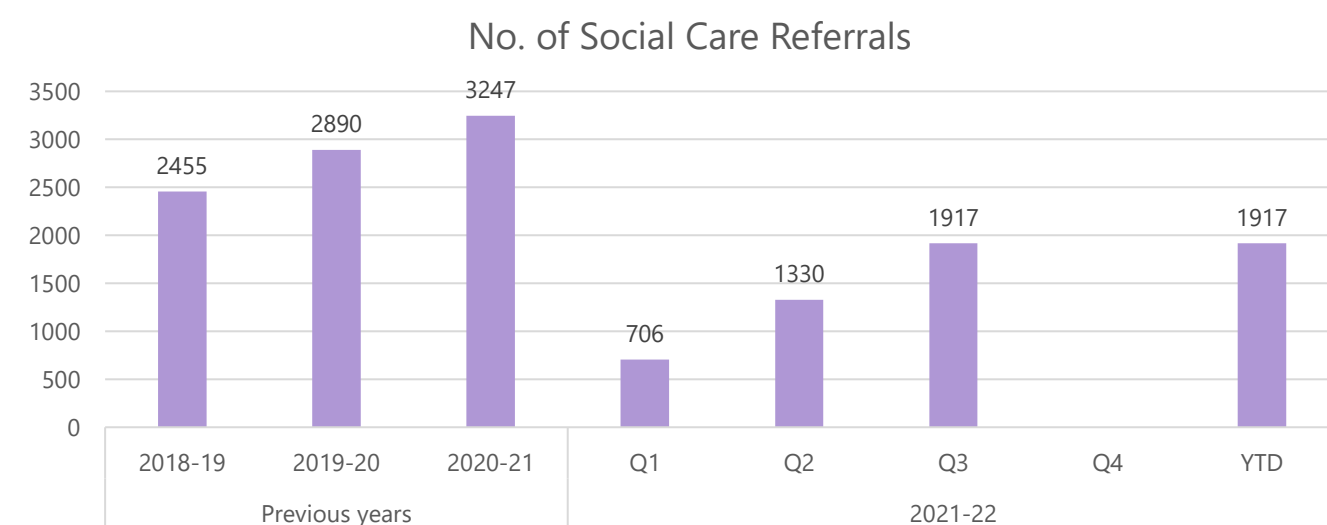
Key discussions with Luton Virtual School Head about their NEET Strategy and activities/ programmes to support LAC and Care Leavers into positive destinations. Introductions made to Strive training and their employability skills boot camp initiative. Also connecting with Jobcentre plus, building those connections that can provide extra support. Continuation of working collaboratively with the Pupil Referral Unit and the Alternative Providers in given them a programme of interventions and activity that supports their Year 11 learners make informed choices about their next steps and to increase sustained destinations.

PTB continues to focus on providing access to the right provision in terms of learner demand and local labour market and skill needs and how to address the transition between Key Stage 4 to 5.



Name of Officer Filling in Commentary:
Troy Hutchinson
Date:
18/01/2022

There has been a minor in year-rise that is typical at this stage of the year and uplift equates to two young persons; LYOS activity in the final period remains to monitor rather than intervene. Comparison to national thresholds continues to reflect positively on local strategies working to identify early, engage and seek to divert young people where appropriate.

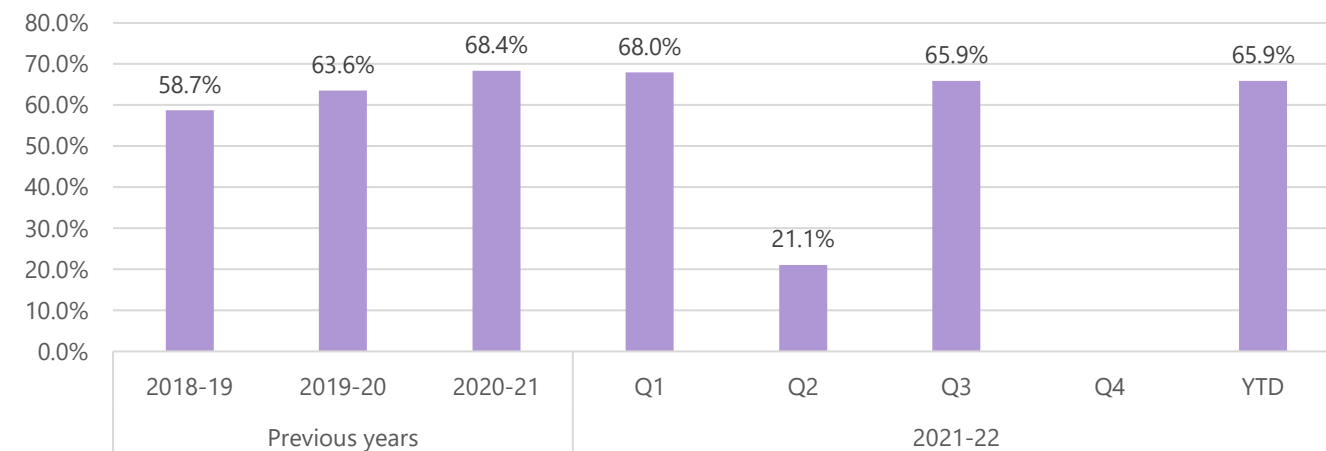


Name of Officer Filling in Commentary:	Diane Rushby	Date:	17/01/2022
Referrals have reduced and is expected to be 20% lower by end of year March 2022 to that of March 2021 (3247). On a positive note: the service are currently on track to having a better rate per 10,000 population of 440.1 position than the statistical neighbour (591.4) and England average (494.3). Referrals ending in no further action are non-existent. Equally, referrals to the Family Partnership Service have increased, which demonstrates that professionals are providing the right service at the right time and preventing social care issues from escalating to the point where statutory intervention is required. Operation Encompass – scheme to speed up the rate of response for domestic violence cases following police referral in transferring low/medium risk cases to be dealt directly by schools. This means less MASH contacts coming from police into the MASH. The MASH have also become more robust in respect of gaining consent from parents/carers to enable CSC to intervene. If the service does not gain consent and the child is not at risk of significant harm then the service will not progress the contact to a referral.			

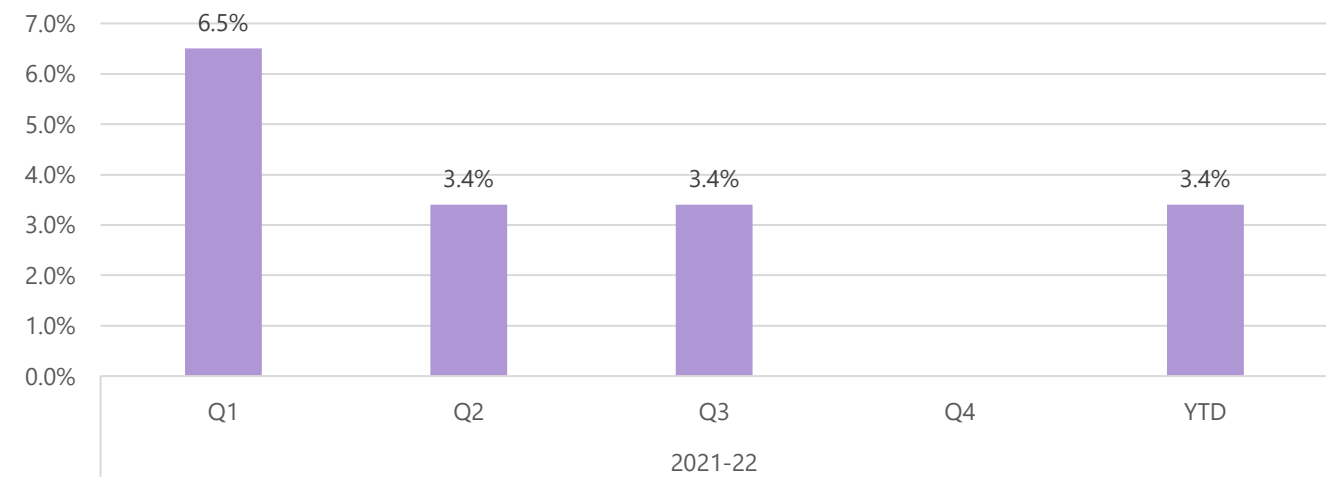
Name of Officer Filling in Commentary:	Teresa Gallagher	Date:	18/01/2022
Luton has approved a further 7 carers in Quarter 3, resulting in 11 new carers to date, with a target of 25. The main barrier to recruitment been the pandemic because the range of usual events and activities around recruitment has been limited. The service believe improvements will build gradually from January onwards. The service had planned the annual foster carer award live event in December 2021, but due to the rise in Omicron it was decided to post-pone it. The annual event is to acknowledge the commitment of our foster carers, and this goes a long way to improve retention. 7th and 8th January - the service presented a fostering service promotion stall at the Milton Keynes Job Fair. This undoubtedly yield enquiries and hopefully progress to recruitment of carers.			

Name of Officer Filling in Commentary:	Francesca Cannarella	Date:	01/02/2022
Methodology: Data is captured through the Capita One System and published monthly. Yearly data refers to Academic Years. The number of referrals for statutory assessment have increased significantly since 2018/2019. This is in line with National trends and neighbouring authorities. The number of pupils issued with an Education Health and Care plan has also increased. Covid 19 also had a significant impact on this increase, which is supported by schools and has been subjectively observed by panel and reported by schools. However it is too early to establish whether this is statistically significant over time, but it would appear that access to education and SEMH needs have increased.			

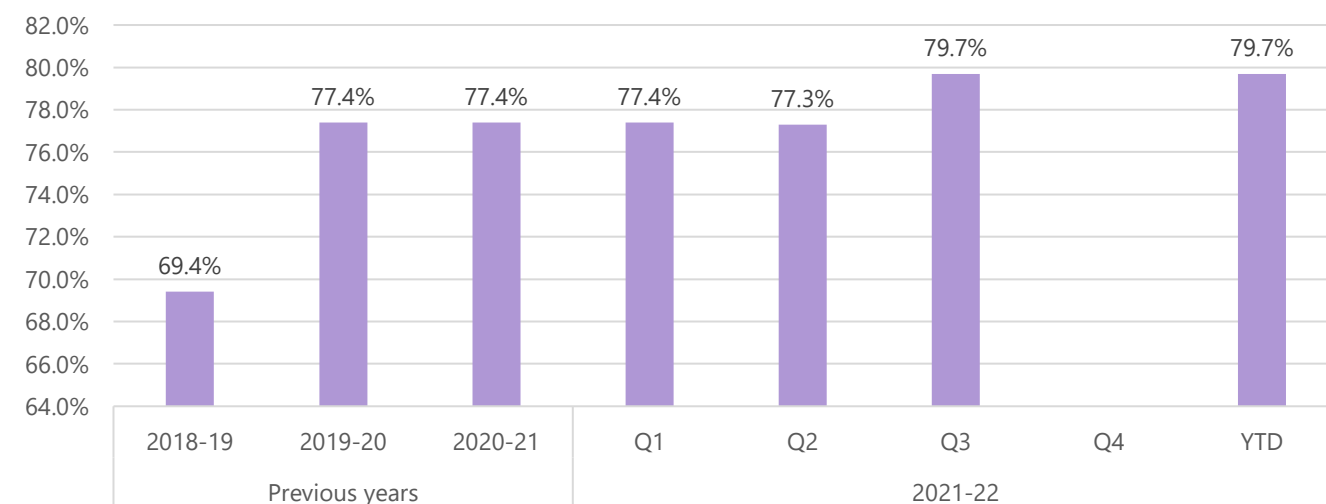
% of EHCP Issued Within 20 Weeks, Excluding Exceptions
(academic ytd)



% of CYP Who are Classified as NEET & Have an Education,
Health & Care Plan (16-18 years)



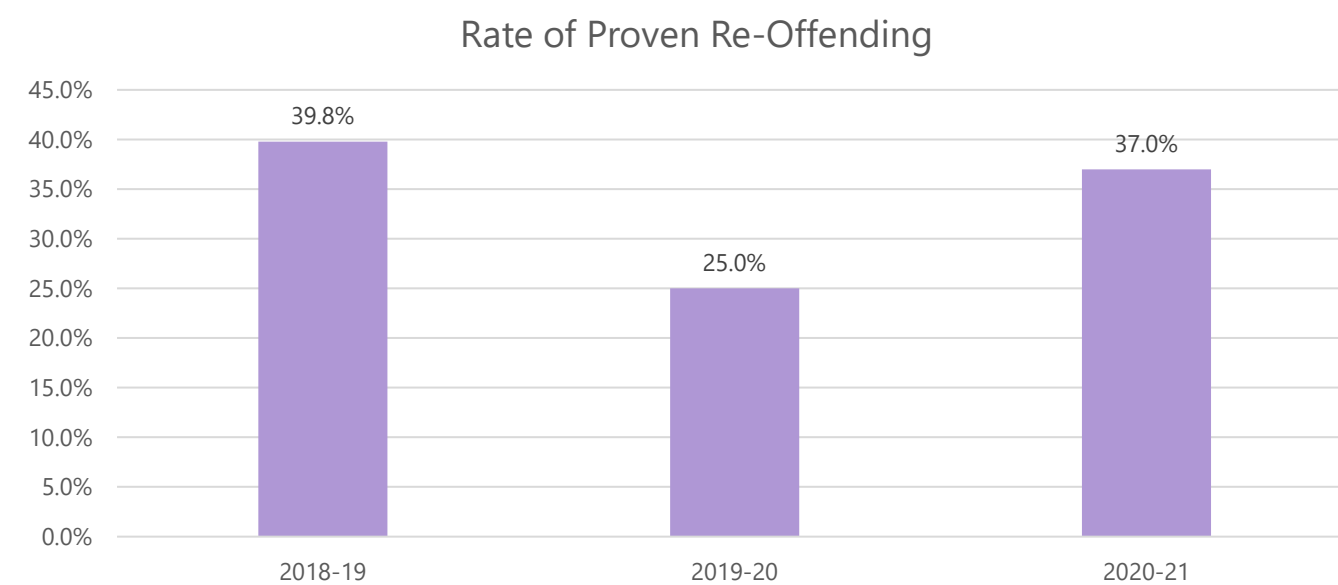
% of Children Attending Good & Outstanding Schools (primary,
secondary and special)



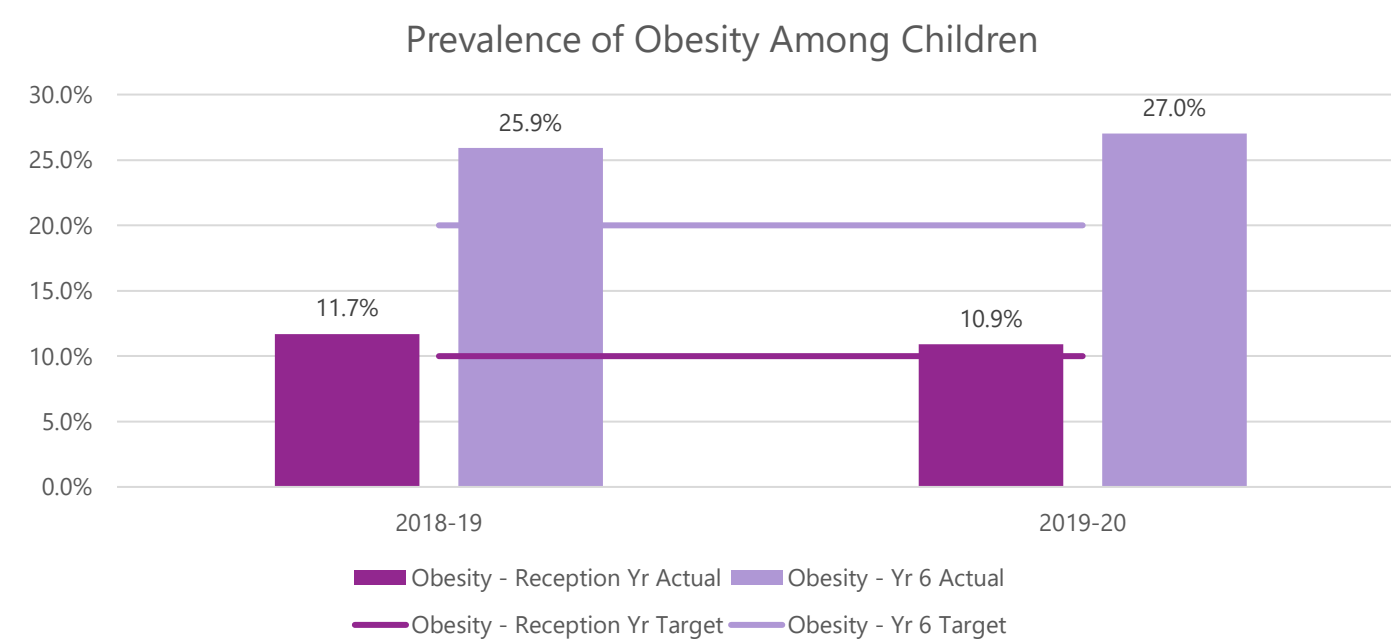
Name of Officer Filling in Commentary:	Francesca Cannarella	Date:	01/02/2022
Methodology - Data is captured from Capita One and published monthly. Quarterly data is reported cumulatively and yearly data refers to the end of the academic, rather than the financial year. The SEND Code of Practice 2015 stipulates that an Education, Health and Care Plan should be issued within 20 weeks. Exceptions to this are covered by The SEND Regulations clause 5.4, 10.4 and 13.3. as requested advice from a setting or responsible for the child not being available for a continuous period of 4 weeks and exceptional circumstances affecting the child or the child's parent/carer.			

Name of Officer Filling in Commentary:	Natasha Vaughan/Pam Crawley	Date:	01/10/2022
Year 12 /13 SEND NEET for Quarter 3 has held steady at 3.4%, the same as in Quarter 2. Comparatively, Quarter 2 2020 reported 5.3%. Of a cohort of 232 8 YP are currently NEET. Of these, 2 are classified as 'not yet ready for work', 4 actively seeking employment, education or training with 2 'not available to the labour market due to illness'. NEET by ethnicity shows White at 62.5%, followed by Asian at 25%, Not Obtained 12.5%. Male and Female NEETS are split equally. As previously reported SEND NEET remains low due to the increase in local provision and the robust transition planning of the LDD Personal Advisers. This has created opportunities and aided the retention of YP with more challenging behavioural issues that were traditionally harder to place. LDD PAs continue to support YP to sustain their EET destinations whilst providing advice, guidance and re-engagement opportunities to those NEET available to the labour market.			

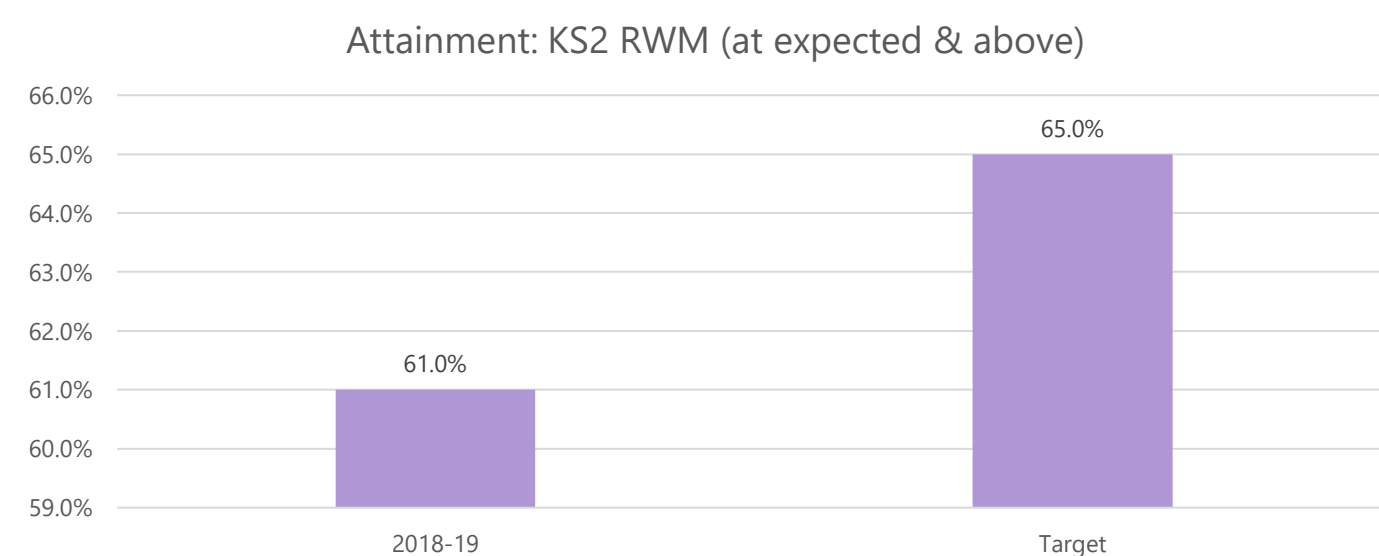
Name of Officer Filling in Commentary:	Sharon Smith/Caroline Dawes	Date:	17/01/2022
Increasing the proportion of good and outstanding schools indicator remains a service priority and the School Improvement Team have robust plans to continue to work alongside head teachers and governors to improve the situation. Luton's schools are large when compared with the national average and as a result changes to the Ofsted outcomes for a few schools can have a significant impact on data both positively and negatively			



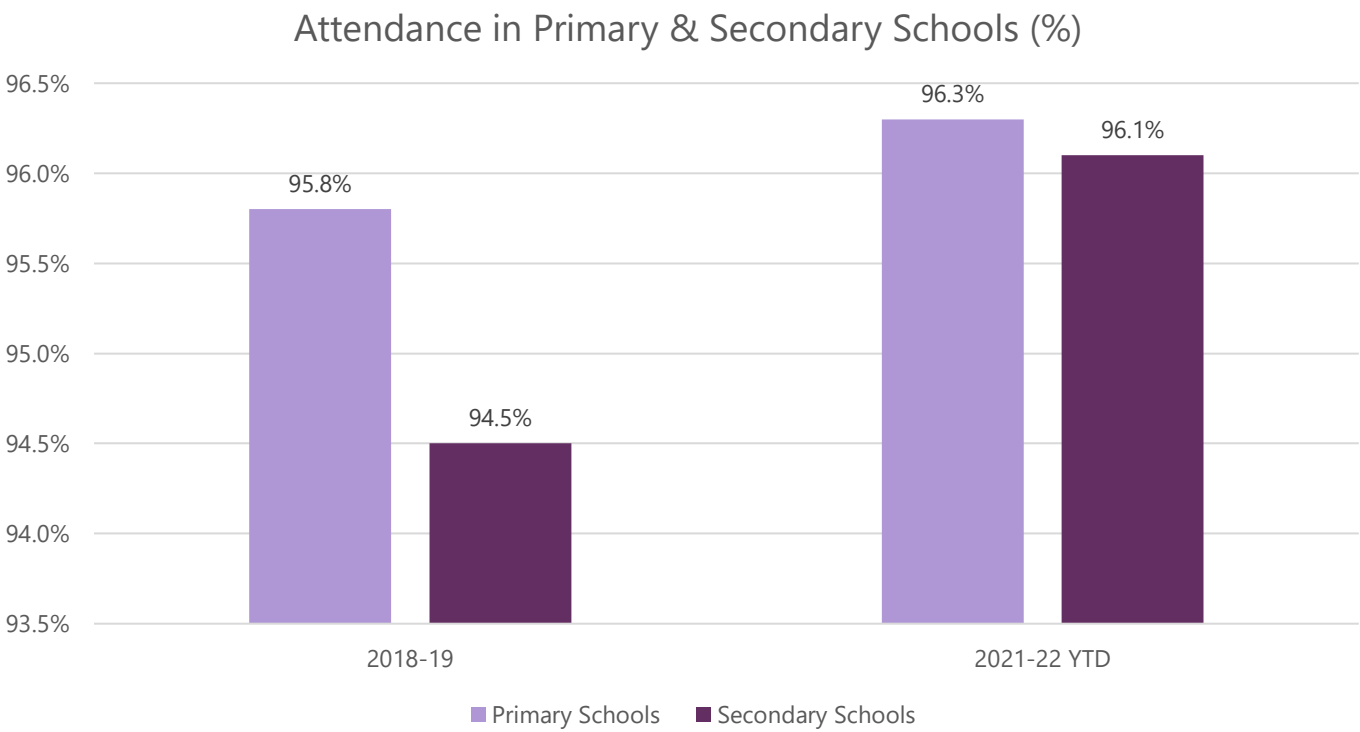
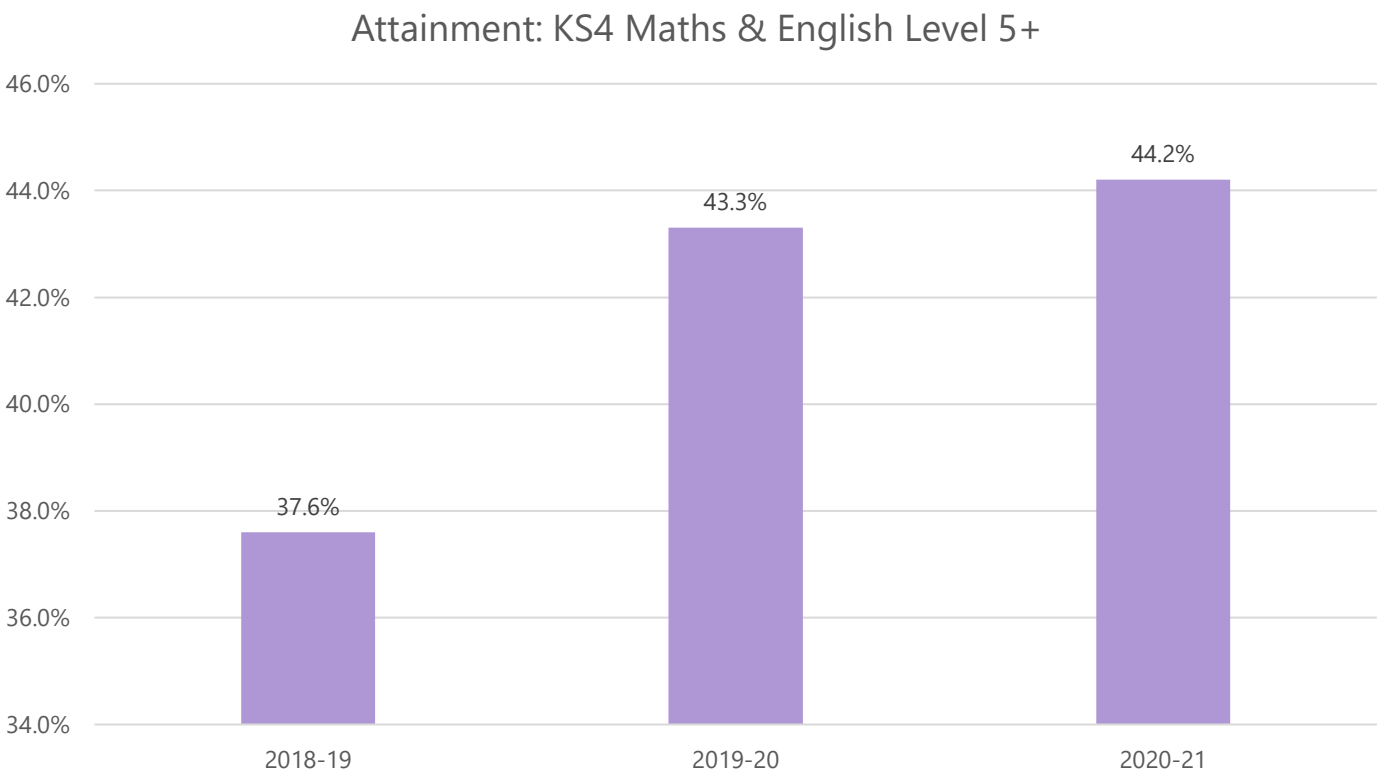
Name of Officer Filling in Commentary:		Date:	
Annual measure. Commentary will be provided in Quarter 4 2021/22.			



Name of Officer Filling in Commentary:		Date:	
Annual measure. Commentary will be provided in Quarter 4 2021/22.			



Name of Officer Filling in Commentary:	Sharon Smith/Caroline Dawes	Date:	17/01/2022
Confirmed results for the past two academic years were not published by DfE due to the Covid-19 pandemic.			



Name of Officer Filling in Commentary:	Sharon Smith/Caroline Dawes	Date:	17/01/2022

Methodology - data source is DfE (<https://explore-education-statistics.service.gov.uk/find-statistics/key-stage-4-performance-revised/2020-21>). KS4 qualifications are based on centre assessed grades for 2020 and 2021 and not terminal exams as in previous years.

Name of Officer Filling in Commentary:	Donna Pain/Julia Jack	Date:	09/02/2022

This data includes the term that schools were in lockdown from 1 January to 8 March 2021 and it shows published attendance figures for primary and secondary combined are equal with national average.

Alongside this, the percentage of sessions recorded as not attending in circumstances related to Coronavirus was much higher than the national average which is not counted as a possible attendance in the final figure. Luton children have attended school on average less than the average child in England. Primary children lost 30% due to covid (26% national av), Secondary children lost 42% (34%) and Special school children lost 18% (15%).

Reducing Net Carbon Emissions

(Reducing our net carbon emissions to meet our long-term goal to be a carbon neutral town)

	Previous years			2021-22					Current Quarter (Q3)		Target		Time period	Reporting frequency	Good performance is	Current RAG Status
	2018-19	2019-20	2020-21	Q1	Q2	Q3	Q4	YTD	Numerator	Denominator	Qtrly	Annual				
Tree Canopy Cover in Luton (Hectares)		66.00	66.00	5 yearly basis (2022 next date)					n/a	n/a	n/a		not yet confirmed	5Y	n/a	
% of Local Sites Where Positive Conservation Management Has Been or is Being Implemented	64%	64%		annual measure, data published: not yet confirmed					14	22	14		2021/22	A	H	😊 G
No. of Rail Passengers to Luton Station (Thousands)	638.6	666.3	data due: Nov 2022	annual measure, data published: Nov 2022					n/a	n/a	n/a		2021/22	A	n/a	
Rate of Cycling & Walking, Residents Taking a Journey at Least Once a Week	61.4%	data due: Sept 2022	data due: Sept 2022	annual measure, data published: Sept 2022					n/a	n/a	n/a		2021/22	A	n/a	

Target Outcomes

- Reduced net carbon emissions from organisations and households.
- Better air quality enjoyed by people across Luton.
- A greener transport network that supports employment and increased use of sustainable travel across Luton.
- Increased walking and cycling by residents, workers and visitors in the town.
- The most sustainable airport in the UK.



Name of Officer Filling in Commentary:

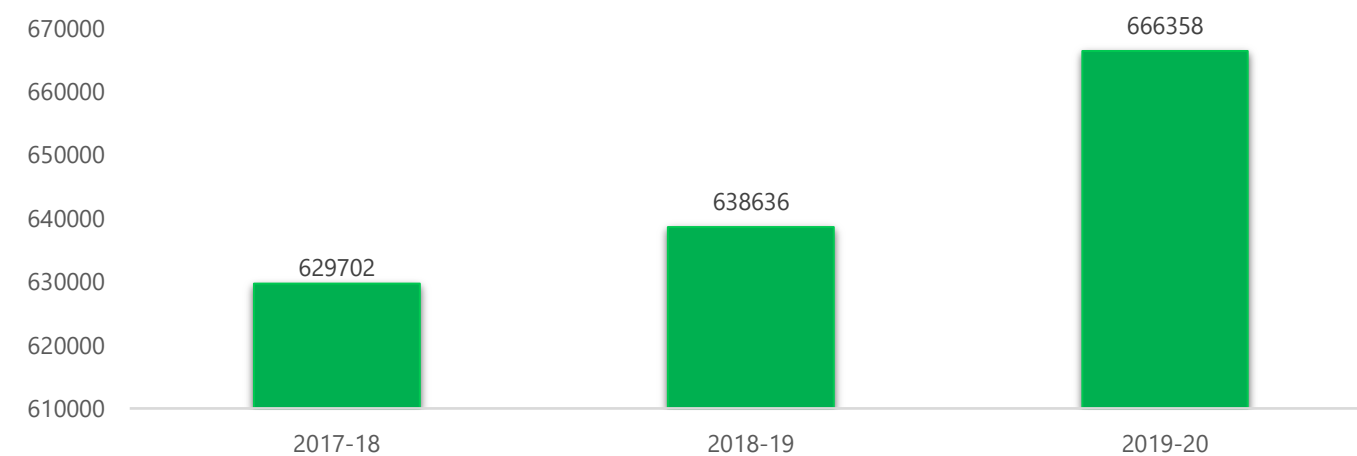
Jane Conway

Date:

10/05/2021

Tree canopy cover is measured on a 5-yearly basis via an external audit utilising I-Tree eco methodology. The next report is due 2022.

No of Rail Passengers to Luton Station



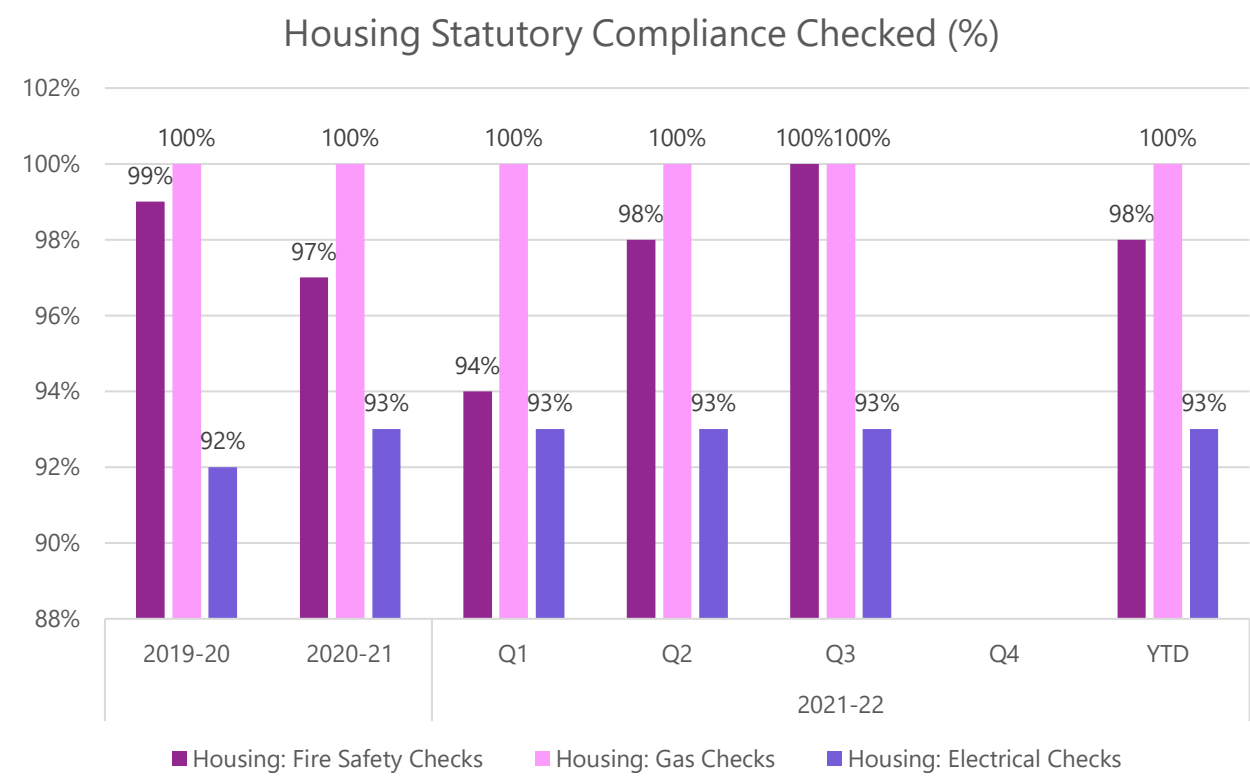
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Date:

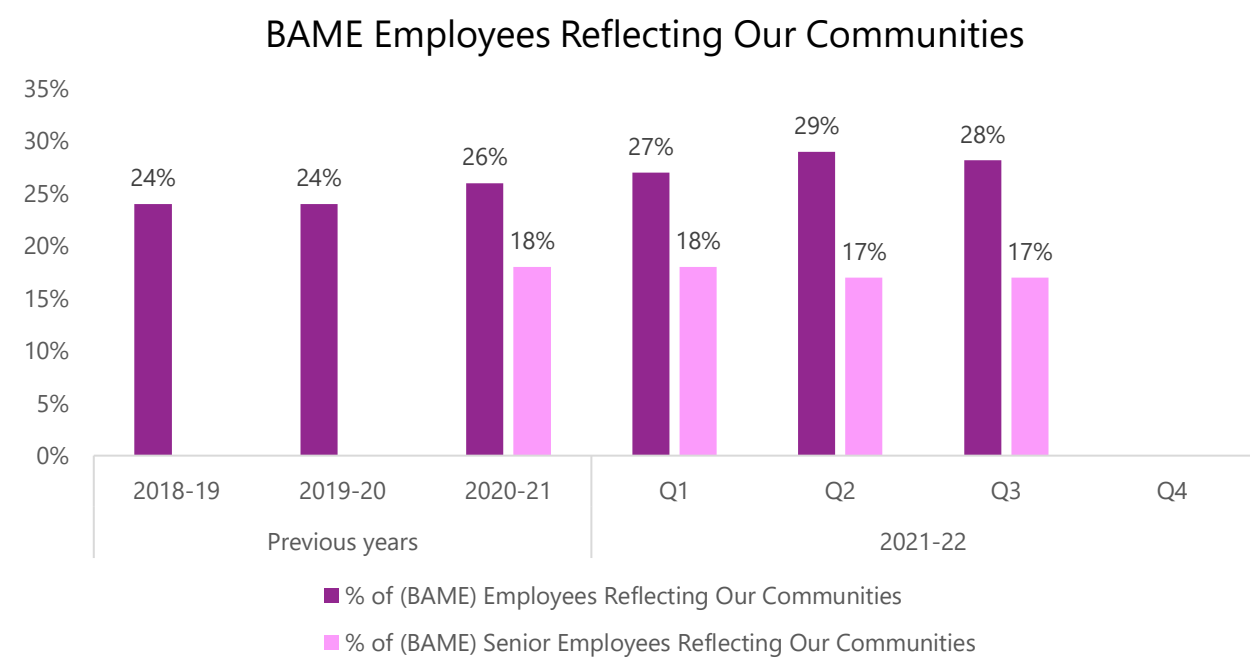
Annual measure. Commentary will be provided in Quarter 4 2021/22.

	Previous years			2021-22					Current Quarter (Q3)		Target		Time period	Reporting frequency	Good performance is	Current RAG Status
	2018-19	2019-20	2020-21	Q1	Q2	Q3	Q4	YTD	Numerator	Denominator	Qtrly	Annual				
% of Housing Stat Compliance Completed Within Timescale: Fire Safety Checks		99%	97%	94%	98%	100%		98%	n/a	n/a	100%	n/a	Oct-Dec 21/22	Q	H	😊 G
% of Housing Stat Compliance Completed Within Timescale: Gas Checks		100%	100%	100%	100%	100%		100%	n/a	n/a	100%	n/a	Oct-Dec 21/22	Q	H	😊 G
% of Housing Stat Compliance Completed Within Timescale: Electrical Checks		92%	93%	93%	93%	93%		93%	n/a	n/a	100%	n/a	Oct-Dec 21/22	Q	H	😊 G
% Corporate of Stat Compliance Completed Within Timescale: Fire Safety Checks			96%	94%	100%	100%		96%	n/a	n/a	100%	n/a	Oct-Dec 21/22	Q	H	😊 G
No. Corporate of Stat Compliance Completed Within Timescale: Fire Safety Checks				2378	2511	2511		2511	n/a	2511	not yet confirmed	not yet confirmed	Oct-Dec 21/22	Q	n/a	
% Corporate of Stat Compliance Completed Within Timescale: Gas Checks			100%	100%	100%	100%		100%	6950	6950	100%	n/a	Oct-Dec 21/22	Q	H	😊 G
No. Corporate of Stat Compliance Completed Within Timescale: Gas Checks				7017	7010	6950		6950	n/a	6950	not yet confirmed	not yet confirmed	Oct-Dec 21/22	Q	n/a	
% of (BAME) Employees Reflecting Our Communities	24%	24%	26%	27%	29%	28%		28%	n/a	n/a	2% year on year increase in BAME representation until workforce profile is 42% BAME to match local population		Oct-Dec 21/22	Q	H	😊 G
No. of (BAME) Employees Reflecting Our Communities				701	745	719		719	n/a	719	1075	1075	Oct-Dec 21/22	Q	L	😞 R
% of (BAME) Senior Employees Reflecting Our Communities			18%	18%	17%	17%		17%	n/a	n/a	42%		Oct-Dec 21/22	Q	H	😊 G
No. of (BAME) Senior Employees Reflecting Our Communities			20	20	19	19		19	n/a	19	47	47	Oct-Dec 21/22	Q	L	😞 R
% of All Roles Covered by Agency Workers			4.9%	7.7%	5.7%	6.4%		5.7%	n/a	n/a	n/a	n/a	Oct-Dec 21/22	Q	n/a	
% of Vacancies Covered by Agency Workers			8.8%	4.7%	3.8%	16.5%		4.0%	n/a	n/a	n/a	n/a	Oct-Dec 21/22	Q	n/a	
% of Vacant Roles					22.6%	29.2%		22.6%	n/a	n/a	n/a	n/a	Oct-Dec 21/22	Q	n/a	
Staff Turnover Rate			8.8	4.7	3.8	3.23		3.8	n/a	n/a	n/a	n/a	Oct-Dec 21/22	Q	n/a	
Amount of Council Tax Collected (millions)	87.0	92.0	91.0	29.3	30.4	23.6		83.3	n/a	23.6	£31.4	n/a	Oct-Dec 21/22	Q	M	😞 A
	97%	97%	91%	27.2%	27.8%	21.5%		76.5%	83.3	108.9	26.90%	n/a	Oct-Dec 21/22	Q	M	😞 A
Total Business Rates Due & Total Business Rates Collected (millions)	68.7	69.4	42.7	11.1	17.0	15.2		43.3	n/a	15.2	£20.6	n/a	Oct-Dec 21/22	Q	M	😞 A
	99%	99%	93%	21.9%	24.3%	26.8%		73.0%	43.3	59.3	28.6%	n/a	Oct-Dec 21/22	Q	M	😞 A

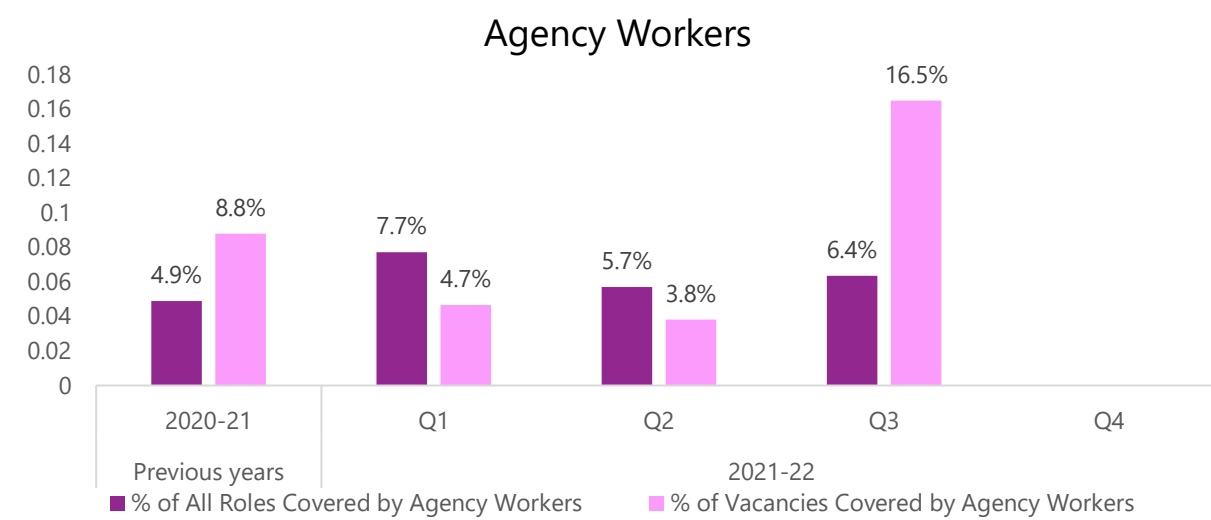
% Corporate of Stat Compliance Completed Within Timescale: Electrical Checks (carried out on a 5 year rolling program)	20.0%	20.0%		5 Yearly Basis	n/a	n/a	(5 x 20= 100%)	not yet confirmed	5Y	H	😊G
% of Decent Streets - Litter	92.5%	84.0%	78.6%	annual measure, data published: Mar 2022	n/a*		n/a	2021/22	A	n/a	
Gender Pay Gap (Corporate)	6.0%	7.0%	3.7%	annual measure, data published: not yet confirmed	n/a	n/a	n/a	2021/22	A	n/a	



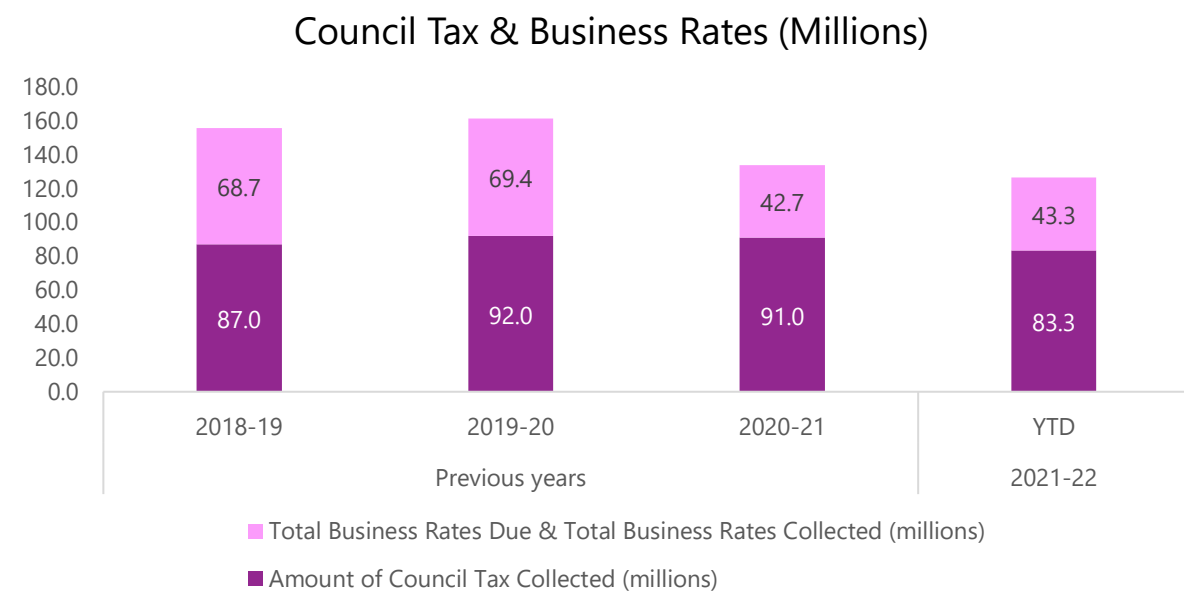
Name of Officer Filling in Commentary:	Henry Anthony	Date:	19/01/2022
100% of Fire Risk Assessments for 287 properties were completed within timescale, 11 of which are Temporary Accommodations. 100% of Gas Checks for 6950 properties were completed within timescale, of which 80 are in Temporary Accommodation. Of 7706 properties 93%, electric checks for 7152 properties as having a test and inspect within the last 5 years , Work is underway to achieve 100% in the next few years with determining regulatory access to enforce, therefore properties may not have been inspected. 304 properties have been moved to TA list.			



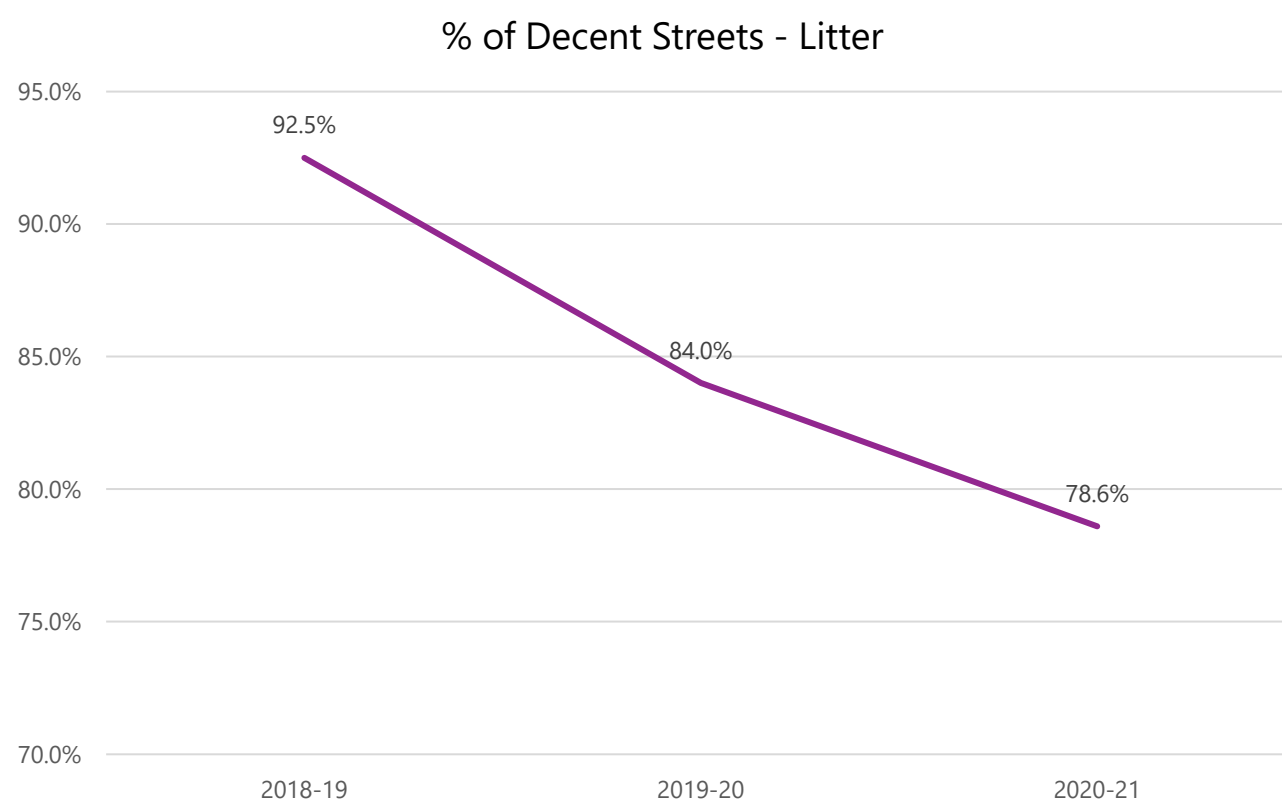
Name of Officer Filling in Commentary:	Anne Davies	Date:	17/01/2022
BAME workforce representation has reduced by 1% since Quarter 2. BAME workforce representation at senior management remains the same as Quarter 2. At 31/12/21 the total workforce is 2560 headcount and the total headcount of Senior employees M6 and above is 111 employees.			



Name of Officer Filling in Commentary:	Andrew Williams	Date:	14/02/2022
The main department areas of recruitment for social work agency workers are Children, Families, and Education and Adult Social care, making up 48% of the agency workforce. These numbers have remained low over the previous two quarters, and any significant reduction going forward is dependent on the development of the ASYE program and a new permanent social worker recruitment campaign planned for Quarter 4/Quarter 1 2022/23. Other areas of significance are: • Customers services (Covid support) - 12% • Housing - 7% • Neighbourhood services - 13%			



Name of Officer Filling in Commentary:	Nigel Robinson	Date:	12/01/2022
Revenue collections continue to be impacted by the recovery from the Covid-19 pandemic for the rest of the year. The limited availability of court dates and ongoing restriction of 1,000 cases per hearing is limiting new enforcement actions. This is hampering recovery on current year balances, however good progress is being made on arrears. High customer demand is still being experienced from residents reprofiling council tax payments, due to fluctuations in household income and the ending of the furlough scheme. The service is supporting residents suffering financial hardship with welfare benefits, whilst sensitively making payment plans to improve collection as economic conditions improve. Business Rate relief changes make comparison to the previous years difficult and the new Covid-19 Additional Relief Fund (CARF) relief will be applied during the fourth quarter.			



Name of Officer Filling in Commentary:	Sarah Hall	Date:	24/01/2022
Keep Britain Tidy are commissioned to carry out an annual independent assessment of the cleanliness of streets. The survey is carried out across five wards which are selected randomly, with one from each quintile of the Index of Multiple Deprivation for the borough in order to get an equal spread of IMD types in each survey. GIS mapping software is used to randomly generate 60 sites in each ward in order to ensure there is no bias towards any particular street or area. The 2020/21 survey was carried out in September 2021. The Street Cleansing Team were, during this period, experiencing shortages of staff due to Covid related absences, vacancies and reassignment of staff to teams to maintain statutory services. Staff were deployed to priority locations such as the Town Centre, main routes and shopping areas, however this had a detrimental impact on the service's ability to maintain standards in other areas. A service review is currently being undertaken to consider how our resources are deployed to ensure that environmental standards are improved. <i>*It isn't possible to provide numerator and denominator figures for this indicator, as the percentage figure is calculated using four different criteria, all with separate scoring systems.</i>			

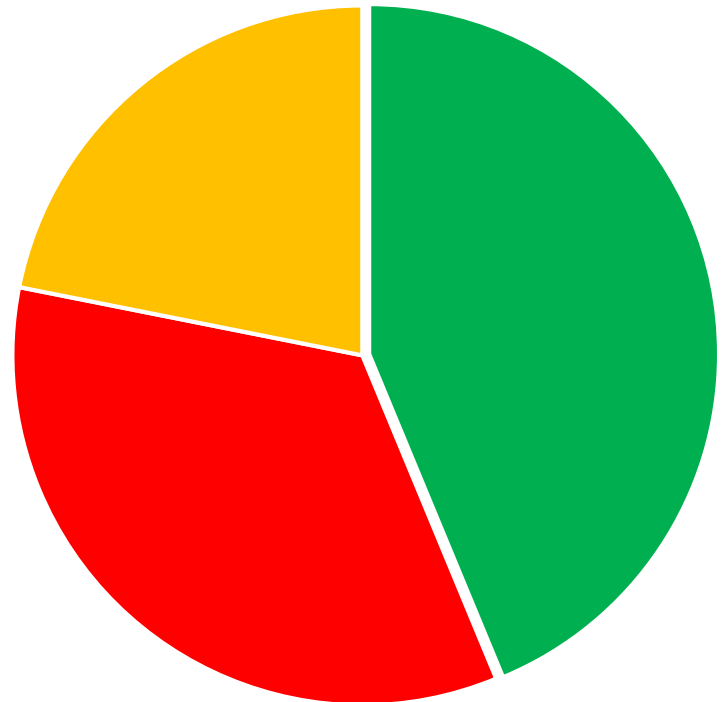
Glossary

Abbreviation	Explanation	Useful links
EET	Participation of young people: education, employment and training	EET DFE
YOS	Youth offending	
ASCOF	The Adult Social Care Outcomes Framework (ASCOF) measures how well care and support services achieve the outcomes that matter most to people The ASCOF is used both locally and nationally to set priorities for care and support, measure progress and strengthen transparency and accountability	NHS ASCOF
BRES	Business Register and Employment Survey	ONS BRES Statistics
EHCP	The EHCP, which means the Education and Health Care Plan, is a document which sets out the education, healthcare and social care needs of a child or young person for whom extra support is needed in school, beyond that which the school can provide It was formerly known as a 'statement of special educational needs'	DFE EHCP Statistics
RWM	End of Key Stage 2 Tests and Teacher Assessment RWM is the combined percentage for Reading, Writing and Maths where the standard was achieved in all subjects	
KS2	Key Stage 2 is a phase of primary education for pupils aged 7 to 11 in England and Wales	DFE KS2 Statistics
KS4	Key Stage 4 (KS4) is the legal term for the two years of school education which incorporate GCSEs, and other examinations, in maintained schools in England normally known as Year 10 and Year 11	DFE KS4 statistics
CYP	Children and young people	
NEET	Not in education, employment or training	DFE Neet statistics



Summary:

- 14 measures are Green
- 7 measures are Amber
- 11 measures are Red



Report Changes

- In order to increase efficiency, the Corporate Performance Report has been changed to a more automated process, where services input their data and commentary directly into report.
- Provisional measures regarding reducing carbon emissions are under development and can be viewed within the report.
- Going forward, data from the Luton Insight's dashboard will be included within the report in order to provide a more in depth understanding of performance and changes within the town.



Q1
(2.31m)

Q2
(2.25m)

Q3
(2.62m)

There was a reported fault in the footfall sensors in Summer 2021.

Footfall in Luton has been falling since 2016.



**7 foster
carers were
approved in
Q3**

- The main barrier to recruitment has been the pandemic because the range of usual events and activities around recruitment has been limited.
- The service believe improvements will build gradually from January onwards.

In Q3, 99 people were assisted to move closer to the job market through 'Passport to Employment'.

This is less than the quarterly target of 150 and it is unlikely that the full year target of 600 will be met this year due to low referrals from the DWP.



- 65.9% of Education, Health and Care Plans were issued within 20 weeks (excluding exceptions).
- While the figure is low, it is an improvement from the previous quarter (21.1%).



APPRENTICESHIPS

SKILLS FOR LIFE

- **Apprentices as a percentage of the workforce** currently stands at 1.13%, which is less than the quarterly target of 2.3%.
- **The number of apprentices employed by Luton Council** has fallen short of the quarterly target of 46, with a Q3 figure of 10.



- **The number of affordable new homes completed** (18) has fallen short of the quarterly target (25).





The number of passengers through the airport increased from 1,850,214 in Quarter 2, to 1,884,736 in Quarter 3.



The recovery of passenger numbers post Covid-19 is forecast to reach pre-pandemic levels by around 2024

Homeless Households Allocated a Permanent Offer Through the Housing Register

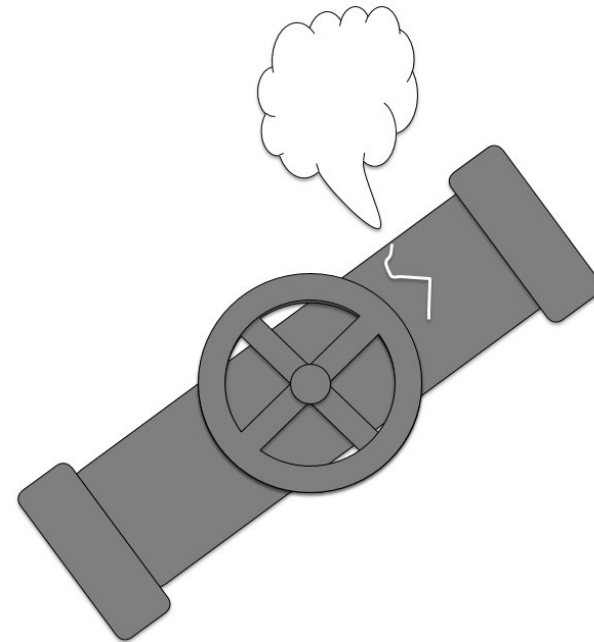


- The number of homeless households allocated a permanent offer through the housing register increased from 45 in Quarter 2, to 51 in Quarter 3.

Statutory Compliance Completed Within Timescale:



- Housing – Fire Safety: **100%**
- Corporate – Fire Safety: **100%**



- Housing – Gas Safety: **100%**
- Corporate – Gas Safety: **100%**



- Housing – Electrical Safety: **93%**
- Corporate – Electrical Safety: **Carried out on a 5 year rolling program**



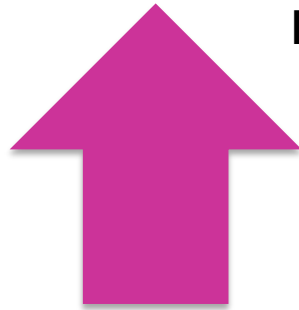
- The conversion rate of homelessness approaches to acceptance, rose slightly from 12% at Q2 to 14% at Q3.
- This is below the target and England average of 25%, which shows high performance.
- The number of households in temporary accommodation is also reducing.



Timeliness of Benefits



New Claims
Q3: 28.90



Changes
Q3: 10.80

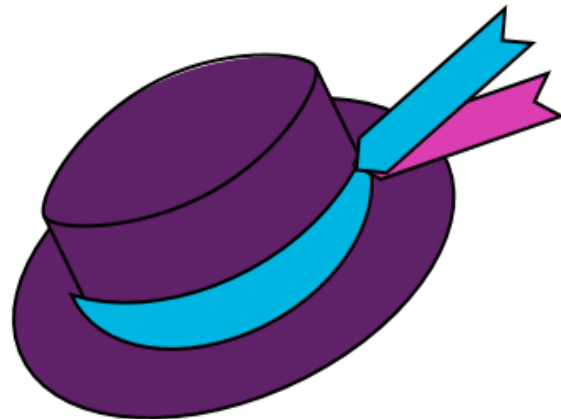
- Despite a high demand for new benefit claims in Q3, performance is within target levels.
- The same trend can be seen for change claims.

- The proportion of registered care services rated good or outstanding stands at 71%.



Thank you

Any Questions?



Committee:	Overview and Scrutiny Board
Date of Meeting:	28 February 2022
Subject:	Luton Tree Policy and Tree Management Strategy
Report Author:	Service Director Neighbourhood Services
Contact Officer:	Steve Battlebury Greenspace Manager
Wards Affected:	All

Purpose

1. To provide Overview and Scrutiny Board with information regarding a Luton Tree Policy and Tree Management Strategy prior to an Executive report.

Recommendations

2. The Overview and Board are recommend to consider:
 - Note the information below and comment on proposals regarding a Tree Policy and Tree Management Strategy for Luton Report

Report

3. The Tree Strategy and Policy document, supported by an action plan, sets out the framework for the sustainable management of trees across the borough of Luton over the next 10 years. It has been prepared with reference to local, regional and national policies and guidance.
4. The purpose of this strategy is to ensure:
 - That tree related decisions and activities are made in a structured and consistent way across all departments and partners according to RISK and to protect and defend the council from tree related claims.
 - That Luton's residents and stakeholders understand how the council manages its trees and why only certain tree works can be carried out.
 - That wherever possible, funding to implement the action plan is in place or funding strategies identified.

Why a Tree Strategy for Luton?

5. Within the expanding urban conurbation and the evolving transport network, within and around the town there are numerous woodlands, municipal parks, country side and wildlife areas such as the River Lea corridor, public open spaces as well as a population of approximately 30,000 street trees. These are made up of 143 different species and are located adjacent to areas of high occupancy. Of particular significance are mature trees within avenues of Victorian origin that line many of the

roads in Built Environment Conservation Areas and areas of local heritage importance.

6. Luton is a large town with a diverse landscape that has developed over the nineteenth century as the town has expanded across surrounding farmland and absorbed local village centres.
7. In addition to the older and larger trees Luton has a population of relatively young ornamental trees within residential developments that have been planted since the 1970s.
8. Trees on council land are managed by the Parks Service, undertaken (according to various arrangements) on behalf of the council department with responsibility e.g. Highways Housing, or in the case of wildlife sites taking into consideration advice from the council's ecologist.
9. Over recent years, substantive research has shown the many benefits trees bring to social, economic and environmental well- being, with, for example improvements of local air quality, reduced summer temperatures, reducing 'run off' caused by localised flooding and improved mental health and well- being.
10. The Council maintains a tree management database, Arbortrack, identifying and auditing the council's tree population.
11. Targets to increase and improve the health Luton's tree canopy is acknowledged as contributing to achieving carbon net zero (Luton 2040). With climatic conditions clearly changing and more frequent extreme weather events predicted, protecting and enhancing our existing tree asset and setting targets to enhance the benefits are therefore essential.
12. The Strategy sets out how the vision statement below will be delivered over the next 10 years.
13. That we have an increasingly healthy, diverse, growing and resilient tree population that enhance the lives of those many benefits to all those living, working and visiting Luton now and for future generations to come.
14. Six key objectives, supported by policy statements provide the focus of the strategy.
 - Ensure the proactive, proportionate management of our trees with the aim of promoting a healthy, resilient tree stock of increasing value to maximize the many health and wellbeing benefits it provides.
 - Ensure that the health and safety of our people, property and infrastructure are protected through proportionate risk management and pro-active maintenance of the tree stock.

- Ensure that our trees are professionally managed and maintained, undertaking works only when necessary for safety, tree health and structural damage mitigation reasons.
- Protect and manage our ancient and veteran trees.
- Ensure sufficient resources (staff, budget and data) are in place to enable the delivery of Objectives above and the actions set out in the action plan.
- Promote and increase a greater sense of community engagement and awareness of the importance of our trees.

Targets: Measuring Success

15. Tree Canopy cover will be measured every 5 years by undertaking a review of the 2017 i-Tree Eco study, which independently estimated the value of ecosystem services provided by 25,198 trees. Protecting and maintaining these trees and increasing the tree stock with a ten year planting programme will form the measurement baseline. The 5 yearly review will monitor the trend to ensure the aims and objectives of the Action plan are on track.
16. The 6 District Parks to achieve and maintain Green Flag Park status (monitored annually). All other sites will be managed in compliance with Green Flag criteria as detailed in the 'Raising the Standard' manual

The 16 Policies

17. Policy 1 The Council recognises the value of trees, and will aim to protect, maintain and enhance the benefits they offer.
18. Policy 2 The Council will pursue a pro-active management approach towards its trees with the aim of promoting a healthy, tree stock, a diverse age structure and increasingly resilient to biological threats.
19. Policy 3 Ensure those with a role in delivering this strategy and policy are trained and competent to do so.
20. Policy 4 The Council will adopt a balanced and proportional approach to the management of the risks posed by trees, with safety being just one of a number of management considerations.
21. Policy 5 The Council will, in managing the risk of subsidence and direct damage to property, to minimise the number and cost of claims whilst avoiding unnecessary tree loss require appropriate evidence to establish the cause of damage and will allocate sufficient resources to review such evidence.
22. Policy 6 The Council will not normally prune or fell trees to abate issues of nuisance, or perceived nuisance, (where the tree does not cause direct or quantifiable damage),

where the consequence of the nuisance is considered to be insignificant or where alternatives to tree pruning or removal can mitigate the issue.

- 23.** Policy 7 The Council will manage non-failure related tree risks resulting in visibility, lighting or access issues and trip and slip hazards in a proactive manner wherever possible as part of a routine and periodic tree inspection regime and through prioritised programmes of work.
- 24.** Policy 8 Where a Council owned tree(s) or woodland is associated with anti- social behavior/and or criminal activity, or where a perceived increased risk due to obstruction of CCTV cameras is present, measures to alleviate the issue will be implemented.
- 25.** Policy 9 The Council will adopt a proactive management approach to ensure that the public highway is maintained without obstruction or interference and that risks posed by Council trees adjacent to the highway are managed in a reasonable and proportionate manner in accordance with Policy 2.
- 26.** Policy 10 Where trees are potentially impacted by vehicle crossover applications, the council's lead Officer will be consulted by the highway department. A site visit may be necessary to make a decision on whether the tree has amenity value and should remain, or whether removal and replacement would be the best and most sustainable solution. Any costs associated with tree removal and replacement of a tree is to be borne by the applicant.
- 27.** Policy 11 The Council will follow a risk-based approach to managing highways level differences, will accept a degree of level difference and will investigate the feasibility and costs of engineering solutions prior to accepting the loss of a tree where its roots or stem are causing a surface distortion or disturbance.
- 28.** Policy 12 Decisions regarding measures to manage root disturbance and highways design decisions will be based on a sound understanding of the value of a tree, with the cost of measures directly compared against the CAVAT value of a tree, and compensation based on the CAVAT value of a tree.
- 29.** Policy 13 The Council will identify ancient and veteran trees and their environs across the borough and will endeavour to allocate appropriate resources for their sensitive and sustainable management to positively influence the longevity of such trees whilst managing the risks to an appropriate level.
- 30.** Policy 14 The Council will actively seek resources to deliver tree planting, with targets linked to the tree canopy target. Trees will be planted in appropriate locations to allow them to develop to their full potential.
- 31.** Policy 15 The Council is committed to promoting and implementing sound biosecurity practices to assist in safeguarding our trees from the introduction and spread of harmful pests and diseases.

32. Policy 16 The Council will not permit development where this would compromise existing trees worthy of retention, particularly those subject to Tree Preservation Orders (TPOs), and where appropriate will ensure that trees are protected either through condition or the making of new TPOs.

Proposal/Option

33. Members are invited to endorse the Luton Tree Policy and Tree Management Strategy

Appendix

34. Appendix A- Luton Tree Policy and Tree Management Strategy
35. Appendix B- PowerPoint Presentation

List of Background Papers - Local Government Act 1972, Section 100D

36. NONE

Luton Tree Policy and Tree Management Strategy

2021-2030

September 2021



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Foreword *(by portfolio holder/Leader/CEO)*

The Luton Tree Policy and Tree Management Strategy provides a framework for the sustainable management of Luton's trees to 2030.

We know that our trees, woodlands and parks have a vital role to play in promoting healthy communities.

We look after large numbers of trees both directly and indirectly, ensuring that their protection and enhancement offer the many benefits they provide our communities now and for future generations to come.

As Cabinet Member for X, I am pleased to present the Luton Tree Policy and Tree Management Strategy and would like to thank all of those who have contributed to the development of this important document.

Executive Summary

Set in the context of National, Regional and Local policies, strategies and legislation, the Luton Tree Policy and Tree Management Strategy provides a framework for the sustainable management of Luton's trees to 2030 to ensure that our trees, woodlands and parks continue to play a vital role in promoting healthy communities and helping to deliver our wider environmental, climate change and zero carbon commitments.

The Strategy and policies set out the strategic vision - an increasingly healthy, diverse, growing and resilient tree population that enhances the lives of all those living, working and visiting Luton now and for future generations and includes the council's aims to ensure that tree related decisions and activities are made in a structured and consistent way and that Luton residents and stakeholders understand how the council resources the management of its tree stock.

It describes how we look after trees on council owned land both directly and indirectly, ensuring wherever possible their protection and enhancement to maximize the many benefits they provide to our communities.

The document provides information about our current tree population including the distribution of species and age class, potential threats from disease and includes targets to increase in the town's tree canopy through retention and protection of existing trees and new planting resourced through maximizing external funding opportunities.

To this end the document includes six key objectives along with key measures that utilize tools including I-tree Eco and the Green Flag Award parks criteria to monitor achievement of canopy targets, quality and action plan targets.

The strategy provides a monetarized value of the Luton council managed tree canopy in relation to the contribution that it makes to the environment and the ecosystem services provided including carbon storage, air pollution, carbon sequestration and water run off with the total contribution conservatively estimated at £77,230 per annum.

It identifies key priority areas for tree planting to help meet the council's commitment to aiming for a net zero carbon by 2040, including the delivery of a town centre tree planting strategy and priority sites designated as County Wildlife Sites in relation to the habitats provided by their trees and highlights trees of significance such as the veteran tree collection at Stockwood Park.

The strategy describes a proportionate approach to risk management relating to trees including a proactive approach to subsidence and includes a guide to common tree enquiries and the approach taken by the council to nuisance issues with the presumption that healthy trees are only removed as a last resort.

How to use the document

This strategy and policy document is divided into four parts:

Part one – Tree protection, enhancement and resilience

Part one sets out our overall strategic vision and background to the strategy. It also set out our six key objectives, tree canopy cover targets and our approach to public engagement.

Part two – Tree management policies

Part two sets out our 16 policies to ensure our trees are proactively and sustainably managed. It also provides guidance to the public and our partners on tree-related matters and their rights and responsibilities.

Part three – Action plan

The Action Plan set out 16 actions, time scales and responsibilities for helping deliver the first 5 years of the strategy (up to 2025).

Part four – Delivery Guides

Provides step by step guides of how to deliver three key elements of the strategy, a defensible tree management protocol, a claims handling protocol and managing highway trees as well as model answers to commonly asked tree related questions.

1 Introduction

1.1 Scope

1.1.1 This Tree Strategy and Policy document, supported by an action plan, sets out the framework for the sustainable management of trees across the borough of Luton (as well as a number of sites owned and managed by Luton within the administrative area of Central Bedfordshire) over the next 10 years. It has been prepared with reference to local, regional and national policies and guidance.

1.1.2 The purpose of this strategy is to ensure:

- that the council's commitment to aiming for a net zero carbon by 2040 is assisted and met.
- that tree related decisions and activities are made in a structured and consistent way across all departments and partners.
- that Luton's residents and stakeholders understand how the council manages its trees and why only certain tree works can be carried out.
- that wherever possible, funding to implement the action plan is in place or funding strategies identified.

1.1.3 Luton Borough Council will hereafter be referred to as "the Council" throughout the document.

1.2 Why a Tree Strategy for Luton?

1.2.1 Luton is a large town with a diverse landscape that has developed over the nineteenth century as the town has expanded across surrounding farmland and absorbed local village centres.

1.2.2 In contrast to the expanding urban development and the evolving transport network, within and around the town there are numerous woodlands, municipal parks, country parks and wildlife areas such as the River Lea corridor, public open spaces as well as a population of approximately 30,000 street trees, made up of 143 different species and adjacent to areas of high occupancy. Of particular significance are mature trees within avenues of Victorian origin that align many of the major road networks.

1.2.3 In addition to the older and larger trees Luton has a population of relatively young ornamental trees within residential developments that have been planted since the 1970s.

1.2.4 Trees on council land are managed by the Parks Service, undertaken (according to various arrangements) on behalf of the council department with responsibility e.g. Highways Housing, or in the case of wildlife sites taking into consideration advice from the council's ecologist.

1.2.5 The Council maintains a tree management database, Arbortrack, identifying and auditing the council's tree population.

1.2.6 Over recent years, substantive research has shown the many benefits trees bring to social, economic and environmental well-being, with, for example improvements of local air quality, reduced summer temperatures, reducing 'run off' caused by localized flooding, capturing carbon and improved mental health well-being. With climatic conditions clearly changing and more frequent extreme weather events predicted, protecting and enhancing our existing tree asset and setting targets to enhance the benefits are essential.

1.3 Our Vision - A New Approach

1.3.1 This Strategy sets out how the vision statement below will be delivered over the next 10 years

That we have an increasingly healthy, diverse, growing and resilient tree population that enhance the lives of all those living, working and visiting Luton now and for future generations to come

1.3.2 Six key objectives, supported by policy statements provide the focus of the strategy.

No.	Key Objective
1	Ensure the proactive, proportionate management of our trees with the aim of promoting a healthy, resilient tree stock of increasing (ecosystem service) value to maximize the many health and wellbeing benefits it provides.
2	Ensure that the health and safety of our people, property and infrastructure are protected through proportionate risk management and pro-active maintenance of the tree stock.
3	Ensure that our trees are professionally managed and maintained, undertaking works only when necessary for safety, tree health and structural damage mitigation reasons.
4	Protect and manage our ancient and veteran trees.
5	Ensure sufficient resources (staff, budget and data) are in place to enable the delivery of Objectives 1-4 above and the actions set out in the action plan.
6	Promote and increase a greater sense of community engagement and awareness of the importance of our trees.
Measure, review and update this strategy (every five years).	

1.4 Measuring Success

1.4.1 The Council will ensure all goals and objectives are only set where a baseline exists and they can be efficiently measured, are meaningful and reported regularly to monitor the progress of the strategy. The key measures are:

1. Tree canopy cover met.
2. To achieve and maintain Green Flag Park status in all 6 District Parks and to manage other sites in compliance with the Green Flag criteria as detailed in the "Raising the Standard Manual"
3. Other Action Plan targets met.

1.4.2 Tree Canopy cover will be measured every 5 years by undertaking a review of the 2017 i-Tree Eco study, which independently estimated the value of ecosystem services provided by 25,198 trees. Protecting and maintaining these trees and increasing the tree stock with a ten year planting programme will form the measurement baseline. The 5 yearly review will monitor the trend to ensure the aims and objectives of the Action plan are on track. (Action Plan target 1).

1.4.3 The 6 District Parks achieving and maintaining Green Flag Park status will be monitored annually. All other sites will be managed in compliance with Green Flag criteria as detailed in the 'Raising the Standard' manual (Action Plan targets 2 and 3).

2 Trees provide benefits

2.1.1 The Council recognises that the trees across the borough provide a wide variety of benefits to individuals, visitors, the local community and to society as a whole. As a consequence, the Council accepts, amongst a number of responsibilities in connection with the management of its trees, a commitment to protect and enhance the benefits provided by the tree population as far as possible (Watt, 2011).

2.1.2 Trees are clearly valued by the public for their visual and aesthetic qualities and for their place in both the urban and rural landscape. Trees mark the changing seasons through dramatic autumnal displays and blossom during spring and can have broader historical, heritage and landscape significance. They provide habitat that supports a range of wildlife, itself valued by the public. Trees and urban green spaces soften the built environment. They can provide a sustainable and renewable resource of timber, woodchip biofuel, mulch, charcoal and are a source of composted leaf litter. Management of the urban forest provides a source of local employment.

2.1.3 Trees also provide many less well-known benefits but that are increasingly becoming recognized and valued. Trees offer essential ecosystem services, defined as the many and varied benefits to humans gifted by the natural environment and from healthy ecosystems. Such ecosystems include, for example, forests, grasslands and water bodies. They also include the urban forest, a system containing all the trees, plants and associated animals. These ecosystems, functioning in healthy relationship, offer clean air, extreme weather mitigation and human mental and physical well-being. Collectively, these benefits are known as 'ecosystem services'.

2.1.4 Trees produce oxygen and absorb carbon dioxide and through the annual production of wood, store carbon. These represent a significant contribution to mitigating the effects of climate change. Increasing tree cover will help the council meet its goal to achieve net zero by 2040.

2.1.5 On a local level the influence of urban trees in moderating temperatures offer direct benefits through cooling in the summer and warming in the winter and indirect benefits through reducing fossil fuel use and emissions by positively influencing heating and air-conditioning requirements. Trees filter and absorb pollutants and by offering shade contribute to reducing the incidence of skin cancers. Trees intercept rainfall, reduce surface run-off and have an important role in flood mitigation, particularly in the urban environment.

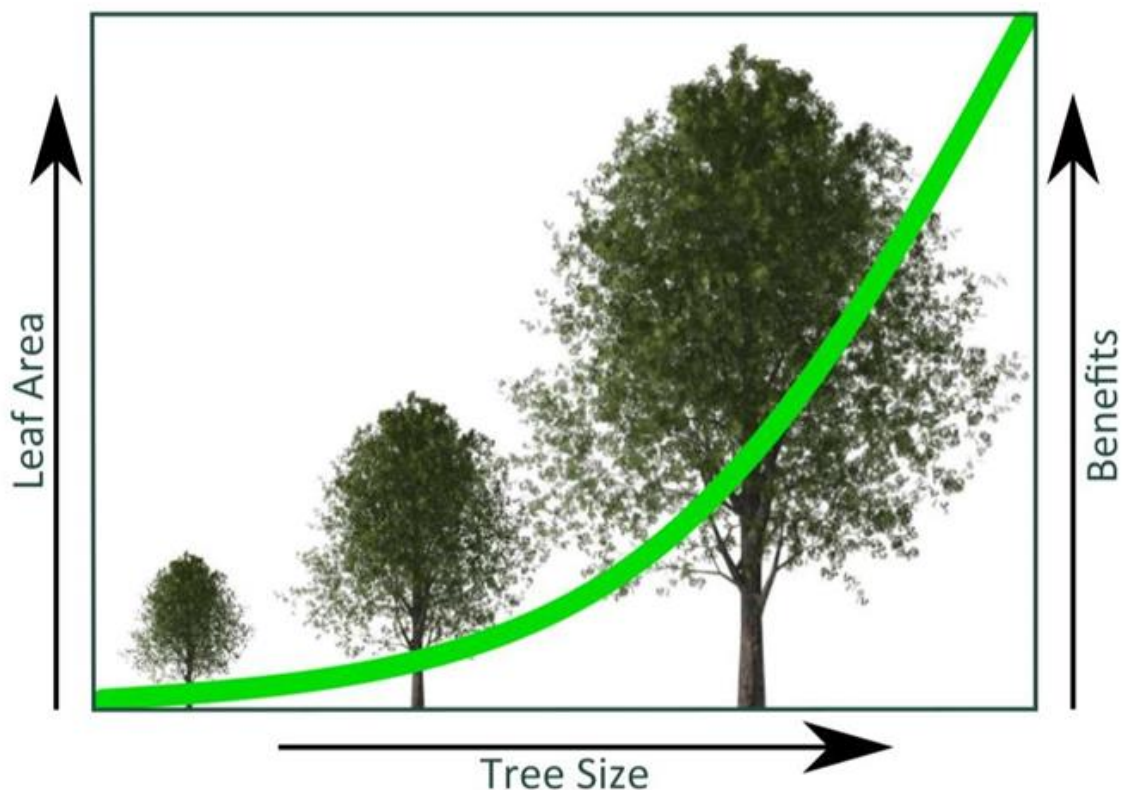
2.1.6 Urban green infrastructure creates desirable environments to live and work in and there is evidence that residential and commercial property values are increased in areas where trees form part of the urban landscape.

2.1.7 Trees are important for general health and wellbeing. They provide key social and psychological benefits and as significant elements of the green infrastructure across the borough have a daily role in the leisure and recreation activities of a community.

2.2 Which trees offer the most benefits

2.2.1 As trees increase in size and age, the benefits they provide increase exponentially. It is therefore of key importance to protect and maintain existing trees, especially where they are old and large. Replacing old trees with new planting is of course essential, but for new trees to replicate the benefits provided by larger trees they would need to be replaced at a rate of 40 to 1, or alternatively wait for 30 to 50 years for their value to increase naturally. Older and larger trees across the council should not be removed unless there are compelling reasons to do so.

Figure 1: The relationship between tree size and leaf area (adapted from Structure and Functions of southern Ontario's Urban Forests, A Kenny, 2001).



2.3 iTree Eco – Our Tree Population and putting a value on the benefits provided by Luton's trees

2.3.1 An i-Tree Eco study (Rogers and Watson, 2017) has estimated the value of ecosystem services provided to the town by 25,198 trees within the public realm. The study was based on inventory data held in the Council's tree survey database but excluded trees within private ownership, woodlands, and trees and groups of trees where incomplete data had been recorded.

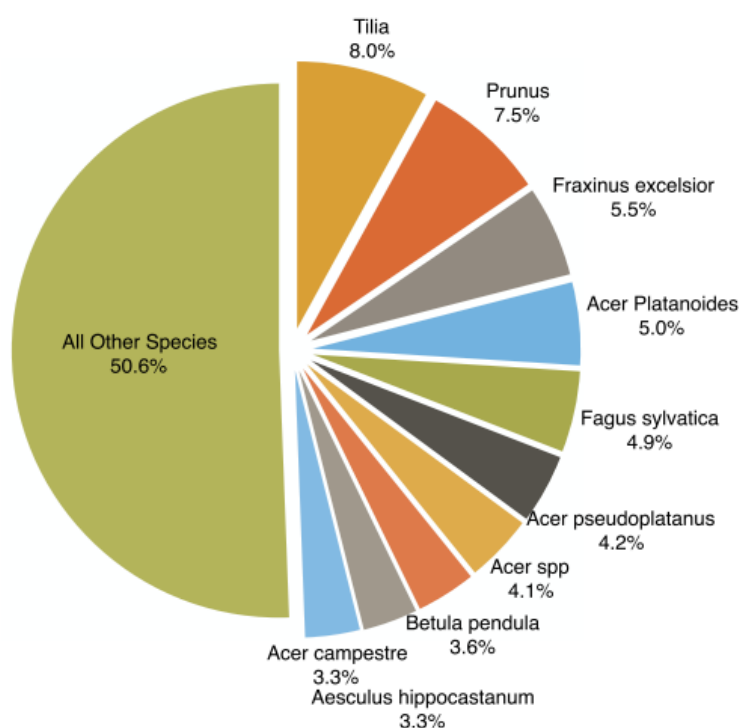
2.3.2 The Council is responsible for a population of trees with a tree canopy cover of 66 hectares, a total replacement value of £38 million and offering ecosystem services conservatively valued at £77,000 annually (as of 2017), or three quarters of a million pounds over the plan period.

Table 1 Headline Figures (i-Tree Eco study, Rogers and Watson, 2017)

Measure	Amounts and Values
Total number of trees measured	25,198
Tree Canopy Cover	66 hectares
Most common species	Lime, Cherry, Ash (143 species recorded)
Replacement Cost	£38,037,000
Carbon Storage	11,800 tonnes or £757,271 in value
Pollution Removal	2.5 tonnes annually or £53,751
Carbon sequestration	247 tonnes annually or £15,801
Avoided water run off	5,063 cubic metres annually or £7,678
Total Annual Benefits	£77,230

2.3.3 The town was found to have a good diversity of tree species, beneficial in ensuring that the tree population has resilience to environmental stress, pests and diseases and climate change. 143 species were represented in the inventory data.

Figure 2: Tree Species population (i-Tree Eco study, Rogers and Watson, 2017)



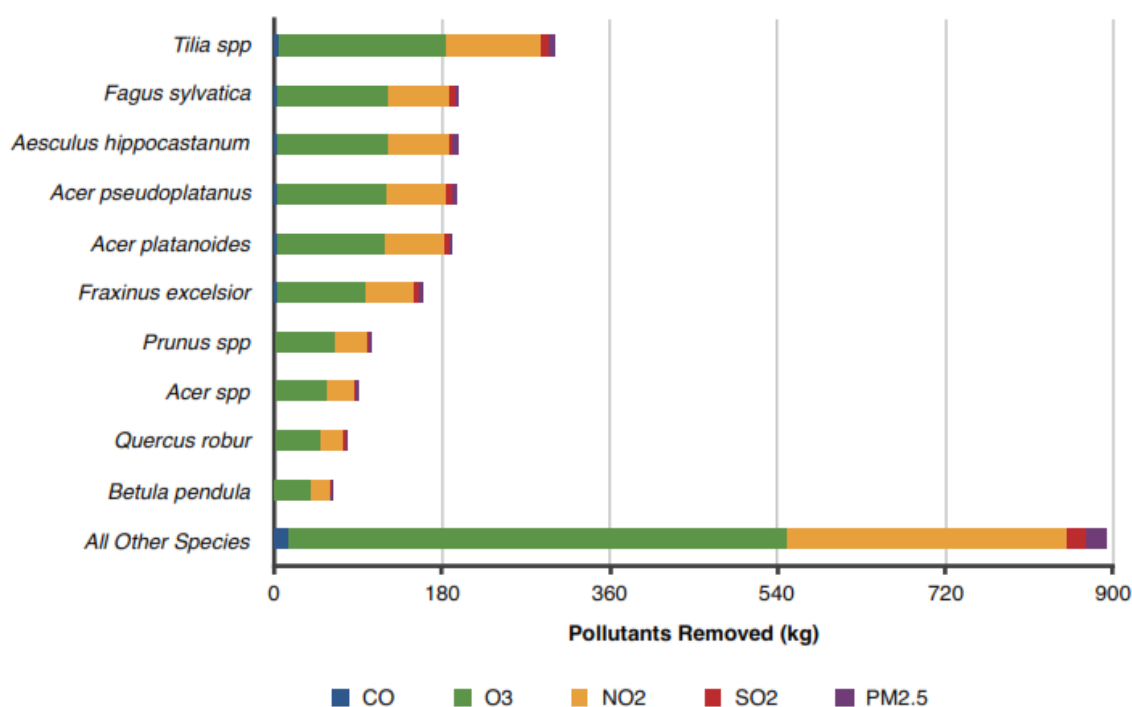
2.3.4 The tree population was found to have a general good size and age diversity, important for a sustainable and diverse tree population to ensure that there are sufficient young trees to replace those at the later life stages. The population was well balanced in the lower size classes, but with less diversity in the larger size classes, stressing the importance of retaining our largest canopy trees and planting new trees to replace them in the future (Action Plan target 8 and 9).

2.3.5 Total leaf surface area for the Council's tree population was estimated at 2,791,800 m², influencing the air pollution removal and storm water capture capabilities of the tree population.

2.3.6 Trees regulate urban temperatures and intercept and absorb pollutants through leaf surfaces. Large trees contribute most to capturing pollutants, with Lime (*Tilia*), Beech (*Fagus*) and Horse Chestnut (*Aesculus*) the top three species in Luton, (Figure 3). Whilst trees can produce volatile organic compounds evaporative cooling counters this such that the net effect of trees is to reduce ozone levels. Different species capture different sized pollutant particles therefore species diversity is important for any air quality strategy. An estimated 2.5 tons of pollutants are removed annually by the Council's tree population, equivalent to a value of £53,750. Whilst Lime (*Tilia*) is the most effective, as different species can capture different sizes of particulate matter, it is recommended that a broad range of species should be considered for planting schemes as a part of any air quality strategy.

2.3.7 11,832 tonnes of carbon is stored within the Council's tree population equivalent to a value of £757,270. Trees store and sequester atmospheric carbon by converting it to wood, reducing the concentration of CO₂ in the atmosphere with a resulting beneficial impact on climate change. This represents what could be released if trees were removed or allowed to die and decompose. 247 tonnes of carbon are sequestered annually by Council's trees, equivalent to a value of £15,800.

Figure 3: Pollutants Removed (Kg) by Tree Species (i-Tree Eco study, Rogers and Watson, 2017)



2.3.8 Run-off contributes to flooding and is a source of pollution in water courses. Trees intercept precipitation and roots promote infiltration and these attributes counter the negative effect of hard surfacing on run-off in the urban landscape. The Council's trees provide 5,063 m³ of run-off reduction annually, equivalent to a value of £7,770

2.4 Capital Asset Valuation for Community Trees (CAVAT) - Putting a value on the benefits

2.4.1 As well as measuring the i-tree value of its tree population as a whole, the Council uses another tree evaluation method, Capital Asset Valuation for Community Trees (CAVAT). [CAVAT](#) provides a basis for managing Luton's trees as public assets rather than liabilities. It can be used to value the tree stock as a whole, like itree, but it is used by the council in individual cases, where the value of a single tree needs to be expressed in monetary terms.

2.5 Pest and Disease threats

2.5.1 The damage to our trees from insect pests, fungi and bacteria is significant. Increasing numbers of pests and diseases, particularly those entering the UK from overseas are a serious threat to our trees, with climate change increasing their range. Their impacts have the potential to be devastating to particular species in the tree population.

2.5.2 This strategy recognises these threats and aims to reduce the impacts upon Luton's trees by retaining a wide diversity of tree species, thereby increasing resilience and adhering to strict biosecurity measures (section 4.10) when sourcing new trees.

2.5.3 There are hundreds of pests and diseases that are currently a threat to our trees and in the case of Oak Processionary Moth, a human health hazard too. Of particular concern to Luton's trees are:

- **Ash Dieback** (*Hymenoscyphus fraxineus*, previously *Chalara*). Ash represents 5.5% of our tree population. This disease will be monitored as a part of our regular tree surveying protocol with appropriate remedial action carried out when necessary. The Council will comply with the latest government guidance. New planting schemes will not include ash as part of the species mix.
- **Acute Oak Decline**. Oak represents less than 3% of our tree population. However, it represents a significant proportion of our ancient and veteran trees. This disease will be monitored as a part of our regular tree surveying protocol with appropriate remedial action carried out when necessary. The Council will comply with the latest government guidance.
- **Oak Processionary Moth (OPM)** (*Thaumetopea procesionea*). The caterpillars of OPM are pests of oak trees, they defoliate them, and a hazard to human health, contact with the caterpillars' can cause skin rashes, eye irritation and breathing difficulties. OPM is established in most of London and spreading geographically. This pest will be monitored as a part of our regular tree surveying protocol and if found, or even suspected, reported immediately in compliance with the regulations governing OPM control. Compliance to our biosecurity principles when sourcing trees will help too.
- **Horse Chestnut Bleeding Canker** (*Pseudomonas syringae pathovar asedculi*) Horse chestnut represent 3.3% of our tree population. This disease will be monitored as a part of our regular tree surveying protocol with appropriate remedial action carried out when necessary. The Council will comply with the latest government guidance.
- **Horse Chestnut Leaf Miner** (*Cameraria ohridella*) Horse chestnut represent 3.3% of our tree population. Whilst the early brown leaves are unsightly, the health impacts upon the tree are not thought to be terminal.

2.5.4 The above pests and diseases, how to spot and report them and best practice management approaches can be found at [the Observatree web pages](#).

3 Policy Context

3.1.1 With a clear steer contained within a number of National, Regional and Local policies, strategies and legislation, the Council have devised a strategy and set out policy with a focus on local needs and priorities and, at the same time, helps deliver the wider aims of the Country.

3.1.2 The national, regional and local policy documents that have informed this strategy are summarized below.

3.2 National Policy

3.2.1 The Governments 'A Green Future: Our 25 Year Environment Plan', recognizes that 'having more trees in and around our town and cities, close to where people live and work, brings people closer to nature and improves air quality, with consequent positive health impacts'. It also recognizes the special importance of our ancient trees and woodlands.

3.2.2 In helping meet its aspirational target of tree cover across the country of 12% by 2060, a target of planting one million new trees in urban areas in addition to the 11 million trees we will plant across the country has been set by the strategy.

3.2.3 Other notable areas are around improving biosecurity to reduce the threat of new pests and diseases like ash dieback entering the country and introducing new requirements to ensure councils properly consult if they are considering removing street trees. The council's approach to publicising tree works can be found in section 4.11 and Action Plan target 15.

3.2.4 The National Planning Policy Framework (NPPF), provides guidance to local authorities when preparing their development plans and in deciding planning applications. It sets out principles for conserving and enhancing the natural environment (Chapter 15 'Conserving and Enhancing the Natural Environment', paragraphs 170-183, 2019)

3.2.5 For the first time, the importance of non - ancient trees and woodlands and the contribution they make to our ecosystem services was recognized at the National level. The policy covering irreplaceable habitats (including ancient woodland and ancient or veteran trees) was enhanced in favour of protection. Wholly exceptional reasons and a suitable compensation strategy are required to justify their loss (exceptional reasons may include, for example, 'infrastructure projects where the public benefit would clearly outweigh the loss or deterioration of habitat'.

3.2.6 Buffer zones distances between ancient woodland and veteran trees are not dealt with in the NPPF, but in Natural England Standing Advice, with a minimum buffer of 15m for ancient woodland (with a recognition of this being dealt with on a case by case basis) and for veteran trees, "A buffer zone at least 15 times larger than the diameter of the tree or 5m from the edge of the canopy, if that's greater".

3.2.7 The role green infrastructure plays in improving air quality and climate change adaptation is recognised with the protection of Open Space within settlements being afforded higher recognition than previously.

3.2.8 The Governments' 25 Year Environment Plan seeks to embed an environmental net gain approach in the planning system. The proposed approach would require developers to assess the potential harm of their plans to habitats and provide an overall improvement to the biodiversity value. If the developer is unable to mitigate or compensate on site, a mandatory payment would be required to go towards habitat improvements elsewhere.

3.2.9 The Town and Country Planning Act 1990 (*Part VIII, section 197*) confers a **duty** on all local authorities to consider trees as a 'material consideration' as a part of the planning decision process. Section 54A and 70 (2) requires local authorities to have regard to the development plan and for tree related applications to be determined in accordance with it. Section 198 confers a power to local authorities to protect trees in the interests of amenity, by making Tree Preservation Orders (TPOs). Section 210 makes the breaching of a TPO a criminal offence. A section 211 requires trees owners with trees in Conservation Areas to notify the local authority of their intention to carry out tree works. Section 215 enables a Local Planning Authority to serve a notice to tidy up land, if its condition is deemed harmful or unsightly to an area. Tree planting is in the scope of works that can be dealt with, providing a tool to improve for example, neglected and dead tree planting schemes.

3.3 Local Policy

3.3.1 Luton's Sustainable Community Strategy 2008-2026 describes the shared vision of how Luton will be in 2026. Key priorities clearly linked to this strategy include, the provision of *'more well designed, safer and accessible open spaces'*; *'successfully adapting and mitigating for climate change'*; *'protecting and enhancing the natural and built environment, including our rivers and natural habitats within Luton's green spaces'*;

3.3.2 The council has committed to aiming for a net zero carbon in advance of the national target in 2050. **Luton's 'Climate Action Plan, Becoming a Carbon Neutral Borough by 2040'**, sets out the actions it will take, working with residents, businesses and partner organisations to reduce carbon emissions and increase carbon sequestration. Section 6.1 of its Action Plan refers to a targeted and safe increase of tree cover on council owned land and local streets. Section 7.4 aims to encourage people to grow food/pollinators on council land. This could include the planting of fruit trees and orchards. Section 9.1 aims to strengthen partnership working with the Environment Agency and water companies to deliver flood mitigation schemes. Tree planting can form an essential component of such schemes.

3.3.3 Luton's Health and Wellbeing Strategy (2012-2019:2016 Refresh) identifies the promotion of healthy communities as a key component. 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 for example, promotes development that is designed, constructed and managed in ways that improve health and promote healthy lifestyles.

3.3.4 The Luton Investment Framework securing £1.5 billion investment, aims for "better health outcomes" and states that "The Council will continue to work with partners and investors to drive improvements to health and wellbeing for local people."

3.3.5 The Investment Framework links to London Luton Airport's development plans and its 395 acre Enterprise Zone and other large scale developments coming forward, including Power Court, a new state of the art stadium, Newlands Park, a mixed-use gateway scheme, Napier Gateway, a 6.9 acre mixed use development, Butterfield, a high quality development in a landscaped environment and the transformation of the Cultural Quarter/Hat District, The Mall, High Town and Marsh Farm. All these projects will require high quality green infrastructure, including tree provision in order to meet the design aspirations of these places and drive improvements to people's health and wellbeing and Luton's pride of place. The existing tree population within the town and the new opportunities for planting have a key role in meeting the commitments of the Investment Framework. The tree strategy provides guidance for considering existing trees and investing in new trees through the planning system in section 4.10.

3.3.6 [The adopted Luton Local Plan \(2011-2031\)](#) sets out the long term strategic spatial planning vision and strategy for the council.

3.3.7 The council's green space and green infrastructure network, of which trees are clearly an essential component, need to be protected and enhanced and recognised as bringing important health and wellbeing benefits (paragraph 2.28)

3.3.8 Strategic Objective 10 aims to improve, protect and enhance the biodiversity of natural areas within the town, including its green spaces.

3.3.9 Policy LLP27 states that *'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'*

3.3.10 Policy LLP28 states that *'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'*.

3.3.11 Paragraph 11.56 states that **'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'.

3.3.12 Policy LLP28 - Biodiversity and Nature Conservation states that *'all existing habitats and ecological networks will be afforded a level of protection from harm'*. It sets out three tiers of designations, all of which are afforded protection. **'Aged and Veteran trees'** are identified as tier three assets.

3.3.13 [The Greenspace Strategy Review 2014 and Green Infrastructure Plan for Luton 2015](#) recognise that the council's publicly accessible as well as its private Green Space, its parks and gardens, churchyards, cemeteries and allotments are seen as an important indicator of the town's attractiveness and a key indicator for people and business looking to relocate to Luton. Clearly trees form a core element of the character of Luton's parks and gardens.

3.3.14 As well as recognizing their value, the strategy also aims to enhance provision by addressing the deficit in areas with poorer accessibility, equating by 2031 to the equivalent additional strategic provision of just under two new 60 hectare sites, supplemented by district level provision, particularly in the central and western areas of the borough.

3.3.15 [The Bedfordshire and Luton Green Infrastructure Plan 2015](#) a strategically planned and well managed network of green spaces provides existing and new communities with a healthy and attractive environment, attractive places to live and visit, increasing the quality of life.

3.3.16 Development should not be permitted where this would compromise the green infrastructure network but would be encouraged where it delivers critical element of the infrastructure. *Street trees and new planting* are highlighted as critical elements

3.3.17 [The Luton Borough Landscape Character Assessment 2014](#) notes that a small proportion of the landscape of the Luton is protected by 'Area of Outstanding Natural Beauty' (AONB) status, with

other key areas previously protected through local landscape designations; 'Area of Great Landscape Value' (AGLV) and 'Area of Local Landscape Importance' (ALLI). The term landscape does not mean just special or designated landscapes and it does not only apply to the countryside. Landscape can mean a small patch of urban wasteland and urban parks (*Greensland Trust 2014*).

3.3.18 Existing landscapes as well as opportunity areas are identified. Opportunity areas of note with trees as key features or those that may be enhanced through new tree planting and identified in the Landscape Character Assessment and identified in the action plan of this strategy include:

- the Northern Urban Edge
- Bramingham Wood
- Houghton Brook Corridor
- Upper Lea Corridor
- Stockingstone Road Greenspace
- Wigmore
- Southern end of Hart Hill
- Someries Farm
- Stockwood perimeter
- Eastern Fringe, and
- Vauxhall Way.

3.3.19 [The Luton Food Plan 2018-22](#) notes that "Access to green space is associated with a range of improved health outcomes and income related differences in wellbeing are reduced where people have access to green space".

3.3.20 The food plan also places importance on increasing the area of green space available to residents: "Greening the Borough/growing your own This priority seeks to increase access to green space and empower residents to grow their own fruit and vegetables as well as improving the visual impact of Luton.

3.3.21 In fulfilment of Part IV of the Environment Act 1995, the Council identifies Air Quality Management Areas (AQMAs) where current or future air quality is unlikely to meet national air quality objectives, develops Air Quality Action Plans and monitors air pollution, to tackle poor air quality in these areas. [Luton's Air Quality Annual Status Report 2018](#) identifies road traffic as the main source of pollution in the borough with other sources including London Luton Airport and local industry.

3.3.22 The Council monitors the levels of both nitrogen dioxide (NO₂) and particulate matter (PM₁₀ & PM_{2.5}) within the Borough. This monitoring has consistently shown that particulate matter levels comply with the relevant air quality objectives as set out in the *Air Quality (England) Regulations 2000*. However, the measurements obtained for NO₂ have identified two locations (along the M1 motorway and along the A505 in part of Bury Park and the Town Centre) where the annual mean objective level for NO₂ is (or is likely to be) exceeded. Both locations have been declared as Air Quality Management Areas (AQMAs) and action plans have been prepared to address the exceedances. [Luton's Air Quality Plan 2018](#) action in these two areas. It is recognized that as well as providing particulate dispersion and reduction benefits, some tree species can increase Biogenic Volatile Organic Compound emissions and planting close to high pollution concentration areas, can trap particulates around ground level. Any negative effects have been built into the tree data and consideration of the 'right tree, right place' should be part of the planning of planting schemes.

3.3.23 Measure 21 of the action plan is to assess the benefits of current Town Centre green infrastructure to inform the development of a new Town Centre Planting Scheme with a key performance indicator to **increase the number of trees planted over the number felled**. Measure 21 acknowledges that ‘in addition to absorbing CO2 there is a growing body of evidence to show that certain trees, shrubs and hedges can also help reduce levels of airborne pollutants’.

3.3.24 The **Town Centre Tree Planting Strategy 2020-2030** identifies **tree planting opportunity sites** to enhance the attractiveness of the Town Centre, and a key element in meeting the commitments of the Investment Framework. The tree planting opportunity sites consist of new locations around the town centre, the reuse of existing, empty tree planting pits and planting opportunities for new developments in the town centre.

3.3.25 **The Tree Habitat Strategy 2019** sets out the Council’s approach to the management of Luton’s trees to provide natural habitat and to maintain, enhance and increase its **tree-based wildlife** and the organisms which depend on that habitat.

3.3.26 Some habitats take a long time to form and so should be considered as ‘irreplaceable’. For instance, habitats associated with ancient trees, such as hollow stems with extensive decay, can take centuries to form and these are considered to be ‘irreplaceable’. In recognition of ‘irreplaceable’ nature of such habitats, ancient trees and woodlands are afforded special status in the NPPF as well as the Local Plan, discussed above in paragraphs 3.2.5 and 3.3.11.

3.3.27 The Council has identified the following priority sites, all of which include areas designated as County Wildlife Sites, in relation to their trees:

- Stockwood Park, for its **wood pasture** and **veteran trees**
- Leagrave Park, for its **wet woodland** on Leagrave Common
- Wardown Park, a Grade II Listed park and landscape and a Peoples Park, a rich habitat for bats, associated with its **trees**
- Lewsey Park, and
- Kidney Wood, an **ancient semi-natural woodland** near to Stockwood Park (within the Central Bedfordshire administrative area but owned and managed by Luton Borough Council).

3.3.28 Where resources allow, the strategy sets out actions the council will take to increase awareness, map, safeguard and manage its **ancient and veteran trees** and associated habitat.

3.3.29 Six of Luton’s parks have been awarded national **Green Flag** status:

- Brantwood Park
- Leagrave Park
- Memorial Park
- Peoples Park
- Stockwood Park, and
- Wardown Park.

3.3.30 The award recognizes the best parks and open spaces in the UK, recognized for having excellent facilities, being well managed and maintained, having high safety standards and for engaging the local community.

3.3.31 Trees and woodlands form a significant feature of many of these parks, with ancient and veteran trees forming a key feature at Stockwood Park. The safe and sustainable management of these trees and community engagement with them will help retain Green Flag status of each of the above parks and at priority sites help achieve new Green Flag status sites, a key target of this strategy (section 1.2.1(2) and Action Plan target 3).

4 The Management of Council Owned Trees

4.1.1 The management approach towards the council's trees, its street trees, Housing trees, School trees and trees in its urban parks, country parks, green spaces, cemeteries, church yards, allotments and woodlands, will aim to improve the resilience of the tree population to ensure that the benefits offered by trees across the borough are maintained and sustained over the long-term.

4.1.2 Resilience is desirable because of the numerous pressures placed on tree health and survival from a number of sources. These include the general damage that trees tend to be subjected to within the urban environment and the sub optimal growing conditions often found in built up areas, as well as the effects of climate change and the risks posed from the increasing occurrence of imported tree pests and diseases.

4.1.3 Resilience will be achieved through improving the diversity of the tree populations age structure, to ensure that there are sufficient thriving young trees to replace mature and old trees as they die, decline or become too costly to manage. Tree replacement will be undertaken whilst at the same time recognizing that mature trees provide the greatest benefits, with the implication that the Council will place a management priority on retaining mature trees for as long as possible, subject to sensible cost benefit.

4.1.4 Resilience will also be achieved through improving the diversity of species mix across the tree population. This will reduce the impact of any host-specific pest or disease on the total tree population and will aim to mitigate for the shift in environmental conditions that might be expected due to climate change.

4.1.5 A preference for a diverse species mix will be accompanied by a focus on planting appropriate trees in each location with regard to the tree's resource requirements (soil, water, nutrients), to the tolerance to pollution, shade, heat and other adverse urban conditions, and to the juxtaposition of the tree's morphology with the adjacent urban use, for example crown scale, epicormic shoots and rooting habit.

4.1.6 A diverse species mix has no benefit for the resilience of the tree population (or any other target) if the trees do not thrive in the location planted, or if they conflict with the public in an unacceptable or unmanageable way. The [Town Centre Tree Planting Strategy 2020](#) sets out a detailed task by task methodology for the bio-secure sourcing, planting and aftercare of new trees.

4.2 Managing Risk

4.2.1 Whilst trees provide benefits, the Council recognises that it also has legal duties and responsibilities to consider the risks posed by trees and to manage those risks whilst protecting the benefits provided. Such risks include, as well as tree failure and subsequent injury and property damage, risk such as direct and indirect property damage, infrastructure damage, highway obstruction, visibility issues and human health risks from tree related pests.

4.2.2 A step by step guide setting out the Council's approach is presented in Guide 1.

4.3 Zero risks equal zero benefits

4.3.1 Trees are living organisms and natural structures and may lose branches or fail completely. Such hazards may arise because of structural defects, general growth patterns, tree species characteristics, local environmental or topographical factors or simply due to the occurrence of extreme weather events. Most commonly, structural failure is attributable to a combination of one or more of these factors.

4.3.2 It is not possible to eliminate the risks that arise without also sacrificing the benefits provided by trees. The only way to achieve zero risk from trees is to remove all trees or to prevent any public interaction with them. The council does not accept that the loss in the benefits that would arise from eliminating the risks posed by trees across the borough is an appropriate or desirable objective.

4.4 The level of risk is low

4.4.1 There is overwhelming evidence that, when considered at a national level, the risks posed by trees to members of the public are extremely low, equivalent to the background level of risk usually experienced by the general public during their everyday lives (Ball and Watt, 2009). Consequently the risks posed by trees as a whole can be considered to be broadly acceptable in terms of the **Tolerability of Risk Framework (HSE 2001)** detailed further in Guide 2. It follows that risks posed by trees are likely to already be adequately controlled through routine management practices (HSE, 2007).

4.4.2 Whilst the risks posed by trees are not necessarily perceived to be low by the public and the media, particularly following an incident, there is no evidence of significant societal concerns¹ regarding tree risk such that these concerns should influence the management strategy that is adopted by the Council for assessing and controlling tree risk (Ball, 2009). Rather than influencing tree risk management directly, societal concerns are recognized as real and are being addressed through targeted communication and consultation to better inform and reassure our residents and other partners that a sound approach to decision making is being exercised across the borough.

4.5 Legal responsibilities

4.5.1 In addition to protecting and preserving the benefits provided by its trees, the Council acknowledges that they have a legal duty to take such reasonable care, to champion its responsibilities as a prudent landowner² and to manage risks to a level that can be considered to be as low as reasonably practicable³.

4.5.2 There is, however, no legislation, approved code of practice or standard to determine, in a prescriptive manner, how the risks posed by trees should be managed.

4.6 Proportionate risk management

4.6.1 The council will aim to exercise a balanced and proportionate management strategy with regard to tree risk through adopting a sensible and common-sense approach to risk management. Safety will be considered to be one of a number of aims in managing the trees within the site, but not the only aim.

¹ "Societal concerns" is a term used to describe the situation whereby the risk, as perceived by the public is greater than the real or quantitative level of risk such that the public demands a level of regulation or control that could be considered to be grossly disproportionate. This situation may arise due to a lack of information on the part of the public, a degree of inequity of exposure to the risk, a fear or dread towards an unknown or unfamiliar risk, whether the risk is voluntarily accepted or not, or to differing views regarding the level of acceptability of the risk.

² Occupiers' Liability Acts 1957 and 1984.

³ Health and Safety at Work Act 1974

4.6.2 This management strategy will involve attempting to identify the real risks posed by trees, rather than risks that are perceived, but with no quantitative basis. This approach is set out in Guide 2.

4.6.3 The council will aim to allocate only appropriate resources, subject to availability, and in a manner that is proportionate to those risks.

4.7 Highway Trees

4.7.1 Maintaining clearance

4.7.1.2 The Council has a duty to ensure that trees and hedges adjacent to the highway do not obstruct users of the carriage way or footway. As well as physical obstruction to passage, this duty includes maintaining adequate visibility, applies to maintaining clear sightlines, ensuring that road signs are not obscured, and that the efficacy of street lighting is maintained. This duty applies to the maintenance of trees on all Council owned land.

4.7.2 Identifying risks posed to the highway by privately owned trees

4.7.2.1 In addition the Council, may exercise a power to require a private landowner to alleviate obstructions to the highway caused by trees located on their land. The duty regarding maintenance of clearance is set out in [section 154 \(1\) of the Highways Act \(1980\)](#)

4.7.2.2 The Council also has the power to require a landowner to manage trees that are deemed to pose a high risk to members of the public using the highway as set out in section 154 (2) of the Highways Act (1980).

4.7.2.3 Where a landowner has been served a notice to alleviate an obstruction or to manage a risk and has not done so the Council may, under specific circumstances enter the land to undertake appropriate work and recover expenses from the landowner.

4.7.2.4 These duties will be exercised by the Council's Highway Authority following appropriate advice from an arboricultural specialist.

4.7.3.5 In addition to these legal duties, the Council has identified policy objectives for the transport infrastructure across the borough, set out in the [Highway Asset Management Policy and Strategy \(2018\)](#). The approach that will be taken to manage the network is set out in the [Highway Maintenance Operational Manual \(2018\)](#).

4.7.3 Maintaining surfaces

4.7.3.1 In addition to managing above ground obstructions, the Council has a duty to manage carriage way and footway surfaces to ensure that level differences are maintained at acceptable levels.

4.7.3.2 Management of the disturbance to highway surfaces will be undertaken according to the guidance provided in the [Highway Maintenance Operational Manual \(2018\)](#). Trip hazards will be assessed during routine surveys commissioned by the Highways Department and managed according to a risk-based approach with shorter response times and resources being targeted at mitigating risks within areas of higher use, and where level differences are the greatest.

4.7.3.3 Where tree roots or stems are identified as causing a disturbance to, or distortion of, the carriage way or footway surface, the Council will consider the feasibility of surface repairs (if necessary) as a means to resolve the trip hazard.

4.7.3.4 Alternatively, more involved engineering solutions will be investigated in relation to the costs involved and with reference to the value of the tree implicated in the disturbance. Trees will generally be retained if it is possible to do so, provided level differences can be managed to appropriate levels and the costs (both initial and during long-term maintenance) are not excessive in relation to the value of the tree.

4.7.3.5 Where measures to manage level differences are found not to be feasible or cost effective, such that the only solution is deemed to be tree removal then funds will be made available for tree replacement that will be based on the Capital Asset Valuation of Amenity Trees (CAVAT) value of the tree lost. CAVAT is discussed further in section 2.4.

4.7.4 New highways schemes, dropped kerbs and vehicle crossovers

4.7.4.1 Projects involving the reconfiguration of the highway will consider the potential implications for trees at the earliest possible stage during the project feasibility and design phases. Project design should ensure that trees can be retained wherever possible, in accordance with Policy 1, 4, 10, 11 and 12.

4.7.4.2 The decision-making process that will be followed during the design phase of such projects will adhere to the principles set out in Policy 1. The value of any tree that might be damaged or that might require removal will be fully incorporated into the appraisal of any project. The costs of damaging a tree or removing a tree will be balanced against the costs of redesign or engineering solutions that allow tree retention within the scheme. Trees will be valued according to CAVAT as set out in section 2.4.

4.7.4.3 The consideration and assessment of the potential for a negative impact on adjacent trees, as a result of proposed highways reconfiguration projects will be considered with reference to the most recent BS5837- *Trees in relation to design, demolition and construction - Recommendations*. Advice regarding whether a tree will be negatively impacted by proposals will be provided by an arboricultural specialist and/or expert reviews of new schemes to ensure new planting is appropriate, sustainable and future risk assessed.

4.7.4.4 Highways reconfiguration also includes any application by a member of the public for the installation of a dropped kerb to facilitate a vehicle crossover from a private residence to the public highway where this is adjacent to and might impact a tree.

4.8 Ancient and Veteran trees

4.8.1 Ancient and veteran trees are valued highly by the public for their individual visual, aesthetic qualities, their size, gnarled, often bizarre form and for their great age that tends to inspire awe, reverence and fascination. These trees may be locally distinctive as individual specimens important to the community around them and may be significant within the broader landscape. They can be the visible relics indicating former land use; evidence of ownership related to historic parks or key elements of the history of a designed landscape. They link us culturally and historically to previous land use and previous generations. Occasionally they have significance to specific historical events.

4.8.2 A high proportion of the ancient and veteran trees within Europe are found in the UK, such that there is an international dimension to the responsibility to protecting them.

4.8.3 Of perhaps the greatest significance, ancient and veteran trees support rare, often unique niche habitats, and provide biodiversity involving complex interrelationships between the species that rely on specific environments for their life cycles. Of primary importance is the relationship created

between a tree and fungi as the fungi develop decaying wood habitat within a tree, which has the potential to support endangered saproxylic invertebrates. This habitat significance is discussed in more detail in [The Tree Habitat Strategy 2019](#).

4.8.4 The Council acknowledges the unique contribution made to the community both aesthetically and in terms of biodiversity, by ancient and veteran trees and further recognises the national and international importance of these trees and the ecosystems within which they have developed.

4.8.5 A significant population of ancient and veteran trees are located at Stockwood Park. The park has been designated a County Wildlife Site in recognition of the significance of these trees to biodiversity.

Ancient or veteran?

4.8.6 Ancient trees have the potential to be more valuable than veteran trees due to the length of time that they have supported the rare habitat associated with the typical morphological features present, and this is generally the case. However, given individual and local genetic variability and wide range of growing conditions it is possible for veteran trees to be older than ancient trees even where the trees are of the same species.

4.8.7 It is often not possible to distinguish with any degree of confidence between an ancient and veteran tree in the field. Consequently the distinction should be subordinate to an assessment of the relative quality, variety and volume of the unique habitat supported, to the potential for longevity of the individual and to the context within which it is growing; a population of veteran trees within a diverse habitat is likely to offer greater ecological value than an isolated individual ancient tree.

4.8.8 As detailed in section 3, the National Planning Policy Framework specifically considers ancient woodland and ancient or veteran trees, indicating that planning applications should be refused where the loss or deterioration of such irreplaceable habitats is involved unless there are wholly exceptional reasons and a suitable compensation strategy exists.

Figure 3 Chart of girth in relation to age and developmental classification of trees (Lonsdale, 2013)



4.9.1 Subsidence and direct damage

4.9.1.1 Although most trees co-exist with adjacent structures without detrimental effect, trees can occasionally cause damage to buildings directly by the pressure of their growing roots, stem or aerial crown parts, or indirectly by the action of extracting water from shrinkable clay soils.

4.9.1.2 The number and value of claims related to trees within the town has historically been a small proportion of the total public liability claims processed on behalf of the Council by their liability insurers (Dean, 2013). There are few areas within the town that have soils that are predisposed to subsidence risk with existing trees in a management regime designed to minimise future risk.

4.9.1.3 The Council will take a proactive approach to managing direct or indirect damage to property caused by its trees and will take a cooperative and non-adversarial approach to the handling of claims. However, the Council will aim to ensure that unnecessary tree removal in response to claims is avoided, by requiring that appropriate evidence establishes, on the balance of probabilities, that the tree is the substantive cause of the damage for which a claim has arisen and it will challenge claims not substantiated by sufficient evidence to prove that both damage is indeed occurring and that the tree is the substantive cause.

4.9.1.4 The Council will follow the advice of their insurers in resolving subsidence or direct damage claims and have due regard to the guidance provided by the [London Tree Officers Association in the Risk Limitation Strategy \(2008\)](#) and will manage claims by following the spirit of the processes described in the [London Tree Officers Association Joint Mitigation Protocol \(2008\)](#).

4.9.15 Where the cause of subsidence or direct damage has, on the balance of probabilities, been attributed to a tree, management options for mitigating the damage or the risk of further damage will be considered by the Council on the basis of the cost involved, balanced with the value the tree provides to the community, based upon its CAVAT value. The Council may opt to remove a tree, to prune a tree, or to retain a tree whilst committing to undertake measures to mitigate the damage being caused, or to prevent further or future damage from occurring.

4.9.2 Nuisance

4.9.2.1 Trees can cause nuisance to people or property by dropping leaves, blossom, fruit or other exudations (honey dew or bird droppings), by casting shade, obstructing views and interfering with media reception. Leaves can block guttering and drains. Mature trees can be perceived to be too large or too tall, simply by virtue of their presence and proximity to a living space. Tree crowns encroaching into the air space of a property can cause the owner concerns that have no substantive basis. Some residents may suffer from health conditions that have the potential to be affected by tree pollen, amongst many other contributory factors.

4.9.2.2 These issues are a natural consequence of living near to trees and need to be balanced with the numerous benefits provided by trees within the urban environment. Whilst the council recognises the stress that such issues can cause its residents, tree removal or pruning will not normally be carried out by the Council where the nuisance being caused is considered to be minor, where the nuisance is not proven or demonstrable or can be mitigated by other means. Guide 1 in Part 4 sets out model answers to a number of 'frequently asked questions' and offers answers in relation to such issues.

4.9.2.3 Where nuisance does not cause direct damage but is considered to be significant, genuine and demonstrable then the Council may, under exceptional circumstances, consider undertaking remedial measures. Such situations may arise because the tree causing the nuisance is clearly in an

inappropriate and unsustainable location, has the potential to cause future direct damage, or is of such poor condition or low value that it is not worthy of retention in light of the issue being caused.

4.9.2.4 Where the nuisance can be abated by very minor works that do not adversely affect the tree (for example by removing or reducing a single low limb), then the Council may consider implementing these measures.

4.9.3 Nuisance generating a risk

4.9.3.1 A number of conflicts between trees and infrastructure generate a risk that is not associated with tree failure. Tree crowns may obscure streetlights, road signs, or highway visibility displays. Foliage and branches may obstruct CCTV camera sight lines. Epicormic growth or low crowns may obstruct thoroughfares and encourage pedestrians to seek alternative access routes, exposing themselves to other risks. Stumps and surface roots may cause a trip hazard. Fallen leaves, exudations and bird droppings have the potential to cause a slip hazard.

4.9.3.2 Trees may also be implicated with anti-social behavior activities, and some trees have poisonous berries or seeds creating concern, although in reality having a very low risk of causing harm. The presence of these issues may not be apparent during a tree inspection and decisions regarding management will be taken where these are brought to the attention of the Council as part of the normal enquiries and complaints process, published by the Council

4.9.3.3 Where possible solutions will be sought that do not result in the loss of a tree or that have negative consequences for the health or longevity of a tree. Decisions will be reached subject to consideration of reasonable costs in relation to the benefits offered by the tree and the significance of the nuisance being caused.

4.10 Biosecurity, Tree planting and Aftercare

4.10.1.1 As well as looking after Luton's existing trees, management of the tree population over the long-term will require a planned tree planting programme if the aims of ensuring the borough has an appropriate tree age structure across its population and increasing tree stock value are to be achieved.

4.10.1.2 **British Standard 845: Trees from nursery to independence in the landscape, recommendations,** acknowledges that a significant proportion of newly planted trees fail to survive to maturity.

4.10.1.3 **The Town Centre Tree Planting Strategy 2020** sets out a detailed task by task methodology and audit through species selecting, sourcing from the nursery, transportation, planting and post planting maintenance to ensure new trees thrive, enhance the site and achieve their independence in the landscape.

4.10.1.4 The key to successful tree establishment requires a collaborative and proactive approach. Successful tree establishment not only consists of the physical actions, technical engineering solutions and a robust and audited aftercare regime, but also requires good communication between Tree Managers and suppliers.

4.10.1.5 Over the last decade there has been a significant increase in the frequency and severity of pests and diseases to our trees and plants in the UK. Many pathogens can enter the UK via infected trees and plants as well as timber and packaging products.

4.10.1.6 In order to help the fight against these biosecurity threats, the council will follow the following biosecurity principles, also set out in the ***Town Centre Tree Planting Strategy 2020***:

- ✓ The council recognise the risk posed to the environment from pest and disease and exercise an awareness of all Biosecurity issues.
- ✓ The council will endeavor to comply with the latest recommendations and guidance from DEFRA, the Forestry Commission, the Arboricultural Association and the Horticultural Industry.
- ✓ The council will regularly check DEFRA web site for updates on “At risk plants”.
- ✓ The council will ask its clients, Contractors, Landscape Contractors, and Nursery Suppliers to commit to the same Biosecurity principles.
- ✓ The council will endeavor to select species that are not at risk from serious pest and diseases, whilst ensuring that we maintain diversity of plant selection.
- ✓ Where possible, the council will source plants that have been propagated and grown in the UK. This project lead time, enables us every opportunity to select UK trees or trees that has been containerised and grown on in the UK for a minimum of two years

4.10.2 Tree planting programme

4.10.2.1 The tree planting programme will be based on a sound understanding of the number of trees required to maintain an appropriate age structure across the tree population and to meet Action Plan target 1 of increasing the canopy cover by 1 Hectare, to 67 Hectares.

4.10.2.2 The programme will require sufficient and appropriate planting sites to be identified across the borough. The ***Town Centre Tree Planting Strategy 2020***, for example has identified planting sites around the town centre. To ensure the planned long-term benefits become available, new tree planting will be limited to those sites where trees have sufficient space to develop to their true potential taking into account their mature scale, physiological requirements and their potential to cause a nuisance, following the principle of the ‘right tree in the right place’.

4.10.2.3 The planting programme will also aim to target areas of the borough where the tree population is currently not as well represented, where the tree population’s life stage is disproportionately in the later stages, in areas of the highest pollution and at potential future Green Flag sites.

4.10.2.4 Resilience will be improved by planting a diverse species mix to ensure that large proportions of the population are not at risk from certain host-specific pests and diseases, or to changing environmental conditions linked to climate change.

4.10.2.5 The species mix for the tree planting programme will focus on choosing species that are expected to survive and flourish at the specific planting sites identified and to avoid those most susceptible to disease, for example ash and Horse Chestnut. The ***Town Centre Tree Planting Strategy 2020*** provides a tree species planting palette.

4.11 Publicising Tree Works

4.11.1 The Governments '***A Green Future: Our 25 Year Environment Plan***', introduces new

requirements to ensure councils properly consult if they are considering removing street trees.

4.11.2 Outside of the consultation requirements for trees covered by Tree Preservation Orders and trees located in Conservation Areas, discussed in section 5.2, all street trees planned for removal, outside of work required urgently for safety reasons will be identified with a notice, with stakeholders having an opportunity to comment.

4.11.3 Non felling, cyclical tree works will not necessarily be publicised.

5 Trees on Private Land and Development Sites

5.1 Privately owned trees.

5.1.1 In addition to the council's power to serve a notice on the tree owner to make the tree safe where it affects the highway, discussed in section 4.7, the council can also call on the [Miscellaneous Provisions Act 1976](#) for tree risks posed to non-highway land and its users. Section 215 of the Town and Country Planning Act 1990 can also be applied where poor tree management negatively impacts on the amenity of an area.

5.2 Tree Preservation Orders and Trees in Conservation Areas

5.2.1 Tree Preservation Orders (TPOs) help the council to protect important trees, primarily in the interests of visual amenity and in the interests of the wider community and to have some control over their management. The council will normally protect trees that it considers to be under threat but will also consider protecting trees that are useful or desirable where the threat is less obvious.

5.2.2 A tree protected by a TPO must not be cut down, uprooted, topped, lopped, wilfully damaged or wilfully destroyed without the council's consent. Such an action can be a criminal offence and carry a significant fine.

5.2.3 To find out if a tree is covered by a Tree Preservation Order, please visit [the Luton Council webpages](#).

5.2.4 To carry out work to a protected tree, a planning application must be made via the [Luton Council webpages](#). If we grant consent, it will usually carry a time limit and a condition that the work follows best practice as set out in the latest British Standard 3998 tree work. Before making an application, we encourage applicants to contact the council to discuss their plans.

5.2.5 All trees with a stem diameter of 75mm or greater, (measured at 1.5 metres above natural ground level) are protected in a Conservation Area. Anyone intending to carry out any work to a tree in a Conservation Area must notify the council before doing so.

5.2.6 The council then has six weeks in which to make a decision. If there is no objection to the work, then the council will notify the applicant, but if there are concerns that the work may be damaging to the amenity of the area, the council will consider giving the tree full protection by issuing a Tree Preservation Order. Before making a planning application, applicants are encouraged to contact the council to discuss their plans.

5.2.7 The Council maintains a public register of applications to works to trees protected by Tree Preservation Orders and trees situated in Conservation Areas.

5.2.8 To find out if a tree is located within a Conservation Area, please visit [the Luton Council webpages](#).

5.3 Trees on Development Sites

5.3.1 Trees are a material consideration for all types of development, whether it is a major scheme or a householder extension. The council aims to retain the most valuable trees, and for them to be sensitively and sustainably located within a scheme.

5.3.2 Trees can be at risk from the pressures of development. Damage can be sustained to both the above ground and below ground parts of trees. Any failure to fully assess the impact of development at the earliest opportunity could lead to the loss of tree cover and the many benefits we know they provide.

5.3.3 Biodiversity Net Gain is a new approach to development which recognizes habitat and species loss in the UK and attempts to readdress the balance by reversing the decline and enhancing biodiversity provision, requiring developers to demonstrate an increase in habitat value compared to the pre-development baseline. Such enhancing biodiversity features can include new trees, hedges and woodlands.

5.3.4 The National Planning Policy Framework already requires development to demonstrate a net gain. Further, in 2019, the Government announced in its Spring Statement that Net Gain would become mandatory. Defra have since produced a Biodiversity Metric ([DEFRA 2.0 calculator](#)).

5.3.5 For major planning applications, submissions will need to demonstrate that:

- The Mitigation Hierarchy has been followed (including proposals for any necessary compensation)
- How the proposal will provide a minimum **10% net gain increase in biodiversity**
- How the proposal will integrate into any wider green infrastructure network.

5.3.6 For minor planning applications, the Government are currently exploring options.

5.3.7 All planning applications potentially affecting trees will be assessed by the council. Before making a planning application, applicants are encouraged to contact the council at the earliest opportunity and engage in pre application discussions.

5.3.8 Where existing trees are potentially impacted by a development proposal, the Council will:

- ✓ require a survey, carried out by an arboriculturist or competent person, identifying each tree's position, size, species, assessment category and root protection area (in accordance with the provisions of current British Standard 5837)
- ✓ require an appropriate ecological survey be submitted to benchmark the pre - development biodiversity value for net gain calculations.
- ✓ expect plans for new development to include measures to safeguard trees, and where appropriate make provision for tree planting to enhance the local tree escape.
- ✓ expect major development schemes to include a comprehensive landscaping, tree planting and long-term maintenance and aftercare programme.

- ✓ impose conditions on planning permissions to ensure that adequate protection is given to retained trees and hedgerows during demolition, site clearance and construction (in accordance with current British Standard 5837) and,
- ✓ only where considered appropriate, serve Tree Preservation Orders to prevent damage and ensure the continuing protection of the most valuable trees.

6. Tree Policies

Policy No.	Theme Policy	Key Objective	Strategy Section
	The Overarching Vision		
Policy 1	The Council recognises the value of trees, and will aim to protect, maintain and enhance the benefits they offer.	1	2.1
	A Pro-active approach		
Policy 2	The Council will pursue a pro-active management approach towards its trees with the aim of promoting a healthy, tree stock, a diverse age structure and increasingly resilient to biological threats.	1	2.1
	A Professional and quantifiable approach		
Policy 3	Ensure those with a role in delivering this strategy and policy are trained and competent to do so.	3	G2
	A balanced and proportional approach		
Policy 4	The Council will adopt a balanced and proportional approach to the management of the risks posed by trees, with safety being just one of a number of management considerations.	2	4.6
	Managing damage		
Policy 5	The Council will, in managing the risk of subsidence and direct damage to property, to minimise the number and cost of claims whilst avoiding unnecessary tree loss, require appropriate evidence to establish the cause of damage and will allocate sufficient resources to review such evidence.	2	4.9.1
	Residents Requests		
Policy 6	The Council will not normally prune or fell trees to abate issues of nuisance, or perceived nuisance (where the tree does not cause direct or quantifiable damage), where the consequence of the nuisance is considered to be insignificant or where alternatives to tree pruning or removal can mitigate the issue.	2	4.9.2.3

	Nuisance generating Risk		
Policy 7	The Council will manage non-failure related tree risks resulting in visibility, lighting or access issues and trip and slip hazards in a proactive manner wherever possible as part of a routine and periodic tree inspection regime and through prioritised programmes of work.	2 and 3	4.9.2
	Nuisance generating Risk		
Policy 8	Where a Council owned tree(s) or woodland are associated with anti-social behavior, and/or criminal activity, or where a perceived increased risk due to obstruction of CCTV cameras is present, measures to alleviate the issue will be implemented.	2 and 3	4.9.3
	Highways		
Policy 9	The Council will adopt a proactive management approach to ensure that the public highway is maintained without obstruction or interference and that risks posed by Council trees adjacent to the highway are managed in a reasonable and proportionate manner in accordance with Policy 2.	1 and 2	4.7
	Highways		
Policy 10	Where trees are potentially impacted by vehicle crossover applications, the council's lead Officer will be consulted by the highway department. A site visit may be necessary to make a decision on whether the tree has amenity value and should remain, or whether removal and replacement would be the best and most sustainable solution. Any costs associated with tree removal and replacement of a tree is to be borne by the applicant.	1 and 2	4.7.4
	Maintaining Safe Surfaces		
Policy 11	The Council will follow a risk-based approach to managing highways level differences, will accept a degree of level difference and will investigate the feasibility and costs of engineering solutions prior to accepting the loss of a tree where its roots or stem are causing a surface distortion or disturbance.	3	4.7.3

	Maintaining Safe Surfaces		
Policy 12	Decisions regarding measures to manage root disturbance and highways design decisions will be based on a sound understanding of the value of a tree, with the cost of measures directly compared against the CAVAT value of a tree, and compensation based on the CAVAT value of a tree.	1 and 2	4.9.1
	Ancient and Veteran Trees		
Policy 13	The Council will identify ancient and veteran trees and their environs across the borough and will endeavour to allocate appropriate resources for their sensitive and sustainable management to positively influence the longevity of such trees whilst managing the risks to an appropriate level.	4	4.8
	Tree Planting and Biosecurity		
Policy 14	The Council will actively seek resources to deliver tree planting, with targets linked to the tree canopy target. Trees will be planted in appropriate locations to allow them to develop to their full potential.	3	4.10.2
	Tree Planting and Biosecurity		
Policy 15	The Council is committed to promoting and implementing sound biosecurity practices to assist in safeguarding our trees from the introduction and spread of harmful pests and diseases.	3	4.10.1.6
	Planning and Development		
Policy 16	The Council will not permit development where this would compromise existing trees worthy of retention, particularly those subject to Tree Preservation Orders (TPOs), and where appropriate will ensure that trees are protected either through condition or the making of new TPOs.	1	5.3

7 Funding and The Action Plan 2020-2025

7.1 Funding

7.1.1 The delivery of parts of this strategy will be facilitated and enhanced if additional funding streams are secured.

7.1.2 The Government have grant schemes open to urban tree and woodland proposals, expected to be available across the period of this strategy. Luton have benefited from the urban Tree Challenge funding and will continue to apply for this and other government funding streams.

7.1.3 In addition to the government, there are a number of organisations who provide advice, financial and practical support for planting trees and creating new woodland. The Woodland Trust's MOREwoods scheme for example, is designed to support planting of small woods or scattered plantings covering at least half a hectare (1.25 acres).

7.1.4 The Community Infrastructure Levy (CIL) was introduced as part of the Planning Act 2008 to deliver infrastructure to the local community as part of a new development. Green infrastructure, including the management of woodlands, ancient and veteran trees and new tree planting can all be funded by the levy.

7.1.5 Section 106 agreements can be sought from developers by the council in order to make development acceptable in policy terms. The Planning Department and Parks Service will work together to ensure that the adverse effects of development on the tree stock are fully mitigated.

7.1.6 When a council owned tree is required to be removed to facilitate a development, the Capital Asset Value for Amenity Trees (CAVAT) value of the tree will be required to mitigate the loss, and the money received used to support the planting targets discussed throughout this Strategy.

7.2 The Action Plan (2020-2025)

	Action	Policy	Delivery	External Funding	Lead
1	Tree Canopy Cover target met The target is 67 Hectares by 2025 (an uplift of 1Ha on the 2017 (i-tree Eco Study baseline) Linked to Action 9	1,2,12, 14,15	2020-2025	Urban Tree Challenge MOREwoods HLF	Parks Service
2	Achieve and maintain Green Flag Status in all 6 District Parks At 6 Parks (2020): Brantwood, Leagrave, Memorial Park, Peoples Park, Stockwood Park, and Wardown Park (2020)	2	2020-2025	N/A	Parks Service
3	Manage all other sites taking account of green Flag criteria as detailed in the "Raising the Standard" manual	2	2025	N/A	Parks Service

4	To gather baseline data to understand the tree value and canopy cover of the borough to meet Action 1 above and measure and set new targets 2025 -20230)	1,2,12, 14,15	2020-2025	N/A	Parks Service
5	All tree surveyors to have a minimum National Qualification Framework at Level 3 or be under the supervision of a surveyor qualified at that level.	3	2021 - ongoing	N/A	Parks Service
6	All tree surveyors to undertake Quantified Tree Risk Assessment training.	3	2022 - ongoing	N/A	Parks Service
7	Adopt CAVAT as a tree evaluation model to be applied when making decisions around unplanned tree removals.	3	2020	N/A	Parks Service
8	Actively seek new on and off-site provision of trees from development schemes	14 16	2020	S106/CIL	Parks/Planning Service
9	Actively seek funding for new tree planting and community engagement.	14 16	2020	Urban Tree Challenge MOREWoods HLF	Parks Service
10	Explore Pre-Application fee funding to contribute to costs of this Action Plan, including tree planting costs	16	2020-2021	Pre app fees (Developer/ Householder	Parks/Planning Service
11	Actively seek funding for Ancient and Veteran management and community engagement	13	2021-2025	HLF	Parks Service
12	Carry out a feasibility assessment of existing empty tree pits to assist in the canopy cover target	14 16	2021	N/A	Parks Service
13	Explore the appetite for signing up to the Joint Mitigation Protocol (JMP)/or following a protocol in the spirit of the JMP	5	2021	N/A	Parks/Insurance Service
14	Create a tree management database GIS map layer based on a combination of geological records, sites with a history of tree related subsidence and sites that pose a higher risk to help minimize tree related subsidence or the risk of subsidence.	5	2021	N/A	Parks/Insurance Service
15	<i>Adopt a Street Trees Removal Publicity Protocol</i>	N/A	2020	N/A	<i>Parks Service</i>
16	Ensure Pest and Disease threats are current (referencing material held on Observatree) and communicated via the Luton web pages.	14	2020-ongoing	N/A	Parks Service

The Guides

Guide 1: Common Tree Enquiries

1. The tree looks dangerous and moves in the wind.

The Council has a qualified tree expert who will inspect a tree following an enquiry or in line with the Tree Risk Management Strategy following routine inspections. Our inspection will determine its condition and safety. Trees have a natural movement in windy conditions with flexing of the trunk and movement of branches being quite a normal response.

2. The tree has not been pruned for a long time. It is too tall and needs to be pruned.

Trees across the borough are regularly assessed and any safety or maintenance related works are reported at this time. The Council does not reduce the height of the trees as a matter of course, as this can stimulate rapid re-growth and/or cause defects in the tree's structure and exacerbate the original reported issue.

The council will routinely prune highways trees to ensure that encroaching branches are pruned where they are obstructing roads and footpaths, masking streetlights, road signs and other street furniture, to maintain vehicular and pedestrian safety on the highway.

3. Tree branches encroaching a garden/boundary

When tree branches or roots encroach on to neighboring land they are legally regarded as a nuisance. Under the terms of law, the tree owner is not obliged to cut back the branches overhanging their neighbors' garden unless damage is being caused. However, the owner of the adjacent land has the legal right and 'abate the nuisance' by cutting the branches or roots encroaching on other property.

Where requests are made to prune trees that overhang a boundary each instance will be assessed on its merits. As a general policy, the council will only undertake work where a tree's branches touch or are very close to a building and as a consequence could cause physical damage.

4. Shading and Blocking Views

Householders have no right to light from across a neighbor's land. Likewise, there is no right to a view, and a view obstructed by the growth of trees cannot legally be regarded as a nuisance. Where requests are made to prune trees to increase light levels, each instance will be assessed on its merits. As a general policy the council will not undertake pruning simply to allow more light to a property, where the trees in question would not otherwise require pruning for other reasons.

An individual's tolerance of shade or their need for light is a subjective and personal matter whilst some people prefer shade there are those that have desire for sunlight. Many people are aware of the ancient and prescriptive right to light, but this only relates to loss of light over a considerable period of time in certain specific circumstances. Where trees are concerned there is no 'right to light'.

5. T.V/Satellite Reception

There is no legal right to television reception. Existing trees on neighbouring land which interfere with television reception, especially with satellite transmissions, are unlikely to be regarded as a nuisance in law. The Council will not carry out tree pruning simply to improve television or satellite reception, where the trees in question would not otherwise require pruning.

In the vast majority of cases, interference can be reduced by an engineering solution such as the relocation of the aerial or by the use of “booster boxes”, which often improve the reception significantly.

6. Pollen and Allergies

Whilst some kinds of tree pollen are known to bring on in sufferers the symptoms of hay fever this is not considered justification for either the pruning of Council trees, or their removal.

7. Leaf Fall

The Council does not carry out a public leaf collection service. Although complaints are sometimes received about the problems caused by leaves falling from trees, the loss of leaves from trees in the autumn is part of the natural cycle and cannot be avoided by pruning. The maintenance of gardens and gutters is the responsibility of the landowner and the Council is not obliged to remove leaves that may have fallen from Council owned trees. Where gutters are regularly blocked by fallen leaves gutter guards may be fitted to provide a low maintenance solution.

8 Fruit, berries and nut fall

There are certain locations where fruit trees are not desirable, for example where soft fruit would make the pavement slippery or where anti-social behavior could encourage fruit being thrown at houses or cars. When considering the ‘right tree for the right place’, the Council takes account of the likelihood of such problems. Equally, where fruit trees are established but where there is a significant, anti-social behaviour problem the Council will consider phased removal and replacement in extreme cases.

9 Sap/Honeydew – The tree is making a sticky mess on my car or garden

Honeydew is caused by greenfly (aphids) feeding on the tree, which excrete a sugary sap. Often the honeydew is colonised by a mould, which causes it to go black. This is a particular problem with tree species such as lime and sycamore.

Unfortunately, there is little that can be done to remove the aphid which causes the problem and pruning the tree may only offer temporary relief. Any re-growth is often more likely to be colonised by greenfly thereby potentially increasing the problem. Honeydew is a natural and seasonal problem. Where new trees are planted we choose trees that are less likely to cause this problem. Where honeydew affects cars, warm soapy water will remove the substance, particularly if you wash the car as soon as possible.

10 Bird Droppings

Bird droppings may be a nuisance, but the problem is not considered a sufficient reason to prune or remove a tree. Even when branches are pruned, the bird will often just move to another branch. Nesting birds are protected under the Wildlife and Countryside Act 1981 (and other related wildlife law). Warm soapy water will usually be sufficient to remove droppings.

11 The tree is causing damage to my drains

Tree roots typically enter drains that are already broken or damaged. Trees themselves very rarely break or damage a drain in the first place. Tree roots found in a drain are usually symptomatic of an underlying problem requiring repair of the broken pipe.

Tree roots can cause damage to paving, lawns and the foundations of buildings or walls. Where a neighbor's tree is causing problems, an owner is within their rights to cut back roots to the boundary of their property, unless it is protected by a TPO or is within a Conservation Area. However, one should be aware that undermining the future stability of the tree can lead to future liability for any future damage caused.

12 The Tree is covered in ivy and it's killing it

Ivy is a climbing plant abundant as a groundcover shrub in many rural types of woodland. It has a variety of conservation benefits and forms an integral part of woodland's habitat. In the urban environment there is a need to balance three main considerations for its retention: tree safety, conservation and aesthetics. In some situations, it may be considered unsightly and more importantly can create problems for efficient management by obscuring potential defects and fungal fruiting bodies. It can also increase the weight of a tree's crown and the 'sail' effect during the wet, windier, winter months, when deciduous trees have shed their leaves. As a general policy the council undertakes the removal of ivy from trees only where it is considered necessary to aid visual tree health assessment.

13 I have a big tree near my property. I am worried about the damage the roots may be doing to my house. What should I do?

Tree roots may potentially cause damage to built structures in two ways:

Direct damage – this is caused when the physical expansion of tree roots or stem lifts paving stones or cracks walls etc. Due to the weight of a house no amount of physical expansion will affect it, but garden walls and small structures such as garages or outbuildings might be at risk.

Indirect damage – this can be caused to larger structures such as houses when tree roots grow underneath the foundations, extract the water there causing clay soils to shrink and the structure to subside. If a building has been built on clay soil near an existing tree, and that tree is then removed, the soil may expand which can cause heave (the opposite of subsidence).

Modern building standards mean that the risk to newer buildings tends to be isolated and the council will expect new buildings to be built to industry guidance and therefore they should not subside due to trees that were in existence at the time they were built. Should you believe that trees are the cause

of cracking to a property, you should consult with your building insurers to determine the probable cause.

14 My neighbours have a high hedge. What can I do about it?

The Anti-Social Behaviour Act 2003 (High Hedges) provides for those who feel that a neighbour's hedge is hindering the reasonable enjoyment of their property to submit a formal complaint to the council. The council will then investigate the matter and may, if considered appropriate, serve a notice on the hedge owner requiring them to reduce the hedges height. In most cases, it should be possible for neighbour's to agree on a course of action without a formal complaint being necessary. This is certainly the preferable approach for all concerned. If you are unable to reach agreement with your neighbour, try contacting a local mediation service. The Council will not deal with a complaint until the mediation process has been attempted. Before coming to the council, you should write to your neighbor to let them know what you are going to do.

Guide 2: Tree Management Protocol

G2.1.1. The tree management database

G2.1.1.1. At the core of the tree strategy sits the adoption of a management system to record and store data that identifies, locates and describes trees and groups of trees within the tree population. Through this system inspections, risk assessments, remedial work recommendations and a history of management is held for reference and to serve as a clear and transparent record and audit trail of the decisions made when managing the town's trees.

G2.1.1.2. The Council will maintain digital records describing the tree population within a specialist tree management database. Trees and groups of trees will be recorded on a digital plan in a Geographic Information System (GIS) and this positional data will be linked to the corresponding specialist tree management database record.

G2.1.2. Formal tree survey

G2.1.2.1. Identifying trees that need management or consideration will be achieved through undertaking formal, programmed tree inspections undertaken or commissioned by the Council's Arboricultural Supervisor but will also be directed by the general, informal observations made by non-specialist Council staff during the course of their daily activities.

G2.1.2.2. The formal tree survey process will take one of two forms depending on the size, age and condition of the trees, the requirements of management and the level and nature of use adjacent to or beneath the trees. Trees will either be managed as part of an inventory or within areas that are subject to periodic walkover or drive-by inspections.

G2.1.3. Tree inventory

G2.1.3.1. The majority of the trees within the Council's ownership and responsibility will be managed as part of an inventory. An inventory will involve recording all individual trees and groups of trees within an area in the tree management database and plotting the location of these in the GIS.

G2.1.3.2 Holding comprehensive records for all trees within an area as part of an inventory is appropriate where the management of the risk posed by trees towards members of the public or property is one of a number of aims and where the management of nuisance, maintenance and general good arboricultural practice are equally important aims.

G2.1.3.3 Critically, an inventory serves as a long-term management tool for the trees in the population.

G2.1.4. Walkover tree survey

G2.1.4.1 Where the level and nature of use within an area is low, where the trees are small or the potential to cause harm is limited, where recording the trees in an inventory would be prohibitively expensive or where the management objective of inspecting trees is intended to be entirely risk focused then a walkover survey may be undertaken. In a proportion of the circumstances described above no regular inspections may be considered necessary or appropriate. For example, a very rarely visited corner of a country park containing a plantation of small trees may require inspections on a very long interval merely to provide an opportunity to recommend formative pruning or silvicultural thinning operations. If that area is very restricted, by coarse vegetation or boggy ground, it is perfectly reasonable to exclude the area from any regular inspection regime.

G2.1.4.2 Within an area identified as requiring a walkover survey trees or groups of trees will be recorded in the tree management database where remedial measures have been identified as necessary to reduce risks below a threshold level, or where monitoring, further information or further assessment by a more experienced individual is recommended.

G2.1.5. Informal tree survey

G2.1.5.1 In addition to the formal, structured, planned survey regimes described within this strategy the Council recognises that tree issues can be identified by non-specialist staff undertaking their daily duties, whilst operating within the estate. Staff with specialist arboricultural knowledge will also be travelling within the area and will have the opportunity to make informal observations regarding risk and nuisance issues outside their formal tree inspection activities.

G2.1.5.2 Reports relating to tree issues identified during activities outside the formal tree inspection process will be made through the formal enquiries and complaints procedure operated by the Council and described in Section 5 of the Tree Management Strategy.

G2.1.5.3 Further investigation instigated by the submission of such reports will range from consulting the records for the tree in question held in the tree management database, to the initiation of a specific site visit and inspection to be undertaken by a specialist.

G2.2. Tree inventory

G2.2.1. A long-term management resource

G2.2.1.1 For the majority of trees, groups of trees, hedgerows and small copses, shelterbelts and woodlands a record will be held in the tree management database regardless of whether any immediate works are required to manage risk, as part of the long-term and proactive approach to the management of the tree population that will be adopted in recognition of the value that the Council places on trees. This will allow resources to potentially be allocated to desirable, but non-urgent measures that would be beneficial to the maintenance and development of trees within the tree population.

G2.2.1.2 Tree inventory data will be held in a tree management database and locations will be plotted within a linked GIS.

G2.2.2. Tree data

G2.2.1 The inventory will involve the collection of data, recorded against each tree or group of trees during a survey, to cover a number of specific areas.

- *Unique reference.* Each tree or group will be assigned a unique reference within the database.
- *Ownership or responsibility.* A record or records relating to ownership or responsibility will be held to allow costs relating to work schedules and inspection regimes to be assigned to specific budgets where this is appropriate.
- *Tree Species.* Species will be recorded to assist with identifying a particular tree on site, to aid management decisions where this is species specific, and to inform tree population level assessments such as resilience and diversity.
- *Basic dimensions.* Data relating to height, stem diameter and crown spread will be collected to assist with identifying a particular tree on site and to help to inform management issues or to respond to enquiries without the need for a site visit *i.e.* to consider whether a tree is located within falling distance of a target, or to make an initial assessment of whether a tree overhangs a boundary.
- *Life stage.* Data to establish whether a tree is young, semi-mature or mature will be recorded to assist with identifying a particular tree on site and to inform tree population level assessments such as sustainability.
- *Health or physiological condition.* An assessment of the health of the tree will inform future management approaches as well as tree population level assessments such as resilience.
- *Observations of attributes or defects.* A comprehensive record of the morphological and physiological features of each tree and any defects, whether significant or not, will be recorded to assist with identifying the tree on site and to act as the core data informing management and justifying management decisions.
- *Context.* The nature and level of use around the tree will be recorded to inform risk management and nuisance decisions.
- *Risk assessment.* A formal tree risk assessment will be recorded to inform management decisions where significant defects are noted and where trees are adjacent to an area of use such that there is a potential to cause harm.
- *Recommendations.* Pruning measures deemed necessary to reduce the likelihood of failure of a tree or tree part, whether risk related or to preserve the tree, as well as measures to manage nuisance or pruning simply for good arboricultural practice or general maintenance will be recorded. Similarly measures to improve tree or soil health will be recorded where this is considered desirable.

- *Target date.* Recommendations will be given a target date for completion to assist with prioritisation and decision making in terms of the allocation of resources. Recommendations will be signed-off as completed when work has been delivered.
- *Cost estimate.* Recommendations will be assigned an estimated cost to inform annual budget estimates and assist with long-term planning.
- *Inspection.* Every tree or group record will be assigned a next inspection recommendation to ensure that a cycle of inspections can be maintained throughout the tree population.

G2.2.3. Trees and groups

G2.2.3.1. Trees will be recorded using point data and groups will be recorded as polygon areas in the GIS. The decision to record trees as individual records or collectively within groups will rest with the judgment of the surveyor or consultant undertaking the survey.

G2.2.3.2. The decision will generally be taken to plot a group polygon rather than individual point data where trees have similar characteristics such as age, species, or size or where the management of an area of trees is most appropriately considered on a collective basis. In addition, group polygon data may be appropriate where the density or close proximity of a number of trees would mean that individually plotted tree point data would become too congested for the data to be easily distinguishable on a plan and would therefore become unmanageable within the GIS.

G2.2.3.3. The survey will aim to record all trees within a tree population including young planted trees, natural regeneration and tree stumps, where holding this data is appropriate and useful for the long-term management of the tree population, for example where a re-inspection will be appropriate within a reasonable timescale to reassess the trees, or where there is a need to record a management recommendation.

G2.2.4. Tree inspection and assessment method

G2.2.4.1. Trees will be assessed during an inspection with reference to the principles described by Visual Tree Assessment proposed by Mattheck and Breloer (1994) and according to general industry best practice for tree inspection such as that summarised in Lonsdale (1999) and various other industry reference documents. Such guidance will be followed to assist in identifying potential defects or areas of concern within the crown structure and the root system of a tree. In addition, suspected or observed changes in the circumstances surrounding the tree, such as excavations, level changes or the removal of adjacent trees or structures that may impact on root stability or the loads to which a tree is exposed will be taken into account when making recommendations for possible management approaches.

G2.2.4.2. The significance of these structural and circumstantial observations will also be considered in relation to the physiological condition of the tree. The potential interaction between decay fungi or pests and diseases with a tree of a particular species will be considered in so far as this might influence the rate at which the current situation might change. Critically, the extent of strength loss associated with any defect will be considered within the context of the safety factor expected for the tree (determined by the relationship between load, stem form and material properties).

G2.2.4.3. During the inspection, observations and investigations relating to each tree being assessed will be achieved through the use of binoculars, sounding mallet, trowel and manual probe and will be undertaken from ground level only. Aerial inspection, invasive or other detailed internal decay detection devices will not be employed when assessing trunk or crown condition during the routine

tree survey. Excavations will not be carried out to assist with assessing root condition. Tree or soil samples will not be taken or analysed as part of the tree inspection process during the routine tree survey site visit. However, recommendations to procure such additional information at a subsequent date, to assist with a management decision, may be made as part of the tree inspection process.

G22.4.4. In addition to observations relating to the likelihood of failure of the tree or group being assessed, any other issues such as the nuisance caused by tree crowns conflicting with structures, thoroughfares, highways or visibility splays will be noted where these are considered relevant and where the Council has a responsibility to manage these issues.

G22.4.5. Where access to inspect a tree or group of trees is impeded, restricted or unsafe, information will be collected as far as feasible given the circumstances, to fulfil the inspection requirement. In these circumstances recommendations to achieve improved access or visibility either through the removal of scrub, debris, vegetation or climbing plants, or through the procurement of keys or access codes (or access permission) to allow a more thorough inspection during a subsequent inspection programme may be specified.

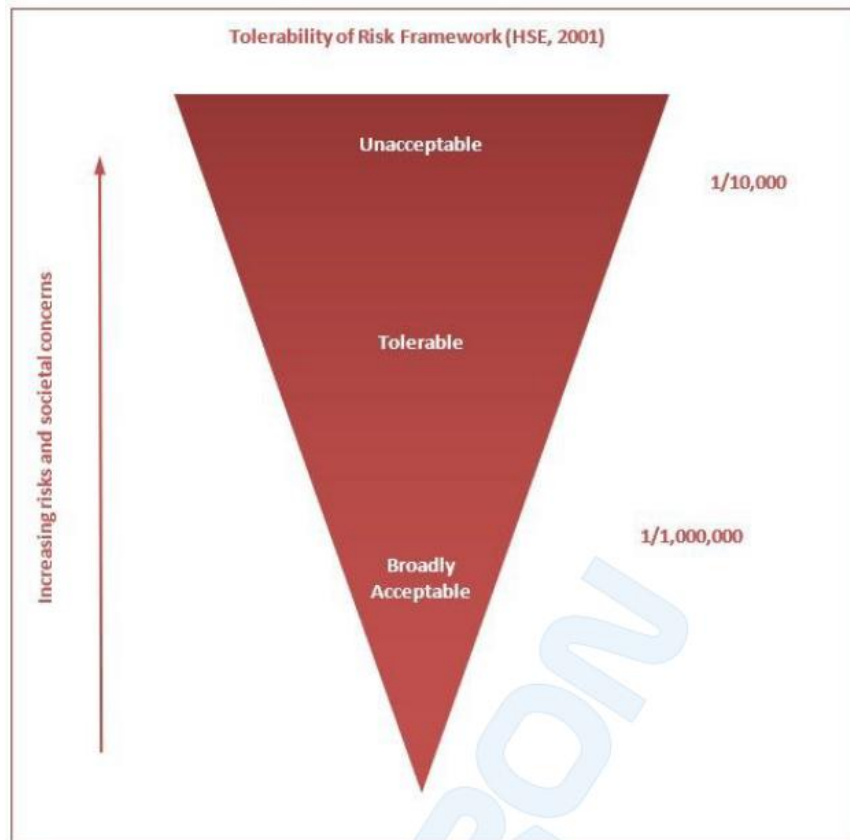
G22.5. Risk assessment

G22.5.1. Where considered appropriate during the tree inspection, a formal risk assessment will be undertaken to assist with the decision-making process. The risk assessment system employed will consider the likelihood of failure of the tree or tree part, the likelihood of a person or property being present if failure were to occur and the expected consequence in terms of the extent of harm likely to be caused were failure to coincide with the presence of a target. The output of the system employed will be expressed in terms of probability to enable consideration in terms of absolute thresholds for risk, rather than in relative terms, or should refer directly to the HSE guidance on the treatment of risk (HSE, 2001).

G22.5.2. A risk of harm that is more likely than 1/10,000 will be considered to be equivalent to an unacceptable level of risk, according to the Tolerability of Risk Framework (HSE, 2001). Measures to reduce such risks will be recommended as a matter of high priority, usually to be dealt with within a short time scale, and outside of any annual, planned or programmed management activities.

G22.5.3. A risk of harm that is more likely than 1/1,000,000 and less likely than 1/10,000 will be considered to be equivalent to a tolerable level of risk and measures to reduce such risks will be recommended only if such operations are considered to be cost-effective, provided that such expenditure is not grossly disproportionate to the risks posed so that risks are managed to a level that can be considered to be as low as reasonably practicable¹. In general, due to the relatively high costs of tree pruning operations, only those risks posed by trees that are greater than 1/100,000 will usually require consideration for an allocation of resources to achieve a measure of risk reduction. Expenditure on reducing tree risk below this level can generally be considered to be grossly disproportionate in relation to the benefits of the risk reduction measures carried out.

¹ As low as reasonably practicable (ALARP). If the benefits in terms of risk reduction are very low when compared to the costs of achieving that level of risk reduction then the expenditure can be considered to be grossly disproportionate, and justification for not allocating resources can be made. The risks posed would be considered to be at a level that is already as low as is reasonably practicable. The principle is easier to understand where a decision relates to a choice between two actions, where both cannot be funded.



G22.5.4. A risk of harm that is less likely than $1/1,000,000$ will be considered to be equivalent to a broadly acceptable level of risk and measures to reduce the risk further will not generally be considered to be appropriate (and would not be considered to be a sensible allocation of Council resources).

G22.5.5. For the majority of trees inspected an informal risk assessment will quickly indicate that the risks posed by a tree are broadly acceptable and the formal risk assessment will not be calculated. In these circumstances, records will show that no formal risk assessment was deemed necessary.

G22.5.6. A threshold of risk for trees across the Council's tree population that will be broadly applied during formal tree surveys is $1/100,000$ on the principle that expenditure beyond this is likely to be grossly disproportionate in terms of the principle of reasonable practicability.

G22.6. Recommendations

G22.6.1. Specific recommendations relating to tree surgery work or other remedial measures will be recorded against tree or group records during an inspection where considered appropriate to address risk, nuisance, pest and disease control measures, good arboricultural practice or long-term maintenance requirements.

G22.6.2. Such recommendations will be assigned a subjective priority generating a target date for completion, to assist with sequencing potentially large work programmes and to enable the Council to maintain control of management budgets. The choice of a priority or target date by a surveyor will be informed by the inspection and any formal quantified risk assessment, where risk is the management issue being addressed. However, where other issues are being considered the surveyor will be required to use their judgment to determine what is reasonable and appropriate, bearing in mind the implications of assigning unnecessary or unjustifiable urgency for work items, upon annual

budget commitments. The surveyor should consider how long it would be reasonable to delay dealing with a particular issue and use this as a basis for recording a priority. There is nothing to prevent work being brought forward should sufficient resources become available to do so.

G22.6.3. The following examples serve to illustrate the decision process that might be followed by the surveyor when assigning a priority to recorded work:

- A large limb with a significant defect overhanging a busy highway is assessed to pose an unacceptable level of risk. Remedial measures are commissioned as a matter of urgency, outside of any planned management regime. A target date to deal with the issue is selected by the surveyor, for example, within 1 month, which is then recorded in the database.
- A large limb with a defect and a moderate likelihood of failure overhanging a footpath is assessed to pose a tolerable level of risk greater than 1/100,000. A target date to reduce the risk to an acceptable level within 1 year, for example is recorded.
- A tree crown is noted to be touching the guttering of an adjacent property. Damage is considered moderately likely to occur. A risk assessment determines that the risk of harm is tolerable but below 1/100,000. A target date to prune the crown from the property within, for example, 2 years being recorded. The risk assessment suggests that the work need not be completed in pure risk management terms. However, the subjective priority indicates that other issues related to Council reputation or resources that would be tied up in dealing with an enquiry or complaint determines that the work should be completed.
- A tree crown is noted to be touching the roof of an adjacent property. Damage is not considered likely to occur until the limbs touching the property reach a large size. A risk assessment is not recorded (risk is considered to be at a broadly acceptable level). A target date to prune the crown from the property within, for example, 3 years is recorded.
- A tree crown obscures a streetlight. The impact on light levels is currently not significant, but is considered likely to become significant within 3 or 4 years. A risk assessment is not recorded (risk of harm from tree failure is not an issue, though other risks related to visibility do apply). A target date to prune the crown from the streetlight within, for example, 3 years is recorded.
- A tree crown obscures a visibility splay at a busy junction. A risk assessment is not recorded (risk of harm from tree failure is not an issue, though other risks related to highway safety do apply).

The potential consequence, in terms of a road traffic accident, is high. A recommendation to lift the crown of the tree is recorded with a priority of between 1 and 6 months.

- The stem of a young planted tree is constricted by a planting strap. The strap has caused significant damage. A risk assessment is not recorded. A target date to remove the strap within 1 or 2 years is recorded to prevent the inevitable loss of the tree.
- A plantation of semi-mature trees requires a silvicultural thinning operation, to ensure the future development and viability of the group. A risk assessment is not recorded. A target date of between 5 and 10 years is recorded. The work is not likely to get commissioned strictly according to the target date. However, costs are assigned to an operational year to help inform future budgets.

G22.6.4. A range of priorities including Immediate, 1 month, 6 months and 1-10 years will be available as options for the surveyor to apply to recommendations being made during a tree inspection.

G22.7. Inspection regime

G22.7.1 A recommendation to carry out the next inspection within a certain timeframe will be recorded for every tree or group of trees assessed during each inspection. This will ensure that data is available to define a periodic inspection regime regardless of whether any remedial pruning is commissioned for the entire tree population.

G22.7.2 The choice of inspection interval will be determined based on the size, age, species and condition of the tree or group of trees in relation to the context within which it is growing. The interval will take into account the requirement for remedial work and the target date that any current work recommendations have been assigned. An appropriate inspection interval will also be influenced by the level and nature of use in the vicinity of the tree and the potential speed with which the condition of the tree might reasonably be expected to change.

G22.7.3 Where trees are recorded as part of an inventory an opportunity exists to record an inspection interval tailored to each unique set of circumstances related to an individual tree and to adjust this over time in response to changes in those circumstances. Decisions relating to an appropriate inspection interval will be made by the surveyor whilst on site inspecting the tree in the context of its surroundings, at the point that they are best placed to make such decisions, rather than as a desk-based exercise applying broad zones to define inspection cycles. Inspection cycles defined by zones inevitably results in an inefficient allocation of resources and are only appropriate where no inventory data is available.

G22.7.4 The following examples serve to illustrate the decision process that might be followed by the surveyor when assigning a priority to the inspection interval:

- Works to address risk have been recommended with a target date for completion of within 1 year. Whether such works will be commissioned or not will depend on the available annual budget. An inspection interval of 1 year will be recorded to cover the eventuality that this work recommendation is not commissioned as intended.
- The crown of a tree is growing close to an adjacent building. The surveyor anticipates that, given growth rates typical for that species, the crown will begin to conflict with the property within 4 years. An inspection interval of 3 years is recorded to reassess this expectation.
- Alternatively; The crown of a tree is growing close to an adjacent building. The surveyor anticipates that, given growth rates typical for that species, the crown will begin to conflict with the property within 4 years. A work recommendation to prune away from the building with a target date of 4 years is recorded so that costs are assigned to a budget. An inspection interval of 3 years is recorded to cover the eventuality that this work recommendation is not commissioned as intended. The work would potentially be completed earlier than necessary if growth rates are slower than the surveyor expects. The inspection gives the opportunity to postpone the work.
- A mature oak adjacent to a busy highway is noted to have no significant defects within the crown and the root environment suggests that no significant issues are likely. Whilst the level of use adjacent to the tree is high an inspection interval of 3 or 4 years might be appropriate because the likelihood of defects developing rapidly is low. Safety factors for a mature oak with a large diameter are high, so significant defects are required before failure is likely.
- A mature birch adjacent to a busy highway is noted to have no significant defects within the crown and the root environment suggests no significant issues are likely. Decay processes and decline

have the potential to occur at a faster pace for this species. Stem diameter and wood strength are lower than oak in maturity, so safety factors prior to defects being taken into account are also lower. An inspection interval of 2 years might be appropriate.

- A young planted tree adjacent to a busy highway poses a very low level of risk. An inspection interval might be driven by a requirement to consider allocating resources to formative pruning to facilitate highways clearance preemptively before the resulting pruning wounds would become too large. An inspection interval of 5 years might be appropriate.
- A semi-mature tree with a good crown structure and no defects is located within a public park in a low use area. An inspection interval of between 5 and 10 years is recorded, depending on how low the use is considered to be, and whether any formative pruning might be considered appropriate at some point during development. There is no requirement to prescribe a short interval in case a branch is broken in a high wind event. Decisions should be based on an assessment of likelihood not on the basis of simply what is possible.

G2.2.8. Level of training and expertise

G2.2.8.1. Undertaking an inspection of a tree as part of the formal tree survey process requires sufficient and specific knowledge and experience and should be carried out by a member of staff or external contractor that is suitably competent and with an appropriate level of training or experience.

G2.2.8.2. Clearly the level of training and experience appropriate for assessing small trees in low use areas differs from that required to make decisions regarding mature trees adjacent to a busy highway. Where detailed assessment of trees with significant defects are required through the use of devices or instruments further specialist knowledge, training and experience will be required.

G2.2.8.3. The Council will require that those tasked with carrying out an operation will have suitable training and experience. The Council will support in house employees in developing their skills and achieving the certification necessary to ensure that they are judged to be able to undertake the tasks required of them and further will aim to ensure that all staff are comfortable in making the management decisions required of them

G2.2.8.4. The Council operates an Arboricultural Services Framework that includes a range of contractors and consultants who have suitable skills and experience to deliver the arboricultural services required. The Council also support staff in Continued Professional Development to ensure that they are comfortable in making the decisions required of them in managing Luton's tree stock.

G2.3. Walkover tree survey

G2.3.1. Managing tree risk only

G2.3.1.1. Areas under the responsibility of the Council will be identified in the GIS where it is not appropriate or cost-effective to record an inventory survey of trees and groups of trees (see Section 2 Tree inventory). Within these areas a periodic walkover survey will be undertaken.

G2.3.1.2. A walkover survey involves recording trees and groups of trees only where the risks posed are considered to have exceeded a threshold level and where remedial measures are recommended.

G2.3.1.3. Such an approach is appropriate to achieve an efficient and cost-effective survey of large and complex sites where the management of tree risk is the over-riding objective, whilst maintaining a system to record data sufficient to constitute an audit trail in the absence of a full tree inventory.

G23.2 Inspection zones

G23.2.1. Inventory data is not available for areas assigned to a walkover survey regime. Consequently, an appropriate inspection interval will be defined at an area level through creating inspection zones within the GIS, with an inspection frequency assigned to any trees located within each zone, regardless of the tree's size, age and condition.

G23.2.2. Efficiency in the allocation of inspection resources will be achieved, where possible, by breaking up walkover survey areas into individual zones within which the use and tree population are relatively similar. Inevitably there will be some variation within any zone. The inspection interval for each zone will be determined by the most frequent inspection deemed appropriate (*i.e.* based on the combination of the highest level of use and the trees with the greatest potential to cause harm).

G23.2.3. How far each walkover area is broken down further into inspection zones will depend on the balance between the efficiency that would be achieved over the long-term in terms of allocating inspection resources and the time and expense required in dividing each area. This process can be ongoing and evolve with subsequent walkover site visits.

G23.2.4. It is appropriate that some zones within any area will be assigned no inspection frequency because the level of use is so low, or the trees are so small that it is not possible for the level of risk posed to be high enough to reach a threshold where remedial measures are justified. Whether a walkover survey is required for these areas will be reviewed every 5 years.

G23.2.5. Inspection zones with frequencies of between 1 and 5 years will be assigned to all areas within which a walkover survey regime has been determined to be appropriate.

G23.2.6. The following example serves to illustrate how inspection zones will be assigned to an area where a walkover survey has been determined to be appropriate:

G23.2.7. A country park is considered to have a high level of recreational use by members of the public, but the area is so large that an inventory is not considered a viable or cost-effective management approach. A general management plan exists for the park so a tree inventory has the potential to conflict with the aims of that management plan. Tree risk management responsibilities will be achieved through an annual walkover survey. During the walkover survey it becomes clear that the high recreational use is, in reality, limited to the car park, the visitors centre and a zone several hundred metres from these focal points. The park is therefore broken up into 4 inspection zones - an inspection interval of 1 year around the visitors centre, an inspection interval of 3 years where trees are within falling distance of the footpath around the park, an inspection interval of 5 years for the areas of young woodland with no frequent access containing trees that have a low potential to cause harm and an area of scrub in an inaccessible corner of the park that requires no walkover inspection.

G23.3 Site visit records

G23.3.1. Tree and group records are recorded in the tree management database only where the risks posed exceed a threshold value. It is possible that no trees will exceed the risk threshold within a particular survey area and consequently a walkover survey may result in no trees or groups being recorded in the tree management database. In such scenario where no trees are recorded, a record that a site visit has been undertaken will need to be maintained either within the tree management database or elsewhere as an audit trail that management commitments have been fulfilled.

G23.4 Tree data

G23.4.1 Where trees or groups of trees are recorded due the level of risk posed, the same data that is recorded during an inventory will be collected against a tree record in the tree management database as set out in Section 2.2. This data is recorded to enable a contractor to find the tree on a plan and to know what remedial measures have been recommended to manage the risks.

G23.5. Walkover survey inspection and assessment method

G23.5.1 The proposed survey method involves recording tree data within the tree management database only when a tree or group of trees has been identified as posing a specific level of risk. The approach is appropriate for large areas and consequently is limited by available resources; the time and level of investigation that can reasonably be allocated to the inspection of each individual tree. In general, a walk-over survey will involve a cursory assessment of the majority of trees with the aim that attention is drawn to specific trees that warrant further inspection. The following factors may identify a particular tree or group as warranting closer investigation during the walkover survey:

- Poor crown condition
- Observed fungal fruiting bodies
- Observed adaptive growth or defects
- Changes to the local environment
- Changes to ground conditions
- Evidence of a history of tree failure within the vicinity
- An undefined impression of general characteristics

G23.5.2 This approach is necessary and defensible because of the scale of the area being assessed, in relation to the resources available. As a consequence, small trees and trees in remote areas that are generally incapable of posing a high risk can be justifiably excluded from any significant attention from the surveyor, unless they are clearly and imminently about to fail. Similarly, the degree of effort or resources applied to surveying trees where access is restricted, for example by dense undergrowth, or where the trees are obscured by ivy, can also be limited, unless one of the above factors leads this principle to be over-ruled.

G23.6. Level of training and expertise

G23.6.1 Walkover surveys are difficult, challenging and require a high level of experience, confidence and discipline in focusing only on those trees meeting very specific criteria with regard to the level of risk posed.

G23.6.2 The surveyor will need to exercise judgment in how much time it is appropriate to spend investigating certain trees and will need to base such judgments on a sound understanding of risk and probability together with the survey remit, requirements and limitations.

G23.6.3 Applying the principles set out in the walkover inspection and survey method to focus time and attention in an appropriate fashion will therefore need to be applied by a competent arboricultural officer or surveyor with experience and a National Qualification Framework of level 3 or above, or in the case of a trainee, under the supervision of a level 3 or above, who is comfortable with the survey method and the framework within which they are being asked to operate.

G23.7. Unscheduled Work

G23.7.1. During the course of the budget year unusual weather events will inevitably result in unexpected tree failures, that will be reported to the Parks Service through various channels.

G23.7.2. Unplanned nuisance issues will arise or be reported and will be directed to the Parks Service through the Council's enquiries and complaints system.

G23.7.3. The Highways department will make requests through the Council's enquiries and complaints system for the Parks service to carry out pruning or tree felling operations to deal with highways clearance issues.

G23.7.4. Subsidence and damage claims will be communicated to the Parks service either via an insurance claim or through the Council's enquiries and complaints system.

G23.7.5. With the exception of the subsidence and direct damage reports these work requests will be considered and actioned on the basis of prioritisation with reference to budget availability and with reference to the relevant policy and strategy sections of this document.

G23.7.6. Requests for unscheduled works will not be actioned where these contradict overriding policy objectives, particularly where the issue is related to one of nuisance.

G23.7.7. Requests to carry out unscheduled works will not be actioned where to do so would result in funds being diverted from planned works that warrant a higher priority, or where such works are already within the planned programme of works, or where the issue has already been noted during an inspection where the recommendation is for the issue to be assessed, or dealt with at some planned time in the future.

G23.7.8. Reports or claims of subsidence or direct damage will be dealt with according to Policy 5 and the Subsidence and direct damage section.

Guide 3: Subsidence and Direct Damage Handling

G3.1. 1 Proactive Management approach

G3.1.1.1. A proactive approach to managing the risk of subsidence will be implemented according to the recommendations set out in the London Tree Officers Association Risk Limitation Strategy For Tree Root Claims (2008). A similar approach will be applied to the management of direct damage and claims of direct damage to buildings by tree roots, such as the movement of boundary walls, or disturbance to hard surfacing.

G3.1.1.2. The principle aim of the strategy will be to minimise the number and cost of subsidence and direct root damage claims, but to retain trees wherever possible (and where this is cost effective) in recognition of the value and benefits that trees bring to the town. Following this strategy will also put the Council's loss adjusters in the position where they may have the ability to contest claims based on the premise of reasonable care.

G3.1.2 Council owned trees

G3.1.2.1. The Council will record the incidence of subsidence to identify areas within the town that have a high risk of subsidence and where the presence of shrinkable clay soils are predisposed to building movement.

G3.1.2.2. Within these areas trees that pose a high risk of subsidence will be identified, according to species and size (and therefore water demand) as well as to their proximity to buildings, and the vulnerability of buildings to subsidence. Action Plan x aims to identify and map areas with a high risk of subsidence and record, in the tree management database, trees with a management regime designed to reduce the risk of subsidence.

G3.1.2.3. Where the Council has identified an area with a high risk of subsidence a preventative approach will be considered which may include:

- Implementing a cyclical pruning regime to reduce and stabilise the water uptake of high-risk trees in high risk areas, targeted at those trees in areas where there is a history of subsidence and subsidence claims where trees are in proximity to vulnerable buildings.
- Considering the removal and replacement of high risk trees in situations where pruning will not adequately address the subsidence risk, where the tree is in poor condition, or is considered to be low value, or where the ongoing management (of the tree, or of related complaints and claims) is considered likely to be unreasonably costly.
- Replacing trees following the principle of the right tree in the right place to minimise the chance of a recurrence of conflict or issues in the future.

G3.1.2.4. The Council will take prompt action when notified of a potential claim and will work to the spirit of the London Tree Officers Association Joint Mitigation Protocol (2008) to manage the claims processes.

G3.1.2.5. Where claims are received the onus to provide evidence that the tree is the cause of building movement will fall on the complainant. The Council will carefully scrutinise the evidence provided by the claimant to ensure that the tree is, on the balance of probability, the cause of the building movement. The Council will assess claims received through the Council's formal reporting procedure.

G3.1.2.6. Where available, sufficient resources will be allocated by the Council, in terms of officer time, to enable confidence that the evidence provided to support a claim is sufficient and to ensure that the evidence eliminates all other factors before attributing the cause of building movement to a tree, as proposed in guidance provided by the Institution of Structural Engineers (2000).

G3.1.3. Privately owned trees

G3.1.3.1. The Council will allocate dedicated resources to assess Tree Preservation Order applications and Conservation Area notifications requesting tree removal or cyclical pruning measures where tree related subsidence or direct damage is claimed.

G3.1.3.2. The same level of scrutiny will be applied to the evidence provided by the tree owner as that required for council owned trees, to establish the cause of building movement to a satisfactory level of confidence.

G3.1.3.3. Applications to prune or fell trees covered by a Tree Preservation Order will not be registered where appropriate and sufficient evidence has not been provided. The following evidence is a statutory requirement to accompany a TPO application:

- *“Subsidence: A report by an engineer or surveyor (to include a description of damage, vegetation, monitoring data, soil, roots and repair proposals) and a report from an arboriculturist to support the tree work proposals.*
- *Other structural damage (e.g. drains, walls and hard surfaces): Written technical evidence from an appropriate expert, including description of damage and possible solutions”*

G3.1.4. Evidence

G3.1.4.1. The level of evidence required to support a claim where council owned trees are believed to be causing damage, or where an application or notification is being made to fell or prune a tree with statutory protection, will be related to a Capital Asset Valuation of Amenity Trees (CAVAT) assessment of the tree in question.

G3.1.4.2. A higher level of evidence will be required to demonstrate that the tree is the cause of damage for those trees considered to have a higher value as set out in the Joint Mitigation Protocol and Risk Limitation Strategy guidance. This will ensure that the level of confidence in reaching decisions about the future management of a tree, is appropriate in the face of the potential loss or damage (through pruning) that would arise.

G3.1.4.3. Investigations to determine causation on the balance of probability relate to determining:

- The nature and degree of the movement of the building.
- Foundation and building design
- The properties of the soil
- The presence and origin of tree roots
- Drainage infrastructure

G3.1.5. Claims handling

G3.1.5.1. The Council will endeavour to manage claims promptly and will operate according to the spirit of the processes described in the London Tree Officers Association Joint Mitigation Protocol (2008).

G3.1.5.2. The protocol sets out how to proceed once a claim is made. The Council will set benchmarked timescales for the process of handling a claim.

G3.1.5.3. Claims will be handled on a non-adversarial basis. Both parties will be afforded an opportunity to state or modify their position at an early stage. The opportunity for both parties to meet informally to resolve disputed cases will be available without prejudice to liability.

G3.1.5.4. Decisions will be based on the evidence provided and appropriate evidence will be required by the Council prior to reaching a decision.

G3.1.5.5. The Council will provide the claimant's insurer with requested information relating to the responsible department and officer, the Council's liability insurer and the assessed value of the tree according to CAVAT (high, medium or low) within a reasonable timeframe to avoid delaying the progress of a claim.

G3.1.5.6. Submission of evidence will be required from the claimant's building insurer within a fixed timeframe or the insurer will be expected to withdraw the case.

G3.1.5.7. Required levels of evidence will relate to the value of the tree.

G3.1.5.8. If agreed, mitigation will be carried out within a reasonable timeframe to prevent further damage to the building.

G3.1.6. Direct damage - roots and stem

G3.1.6.1. The Council will require evidence that tree roots are the cause of direct damage before a decision will be reached regarding the long-term management of a tree. The extent of evidence required that the tree is responsible for the damage will depend on the value of the tree and a process similar to that taken for the consideration of subsidence claims will be followed.

G3.1.6.2. Mitigation for direct damage by roots may be achieved through simply severing the roots at the boundary between council owned land and the privately owned land upon which damage is occurring. The Council will consider whether it is cost-effective to sever roots or to remove a tree that has been shown to be causing direct root damage. Whether measures will be taken by the Council to prevent recurrence of, or the potential for the recurrence of root damage through preventing the growth of roots extending across a boundary will be considered on a cost benefit basis.

G3.1.6.3. Where incremental growth of a tree stem is causing direct damage then appropriate measures that might allow the retention of a tree will be discussed prior to acceptance that tree removal is the only management option.

G3.1.7. Direct damage - crown

G3.1.7.1. The Council will manage trees, in respect of the potential for conflict between above ground parts and adjacent structures, proactively through operating a regime of periodic tree inspections as described in the Tree inventory and Walkover tree survey sections. Where tree crowns or limbs are noted to be conflicting with a structure such that direct damage is considered likely to be caused through either impact during movement in wind events or through progressive annual growth, then remedial measures to prune away from the structure will be specified and recorded during a routine inspection of the tree and will be held as a record within the tree management database.

G3.1.7.2. Remedial works to prevent or mitigate for damage will be prioritised, and works will be completed within a time frame appropriate to the nature, extent and the potential cost of the damage that might be caused in relation to other demands on the resources allocated to managing the tree stock. Remedial work to prevent major damage or to reduce risk will take priority over measures to deal with minor or inconsequential damage.

G3.1.7.3. The Council will only undertake remedial measures to prevent damage and does not make a commitment to maintain any specific clearance or to remove any tree where conflict can be managed adequately through routine inspection and periodic pruning operations.

Guide 4: Managing Highway Trees

G4.1.1 Trees and hedges obstructing the highway

G4.1.1.1. The Council will aim to meet its duty to maintain the highway clear of obstruction and interference by above ground tree parts through operating a proactive, cyclical tree management programme of Council owned trees as described in Section 2 Tree inventory and Section 3 Walkover tree survey. The routine and periodic inspection regime and the resulting scheduled annual works programme, will consider and make recommendations to manage a range of issues including risk of harm to members of the public and damage to property through tree failure, the potential for direct damage to property, general issues of nuisance, and nuisance that has the potential to result in non-failure tree risk, as well as general good tree maintenance practices and the requirement to keep the highway clear.

G4.1.1.2. The tree survey will be administered by the Parks Service with a range of responsibilities and competing demands on resources from a number of areas only one of which is obstruction to the highway.

G4.1.1.3. During the routine tree inspection process maintaining clearance of low tree canopies over carriageways and footways, ensuring clear visibility splays and sightlines, and maintaining unobscured road signs and street lights will be included in the standard considerations for which remedial works may be required. During the tree survey the prioritisation of such works will be treated in the same way as the prioritisation of recommendations to achieve other objectives, such as risk and general nuisance, will be based on sound principles of risk management and will take into account cost effectiveness in the context of limited annual resources.

G4.1.1.4. For example, restoring a visibility splay at a busy junction where the risk of an accident (and the consequences of an accident) are considered to be high will tend to justify action within a short time frame. Clearance from a street light over a busy road is likely to justify less urgency, but might be proposed to be programmed to be achieved sooner than clearance from a street light along a minor

road or a light over an infrequently used footpath. Similarly, clearance of a road warning sign might be proposed to be achieved sooner than clearance of an informative sign.

G4.1.2. Highways safety and service inspections

G4.1.2.1. Concurrently to the periodic tree surveys administered by the Parks department, safety and service surveys of the carriageways and footways will be carried out by the Highways department as described in the Highway Maintenance Operational Manual (2018) to meet the requirements set out in the Highway Asset Management Policy and Strategy (2018).

G4.1.2.2. The frequency of inspections carried out by the Highways department across the carriageway and footway network will take a risk-based approach targeting resources at the higher use areas, where the consequence of highway asset failure is the greatest. The survey regime will be carried out according to the carriageway and footway hierarchy defined across the network.

G4.12.3. The Highways Department has defined set response times for dealing with various issues dependent on the level of use of the infrastructure (according to the carriage way and footway hierarchy) and the severity of the issue or defect in the highway asset identified during the safety and service survey regime.

G4.12.4. Abrupt footway trip hazards caused by tree roots will be assessed by the highway inspector according to risk matrix 1F at Appendix 1 in the Highways Maintenance Operation Manual.

G4.12.5. Footway surface level differences will be assessed by the highway inspector according to risk matrix 1J at Appendix 1 of the manual.

G4.12.6. Traffic signs obscured by vegetation will be assessed by the highway inspector according to risk matrix 1K at Appendix 1 of the manual, with remediation of regulatory and warning signs taking priority.

G4.12.7. The Parks Service will not necessarily record recommendations during the tree survey with priorities that adhere to the response times and prioritisation set out in the Highway Maintenance Operational Manual. If the level of risk from a highway defect is the same as for a tree defect then the response time should be the same. Incorporating the implications of these risk matrices directly and strictly into the tree management decisions that need to be considered by the tree surveyor would add a degree of complexity and rigidity to what already involves a broad range of considerations and has the potential to conflict with the competing aims of the tree survey.

G4.12.8. However, the general principle that higher risks are likely where issues arise on areas of the network classified as higher use will be followed naturally as part of a general risk aware approach to tree inspection.

G4.12.9. The general proactive management and maintenance of the tree population carried out by the Parks Service through the day to day operation of the tree survey is likely, over time, to resolve many of the above ground conflicts between trees and the highway infrastructure through the annual, scheduled works packages issued and managed by the Parks Service. These contracts contain a suite of remedial measures designed to resolve issues related to tree failure risk, nuisance as well as conflicts with the highway.

G4.12.10. Issues may be identified during the safety and service surveys undertaken by the Highways department that have not been already recorded during the tree survey. This will instigate an inspection by the arboricultural officer and any work required will be prioritised and included into the annual scheduled works package commissioned by the Parks Service.

G4.12.11. Where issues have not been picked up and managed as a result of the routine tree survey then the Highways department may request that a tree pruning operation that has been identified during a safety or service survey, be arranged by the Parks Service. The Parks Service will be informed of the request via the formal enquiries and complaints process operated by the Council.

G4.13. Management of trees causing surface disturbance

G4.13.1. The tree survey will not make recommendations to resolve surface disturbance issues because the remedial measures required relate to resurfacing or engineering operations outside the

expertise of the tree specialist. The identification and resolution of surface disturbance by tree roots will be the responsibility of the Highways department.

G4.13.2 Flow Chart 1 at Appendix 1 of the Highway Maintenance Operational Manual sets out the decision-making process that will be followed by the Highways department.

G4.13.3 Where roots have damaged surfacing the Highways department will aim to retain trees wherever possible. Surfaces will be repaired where levels can be restored to within acceptable tolerances, where roots do not need to be removed or where root pruning is minimal and is not considered to be likely to harm the tree.

G4.13.4 Where engineering solutions can be employed that allow tree retention and avoid root pruning and where the tree offers sufficient value then the additional costs involved will be considered.

G4.13.5 The value of a tree will be incorporated formally into the decision-making process using the Capital Asset Valuation of Amenity Trees (CAVAT) system. The costs of engineering solutions will be considered in the context of the potential loss of the CAVAT value of any implicated tree. In this way apparently costly engineering solutions have the potential to become re-evaluated as the cheaper option.

G4.13.6 Where advice is required to determine the extent of root pruning that a tree might tolerate the Highways department will contact the Parks Service to consult with an arboricultural specialist. Such engagement will be facilitated through the formal enquiries and complaints process operated by the Council.

G4.13.7 Tree removal will only be accepted following consultation with the Parks Service, where root pruning is considered to be an unacceptable solution in relation to the long term viability of the tree, where the loss of the tree is not considered to result in a significant loss of amenity because of the low value of the tree, or where the loss of amenity is less significant due to the high value of other trees in the street.

G4.13.8 Where a decision has been reached to remove a tree, then mitigation will be provided in terms of funds that will directly related to the CAVAT value of the tree that is lost.

G4.13.9 Arboricultural input will serve to inform the impact, effectiveness and long-term viability or maintenance costs of engineering solutions for resolving level differences in relation to the tree causing the disturbance. A decision will be reached that balances the requirements of the surface, in terms of performance criteria and maintenance costs (whether further disturbance or damage can be expected), with the damage that would be caused to the tree, against the value of the tree.

G4.4.1 New highways schemes, dropped kerbs and vehicle crossovers

G4.4.1.1 Projects involving the reconfiguration of areas of the highway will consider the potential implications for trees at the earliest possible stage during the project feasibility and design phases to ensure that trees are retained wherever this is possible.

G4.4.1.2 To properly facilitate this the Highways department will seek advice from an arboricultural specialist who will be part of the design team considering the feasibility of the project from conception through to final design.

G44.13. The value of any tree that might be damaged or that might require removal will be fully incorporated into the appraisal of any project and the costs of damaging a tree or removing a tree will be balanced against the costs of redesign or engineering solutions that would allow tree retention within the scheme. The value of a tree considered during the project will be formally calculated using the Capital Asset Valuation of Amenity Trees (CAVAT) system.

G44.14. The consideration and assessment of the potential for a negative impact on adjacent trees, as a result of proposed highways reconfiguration projects will be treated according to the same processes and principles that are set out in Section 8 Planning and Development. Whether or not such operations require a planning application, the process for assessing the impact on tree health and viability should require reference to BS5837: 2012 *Trees in relation to design, demolition and construction - Recommendations*, and the same considerations that inform whether or not a planning application is granted should apply to decisions related to highways redesign, at least in relation to tree retention or removal.

G44.15. The decision process that is followed for any highways reconfiguration project will be applied to an application, by a member of the public, for the installation of a dropped kerb to facilitate a vehicle crossover from a private residence to the public highway where this is adjacent to and might have a negative impact on a tree.

G44.5. Private trees obstructing the highway

G44.5.1. Landowners responsible for trees outside the ownership of the Council will be required to maintain clearance of the highway. Where such trees are noted during safety and service surveys carried out by the Highways department or where they are brought to the attention of the Council then the Highways department will give the landowner notice of the duty to maintain clearance as set out in section 154 (1) of the Highways Act (1980).

G44.5.2. The Highways department may liaise with the Parks Service to seek advice on the appropriate remedial measures to request the tree owner to undertake and will do so through the formal enquiries and complaints process operated by the Council.

G44.5.3. Where the landowner fails to undertake the requested measures to remove the obstruction within the period required by the Act then the Highways department may carry out the work required and recover expenses from the landowner. The Highways department may liaise with the Parks Service to arrange for the works to be completed where this situation arises.

G44.6. Tree risk management

G44.6.1.1. The management of risk posed by Council owned trees to users of the highway will be achieved through undertaking a proactive, cyclical inspection regime and an annual prioritised programme of works as described in Section 2 Tree inventory and Section 3 Walkover tree survey.

G44.6.1.2. Where trees are brought to the Council's attention that are not within council ownership or responsibility but that pose a level of risk to users of the highway, then the Highways department may give the landowner notice to manage the risk to an acceptable level as set out in section 154 (2) of the Highways Act (1980).

G44.6.1.3. The Highways department may liaise with the Parks Service to seek advice on the appropriate remedial measures to request the tree owner to undertake and will do so through the formal enquiries and complaints process operated by the Council.

G4461.4 Where the landowner fails to undertake the requested measures to remove the obstruction within the period required by the Act then the Highways department may carry out the work required and recover expenses from the landowner. The Highways department may liaise with the Parks Service to arrange for the works to be completed where this situation arises.

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DRAFT

Luton Tree Policy and Tree Management Strategy 2021-2030

Policy Group Meeting

10th February 2022

Why a Tree Strategy for Luton?

Luton's Urban Forest

30,000 trees

Highways

Housing

Parks & Green Spaces

Net carbon by 2040

Duty of Care

National Tree Planting Targets

Green Flag



Purpose is to ensure:

- ✓ that tree related decisions and activities are made in a structured and consistent way across all departments and partners.
- ✓ that Luton's residents and stakeholders understand how the council manages its trees and why only certain tree works can be carried out.
- ✓ that the council's duty of care is met and discharged
- ✓ that the council's commitment to aiming for a net zero carbon by 2040 is assisted and met.
- ✓ that wherever possible, funding to implement the action plan is in place or funding strategies identified.

Tree Benefits



Environmental

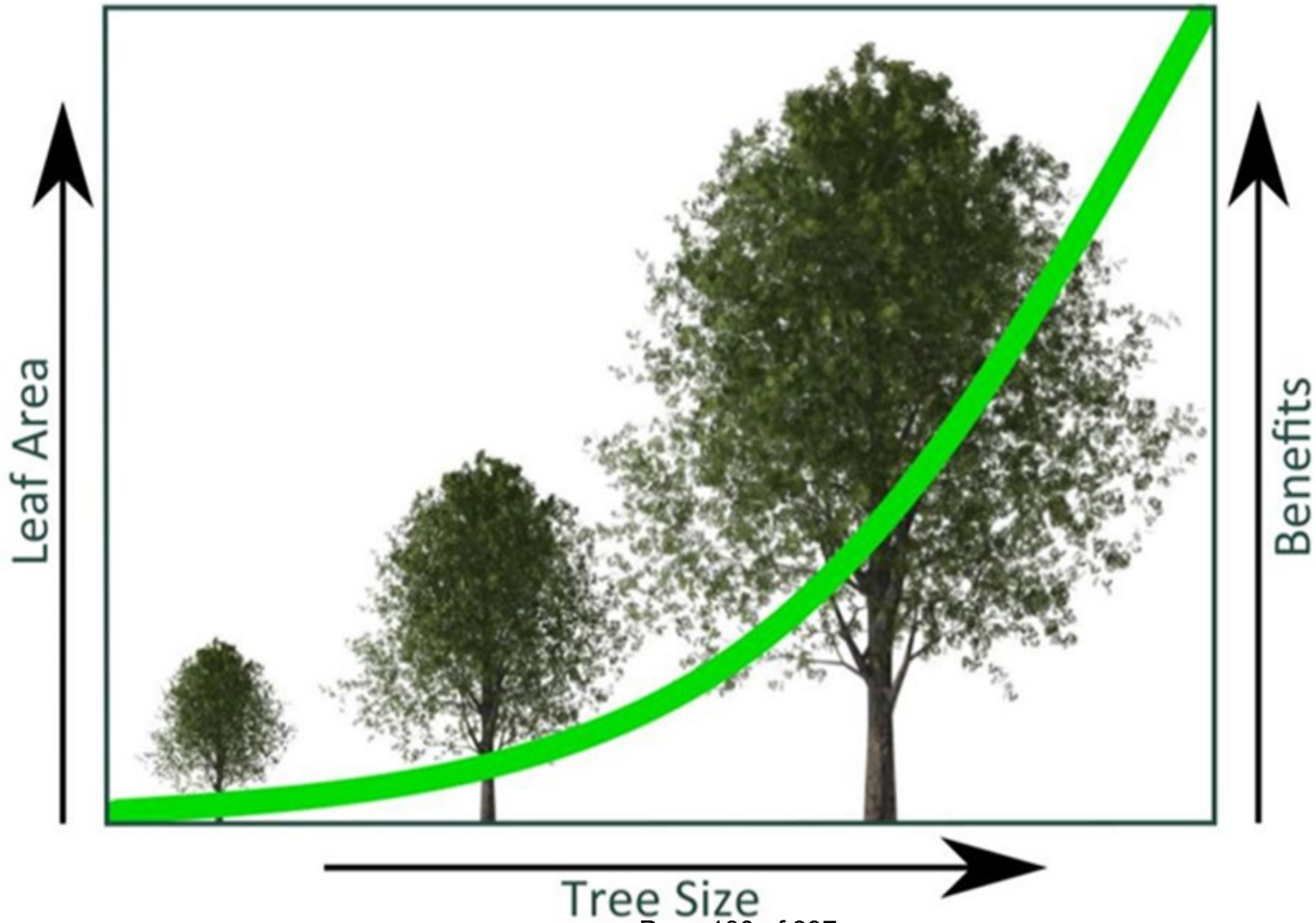
- ✓ Reduce wind speeds and slow rainfall, reducing the risk of flooding and flash flooding.
- ✓ Provide a diverse habitat and corridors for wildlife.

Health

- ✓ Help mitigate atmospheric pollution, and reduce the impact of traffic on air quality.
- ✓ Improve people's mental health and well-being.

Economic

- ✓ Provide environments that encourage inward investment and business relocation.
- ✓ Increase property values.



Measure	Amounts and Values
Total number of trees	25,198
Tree Canopy Cover	66 hectares
Most common species	Lime, Cherry, Ash (143 species)
Replacement Cost	£38,037,000
Carbon Storage	11,800 tonnes
Pollution Removal	2.5 tonnes annually or £53,751
Carbon sequestration	247 tonnes annually or £15,801
Avoided water run off	5,063 cubic metres annually or £7,678
Total Annual Benefits	£77,230



A council was fined **£300,000** over the death of a man killed by a falling tree (Dec 2021).

The site (a cemetery), had not been part of a planned council inspection programme since 2009.

"Local authorities need to ensure they have suitable inspection systems in place, including monitoring and audit provisions....and to ensure they have enough suitably trained and competent tree inspectors to enable compliance with their tree management policies' HSE.



**20,000 + trees
inspected over the
last 2 years.**



**Health and Safety
Executive**



Part One – Tree protection, enhancement and resilience

Sets out the overall strategic vision and background to the strategy. It also set out our six key objectives, tree canopy cover targets and our approach to public engagement.

Part Two – Tree management policies

Part two sets out our **16 policies** to ensure our trees are proactively and sustainably managed. It also provides guidance to the public and our partners on tree-related matters and their rights and responsibilities.

Part Three – Action plan

The Action Plan set out 16 actions, timescales and responsibilities for helping deliver the first 5 years of the strategy.

Part Four – Delivery Guides

Provides step by step guides on how to deliver three key elements of the strategy:

1. Defendable tree management protocol
2. Claims handling protocol
3. Managing highway trees
4. Model answers to commonly asked tree related questions.

The 6 Key Objectives

1

Ensure the proactive, proportionate management of our trees with the aim of promoting a healthy, resilient tree stock of increasing (ecosystem service) value to maximize the many health and wellbeing benefits it provides.

2

Ensure that the health and safety of our people, property and infrastructure are protected through proportionate risk management and pro-active maintenance of the tree stock.

3

Ensure that our trees are professionally managed and maintained, undertaking works only when necessary for safety, tree health and structural damage mitigation reasons.

4

Protect and manage our ancient and veteran trees.

5

Ensure sufficient resources (staff, budget and data) are in place to enable the delivery of Objectives 1-4 above and the actions set out in the action plan.

6

Promote and increase a greater sense of community engagement and awareness of the importance of our trees.

The 16 Policies

Policy 1 The Council recognises the value of trees, and will aim to **protect, maintain and enhance** the benefits they offer.

Policy 2 The Council will pursue a **pro-active management** approach towards its trees with the aim of promoting a healthy, tree stock, a diverse age structure and increasingly resilient to biological threats.

Policy 3 Ensure those with a role in delivering this strategy and policy are trained and **competent** to do so.

Policy 4 The Council will adopt a balanced and **proportional approach** to the management of the risks posed by trees, with safety being just one of a number of management considerations.

Policy 5 The Council will, in managing the risk of **subsidence and direct damage** to property, to minimise the number and cost of claims whilst avoiding unnecessary tree loss require appropriate evidence to establish the cause of damage and will allocate sufficient resources to review such evidence.

The 16 Policies

Policy 6 The Council will **not normally prune or fell trees** to abate issues of nuisance, or perceived nuisance, (where the tree does not cause direct or quantifiable damage), where the consequence of the nuisance is considered to be insignificant or where alternatives to tree pruning or removal can mitigate the issue.

Policy 7 The Council will manage **non-failure related tree risks** resulting in visibility, lighting or access issues and trip and slip hazards in a proactive manner wherever possible as part of a routine and periodic tree inspection regime and through prioritised programmes of work.

Policy 8 Where a Council owned tree(s) or woodland is associated with **anti- social behaviour/and or criminal activity**, or where a perceived increased risk due to obstruction of **CCTV** cameras is present, measures to alleviate the issue will be implemented.

Policy 9 The Council will adopt a proactive management approach to ensure that the **public highway is maintained without obstruction or interference** and that risks posed by Council trees adjacent to the highway are managed in a reasonable and proportionate manner in accordance with Policy 2.

The 16 Policies

Policy 10 Where trees are potentially impacted by **vehicle crossover applications**, the council's lead Officer will be consulted by the highway department. A site visit may be necessary to make a decision on whether the tree has amenity value and should remain, or whether removal and replacement would be the best and most sustainable solution. Any costs associated with tree removal and replacement of a tree is to be borne by the applicant.

Policy 11 The Council will follow a risk-based approach to managing highways level differences, will accept a degree of level difference and will investigate the feasibility and costs of engineering solutions prior to accepting the loss of a tree where its roots or stem are causing a **surface distortion or disturbance**.

Policy 12 Decisions regarding measures to manage root disturbance and highways design decisions will be based on a sound understanding of the value of a tree, with the cost of measures directly compared against the CAVAT value of a tree, and **compensation based on the CAVAT value** of a tree.

The 16 Policies

Policy 13 The Council will identify **ancient and veteran trees** and their environs across the borough and will endeavour to allocate appropriate resources for their sensitive and sustainable management to positively influence the longevity of such trees whilst managing the risks to an appropriate level.

Policy 14 The Council will actively seek resources to deliver **tree planting**, with targets linked to the tree canopy target. Trees will be planted in appropriate locations to allow them to develop to their full potential.

Policy 15 The Council is committed to promoting and implementing sound **biosecurity practices** to assist in safeguarding our trees from the introduction and spread of harmful pests and diseases.

Policy 16 The Council will not permit **development** where this would compromise existing trees worthy of retention, particularly those subject to Tree Preservation Orders (TPOs), and where appropriate will ensure that trees are protected either through condition or the making of new TPOs.

Questions?

@treeworks.co.uk

Committee:	Overview and Scrutiny Board
Date of Meeting:	28 February 2022
Subject:	Development of the Council's Social Justice Framework and Equality Diversity and Inclusion Strategy
Report Authors:	Marek Lubelski, Social Justice Manager/Adam Divney, Service Director Citizen Engagement and Legal
Contact Officer:	Marek Lubelski, Social Justice Manager
Wards Affected:	All

Purpose

1. To update and seek feedback from OSB on the development of the Council's Equality, Diversity and Inclusion (EDI) Strategy towards the 2040 goal of a town built on fairness and social justice

Report

2. The Council's 2040 commitment to a town built on fairness and social justice has required a renewed and refreshed focus on its approach to EDI. Driving transformation and delivery on this element of the programme for the Council and the town is fundamental to the achievement of the 2040 vision.
3. The foundation for this work is updating and strengthening the Council's strategic approach to achieving social justice and greater equity. The report outlines the framework for this strategic approach and its key elements and work-streams currently being delivered to develop and drive the EDI strategy and agenda across the Council and its wider 2040 partnerships.
4. The context for this renewed approach begins with the ambition of the 2040 vision to change the drivers and dynamics of socio-economic deprivation and exclusion and eliminate poverty. It builds on the Council's long-standing commitment to valuing Luton's 'many voices' by supporting and promoting diversity, cohesion and inclusion across the whole community to ensure the town is 'fair for all'.
5. It also aims to reflect the lessons learned from disproportional impact of Covid 19 on diverse sections of our community (currently being actioned through the 'Talk-Listen-Change' programme), as well as the Black Lives Matter movement and the need to tackle structural inequality to achieve racial equity for ethnic minorities, most recently addressed in the Council motions of January 2021.
6. The fundamental principles and basis of the Council's strategic approach to achieving social justice and greater equity with our community is set out in this model which shows the links and interdependencies between the key areas of strategic focus of equality and diversity, community cohesion and social inclusion as the building blocks of social justice:

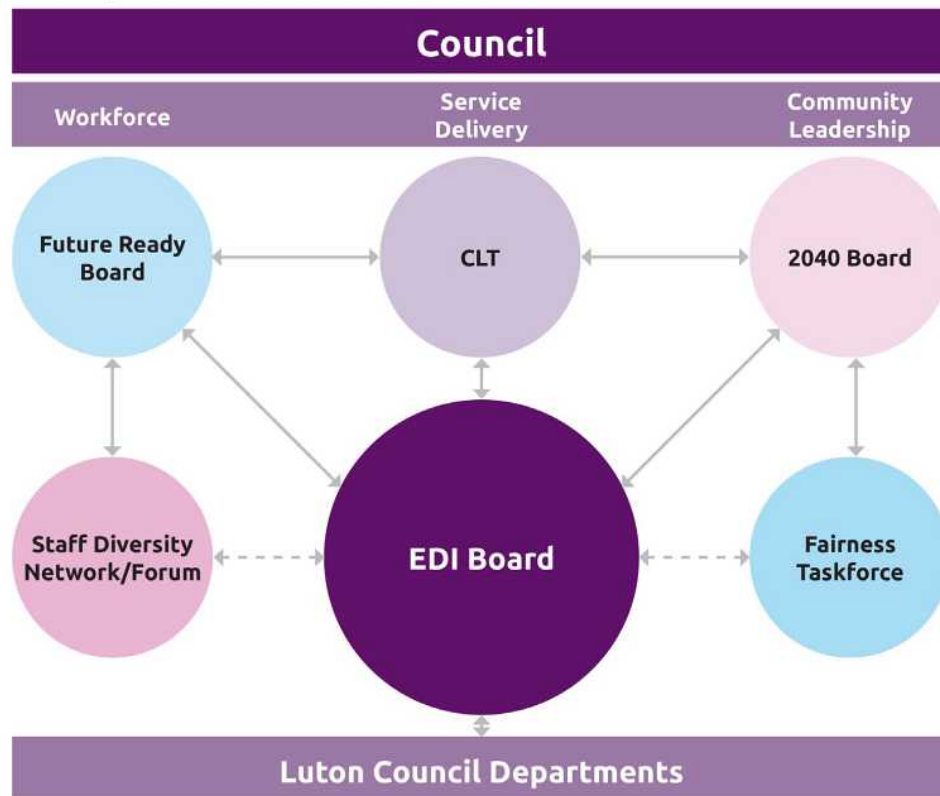


7. Initial scoping of EDI Strategy for the Council is based on three interrelated and overlapping dimensions to the Council's commitment to champion EDI and set the pace for the town:
 - Internal workforce and culture: as an exemplary employer for Luton.
 - Community and residents: as service commissioner, provider and deliverer ensuring access to and meeting the needs of a super-diverse community.
 - Citizens and civil society: as community leader and partnership convener working towards a town built on fairness for 2040.
8. The first phase of the development of the EDI strategy (Oct- Feb) has involved initiation of three fundamental building blocks for these dimensions: a new internal EDI Board, EDI community focus groups, and the Fairness Taskforce.

EDI Board:

9. To strengthen governance and support of the Council with advice, challenge, and scrutiny related to its equality duties and EDI strategy commitments across its key areas of responsibility, a new internal EDI Board chaired by the Executive Leader and supported by strategy group of key service directors has been established as set out in

Equality Diversity and Inclusion Governance



10. The Board is also made up of a diverse group of EDI coordinators recruited from all divisions of the Council linked to each service director to ensure that the whole organisation develops and maintains a clear focus on the Council's EDI duties and commitments, and nurtures and sustains the culture change required to enable this.
11. Future delivery and reporting on the Council's strategic commitment to promoting and strengthening all aspects of the EDI agenda will be driven and overseen by the EDI Board.
12. The Board has begun its work already to deliver on strategic EDI objectives such as:
 - reviewing, strengthening and updating the Council's Integrated Impact Assessment (IIA) process;
 - scoping an annual 'state of the borough' publication on key EDI and social justice indicators for the town;
 - preparing learning and development sessions for senior management on the values, commitment and knowledge needed to serve a super diverse community and develop and lead a workforce that can do this effectively.

EDI Focus Groups:

13. Given the central importance of the EDI agenda for Luton's community, our work to develop the Council's strategic approach has begun by initiating dialogue with, and seeking in-depth feedback from, citizens through focus groups convened from across the characteristics protected under the Equality Act (2010).
14. This has already involved 23 focus group sessions with more than 200 participants providing insight into specific and common issues around identity, access to services, experience of prejudice, discrimination and hatred, and priorities for change.
15. A number of further focus groups are scheduled, and they and their priorities will continue to be supported by the Social Justice Unit as a key element of the development and delivery of the strategy.
16. Examples of actions already underway arising from this dialogue with focus group participants include:
 - community scrutiny of progress on the Council's Black Lives Matter motion;
 - organisation of an inclusive Luton Pride steering group to deliver an annual community celebration from 2022 and beyond;
 - preparation of guidance and support for Eastern European communities on reporting experiences of prejudice and hatred.

Luton's Fairness Taskforce:

17. In order to enable wider civil society engagement in and co-production of the overall 2040 aim of a town built on fairness and social justice, the Council has also initiated Luton's Fairness Taskforce. This launched in November 2021 with over 120 citizens, VCS organisers and partners participating, and has begun a process of co-design involving community partners already interested in the programme.
18. The Taskforce is supported by key 2040 partners: University of Bedfordshire, Beds and Luton Community Foundation, BLMK CCG, and the Young Foundation - a national sector leadership body for community research and social innovation. Further dialogue with Luton anchor institutions to widen Taskforce partnership understanding, commitment and resourcing will follow as part of the strategy development process.
19. The diagram below shows how the Fairness Taskforce underpins and supports the overall 2040 programme:



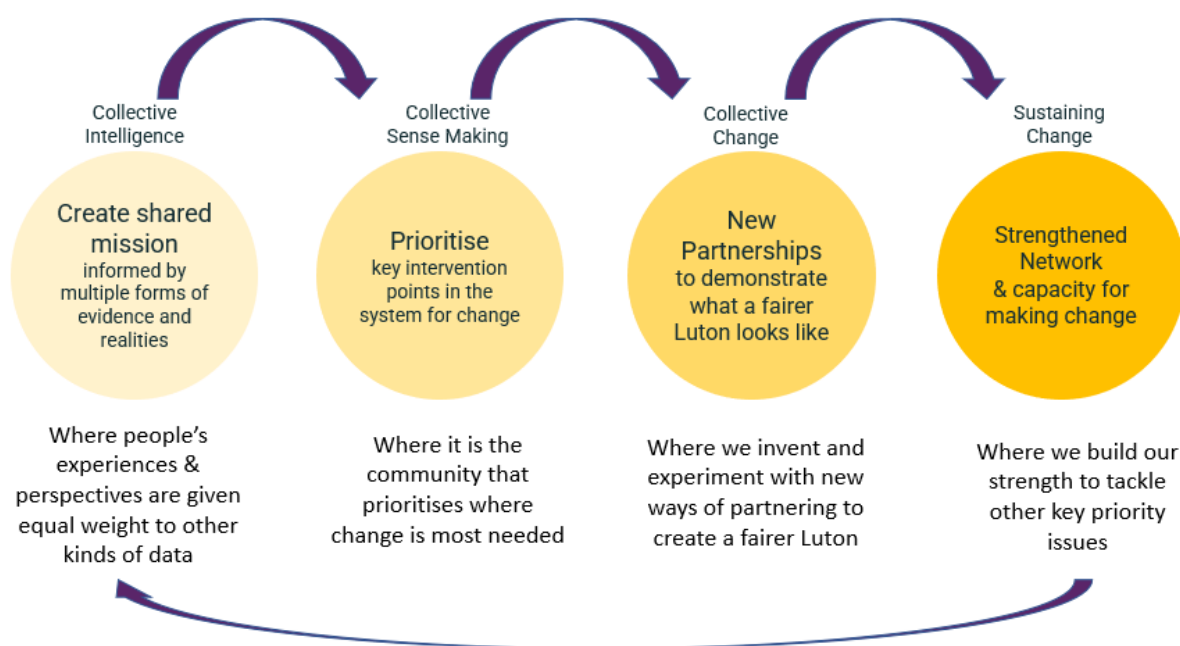
20. Through an open and inclusive process of co-design, the Fairness Taskforce aims to support the Council's drive for greater equity and tackle structural inequality in key areas of concern to the wider community and the culture of the town.

21. It has initiated a quarterly citizens' forum to help co-create a focus and force for change, and to shift dialogue with our community, civil society and VCS partners on the EDI and social justice agenda from 'for' (solely providing services for) to 'with' (collaborating as equal partners on delivering solutions), using the following principles and process:

- Starting with lived experience – generating voice and insight through co-research;
- Understanding and making sense – sense checking and identifying what needs to change through co-design;
- Making the change – enabling new and equitable approaches across whole systems and community partnerships through co-production.

22. The Council website is publishing regular updates on the delivery programme for the Taskforce, and the diagram below outlines the dynamic process the it is evolving and

working to in order to deliver new approaches and partnerships that deliver agreed changes and can lead to increased equity:



EDI Strategy Framework Key Elements:

23. The work in progress to strengthen the Council's strategic commitment and approach to EDI set out above needs to be understood and enabled as a living process that is continually shaped and refreshed through dialogue with citizens and our community.

24. From the first phase of scoping and the feedback from initial engagement with citizens described above, the initial key elements and focus of the EDI strategy framework are outlined as follows:

- Achieving the 2040 ambition and a town built on fairness and social justice;
- Our values and commitment to EDI and equity – eliminating poverty and socio-economic deprivation and exclusion;
- Our public sector equality duties;
- 'Many voices - one town – fair for all' - valuing and serving our super-diverse community, and understanding and speaking about identity, culture and discrimination;
- What our community tells us about their experience, hope and concerns around: identity, access to services, experience of prejudice, discrimination and hatred; and, what needs to change;
- Monitoring change and the 'state of the borough' in terms of the EDI agenda and progress towards social justice;

- The future of Luton - horizon scanning for challenges, opportunities and risks to safeguard cohesion and equity and help shape the culture of the town towards fairness and equity;
- Tackling prejudice, discrimination, and hatred in all its aspects: ensuring Luton is genuinely inclusive for all and 'no place for hate';
- Social inclusion and enabling distributed community leadership for positive power and influence and opening access to resources;
- Our work to deliver EDI and social justice objectives:
 - 1) Internal workforce and culture: the Council as an exemplary employer for Luton.
 - 2) Community and residents: the Council as service commissioner, provider and deliverer ensuring access to and meeting the needs of a super-diverse community.
 - 3) Citizens and civil society: the Council as community leader and partnership convener working towards a town built on fairness for 2040.

EDI Strategy Development and Delivery:

25. Building on the Council's strategic approach to social justice and equity, and the key elements of dialogue, governance and delivery that have already been initiated, we plan for the future development and delivery of the strategy to continue as follows (set out in the table below).

26. This will include opportunities for wider engagement and feedback from residents, and dialogue on the main themes of the strategy with EDI focus groups, wider citizens, civil society and VCS partners, the private sector, and 2040 anchor institutions on the key areas of focus and delivery for the strategy :

EDI Strategy Development (Phase 2 and 3)	March – July 2022
Phase 2:	
Public consultation questionnaire (based on EDI focus grps)	March - April
Stakeholder Roundtables: - Citizens - VCS - Key sectors (e.g. business, culture)	March - April

- 2040 anchor institutions (e.g. health, criminal justice)	
EDI Focus Grps	Ongoing
Development of Strategy Draft	April – May
Phase 3: OSB	May
Executive (Final Draft)	June
Statutory Consultation Period	June/July
Adoption of Strategy and Launch	July

Proposal/Options

Appendix

List of Background Papers - Local Government Act 1972, Section 100D

Committee:	Overview and Scrutiny Board
Date of Meeting:	28 February 2022
Subject:	Moving Traffic Contraventions
Report Author:	Neighbourhood Operations Manager
Contact Officer:	Tony Stefano - Neighbourhood Operations Manager
Wards Affected:	All

Purpose

1. To update on the proposals being considered for adoption by the Council that relate to the enforcement of Moving Traffic Contraventions and the public engagement process.
2. This report intends to set out an overview of these powers to Overview and Scrutiny Board for consideration and comment, prior to the report to Executive.

Recommendations

3. The Committee is recommended to note the content of the report which proposes to introduce Part 6 of the Traffic Management Act 2004 which relates to Moving Traffic Contraventions at the two trial site identified within the report.

Background

4. The Council currently undertakes enforcement of parking regulations under the provisions of the Traffic Management Act 2004 which was introduced for all Councils across England and Wales from effect from 1 April 2008.
5. At the time of introduction the enabling regulations for part 6 of the legislation were not introduced for Councils outside London meaning that Councils outside London were unable to take on the enforcement of various other types of Moving Traffic Contraventions such as Yellow Box Junctions, Banned Turns and No Entry signs.
6. The decision not to enable regulations outside London meant that the Council had to use different legislation (Transport Act 2000) when Bus Lane enforcement was introduced in 2011. This is the only moving offence that we are able to monitor and enforce.
7. Bedfordshire Police are currently responsible for enforcement of moving traffic contraventions.
8. The government announced last year that they were looking to introduce the enabling regulations that would allow Councils outside London to consider taking on the powers and responsibility for enforcement.

Report

9. The types of moving contraventions that the Council could consider undertaking enforcement of are show below;



10. Towards the end of 2021 the DfT contacted Councils outside London asking for an indication if we would consider taking on such powers. Luton indicated that it was willing to consider doing so.
11. The DfT have just laid the various regulations before Parliament week ending 30th January 2022 and have suggested that they will be in a position to receive applications from Councils from early February 2022 onwards. However, it is unlikely that any enforcement will commence until at least June 22 dependent on the issuance of the Designation Orders.
12. In order for the Council to adopt the powers, we will need to undertake some initial work to be in a position to make an application to the Secretary of State (SoS) for the required 'Designation Order'. This includes
 - Identifying a trial location that evidence suggests this type of enforcement will be necessary.
 - Undertake a review of the Traffic Regulation Orders and signs and lines to ensure that they are in good order.
 - Carry out a public engagement exercise for a minimum of six weeks.
 - That all equipment used for enforcement is certified by the relevant approval body.
 - Consulted with the Chief Constable.
13. It is proposed that we look to commence enforcement at two trial sites. Manchester Street and George Street both located within the town centre and have been selected due to concerns that have been raised regarding numbers of vehicles entering the zone and safety around pedestrians. Consultation is underway for these two locations.
14. An application for the 'Designation Order' to the SoS can be made which can be in the form of a letter confirming that all of the requirement in point 11 have been undertaken.
 - The application can be in writing in the form of a letter to the DfT but that it must be from the Chief Executive of the Council and confirm that the necessary pre-requisites have been undertaken.

15. Working with partners, we can then consider other potential locations that may benefit from the need of this type of enforcement.
16. The Council already has a digital enforcement system in place and used for the purposes of bus lane and parking enforcement activities. The provider has confirmed that the system is able to be used for enforcement of these powers subject to receiving an updated approval from the DfT approval body and any existing or new cameras being given the required approval.
17. Not all sites will be covered by cameras and there is no requirement on the Council to be able to undertake enforcement at all locations. Those sites selected that do not will need to have equipment installed to facilitate enforcement. The cost per camera is in the region of £17000.
18. There is a requirement that should the Council undertake enforcement then we will be required to issue a Warning Notice only to all first time offenders for the first six months. If these vehicle repeat the offence, only then can they be issued with a Penalty Charge Notice which the fee is currently expected to be £70 reduced to £35. This will also be a requirement of any new sites that are introduced.

Proposal/Options

19. If agreed, the current proposal is to consider only a small number of sites where enforcement is necessary and proportionate. The Council could decide to do the following;
 - Agree the proposal and proceed to adopt the powers.
 - Reject the proposal and the existing process will remain in that the Police will remain responsible for enforcement.

Appendix – N/A

List of Background Papers - Local Government Act 1972, Section 100D

Committee:	Overview and Scrutiny Board
Date of Meeting:	28 February 2022
Subject:	Powers Requiring Drivers to Switch Off Engines
Report Author:	Neighbourhood Operations Manager
Contact Officer:	Tony Stefano-Neighbourhood Operations Manager
Wards Affected:	All

Purpose

1. There are powers available to the Council to take enforcement action in respect of requiring drivers to switch off engines whilst stationary (commonly referred to as engine idling). It is intended to seek approval from Executive to adopt these powers and commence enforcing the regulations.
2. This report intends to set out an overview of these powers to Overview and Scrutiny Board for consideration and comment, prior to the report to Executive.

Recommendations

3. The Committee is recommended to note the content of the report which proposes to introduce monitoring and enforcement of the powers to require drivers to switch off engines.

Background

4. Luton currently has three Air Quality Management Areas (AQMA3s) declared due to exceedances of the annual mean air quality objective level for nitrogen dioxide.
5. One of the Air Quality Action Plan measures identified for the town centre AQMA is to:

“Raise awareness of vehicle idling through no-idling campaigns and driver education - Prioritising the town centre and AQMA3, with an emphasis on licensed vehicles and buses.”
6. Airport Air Quality Impact Task & Finish Group Recommendation 19 calls for “...work be undertaken with local schools to address the issue of engine idling.” The introduction of these powers will go some way to implementing this recommendation.

Report

7. The powers to undertake enforcement are contained within The Road Traffic (Vehicle Emissions) (Fixed Penalty) (England) Regulations 2002. The adoption of these powers would allow for an authorised officer to issue a Fixed Penalty Notice (FPN) for £20 where a motorist is in breach of the regulations by failing to switch off their engine which increases to £40 if not paid or challenged within 28 days. If adopted, these powers would be available across the Borough.
8. It is proposed that monitoring and enforcement of the powers will be undertaken by the Councils existing uniformed teams within the Neighbourhood Services division subject to the necessary training and authorisations being provided.

9. Department for Transport (DfT) guidance states that a FPN should only be issued as a last resort and only where driver co-operation to voluntarily switch off their engine is not obtained. In addition, the guidance states that breaches should not be enforced where;
 - Vehicle is stationary due to traffic e.g. queuing
 - Where an engine is running in order to trace a vehicle defect
 - Where machinery on a vehicle requires an engine to be running
 - Where a vehicle is propelled by gas produced by the functioning of plant on the vehicle.
10. In addition, the guidance states that common sense should be applied at all times in considering enforcement of these powers and sets out some examples of what might be considered as mitigation for leaving an engine running, including:
 - On a cold day at a taxi rank
 - If the driver is elderly to keep warm
 - If the vehicle is a recovery vehicle carrying out a recovery and needing to run lights off the engine; or
 - To help defrost a windscreen in very cold weather.
11. Whilst the powers will be available town-wide, priority for monitoring will be given to areas around schools and areas within the 3 existing and any future AQMAs.
12. Publicity prior to the use of these powers will be undertaken to inform motorists that these powers will be enforced in Luton (if approved). This publicity will be in line with section 3 of the guidance. Officers who will be involved in using the powers will be provided with training to ensure high standards of professionalism and consistency of approach.
13. It is proposed that consideration be given to the placement of appropriate signs within the areas of focus such as the AQMS and schools which will have some cost implications and needs to be explored further.
14. In cases where a FPN has been issued, motorists will have the right to request a hearing which will initially be an internal review within the Council. The matter may then be referred to Court by the motorist if they are dissatisfied with the outcome of the review. Procedures for the review process will need to be produced and be in line with the legislation and guidance.
15. Recovery of unpaid FPNs is broadly in line with and uses the same pathway as that of parking enforcement generally via the Traffic Enforcement Centre at the Northampton County Court. The guidance also permits the Council to prosecute an individual for the offence if deemed necessary, appropriate and proportionate which will usually only be considered after the traffic enforcement process has been undertaken. This is set out within section 8 of the guidance which can be found in the background papers below.

Proposal/Options

16. The proposal is to adopt the powers and authorise officers to undertake the monitoring and enforcement with a focus on Luton's existing AQMA's and around School locations.
17. The Council could decide that it does not wish to adopt the powers at this time.

Appendix

18. None

List of Background Papers - Local Government Act 1972, Section 100D



Guidance on powers
to require drivers to s

Committee:	Overview and Scrutiny Board
Date of Meeting:	28 February 2021
Subject:	Draft Housing Strategy 2022-27
Report Author:	Claire Astbury, Head of Housing Strategy & Development
Contact Officer:	Claire Astbury
Wards Affected:	All

Purpose

1. To share the draft housing strategy ahead of moving to public consultation.

Recommendations

2. To comment on the strategy so that any suggestions can be incorporated in the consultation version.

Background

3. Executive approved our Luton Housing Strategy 2019-2022 in December 2018. This strategy document was developed following significant local consultation and was very extensive. Since this time, the Luton 2020-2040 vision has set an overarching strategic direction for the council and the town. Covid-19 impacted the delivery of the housing strategy but we have delivered on key aspects of the strategy. Our corporate work on Minimum Income Standard shows that housing costs are a significant driver of poverty in Luton, as well as impacting on health and wellbeing. The strategy supports our work around climate change, a Child Friendly Town and a Marmot Town of health equity. Our approach to housing is therefore central to achieving our broader ambitions for the town

Report

4. An updated draft strategy covering a five year period 2022-2027 is attached for approval ahead of consultation. It sets out not just our ambitions around delivery but also our intention to work with our residents and tenants, reflecting and anticipating emerging regulatory expectations.
5. The new strategy is informed by our Luton 2040 vision and has clear links to a range of corporate priorities. It continues to take the four main themes of our existing strategy:
Right Homes, More Homes
Reducing Homelessness
Quality Homes and Neighbourhoods
Supporting Wellbeing
6. The Executive Summary sets out our main areas of delivery:

Good housing is crucial to achieving wider ambitions for Luton. Our housing strategy sets out how we plan to ensure that the local people benefit from good quality, affordable and appropriate housing and services.

The council and its partners are well placed to play an active role in the local housing market through development, engagement and enforcement, so that people have

healthy homes and neighbourhoods they can be proud of, and specialist needs are met, supporting independent living.

Aligned to the Luton 2020-2040 agenda, by 2027 we aim to ensure:

- *Good and improving housing services*
- *An active and increasing role for our residents and tenants.*
- *At least 425 new homes and 85 new affordable homes each year.*
- *A bold intervention in the local rental market to make homes available at lower cost.*
- *More of the homes we most need, especially family homes.*
- *Significant reductions in the use of temporary accommodation, to under 500 households.*
- *No rough sleeping in Luton.*
- *Improved conditions in the private rented sector through extension of licensing.*
- *Reduction of fuel poverty through additional energy efficiency measures to homes of all tenures.*
- *Full compliance with emerging building safety and fire safety requirements.*
- *Clear plans for the delivery of specialist housing to meet social care needs.*

Proposal/Options

7. To comment on the strategy before a version is finalised for public consultation.

Appendix

8. Draft Housing Policy Document – Appendix A
9. Draft Housing Policy PowerPoint Presentation – Appendix B

List of Background Papers - Local Government Act 1972, Section 100D

Implications

Item	Details	Clearance Agreed By	Dated
Legal	The council has some statutory obligations in regard to housing services, as a landlord, and in homelessness, as well as contractual obligations. The housing strategy reflects these as well as identifying some additional projects such as a company to offer rented homes which will have legal implications, and be assessed as it comes forward.		
Finance	The council's housing activities are part of its overall budget monitoring approach both in terms of the general fund and the 30 year HRA business plan. New commitments are tested for		

Item	Details	Clearance Agreed By	Dated
	value for money based on a business case.		
Equalities	Housing is identified in the strategy as a social justice issue. Achieving more good quality affordable homes will support our anti-poverty work as well as mitigating against inequalities. Poor housing outcomes are more often found amongst ethnic minority communities, women, and young people, and our work aims to reduce these inequalities.		
Environment	Housing plays an important part in meeting our climate change goals because around 40% of carbon emissions come from domestic dwellings.		
Community Safety	Housing is a recognised part of the Reducing Reoffending strategy and this strategy recognises that with the ambition to support that delivery. Our work on estates around anti-social behaviour and our commitment to achieve Domestic Abuse Housing Alliance accreditation support our community safety activities.		

Appendix A - Draft Housing Strategy

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1. Foreword

Foreword from Cllr Shaw

A good home is the starting point for a good life. In Luton we know that people having a secure affordable home is essential to our ambitions for eradicating poverty and helping everyone to thrive.

In Luton we work with a range of partners to make homes available, improve the quality of properties and support wellbeing.

Our greatest challenge is to ensure that suitable, good quality, affordable homes are available to all who need them. Too many people are struggling with housing costs, homelessness, inaccessible and unhealthy homes. Levelling up starts at home.

We will meet this challenge through taking up all opportunities to provide new homes which meet local needs, and improving the homes we already have in the town.

The climate challenge grows ever more urgent so reducing carbon emissions from homes is a key aspect of the council's work.

The pandemic has reinforced our understanding of the importance of home to support good health and wellbeing. Housing is not just about bricks and mortar but the surrounding neighbourhoods, and the ability to live well. Specialist housing provision is an essential part of an independent and healthy life. We have great places and communities in Luton, and will make a contribution through our housing work to improve wellbeing across the town.

2. Executive Summary

Good housing is crucial to achieving wider ambitions for Luton. Our housing strategy sets out how we plan to ensure that the local people benefit from good quality, affordable and appropriate housing and services.

The council and its partners are well placed to play an active role in the local housing market through development, engagement and enforcement, so that people have healthy homes and neighbourhoods they can be proud of, and specialist needs are met, supporting independent living.

Aligned to the Luton 2020-2040 agenda, by 2027 we aim to ensure:

- *Good and improving housing services*
- *An active and increasing role for our residents and tenants.*
- *At least 425 new homes and 85 new affordable homes each year.*
- *A bold intervention in the local rental market to make homes available at lower cost.*
- *More of the homes we most need, especially family homes.*
- *Significant reductions in the use of temporary accommodation, to under 500 households.*
- *No rough sleeping in Luton.*
- *Improved conditions in the private rented sector through extension of licensing.*
- *Reduction of fuel poverty through additional energy efficiency measures to homes of all tenures.*
- *Full compliance with emerging building safety and fire safety requirements.*
- *Clear plans for the delivery of specialist housing to meet social care needs.*

3. Luton 2020-2040: A Place to Thrive

Luton Borough Council, alongside local partners, has a truly ambitious vision for Luton that builds on our strengths and key assets as a town as well our shared values. Together, we will build on the success of recent years and overcome the challenges we face today to build a healthier, fairer and more sustainable town where everyone can thrive and no-one has to live in poverty.

Our approach is set out in the Luton 2020-2040 vision. Our strategy for housing helps to deliver this ambition because good quality, affordable and sustainable homes are essential to quality of life, health and wellbeing, social justice, community and the local economy. Housing outcomes underpin all five of our strategic priority areas.

We won't achieve all these outcomes on our own. As well as collaborating across the council, we are actively working with other partners across community, voluntary, business and public sectors to influence and enable projects which improve lives. Housing supports our wider ambitions on health, skills, employment and better places and we work with partners such as housing associations, clinical commissioners, education institutions, housing developers, builders and local businesses to make a difference on the ground.



4. Local Context

Headline Figures about Luton

 • 223,800 residents in the town. • Super diverse town – 55% non-White-British. • One of the youngest populations in the country – 27% of residents under 18. • Over 65 population forecast to grow by 38% by 2035.	 • The median house price in Luton is £258,000 – 34% increase since 2015. • The Median house price is 8.5 times the median gross annual earnings for residents. • 29% of homes are rented privately, twice the amount of social housing in the town.	 • Domestic buildings account for 29% of carbon emissions in Luton. • 8% of households experience low income/high cost fuel poverty, rising to 12% of private tenants
 • More than 1 in 4 workers earning below the Real Living Wage. • 23,000 employees on zero-hour and agency contracts. • Claimant count of 8.4% - up from 3.4% in March 2020 – the sharpest rise in the country.	 • 33.4% of households are living below the Luton Minimum Income Standard for a decent standard of living, with 12.2% unable to afford basic needs. • 39.4% of children growing up in relative poverty in 2019/20. • 26% of working households in relative poverty.	 • Life expectancy gap of 6.9 years between women in Luton's most deprived and most affluent wards – for men this gap is 5.1 years. • Male life expectancy in Luton one year less than the national figure. • Over 25,000 people living with mental health conditions and 3,900 with learning disabilities.

The Covid pandemic had a significant impact on the town especially in relation to employment and health. The effects were felt most deeply by people who were already experiencing the most disadvantage. The pandemic also had greatest impact in particular ethnic groups. Equitable recovery is a central part of our approach and ambitions.

Taking a “Health in All Policies” approach to housing could significantly impact the health and well-being of populations, especially vulnerable groups. This is more critical than ever, given the context of the pandemic that has led to worsening overall health and well-being. Housing is a key means to support the BLMK Integrated Care System’s priorities of Start Well; Live Well, Age Well, Growth and Reducing Inequalities.

Luton has limited land availability and the pattern of development is shifting so that over the next ten years, we will see much more densification and higher buildings become part of the townscape.

Our approach will be based on working in partnership and listening to our residents and communities. We benefit from strong community engagement and initiatives in Luton and will work

Appendix A - Draft Housing Strategy

with residents and communities across the town. Housing has been identified by our Fairness Taskforce as a social justice issue. With such a significant population of young people, access to appropriate housing is also a generational fairness issue. The Fairness Taskforce expressed ambitions to ensure Luton has “safe, secure and truly affordable housing for everyone” and is “A place where nobody needs to sleep outside on the streets”.

We are increasing our engagement with tenants and residents so our services are responsive and accessible. Our customer approach supports early interventions, integrated services and easy digital options for people, whilst providing additional support where needed. Our council wealth building approach supports the local economy and the council is actively investing in housing projects as part of this approach. This plays a part in Levelling Up the local economy and building relevant skills for the future.

CASE STUDY: LISTENING TO TENANTS AND RESIDENTS



Pam (Chair) of the Tenant Board *‘During lockdown regular Tenant Board zoom meetings meant we continued to be involved with budget setting and reviewing housing service performance. Locally we also held a series of small walkabouts across the town. This helps resolve local issues. Recycling in flat blocks was raised by the local tenants and residents group and they now issue recycling bags to residents. This helps the group to both maintain the tidiness of the local area and keep tenants informed and involved.’*

John (Vice Chair) of the Tenant Board *‘I believe wherever they live, tenants can make a difference to council housing services, and as a Board member, I know it’s an enormous privilege to represent tenants’ views and use them to help ensure housing services are the best that they can be.’*

Targets and Priority Actions – How we work

Housing services will contribute to and deliver our emerging Corporate Customer Commitment so service standards are clearly understood.

We will review our housing service delivery to align with the council’s customer service approach.

We will implement a new housing software system which allows for customer visibility, clear information and ensures building safety monitoring and compliance.

We will implement the ISO9000 quality assurance system to our housing services.

5. Strategic Context



6. Future Considerations

During the delivery period for this strategy we are anticipating some major changes in legislation and housing policy, which we will need to incorporate into our work.

Building Safety

There will be increased focus on building safety, particularly in relation to the council's own housing stock. New legislation and regulation is anticipated in the next 18 months which mean that we will have additional responsibilities especially for complex and high risk buildings.

Tenant's Charter

A welcome change in regulatory oversight and a new inspection regime from the Social Housing Regulator will mean that as a landlord we will be expected to show how we are listening to our tenants and delivering on their priorities. The Housing Ombudsman also has greater powers to ensure redress for poor service.

Planning Law

Anticipated changes to planning law and guidance will introduce new approaches to planning and zoning, with a broader range of affordable home ownership tenures expected, including First Homes, for which evidence of demand is not yet clear, and which may impact on site viability for other affordable housing tenures.

OxCam Arc Spatial Strategy

Luton sits within the Oxford to Cambridge Arc, which is anticipating significant growth over the next 30 years. Strategies to guide that growth are in development with adoption of new national planning policies anticipated by 2023. Luton Council will be an active partner in this consultation and growth agenda.

BLMK Integrated Care System

The establishment of an integrated care system for the Bedfordshire, Luton and Milton Keynes area provides opportunities for improved liaison between health, social care and housing systems. Priorities set by the BLMK area will influence the work of all partners including local councils.

Domestic Abuse Act Implementation

The introduction of the Domestic Abuse Act in 2020 requires some changes in terms of how we support victims of domestic abuse, and work with perpetrators. The Council is working towards DAHA accreditation from the Domestic Abuse Housing Alliance.

Care Leavers

Care leavers are entitled to support to the age of 25 years old, with implications for independent housing options.

Social Care White Paper

The government has recognised the importance of housing and accommodation settings in supporting wellbeing for people accessing social care. Changes to strategic work, extension of assistive technology and changes to the delivery of Disabled Facilities Grants have been announced with further changes expected to follow to deliver improvements.

7. Right Homes, More Homes

Outcome Statement

A good mix of homes is available to people in Luton which meet local needs. Luton is an attractive place to deliver new homes and housing is a part of regeneration and transformation in the town. Luton Council is an active and involved partner in driving delivery and increasing access to homes. Increased delivery of affordable homes helps our target to reduce homelessness.

7.1 Current Position

Luton has very high levels of housing need and recent housing delivery has not met the most acute need for family sized homes and affordable housing. One factor in this is the homes delivered through Permitted Development Rights which we have very limited opportunity to influence.

Our Local Plan, adopted in 2017, set out a need for 17,800 homes to meet needs over the plan period 2011-2031. However our Local Plan only provides for the delivery of 8,500 homes with the remainder to be provided in neighbouring boroughs.

The Local Plan requires 20% affordable housing on sites over 11 homes, whilst neighbouring Local Plans require 30% affordable housing. However there is currently no established mechanism to make homes in neighbouring areas available to households on the Luton Housing Register. Viability considerations, relating to site remediation, infrastructure and other costs, present a significant challenge to delivery of affordable homes in the area.

Affordable housing is defined in planning policy and covers a wide range of tenures and price points. We know from local data that the most affordable forms of accommodation are homes at regulated Social Rents or Affordable Rents; rents of all kinds which fall within Local Housing Allowance levels; and shared ownership models of low-cost home ownership.

Housing delivery over the past five years has been varied, with an average yearly supply of 713 homes, of which 115 were affordable.

Year	Total	Of which, affordable
2020/21	474	71
2019/20	791	173
2018/19	627	69
2017/18	873	134
2016/17	798	127

There are around 9,000 households on the council's housing register. In 2020/21, partly due to the covid crisis, we accepted a homelessness duty for 428 households. Demand for affordable housing is extremely high.

Meeting the shortfall of supply is a priority for Luton Council, with a clear demand for an additional 300 affordable homes to rent each year, above current availability.

The council has responsibilities to maintain a Self-Build and Custom Build register and seek to enable serviced self-build plots. Although the number on the register is low, it has proved difficult to bring forward appropriate self-build serviced plots which meet the government definition.

CASE STUDY – OAKLEY HOUSE AFFORDABLE HOUSING SCHEME



Oakley House is a scheme of 65 affordable homes by Hightown Housing Association at a former employment site in Leagrave. The scheme is Hightown's fifth in the town, demonstrating a growing commitment to providing affordable housing in Luton and to land-led schemes. The project was granted planning permission in November 2021 and is expected to complete in 2024. Andrew Royall from Hightown said "This planning permission helps us continue our mission of building as many high quality homes as we can to respond to the shortage of affordable housing in Luton".

7.2 Opportunities and Challenges

Luton Council has the ambition to encourage significant investment in new homes and to deliver homes directly. We are developing through our wholly owned company, Foxhall Homes as well as the Housing Revenue Account. Our procurement approach follows our Wealth Building Strategy which supports the economy through local supply chains and social value. Rising values in Luton, whilst creating affordability challenges, make the town an attractive place to develop new homes. This stronger housing market better supports viability and additional planning gain.

Housing is fundamental to our ambition for Luton to be a place where no one is stuck in poverty. We know that those living in private rented housing are most likely to be struggling to cover rent and other bills on a month by month basis. They are also most likely to be the next homeless approaches to the Council, seeking housing assistance.

As such, we plan to make a bold intervention in the rental market in Luton: we currently own around one in ten properties in our town, we intend to increase that significantly. We will develop a new council company which will purchase and access properties in and around our town with a core focus of providing good quality homes, which are well managed and which offered at a range of rent levels affordable to tenants, with the ambition to hold most rents at 80% of the market rate. Officers will look at developing a Luton Living Rent, which offers tenants more affordability.

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This will mean those currently living in private sector homes, which in our town are too often poorly maintained, will be able to move into well managed, good quality homes at the same time as making a saving on their monthly housing costs. Keeping more money in people's pockets in this way will be a significant step towards ensuring no one is stuck in poverty in our town.

The council will also explore opportunities to participate more fully in local supply through working with providers and developers in the area to acquire new homes, and partner with SME developers and larger developers.

We have a strategic priority to make the funding available through our treasury strategy and maximise the capacity of our Housing Revenue Account capital programme in order to invest in new homes so we can meet our ambitions to reduce poverty and homelessness.

Although land supply is restricted in Luton there are some significant strategic sites and opportunities across the town, especially in our town centre. Our Town Centre Masterplan was adopted in 2021 and seeks to support the provision of family sized homes as part of transforming the centre as an aspirational location to live and to provide a greater mix of accommodation.

Within Luton there are some very large sites coming forward with significant housing provision such as Power Court and several sites on Kimpton Road. A steady stream of windfall and infill sites also support local SME developers and builders. Construction is an important part of our local economy and supports our Inclusive Growth and Local Wealth Building approach – with the potential to create sustainable jobs and skills. Local investment in construction skills contributes to long term economic strength.

Our performance is improving in securing affordable homes through the planning process but there is further to go. Challenges do exist in terms of access to land, and the costs of remediating brownfield land. Securing the right mix of homes especially family sized homes, remains a key challenge. We will take the opportunity arising from the finalisation of the Central Bedfordshire and North Hertfordshire Local Plans to secure additional homes to meet Luton's needs. We will review our Article 4 Directions based on new legislation to protect key employment sites.

Our increasing engagement with our community and grassroots based solutions could provide more opportunity to mobilise community wealth towards a community land trust or community self-build projects.

7.3 Targets and Priority Actions

A minimum of 425 net new homes a year in Luton as set out in the Luton Local Plan with a minimum of 20% affordable (85 per year).

A minimum of 900 council-led homes over the 2022-27 period, including at least 350 affordable homes.

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Publish a Housing Supply Plan which sets out how we will maximise our capacity to deliver more homes and work with partners to build homes to meet Luton's housing needs, encouraging local labour and skills.

We will establish a company to acquire homes to offer at below market rents, increasing the council's ability to shape the rental offer in Luton.

An aspiration to achieve 350 new affordable homes a year by the end of the strategy period, driven by council-led delivery, resulting in at least 700 lettings per year to affordable homes by 2027.

60% of all new homes and 80% of council-led homes to be family sized (2 bedroom 4 person minimum) between 2022 and 2027.

A minimum 10% of new affordable homes to be wheelchair accessible.

We will review our Article 4 protections around permitted development to respond to government changes, giving more oversight to homes created through building conversions and protecting employment locations.

We will create opportunities for delivery of a range of options for households seeking housing, who are unlikely to receive an offer from our housing register; including improved pathways for tenants and applicants to access intermediate and low cost home ownership, keeping under review the role of First Homes.

We will support self-build and meet statutory requirements to provide serviced plots.

Improve partnerships and communication with housing developers and affordable housing providers including potential community build projects, driving the progress of any stalled sites.

We will keep under review the needs of people in Luton especially in relation to the large cohort of younger people in the town.

8. Reducing Homelessness

Outcome Statement

Households in Luton have access to high quality employment and support which helps to secure long term accommodation which is suitable and affordable. Low income households are also able to access the private rented sector affordably. When people need advice and support, the council will be proactive in preventing homelessness, and prompt in dealing with statutory homelessness applications. We will continue to reduce the use of temporary accommodation and help people to secure settled accommodation. We will work in partnership to eliminate rough sleeping.

8.1 Current Position

Homelessness is a major challenge in Luton and the town is an outlier in the use of temporary accommodation. Too many households struggle to secure appropriate housing and the cost of rents in the private sector are well above Local Housing Allowance levels making them out of reach for any low income households including many people who are in work. At November 2021, actual rents were 10-25% above LHA levels, depending on size of property, meaning that households on low incomes would need to find an additional £8 to £58 per week to top up the shortfall.

The Covid-19 pandemic impacted on homelessness in a number of ways. Rough sleeping was virtually eliminated through the Everyone In initiative during 2020/21 but has started to increase following the ending of targeted funding, especially for people with No Recourse to Public Funds. Luton's economy was particularly hard hit during the pandemic due to the role of the airport in providing local jobs and supply chain demand. The town had one of the highest furlough rates in the country which meant that households were more likely to have a change of circumstances and move onto Universal Credit from other legacy benefits. The claimant count for working age people increased by around 120% during the pandemic. Housing affordability remained a challenge throughout the pandemic, and a more limited housing market reduced opportunities to secure housing.

Homelessness approaches were 2,032 in 2019/20 and fell to 1,625 in 2020/21. The most common reason for homelessness is the ending of a private tenancy or family and friends being unable to accommodate.

CASE STUDY: HOMELESSNESS PREVENTION

Our homelessness prevention officer was able to negotiate with a private landlord so that a family could stay in the home where they had lived for ten years. The landlord had been looking to renegotiate the rent and our financial assessment showed the family were able to afford a change in rent. The council supported the transition through short term financial assistance. This intervention prevented a homelessness application, helped the family to remain for at least another two years and also stabilised a fostering placement for a looked after child.

As a major landlord in the town the work we do with our tenants to sustain tenancies and prevent evictions is a part of a broader homelessness prevention offer. Our homelessness service was reshaped in 2020 to better meet demand and place greater focus on prevention of homelessness. We also benefit from strong local partnerships with statutory partners and

the voluntary sector and work together to support vulnerable people experiencing homelessness. This collaboration has supported a growing Housing First programme to provide long term accommodation with support to former rough sleepers. However there are individuals known to us and our partners who have complex needs and are not well served by existing services. The council is working with partners to access funding for specialist supported accommodation for exploited women, and for around fifteen units of supported accommodation for people with complex needs.

Information from Education services indicates that some schools have seen significant turnover of pupils in their school roll; and temporary accommodation is a factor in this churn which disrupts educational outcomes. Although the use of temporary accommodation is reducing, it remains a significant form of accommodation in the town. It is essential this is good quality accommodation, and we have been increasing our oversight on safety compliance and quality, and the management of hostel accommodation, over the past two years.

8.2 Opportunities and Challenges

Luton has a strong infrastructure of partnership which can mobilise quickly to respond to funding opportunities and emerging challenges in homelessness. A key strategic aim is to play our part in keeping partnerships active in the town.

The delivery of more affordable homes is an essential part of meeting our homelessness challenge, but there is more availability in the private rented sector. Maintaining the accessibility of private tenancies as a means of preventing and alleviating homelessness is therefore both an opportunity and a challenge. The council has responded to this opportunity through establishing a social lettings agency as a joint venture with Squared housing association. Luton Lets Squared has a role to influence the quality of the local rented market and make it more accessible to people on lower incomes who would struggle to meet the requirements of other lettings providers.

Luton has a strategy for post-covid economic recovery including improvements in skills and employability which will help people secure good jobs and support their families. This will also help to alleviate the risk of homelessness.

As a council we have been very successful in accessing national funding to develop our services to homeless people especially rough sleepers. However, this does mean that a number of homeless services and projects are dependent on short term external funding. Despite several funding bids, we have so far not secured investment in much needed complex needs accommodation for people who are most at risk of falling between assessment systems. The Rough Sleeping Initiative Grant is due to end in 2025 and will encourage a collaborative approach to commissioning which should deliver ongoing support to people rough sleeping. However, the loss of funding is a risk to services.

There is an opportunity to examine and reshape the model for service provision to be more sustainable over the next two years, in partnership with delivery organisations.

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The council also faces a significant financial challenge whilst temporary accommodation usage is so high. Reducing the use of temporary accommodation will not only improve housing options for people in the town but help the council to make necessary savings.

Another challenge faced by the council is the attractiveness of Luton as a location for other authorities placing homeless households into our area. This creates additional demand in the longer term and requires transparency and partnership to ensure people settle well. These placements have tended to concentrate in permitted development projects converted from office use, some of which have not met required standards.

CASE STUDY: BIG CHANGE LUTON



Led by the Luton Homeless Partnership, Big Change Luton provides an opportunity for people to donate directly to local charities working with people who experience homelessness. Through this funding, personalised support helps with a range of things to help people settle and get back on track. For example, Declan had help to furnish his first home after living in a tent for eight years, and Chloe was able to apply for a passport which helped to secure accommodation and apply for a driving license to support her in finding work.

8.3 Targets and Priority Actions

Number in temporary accommodation to reduce to under 700 by 2024 and under 500 by 2027.

Accommodation will be safe secure and suitable for children in temporary accommodation.

We will encourage and support families to move into rented homes within 2 years of entering temporary accommodation.

All temporary accommodation to continue to meet building safety and compliance requirements.

Rough sleeping to reduce to zero by 2027.

Increase income to and expand Luton Lets Squared to support more successful private sector discharges.

Retain and strengthen partnerships including Luton Homeless Partnerships.

Complete and implement system change approach to improve outcomes for vulnerable people at risk of rough sleeping.

Delivery of complex needs accommodation/specialist supported housing for women, directly or with partners.

9. Quality Homes and Neighbourhoods

Outcome Statement

Luton Council makes a difference on the ground through active housing management, in line with tenant input; effective estates management and ensuring homes, of all tenures, are of good quality. The council will be an exemplar for building safety within the town. Our activities contribute to the council's Zero Carbon target as part of the Luton 2040 agenda and improvements to energy performance also tackle fuel poverty in the town. Homes and neighbourhoods support our ambitions to be a Child Friendly Town.

9.1 Current Position

People in Luton really care about the town and we know that they have concerns about poor quality homes and neighbourhood issues such as fly tipping and anti-social behaviour.

Good homes are essential to health, and people's wellbeing, therefore our work to tackle fuel poverty and improve standards, especially in our own stock and in the private rented sector, will be a major contribution towards improved outcomes for people.

As a landlord to around one tenth of homes in the town, the council has important responsibilities towards building safety, providing good quality sustainable homes and supporting wellbeing. During the covid pandemic, our actions helped to keep people safe at home, including in vulnerable settings such as sheltered housing and temporary accommodation.

Government and regulators are increasing their scrutiny of building safety. The council has a very strong record in regard to buildings compliance, and intends to retain and strengthen this approach.

We have invested heavily in improvements and works to homes, including major cladding projects in our tower blocks to improve energy efficiency. We have also grown our tenant involvement over recent years, despite the challenges of the pandemic, making sure that we are listening to our residents and responding to their concerns, to meet the expectations of the Social Housing Charter and White Paper. Our tenant scrutiny committee has set out a programme of work to review our services. Their first report on the repairs services has been accepted and improvements are now being tracked.

Our Healthy Estates approach supports active lives, wellbeing and social integration in our council estates. We know that if people feel safe they are more likely to engage and become part of their neighbourhood. Making the environment more attractive will encourage people to exercise, socialise and play, keeping active and connected to their community. Safe play is a central part of our Child Friendly Town, along with safe walking and cycling routes especially to schools, which also supports our climate change actions.

CASE STUDY: HIGH RISE CLADDING PROJECT



The council owns ten high rise blocks and is well advanced on a programme of improving these with insulated cladding. Due to start in 2017, the project was held back to engage with tenants, test our materials and provide reassurance about fire safety. So far, work has commenced on all ten blocks, with three blocks completed. The £34M project is funded through the Housing Revenue Account matched with £8M European ERDF funding through SEMLEP and delivered with Engie and United Living. When the project completes in 2022 It will have improved 1064 homes by increasing their energy rating, ensuring all the homes are at EPC C standard.

Our enforcement work within private sector housing helps to ensure a good quality private rented sector in the town. We are on target to introduce additional licensing across the borough for HMOs and selective licensing for all privately rented homes in South ward from 1st April 2022. At present, 440 HMOs are licensed, with research from BRE indicating that extending our licensing schemes will bring an additional 4,000 HMOs and 3,500 properties in South Ward under this protection. We actively pursue a range of enforcement options against landlords who disregard the law by providing unsafe homes and exploiting tenants. We also influence the local lettings market through Luton Lets Squared which is helping to improve standards locally especially for lower income households.

Domestic dwellings account for 39% of CO2 emissions in Luton. If we are to be a carbon neutral town by 2040, this will require significant investment and a step change in sustainable technologies for insulation, heating and hot water across all homes, including initiatives which will be attractive to homeowners. Some of this is outside the Council's control but we can inform and encourage energy efficiency for all residents, and we have set minimum energy performance standards for all homes we provide as temporary accommodation. The council has also set minimum standards for new council homes, decarbonising heating where possible.

Long term empty homes can blight neighbourhoods so we have targeted support, backed up by enforcement action, to encourage homes into use, successfully bringing 50 homes into use in 2020/21.

9.2 Opportunities and Challenges

Our influence over the homes that we own and manage is a great opportunity to continue to be a local leader in low carbon design, retrofit and housing quality. Our maintenance of our homes, the standards we set for new homes, as well as considering active travel, design and the provision of charging points, all help us to work towards Zero Carbon. We will continue

to work with tenants and residents to improve the quality and energy efficiency of homes in the town. Our growing tenant engagement will help us to target our building safety and community involvement work towards the things that matter most to our residents. The ability to engage closely with tenants provides opportunities to tackle issues such as anti-social behaviour, hoarding and cuckooing which impact on residents and neighbourhoods more generally.

Housing also has access to community assets which can act as a hub for interaction and community building, supporting thriving neighbourhoods, improving community safety and tackling social isolation. Housing projects contribute to the local economy through skills, apprenticeships and local procurement, all helping to build economic resilience in Luton. We are establishing partnerships around green skills and construction which will create good employment opportunities for local people.

Luton benefits from a strong and active voluntary sector which already delivers street-level improvements such as clean ups, and helps to build a sense of safety and community. It's important to build on this asset in our town, working with our social justice and community engagement teams.

Working with NHS partners, social care and education colleagues and learning from the NHS Healthy New Towns provides us with a great opportunity to create health-promoting homes and neighbourhoods. This means helping people to eat well, be smoke free, physically active, socially connected and live in thermal comfort.

As new funding becomes available for improving housing quality and efficiency, we will take up as much opportunity as possible to attract this investment into Luton for the benefit of tenants and residents. We are also exploring opportunities to deliver energy efficiency projects as part of broader carbon offsetting activity linked to London Luton Airport. This could be transformative, especially for privately owned, older homes in the town.

Our expanding licensing activity and our own co-owned lettings company provide opportunities to shape and improve the standards of the private rented market across the town.

We face significant challenges to meeting our low carbon ambitions. Funding options, especially for private homes, availability of trusted skilled installers, and appropriate advice and information are all issues we need to overcome. The growing necessity to retrofit homes will create opportunities in terms of supply chains and training options. We are working strategically with education and training providers to support these new green skills.

Another challenge in this area is how we measure our performance. There is limited comparable data covering the private sector homes in the town. We will work with partners including installers, residents, charitable organisations and local businesses to track our impact.

CASE STUDY: TENANT ENGAGEMENT MAKING A DIFFERENCE TO NEIGHBOURHOODS

Tenant Participation staff supported a Tenants & Residents group in Park Town, which has helped to resolve issues through engagement. For example, consultation with residents led to a change of approach in door security measures making the block safer. The residents have also influenced improvements to a play area to enable it to re-open.

9.3 Targets and Priority Actions

Council homes to meet EPC Band C by 2025.

A minimum of 400 private homes per year to receive efficiency/decarbonisation improvements via external funding schemes.

No temporary accommodation will be used if it has an EPC rating of D or below.

HMO licensing to cover all appropriate properties by 2025.

Selective licensing to cover all appropriate properties by 2025.

Evaluate current licensing arrangements and Government White Paper proposals to inform an extension of licensing across the borough

Bring 40 empty homes a year into use through council intervention.

At least 300 Statutory Notices resolved per year.

Annual increase in homes which are licensed and inspected.

New homes developed by the Council or Foxhall Homes to be minimum EPC band B by 2025.

EV charging points to be incorporated in all new housing developments and provision in council estates to be improved.

The council will take an active role in ensuring that sufficient training and skilled labour is available locally to support retrofit activities.

Refresh our asset management plan to include our selected options for the replacement of gas boilers across the council housing stock by 2026.

As a landlord we will observe all new building safety compliance requirements.

We will grow our tenant engagement and meet all expectations of the Social Housing Regulator on consumer regulation.

We will continue to involve tenants from all across the town and respond to the findings of the regular STAR survey.

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We will encourage council tenants to organise and promote the option of tenant management organisations, including co-operatives, under the Right to Manage.

An active programme of tenancy audits will ensure contact with 1800 tenants each year.

Rollout of Healthy Estates Strategy to improve external environments on council estates.

Housing services to be linked to our Child Friendly Town activities.

10. Supporting Wellbeing

Outcome Statement

Everyone in Luton can access homes which support their independence and wellbeing across the life course. Longer term needs of older people and people with disabilities or care needs are anticipated. Where housing with support is required, this is planned well in advance and commissioned in partnership. Co-production supports good design and service delivery. Housing is a central part of tackling health inequalities and achieving Marmot Town status for Luton. The council will create opportunities for investment into specialised housing which meets local needs.

10.1 Current Position

Housing is a significant determinant of good health. Good quality, secure and genuinely affordable housing is the basis from which residents can achieve their full potential. The experience of the Covid-19 pandemic showed at a national level, and locally, that poor housing plays a large role in reducing wellbeing. This was supported by the findings of the Talk, Listen, Change project examining disproportionate impacts of covid on ethnic minority communities in Luton. Some specialist needs grew during the covid pandemic as a result of lockdowns and social isolation.

For some cohorts, specialist housing provision is an essential part of an independent and healthy life. The Social Care White Paper in November 2021 stated “every decision about care is also a decision about housing”. We currently have a range of specialist housing and services in the town in the town which address the needs of:

- Children leaving care
- People living with physical disabilities, sensory disabilities, learning disabilities and mental ill-health
- Migrants, refugees and people with no recourse to public funds (NRPF)
- People fleeing domestic abuse
- People with a history of offending behaviour
- People that have faced multiple exclusion and homelessness
- Older people who are in need of some support

Our corporate commitment to children and young people and role as a corporate parent make housing provision for children leaving care an essential ongoing part of that responsibility.

A study by Campbell Tickell on behalf of the BLMK Transforming Care Partnership identified a likely additional demand of 98 units of specialist accommodation in Luton for people with learning disabilities between 2018 and 2023; primarily supported housing. A study of older person’s housing needs in Luton indicated a requirement by 2030 of 711 specialist homes, comprising 134 age exclusive, 468 sheltered and 109 extra care homes.

Luton Council updated its Market Position Statement in 2021 which included a target to support people to live independently at home as long as sensibly possible, and to ensure that Luton has the right supply of appropriate housing and accommodation for its changing demographic. The Housing Strategy will support the delivery of the Market Position Statement, especially in relation to reducing out of borough placements, supporting hospital

discharge and providing aspirational independent living options which make the best use of land availability and new technology.

10.2 Opportunities and Challenges

We have been improving our joint working with Adult Social Care, Public Health and the NHS and this has improved the opportunity to meet physical and mental wellbeing outcomes through housing projects. Finding an appropriate aspirational housing offer for older people is a challenge but also presents an opportunity to free up family sized homes of all tenures and ensure that older people are part of new emerging neighbourhoods.

We are building joint working with Children's Services to ensure better transitions for young people into independent living. We aim to provide improved support and training for tenancy sustainment and a commitment to care leavers to maintain a housing offer.

Our role as a landlord supports a range of specific client groups and broader wellbeing. For example, our Healthy Estates strategy, support for smoke free buildings and involvement in providing accommodation for housing first clients. Our adaptations service supports independent living across the town, helping people to live well at home.

We have an in-house assistive technology function which can act as a base for various additional services beyond a lifeline option. The digitalisation of all telecare in the next 5 years presents a very significant operational challenge which we need to prepare for, but provides a basis for extending services from a new digital platform.

Our multi-agency approach means that housing contributes to wider ambitions such as reducing reoffending, preventing domestic abuse and supporting survivors of abuse and exploitation.

Luton has recently experienced a very dynamic population change which makes longer term demographic trends harder to predict. However, our most vulnerable residents are least likely to move out of the borough which means we can focus on the needs of service users known to us over the long term. Collaboration with the voluntary sector and directly with the local community can help to shape services. The Fairness Taskforce has the potential to ensure that Luton is a truly equitable place which includes a better deal for people who may be more vulnerable or marginalised, including opportunities for younger people to access appropriate housing.

Housing is an essential element of our work to reduce health inequalities, which means that our activities create an opportunity to improve collaboration.

10.3 Targets and Priority Actions

We will publish action plans setting out how we will identify appropriate sites near to facilities and deliver specialist accommodation to meet specialist needs; including people with Learning disabilities and autism, young people transitioning from Children's Services, people with mental health and complex needs, and older people.

We will collaborate with partners on tenancy information and sustainment projects for young people leaving care.

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We will support Children's Services in the provision of specialist accommodation.

We will complete the programme of refurbishment of our sheltered housing schemes.

We will consult with tenants in sheltered housing as part of a review of staffing and services with options around more active on-site staffing with a broader role. These options will also be considered in light of HRA resources and the impact on costs to tenants.

We will increase partnership working with health services to target support in line with the frailty framework.

Satisfaction with adaptations at 95% or above.

We will work with partners including Adult Social Care to improve advice and information for older people about housing options, and explore all opportunities to develop specialist senior living accommodation, including extra care where required.

Delivery of specialist accommodation for mental health and complex needs.

ATS to be active in developing assistive technology options for people.

Achieve Domestic Abuse Housing Alliance (DAHA) accreditation by 2023.

We will collaborate with partners in the criminal justice system to support housing solutions to help reduce reoffending.

We will grow and commit to established and new partnerships which support the physical and mental wellbeing of residents.

11. Risk Profile

The housing market is subject to external influences well beyond the reach of the council so there are elements of the strategy which will be subject to delivery risks.

Significant economic challenges which undermine local incomes for an extended time will likely exacerbate debt, arrears and homelessness, and put pressure on rent policies.

The council itself faces financial challenges including required savings for our temporary accommodation and homelessness provision, and pressure on the Housing Revenue Account for example reductions in rental income impacting long term investment capacity.

Covid-19 or other pandemic may remain a medium term risk which disrupts service provision, economic activity and wellbeing.

Supply chain and cost pressures could reduce the viability of developments, impacting on affordable housing delivery, broader housing costs and construction as a whole.

The relative benefits of building in Luton compared to other areas in the locality, in terms of the availability of construction land, house prices and construction costs could mean that delivery shifts to adjacent areas.

Government policies in relation to social security benefits, and eligibility for assistance, especially the rate of Local Housing Allowance in relation to actual local rents, could mean it's harder to secure long term accommodation for families in need of a home.

National and subregional planning policies and guidance may impact on our ability to attract appropriate development.

Technological changes including digitalisation of telephone line services, the availability of digital access and service changes will require the council to respond effectively to maintain good services, and adapt the technology offer to stay relevant.

The council's best means of responding to external challenges is to remain very clear about its ambitions and build ever stronger relationships with external partners. In terms of financial challenges, strict budget management and proactive work to improve efficiencies will be central to managing the risks.

Appendix A - Draft Housing Strategy

12. Summary of Key Actions

No.	Strategy Action	Specific actions/activity	Who leads?	When?
1	Housing services will contribute to and deliver our emerging Corporate Customer Commitment so service standards are clearly understood.	TBC	Colin Moone	TBC
2	We will review our housing service delivery to align with the council's customer service approach.	TBC	Colin Moone	TBC
3	We will implement a new housing software system which allows for customer visibility, clear information and ensures building safety monitoring and compliance.	TBC	Colin Moone	TBC
4	We will implement the ISO9000 quality assurance system to our housing services	TBC	Colin Moone	TBC
5	A minimum of 425 net new homes a year in Luton as set out in the Luton Local Plan with a minimum of 20% affordable (85 per year).	TBC	Claire Astbury	Ongoing
6	A minimum of 900 council-led homes over the 2022-27 period, including at least 350 affordable homes.	TBC	Claire Astbury	Ongoing
7	Publish a Housing Supply Plan which sets out how we will maximise our capacity to deliver more homes and work with partners to build homes to meet Luton's housing needs, encouraging local labour and skills.	Review capacity Publish Plan	Claire Astbury	By end of 2022
8	We will establish a company to acquire homes to offer at below market rents, increasing the council's ability to shape the rental offer in Luton.	Complete business case Establish company structure Commence acquisitions	Colin Moone	By 2023 By end 2023
9	An aspiration to achieve 350 new affordable homes a year by the end of the strategy period, driven by council-led delivery, resulting in at least 700 lettings per year to affordable homes by 2027.	TBC	Claire Astbury	Ongoing
10	60% of all new homes and 80% of council-led homes to be family sized (2 bedroom 4 person minimum) between 2022 and 2027.	Monitor house types as part of housing supply tracker.	Claire Astbury	Ongoing

Appendix A - Draft Housing Strategy

11	A minimum 10% of new affordable homes to be wheelchair accessible.	Monitor house types as part of housing supply tracker	Claire Astbury	Ongoing
12	We will refresh our Article 4 protections around permitted development to respond to government changes, giving more oversight to homes created through building conversions.	TBC	Sue Frost	TBC
13	We will create opportunities for delivery of a range of options for households seeking housing, who are unlikely to receive an offer from our housing register; including improved pathways for tenants and applicants to access intermediate and low cost home ownership, keeping under review the role of First Homes.	TBC as part of Housing Supply Plan	Claire Astbury	2022
14	We will support self-build and meet statutory requirements to provide serviced plots.	Incorporate self-build into planning policy at next Local Plan. Monitor and support Self-Build Register. Consider provision of plots on unused council land.	Claire Astbury	Ongoing
15	Improve partnerships and communication with housing developers and affordable housing providers including potential community build projects, driving the progress of any stalled sites.	Monitor site progress in housing supply tracker. Identify lead contacts for each site. Proactive stakeholder work including developer forum.	Claire Astbury	Ongoing
16	We will keep under review the needs of people in Luton especially in relation to the large cohort of younger people in the town.	TBC	Claire Astbury	Ongoing
17	Number in temporary accommodation to reduce to under 700 by 2024 and under 500 by 2027.	TBC	Nazakat Ali	2024 and 2027
18	Accommodation will be safe secure and suitable for children in temporary accommodation.	All building safety compliance in place. Accommodation regularly reviewed.	Nazakat Ali	Ongoing
19	We will encourage and support families to move into rented homes within 2 years of entering temporary accommodation.	TBC	Nazakat Ali	Ongoing
20	All temporary accommodation to continue to meet building safety and compliance requirements.	Compliance monitoring in place.	Nazakat Ali	Ongoing

Appendix A - Draft Housing Strategy

21	Rough sleeping to reduce to zero by 2027.	TBC	Nazakat Ali	2027
22	Increase income to and expand Luton Lets Squared to support successful private sector discharges to 150 properties a year.	TBC	Nazakat Ali	2024
23	Retain and strengthen partnerships including Luton Homeless Partnerships.	Regular attendance and support for partnerships. Commissioning to be well organised and managed.	Nazakat Ali	Ongoing
24	Complete and implement system change approach to improve outcomes for vulnerable people at risk of rough sleeping	TBC	Nazakat Ali	TBC
25	Delivery of complex needs accommodation/specialist supported housing for women directly or with partners	TBC	Claire Astbury/ Nazakat Ali	TBC
26	Council homes to meet EPC Band C by 2025	TBC	Tim Keogh	2025
27	A minimum of 400 private homes per year to receive efficiency/ decarbonisation improvements via external funding schemes	Promotion of funding options. Work with funders and installers to increase takeup.	Shabir Hussain	Ongoing
28	No temporary accommodation will be used if it has an EPC rating of D or below	Monitor and review temporary accommodation stock.	Nazakat Ali	Ongoing
29	HMO licensing to cover all appropriate properties by 2025.	Monitor HMO licensing.	Dave Stevenson	2025
30	Selective licensing to cover all appropriate properties by 2025.	Monitor licensing scheme and takeup.	Dave Stevenson	2025
31	Evaluate current licensing arrangements and Government White Paper proposals to inform an extension of licensing across the borough.	TBC	Dave Stevenson	TBC
32	Bring 40 empty homes a year into use through council intervention	Liaise with owners. Access to discretionary support. Enforcement and advice.	Dave Stevenson	Ongoing
33	At least 300 Statutory Notices resolved per year	Monitor enforcement action.	Dave Stevenson	Ongoing
34	Annual increase in homes which are licensed and inspected	Monitor enforcement activities.	Dave Stevenson	Ongoing
35	New homes developed by the Council or Foxhall Homes to be minimum EPC band B by 2025	Clarify design standards.	Colin Moone/ Claire Astbury	2025
36	EV charging points to be incorporated in all new housing	TBC	Colin Moone	TBC

Appendix A - Draft Housing Strategy

	developments and provision in council estates to be improved.			
37	The council will take an active role in ensuring that sufficient training and skilled labour is available locally to support retrofit activities.	Partnership work with colleges and installers.	Shabir Hussain	TBC
38	Refresh our asset management plan to include our selected options for the replacement of gas boilers across the council housing stock by 2026.	Publish asset plan	Tim Keogh	2026
39	As a landlord we will observe all new building safety compliance requirements	Amend our building safety approach to keep pace with new regulations	Tim Keogh	Ongoing
40	We will grow our tenant engagement and meet all expectations of the Social Housing Regulator on consumer regulation.	Tenant board and scrutiny group strengthened. New residents associations. Training for staff and tenants	Sarah Markham	Ongoing
41	We will continue to involve tenants from all across the town and respond to the findings of the regular STAR survey.	TBC	Sarah Markham	Ongoing
42	We will encourage council tenants to organise and promote the option of tenant management organisations, including co-operatives, under the Right to Manage.	TBC	Sarah Markham	Ongoing
43	An active programme of tenancy audits will ensure contact with 1800 tenants each year.	Tenancy audits to be completed.	Sarah Markham	Ongoing
44	Rollout of Healthy Estates Strategy to improve external environments on council estates.	TBC	Sarah Markham	Ongoing
45	Housing Services to be linked to our Child Friendly Town activities.	TBC	TBC	TBC
46	We will publish action plans setting out how we will identify appropriate sites near to facilities and deliver specialist accommodation to meet specialist needs; including people with learning disabilities and autism, young people transitioning from Children's Services, people with mental illness and complex needs, and older people.	Detailed plans to be published for consultation	Claire Astbury	2023
47	We will complete the programme of refurbishment of our sheltered housing schemes.	Complete all refurbishment projects.	Tim Keogh	2027

Appendix A - Draft Housing Strategy

48	We will consult with tenants in sheltered housing as part of a review of staffing and services with options around more active on-site staffing with a broader role. These options will also be considered in light of HRA resources and the impact on costs to tenants.	Consultation with tenants.	Sarah Markham	TBC
49	We will increase partnership working with health services to target support in line with the frailty framework.	TBC	Claire Astbury	Ongoing
49	Satisfaction with adaptations at 95% or above.	Monitor adaptations activity and satisfaction.	Peter Devine	Ongoing
50	Work with partners including Adult Social Care to improve advice and information for older people about housing options, and explore all opportunities to develop specialist senior living accommodation, including extra care where required.	TBC	Claire Astbury	Ongoing
51	Delivery of specialist accommodation for mental health and complex needs.	TBC	Claire Astbury	Ongoing
52	ATS to be active in developing assistive technology options for people.	TBC	Tabby Adrees	Ongoing
53	Achieve DAHA accreditation by 2023.	Submit accreditation application	Claire Astbury	2023
54	We will collaborate with partners in the criminal justice system to support housing solutions to help reduce reoffending.	Liaise with Probation and other partners on the housing elements of the Reducing Reoffending Strategy.	Claire Astbury	Ongoing
55	We will grow and commit to both established and new partnerships which support the physical and mental wellbeing of residents.	TBC	Colin Moone	Ongoing

Luton Housing Strategy 2022-2027

Claire Astbury
Head of Housing Strategy & Development

Housing Strategy background

- High housing costs are a significant driver of poverty, especially in the private rented sector (which makes up 29% of homes in the town).
- Poor quality homes, cold homes and overcrowded homes are factors in poor health outcomes.
- High homelessness and temporary accommodation usage (around 1160 households), along with the psychological impact of housing insecurity, adds mental health pressure even where accommodation is good quality.
- Safe neighbourhoods supporting active travel, exercise and play are essential to wellbeing.
- Despite limited land supply there are significant development opportunities including the town centre.

Luton's Housing Strategy

Our draft Housing Strategy 2022-2027 contains four themes and supports our broader Luton 2040 ambitions:

- Right Homes, More Homes
- Reducing Homelessness
- Quality Homes and Neighbourhoods
- Supporting Wellbeing

Full consultation March-May

Final sign off by September

Right Homes More Homes

The position

- Luton is a tightly boundaried borough with limited land availability compared to housing need.
- Recent developments have tended to be smaller properties.
- There are some strategic opportunities such as the renewal of the town centre.

Our targets and ambitions

- Delivery of more homes and especially affordable and family sized homes.
- The council as a leader in local development, but with improved relationships with other housing developers.
- An intervention in the local rental market to make homes available.
- Targets for family sized homes and accessible housing.
- Access to homes in neighbouring areas.

Reducing Homelessness

The position

- Luton is an outlier in levels of homelessness and temporary accommodation usage.
- We had significant improvements in reducing rough sleeping before and during the pandemic.

Our targets and ambitions

- Reduce the households in temporary accommodation to under 700 by 2025 and under 500 by 2027.
- Reduce rough sleeping to zero by 2027.
- Retain and strengthen partnerships.
- Delivery of specialist accommodation for some people with complex needs.

Quality Homes and Places

The position

- People in Luton care about the look and feel of the town.
- As a major landlord and custodian of open space we impact on the quality of place eg through our Healthy Estates work and green initiatives.
- Private rented homes are generally poorer quality.
- Energy efficiency of homes is crucial to our climate change goals and also helps to tackle fuel poverty.

Our targets and ambitions

- Improve the quality of private rented homes through licensing and enforcement.
- Charter for social landlords on neighbourhood quality and management
- Increase energy efficiency of all homes.
- Grow resident engagement and improve our management of place.

Supporting Wellbeing

The position

- Some people have needs for specialised housing to support wellbeing and independence.
- We have recently updated our Market Position Statement to flag up specific needs around eg learning disabilities, older people.
- Social Care White Paper 2021: “Every decision about care is also a decision about housing”.

Our targets and ambitions

- Delivery of specialist accommodation options for LD, autism, MH, older people, children leaving care.
- Liaise with health colleagues on the Frailty Framework.
- DAHA accreditation improving domestic abuse services and practice.
- Partnership working with health and social care, criminal justice services etc.

Committee:	Overview and Scrutiny Board
Date of Meeting:	28 February 2022
Subject:	Employment and Skills Strategy
Report Author:	Debbie Poole-Hunt - Service Manager – Economic Growth & Skills
Contact Officer:	Debbie Poole-Hunt
Wards Affected:	All

Purpose

1. To consult and seek views on the proposed new Employment and Skills Strategy 2022-2027.
2. To consult and seek views on the proposed implementation plan that underpins the priorities laid out in the strategy.

Recommendation

3. **The Overview and Scrutiny Board is invited to consider the attached Executive report and make any comments in particular on the proposed new 5 year Employment & Skills Strategy 2022-2027 attached at Appendix 2 and the proposed implementation plan that underpins the strategic priorities laid out in the strategy at Appendix 3.**

Report

4. Employment and Skills Strategy 2022-2027

Proposal/Option

5. To support the approval of the new Employment and Skills Strategy and associated implementation plan to deliver Luton's 2020 – 2040 vision. This will deliver inclusive growth where Luton's residents are able to access the education, skills, and employment support they need to enable them to secure fulfilling, appropriate, sustainable careers throughout their lives, which supports the growth, diversity and enterprising prosperity of the local economy
6. Following on from Policy Group on the 10th February 2022, members asked for the following to be included;
7. For the strategy to include a map of areas of deprivation and to include a focus on 'not leaving anyone behind'
8. To include a KPI focussed on Looked After Children (LAC)
9. Ensure that the promotion of digital skills is included

Appendices

- 10.** Executive report – Appendix A
- 11.** Integrated Impact Assessment – Appendix B
- 12.** Employment and Skills Strategy – Appendix C
- 13.** Implementation Plan – Appendix D
- 14.** Consultation record (to date and future focus) – Appendix E
- 15.** Summary page – Appendix F

Item No:

0

Report For:	Executive
Date of Meeting:	07 March 2022
Report Of:	Service Manager Economic Growth & Skills
Report Author:	Debbie Poole-Hunt
Subject:	Employment and Skills Strategy
Lead Executive Member(s):	Cllr Aslam Khan
Wards Affected:	All
Consultations:	Councillors ☒ Scrutiny ☒ Stakeholders ☒ Others ☒

Recommendations

1. That the Executive is recommended to
 - (i) Approve the Employment and Skills Strategy for 2022-2027 as set out at Appendix 2 to this report; and
 - (ii) Approve the implantation plan that underpins the strategic priorities laid out in the strategy, as set out at Appendix 3 to this report.

Background

2. Luton's 2020 - 2040 shared vision is that "Luton will be a healthy, fair and sustainable town, where everyone can thrive, and no-one has to live in poverty". Within this there are five strategic priorities:
 - An inclusive economy
 - Protecting the most disadvantaged
 - Child-friendly town
 - Carbon neutral town
 - Strong and empowered community

Whilst this Strategy cuts across both the Inclusive Economy Board and the Population Well-being Board and their respective strategies, it largely falls under the Inclusive Economy Board which is responsible for overseeing the delivery of the Inclusive Economy Strategy and has specific target outcomes for:

- A skilled workforce that meets the needs of local employers.
- More of our residents in high-value, well-paid jobs within Luton.

In order to drive this priority forwards, we need to update our Employment and Skills Strategy to ensure we deliver inclusive growth where Luton's residents are able to access the education, skills, and employment support they need to enable them to

secure fulfilling, appropriate, sustainable careers throughout their lives, which supports the growth, diversity and enterprising prosperity of the local economy.

The Current Position

3. COVID-19 has significantly impacted the livelihoods of people and communities across the town. Indeed, Luton has been particularly hard hit, compared to other areas of the UK – seen within job losses, furlough levels and business performance, which has accentuated poverty, and disproportionately impacted certain members of society, including young people. Without action, the progress we have made in recent years on the levelling up agenda is under threat. Tackling inequality is at the heart of the challenge we face with many of our communities being disproportionately impacted by COVID-19.
4. Given the current economic uncertainty, the Strategy is designed to be flexible and responsive so it can adapt to change as we move towards economic recovery and reform. It embraces what works, building on the foundations already in place, but acknowledges urgent action is required in other areas.
5. Securing a strong economic recovery is therefore essential if we are to continue growing our economy in a way that can benefit everyone in Luton. This is a central pillar of the Luton 2020 – 2040 Vision to ensure that everyone in Luton has the opportunity to thrive and no-one has to live in poverty.

Goals and Objectives

6. Our Vision is to deliver inclusive growth where Luton's residents are able to access the education, skills, and employment support they need to enable them to secure fulfilling, appropriate, sustainable careers throughout their lives, which supports the growth, diversity and enterprising prosperity of the local economy

Proposal

7. The Employment and Skills Strategy 2022-2027 (ESS) has been developed by Luton's Employment and Skills Partnership Board (ESPB) and is founded on a rich and timely evidence base. Data has been combined with extensive stakeholder engagement to understand Luton as a place and enable a co-designed vision, objectives, and actions. Based on this, the Strategy identifies four key strategic priorities which frame the basis for local action;
 - (i) Skills driving economic recovery and growth
 - (ii) Developing a pipeline of talented and resilient people
 - (iii) Tackling long-term inequality and economic inactivity
 - (iv) Creating an adaptable, upskilled workforce
8. The document is a reflection of co-creation, with stakeholder perspectives and local knowledge, which offers great value to the ultimate shape and content of the Strategy. By delivering the strategy over 5 years, in 2027 Luton will be characterised by;
 - (i) Businesses will be responsible employers who actively engage in shaping the local employment and skills landscape, invest in the workforce and support residents into work

- (ii) Residents understand their career options and fulfil their potential through accessing right employment and skills support and advice
- (iii) Young people leave education well prepared for work and with high aspirations, understanding their career options and the opportunities available locally
- (iv) Partners work together to provide integrated employer led skills and employment pathways that support those furthest from the labour market to the provision of higher-level skills
- (v) Health commissioning will be integrated with work and skills support to capitalise on the fact that 'good work is good for your health' and wellbeing

Key Risks

9. The Strategy is underpinned by the recognition of the importance of equality and inclusion and has a critical role to play in achieving the 2040 vision that Luton will be a healthy, fair, and sustainable town, where everyone can thrive, and no-one has to live in poverty. If the proposed Employment and Skills Strategy is not approved, Luton will be unable to develop a pipeline of talented and resilient people, tackle long-term inequality and economic inactivity, which will then have a major impact on economic recovery and growth. Ultimately it would prevent us from delivering Luton's 2020 – 2040 vision of eradicating poverty.

Consultations

10. We have directly engaged with more than 300 individuals, organisations and community groups as part of this process through focus groups, conference, 1:1 interviews and a public online consultation. (see appendix 4)

The strategy is a real reflection of co-creation, with stakeholder perspectives and local knowledge offering great value to the ultimate shape and content of the Strategy.

This is also just the start of the conversation which will continue for the lifetime of the Strategy.

Alternative options considered and rejected (please specify)

11. The Executive can accept, reject or amend the recommendations in the report.

Appendices Attached

12. (1) Integrated Impact Assessment
(2) Employment and Skills Strategy
(3) Implementation Plan including overview of key priorities
(4) Consultation record (to date and future focus)

List of Background Papers - Local Government Act 1972, Section 100D

13. Luton 2040 vision.

Appendix B - Integrated Impact Assessment Form (IIA)

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

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

Why do I need to do an IIA?

The aim of this impact assessment process is to:

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

When do I need to do an IIA?

- An IIA must be started at the beginning of any project, policy or strategy, and cannot be finalised until such time as all consultations, as required, are undertaken.
- The Impact Table will help you to make early consideration of the potential impacts of your proposal and should be used from the point at which preliminary report is taken to Corporate Leadership and Management Team (CLMT) where appropriate. By using this table at your earliest point in the project, potential impacts can be highlighted and it will also be clear whether you need to carry out a full IIA.
- If you complete this table and all impacts identified are neutral, i.e. there is no noticeable impact on characteristics and priorities listed and you are fully confident of this, please contact the SJU by email setting out how you have reached this judgement as it is unlikely you will need to carry out a full IIA.
- An IIA must at all times identify those who will be affected by the decision, policy or strategy.
- At a time of economic austerity IIA authors are minded to consider the whole range of decisions, both locally and nationally when analysing the impact on citizens.
- Your first early draft is to be sent to the Social Justice Unit for comments and guidance
- Once consultation has ended, the IIA must be updated with results of the consultation and returned to Executive, where required, for further consideration and approval – at this stage it will be signed off as completed by the Social Justice Unit.

If you need further guidance please contact the Social Justice Unit (SJU). Please see links at the end of this document to key Corporate and Partnership documents that may help you complete this IIA.

Appendix B - Integrated Impact Assessment Form (IIA)

Proposal Title:	Employment & Skills Strategy 2022 - 2027
Lead Officer Name:	Debbie Poole-Hunt
Date of IIA:	21/01/2022

Date updated after consultation:	
Early draft Seen by: <i>(Please send an early draft of your IIA to the SJU to ensure all impacts are being considered at the appropriate time)</i>	Lucinda Smith, Programme Manager and EDI Co-Ordinator, Inclusive Growth Marek Lubelski, Social Justice Manager, 3 February 2022 Maureen Drummond, Equality and Diversity Adviser, 9 February 2022

Finalised IIA Signed and seen by SJU :	
Name:	
Date	

Names of all other contributors and stakeholders involved in the preparing of this proposal who have been consulted with and agreed this assessment: <i>(Please note the IIA must not be carried out by one person)</i>	CLMT, SLMG, Inclusive Economy Board, ESPB, SEMLEP, Health & Wellbeing Board, Children's Trust Board, Careers Hub Luton management group, Progression and Transition Board, Luton Education Leaders, Luton Secondary Heads Group, Elected Members, Community Fora, Reimagining Mental Health Collaborative, Apprenticeship Steering Group, London Luton Airport, Luton Rising, Population Wellbeing DMT, Inclusive Economy DMT, DWP, Luton 6th Form College, Barnfield College, University of Bedfordshire, employer representative bodies, Trade Union representatives. Jodie Yandall Martin Stein
If there is any potential impact on staffing please include the name/s of the trade union representative/s involved in the preparation of this assessment or any supporting evidence of request to participate:	

Appendix B - Integrated Impact Assessment Form (IIA)

Proposal Outline

Information supporting the proposal (who, what, where, how). Breakdown of present users by ethnicity, age, gender, disability, religion/belief, sexuality (if recorded). Show areas in the town with the biggest and lowest needs. Greater emphasis is required at the start of the IIA on the service, how it is delivered now and how the new service will be delivered.

The Employment and Skills Strategy 2022-2027 (ESS) has been developed by Luton's Employment and Skills Partnership Board (ESPB) and is founded on a rich and timely evidence base. Data has been combined with extensive stakeholder engagement to understand Luton as a place and enable a co-designed vision, objectives, and actions. Based on this, the Strategy identifies four key strategic priorities:

1. Skills driving economic recovery and growth
2. Developing a pipeline of talented and resilient people
3. Tackling long-term inequality and economic inactivity
4. Creating an adaptable, upskilled workforce

The Strategy is underpinned by the recognition of the importance of equality and inclusion and has a critical role to play in achieving the 2040 vision that Luton will be a healthy, fair, and sustainable town, where everyone can thrive, and no-one has to live in poverty.

Given the current economic uncertainty, the strategy is designed to be flexible and responsive so it can adapt to change as we move towards economic recovery and reform. It embraces what works, building on the foundations already in place, but acknowledges urgent action is required in other areas.

Luton faces high levels of deprivation, with 46% of children growing up in poverty, and inequalities remain between genders and races as a result of lower wages, skills attainment, and rates of economic participation. People who face certain conditions that may make steady employment and skills engagement difficult may include:

- People within areas of high social deprivation
- Households on a single income with dependent children (with challenges around affordable childcare / flexible working)
- Young people who are care leavers, or who are (or at risk of) not in education, employment, or training (NEETs)
- People with disabilities, mental and physical health conditions or learning difficulties
- People from black and minority ethnic backgrounds
- People for whom English is a second language
- Returners to work with caring responsibilities
- Some people aged 50 or over with low levels of transferable and digital skills
- Individuals who are homeless or in temporary accommodation
- Ex-offenders

Sitting alongside the strategy is an Implementation Plan giving details key performance indicators (KPIs), and has specific target outcomes for:

- **A skilled workforce that meets the needs of local employers.**
- **More of our residents in high-value, well-paid jobs within Luton.**

The outcomes will be delivered through the ESPB and monitored by the Luton Inclusive Economy Board. The Luton Progression and Transition Board (PTB) will continue to oversee initiatives to improve opportunities for the development of young people in the town. However, given the significant connection between health and work, it also closely ties into the Population Wellbeing Strategy owned by the Health and Wellbeing Board.

Appendix B - Integrated Impact Assessment Form (IIA) **Luton**

Impact Table

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

Once you have completed this process you should have a clearer picture of any potential significant impacts¹, **positive**, **negative** or **neutral**, on the community and/or staff as a result of your proposal. The rest of the questions on this form will help you clarify impacts and identify an appropriate action plan.

Protected Groups	Citizens/Community			Staff (for HR related issues)		
	Positive	Negative	Neutral	Positive	Negative	Neutral
Race	✓					
Gender	✓					
Disability	✓					
Sexual Orientation	✓					
Age	✓					
Religion/Belief	✓					
Gender Reassignment	✓					
Pregnancy/Maternity	✓					
Marriage/Civil Partnership (HR issues only)						
Care Responsibilities ² (HR issues only)						
Social & Health ³						
Impact on community cohesion	✓					
Impact on tackling poverty	✓					
Impact on health and wellbeing	✓					
Environment						
Impact on the quality of the natural and built environment	✓					
Impact on the low carbon agenda	✓					
Impact on the waste hierarchy	✓					
Economic/Business						
Impact on Luton’s economy and/or businesses	✓					
Impact on jobs	✓					
Impact on skills	✓					

¹ "Significant impact" means that the proposal is likely to have a noticeable effect on specific section(s) of the community greater than on the general community at large.

² This is a Luton specific priority added to the 9 protected characteristics covered under the Equality Act and takes into account discrimination by association.

³ Full definitions can be found in section 3

Appendix B - Integrated Impact Assessment Form (IIA) **Luton**

Please answer the following questions:

1. Research and Consultation
1.1. Have you made use of existing recent research, evidence and/or consultation to inform your proposal? Please insert links to documents as appropriate.
Click here for local demographics and information
The ESS is based on detailed evidence and stakeholder engagement in the form of: 1. Evidence Baseline Report – data and information relevant to employability and skills, including skills supply and demand. 2. Policy and Literature Review Report – relevant strategies, policies, and publications, identifying strategic drivers and summarising the funding and support ecosystem. 3. Stakeholder Engagement Summary Report – the key narratives and recurring themes that were drawn from stakeholder engagement and co-creation. In detail, the following were referenced: • Covid 19 Economy and Skills Insight reports • Engagement with local business providers, and the Inclusive Economy Board • Luton Inclusive Growth Commission Report Autumn 2019 • Community Wealth Building Report March 2020 • The work underpinning the Luton 2040 Vision • Luton's Population Wellbeing Strategy
1.2. Have you carried out any specific consultation with people likely to be affected by the proposal? (if yes, please insert details, links to documents as appropriate).
Guidance Notes: <i>If you have not yet undertaken any consultation you may wish to speak to the Consultation Team first as a lack of sufficient consultation could place the Council at risk of legal challenge.</i> Click here for the LBC Consultation Portal
Specific consultation was undertaken with people likely to be affected including: SEMLEP, Health & Wellbeing Board, Children's Trust Board, Careers Hub Luton Management group, Progression and Transition Board, Luton Education Leaders, Luton Secondary Heads Group, elected members, Community Fora, Reimagining Mental Health Collaborative, London Luton Airport, Luton Rising, DWP, Jobcentre Plus, Luton 6th Form College, Barnfield College, University of Bedfordshire, Bedfordshire Chamber of Commerce, the Federation of Small Businesses, Trade Union representatives. A full timeline of consultation meetings and activities showing outcomes is attached as an Appendix.
1.3. Have you carried out any specific consultation with citizens likely to be affected by the proposal? If yes, please insert details, links to documents, as appropriate above. Please show clearly who you consulted with, when you consulted and the outcomes from the consultation. Mitigations from consultation should be clearly shown in Action Plan at end of document.
For advice and support from Consultation Team click here

Appendix B - Integrated Impact Assessment Form (IIA)

1. Online ESS consultation survey posted on *Let's Talk Luton*: 30/09/2021 to 5/11/2021
2. ESS article and survey link included in the monthly newsletter for the Luton VCSE sector and CLLD networks, October and November 2021
3. Business Focus Groups 12/10/2021, 14/10/2021 and 21/10/2021
4. Community Fora 18/10/2021 and 2/11/2021
5. Elected Members Workshop 19/10/2021
6. Working with the community on Skills Development meeting with Cllr Simmons, 5 All Saints Close, Luton 22/10/2021
7. Community Focus Group 2/11/2021 and 4/11/2021
8. COMF & Fairness Taskforce launch event 17/11/2021
9. Barnfield College Student Focus Group 3/12/2021
10. Online ESS consultation survey posted on *Let's Talk Luton*: 14/12/2021 to 7/1/2022
11. Luton 6th Form College Student Focus Group 20/1/2022

A full timeline of consultation meetings and activities showing outcomes is attached as an Appendix.

2. Impacts Identified
2.1. Where you have identified a positive impact, for communities or staff, please outline how these can be enhanced and maintained against each group identified. Specific actions to be detailed in action plan below.
Guidance Notes: <i>By positive impact we mean, is there likely to be a noticeable improvement experienced by people sharing a characteristic?</i>
The ESS aims to positively impact communities across all of the groups identified. It will impact all residents and businesses with specific focus on: • Residents and local workforce who are unemployed, facing redundancy or looking to upskill or reskill • Young people and those aged over 50 facing unemployment • Increasing resident's earnings versus workplace earnings • Increasing higher level jobs in Luton and attracting quality employers • Addressing poverty levels in Luton through employment and progression • Helping business survival rate in Luton • Protecting and ultimately increasing the number of jobs and number of business start-ups The consultation process identified key evidence related to protected characteristics and the social exclusion and barriers to employment experienced. Under-employment amongst women from black and Asian communities and the lack of part-time / shift work to fit with existing care commitments were identified along with the need for interventions to support the unemployed aged under 24 or over 50 into employment, as they are at risk of becoming long-term unemployed. Specific interventions such as DWP's new 'Way to Work' programme and Restart Scheme will be supported. Young people will be helped through specific activity including early-stage school and employer engagement, the development of career pathways, work experience, Higher Apprenticeship opportunities and the emerging T-Level qualifications. In pushing the Inclusive Economy and Real Living Wage agendas, helping local businesses, and supporting the development of generative firms, community wealth building can help ensure that Lutonians get good pay, allowing them to spend money on other goods and services, building a virtuous and prosperous circle, working to alleviate poverty in the town. Scaling up interventions in skills means the generations of the future are well-placed to benefit from growing prosperity, and a collaborative, anchor-led approach is the best way to do this. Ensuring serious social value is delivered from all contracts, is a tried and tested way of making council and anchor institution spend go further – which means the "Luton Pound" helping the town, and more money in the pockets of Lutonians. Celebrating good employers through the Good Business Charter and challenging those who could do more is a clear demonstration from both the Council and anchors that they are committed to the 2040 plan. The Good Business Charter will encourage Anchor Institutions to sign up to good working practices such as fair pay and conditions, workplace wellbeing, skills and progression, carbon reduction, local supply chains and diversity and recruitment. Internally, the Council can demonstrate its own commitment to ensuring all areas of and groups in Luton are represented.

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

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

There is no negative impact on communities. However, steps will be taken to avoid disproportionality impact in the labour market on different protected characteristics, particularly addressing any employment barriers and any ongoing work planned and mitigation to address that rebalance in the strategy.

The strategy recognises the disproportionality of socio economic deprivation across the Borough. Measurable actions are detailed in the accompanying Implementation Plan, shaped by and delivered in partnership with different and representative ethnic groups in Luton.

Claimant figures (JSA and National Insurance credits plus Universal Credit principally for the reason of being unemployed) post-Brexit and Covid-19 remain high in Luton, with the claimant figure ratio v January 2020 figure being 2.19, the highest across the SEMLEP area (1.77). 9,475 Luton claimants were recorded for December 2021, rising from 6,925 in April 2020. By all age groups and by gender, claimant figures for Luton are significantly above the national average (source: ONS). For Claimants and Vacancies vs Pre Covid-19 (March 2020), Luton has the highest ratio in the SEMLEP area at 2.19, compared to Central Beds (1.82) and Bedford (1.51).

Luton employment rates by ethnicity during Covid-19 lockdown 2019 to 2021 fell for all White aged 16 to 64 from 58,400 to 56,700 and for all black and minority ethnic background aged 16 to 64 from 40,700 to 39,600.

Leaving the EU was given as a cause of recruitment difficulties (high volume of vacancy postings) in 14 out of 23 listed sectors. Job postings have generally risen since the Covid-19 pandemic, particularly in the Care Sector e.g. care-giver / personal care aide up from 2,645 (pre-pandemic) to 4,186 (current levels).

The SEMLEP Business Survey 2021 showed 60% of businesses had vacancies in the last 12 months that were hard to fill, with plant and machine operatives being the hardest occupation to fill at 18%. The highest increase in reasons given (2017-2021) were: low number of applicants with the required skills (54%), low number of applicants generally (31%); lack of qualifications the company demands (23%).

2.3. Where you have identified a **neutral*** impact for any group, please explain why you have made this judgement. You need to be confident that you have provided a sufficient explanation to justify this judgement.

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

None.

3. Social & Health Impacts

3.1. If you have identified an impact on community cohesion⁴, tackling poverty⁵ or health and wellbeing⁶, please describe here what this may be and who or where you believe could be affected, **Please also ensure that you consider any possible impacts on Looked After Children.**

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

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

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

The impact of the ESS on community cohesion, tackling poverty and health and wellbeing are set out in Section 2. Everyone benefits from a Luton without poverty: residents will live happy and healthy lives, businesses will profit through a thriving economy and highly-skilled and high-performing local workforce, and pressure will ease on public sector organisations and charities who are currently overwhelmed by high service demand.

The awareness of health outcomes and how they relate to wealth – and vice versa – is particularly important in the Luton context – this is recognised in the Population Wellbeing Strategy 2019-2024, which specifically notes that:

“At least 60% of health outcomes are determined by factors outside healthcare (wider determinants). This includes having a good home, good job and good social network (family and friends). Our health and wellbeing ambition, which is linked to our Luton 2040 ambition of eradicating poverty, is that: Luton is a more equitable place where people thrive, have the opportunity to live a healthy life mentally, socially and physically; and maximize their potential.”⁷

Commitment to an Inclusive Economy is integral to the ESS and the Luton 2040 ambition of eradicating poverty. Awareness of the relationships between health and wealth – and the wider determinants of health – is also crucial in assembling bespoke strategies for place. This is because looking solely at economic statistics alone may lead to policy proposals that overlook some of the health-related issues holding people back from the labour market and increasing their levels of skills. The same applies in the other direction – health-based interventions which do not have an understanding of, for example, the ways in which low pay or poor housing may lead to health issues.

Luton is well-placed, in other words, to apply the principles of an Inclusive Economy and an Employment and Skills Strategy that ‘future proofs’ the local workforce and economy – both as a means to implementing the Luton 2040 agenda, and as a broader project that seeks to make Luton’s local economy more prosperous and pluralistic.

⁴ is the proposal likely to have a noticeable effect on relations within and between specific section(s) of the community, neighbourhoods or areas.

⁵ is the proposal likely to have a noticeable effect on households that are vulnerable to exclusion, e.g. due to poverty, low income and/or in areas of high deprivation

⁶ Is the proposal likely to have a positive or negative impact on health inequalities, the physical or mental health and wellbeing of an individual or group, or on access to health and wellbeing services?

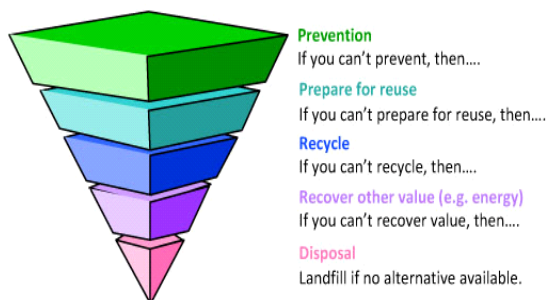
⁷ [Luton’s Population Wellbeing Strategy 2019-2024, https://bit.ly/2ujzVom](https://bit.ly/2ujzVom)

4. Environment Impacts

4.1. If you have identified any impacts related to the built and natural environment⁸, low carbon⁹ and waste minimisation please describe here what this may be and who or where you believe could be affected

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

Waste Hierarchy



[For advice and support from the Strategy & Sustainability Team click here](#)

The ESS identifies the importance of growing the green economy, green skills and green jobs to deliver a value-driven, inclusive and carbon neutral economy. The ESS encourages good practice in relation to the waste hierarchy with specific activities under the Good Business Charter, Carbon Literacy training to businesses and developing the green economy with grants for green start up/micro business expansions.

⁸ Is the proposal likely to Impact on the built and natural environment covers issues such as heritage, parks and open space, cleanliness, design, biodiversity and pollution.

⁹ Is the proposal likely to impact on low carbon includes issues such as use of energy, fuel and transport.

5. Economic Impacts

5.1. If you have identified any impacts related to Luton's economy and businesses ¹⁰, creating jobs¹¹ or improving skill levels ¹², please describe here what this may be and who or where you believe could be affected

Guidance Notes: Please use this section to describe the social impacts and detail any specific actions or mitigations in the action plan below. Please detail all actions that will be taken to enhance and maintain positive impacts and to mitigate any negative impacts relating to this proposal in the table below.

[For advice and support on Economic Development click here](#)

Whilst the ESS and its Implementation Plan have an initial timeframe of 2022 to 2027, it includes a focus on Luton's economic recovery out of the COVID-19 pandemic. In recent years, Luton has enjoyed economic success with high rates of economic growth and earnings above the national average. Despite this, Luton has faced high levels of deprivation with 46% of children growing up in poverty. The COVID-19 pandemic presents challenges for our economy and for our residents as set out in section 2.

The delivery of the ESS will be owned by key stakeholders, partners and anchor organisations. Within the council, reporting and accountability will be based within the Economic Growth and Skills Service as part of its vision for an Inclusive Economy.

¹⁰ Is the proposal likely to impact on Luton's economy and businesses for example by creating an opportunity to trade with the Council, support new business opportunities?

¹¹ Is the proposal likely to impact on the creation of new jobs in the local economy? This will also link to health and well-being and the reduction of poverty in the social box.

¹² There are significant skills gaps in Luton's economy. Is the proposal likely to create opportunities for up skilling the workforce or to create apprenticeships?

Appendix B - Integrated Impact Assessment Form (IIA)

Impact Enhancement and Mitigation

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

Action	Deadline	Responsible Officer	Intended Outcome	Date Completed / Ongoing
Development of programmes that support the ESS delivery	March 2022	Sinead McNamara Debbie Poole-Hunt	Clear, tangible outcome-driven programmes	Ongoing (2022-2027)

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

Key Contacts

Name	Position
Sinead McNamara	Service Director Inclusive Growth (secondment)
Debbie Poole-Hunt	Service Manager Economic Growth and Skills
Martin Stein	Programme Manager, Skills and Employability

Appendix B - Integrated Impact Assessment Form (IIA) **Luton**

Next Steps

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

Completed and signed IIAs will be published on the internet once the democratic process is complete

Useful Documents

[Corporate Plan](#)

[Equality Charter](#)

[Social Justice Framework](#)

[Family Poverty Strategy](#)

[Joint Strategic Needs Assessment \(JSNA\)](#)

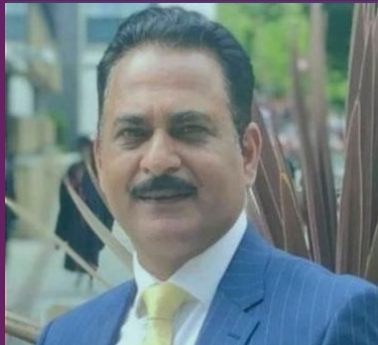
[Community Involvement Strategy](#)

Luton Employment & Skills Strategy 2022-2027

Luton 2020 - 2040
A place to thrive



Foreword



Councillor Aslam Khan

Luton Borough Council
Deputy Leader

Skills and Employability
Portfolio Holder

I am delighted to present to you our town-wide Luton Employment and Skills Strategy, 2022-2027.

This is a vitally important document that will be central to our shared ambition to transform lives and help to deliver our vision for Luton, by 2040. Luton is unique – a showcase for enterprise, diversity, and opportunity and so our Strategy reflects closely on this. By being clear on our specific challenges and priorities, we will make a real difference to those who need support and are ready to flourish.

Skills and productive work are the essence of a thriving and successful place. Through this Strategy we will improve access to opportunities, tackle structural barriers, upskill our residents and align skills to meet the needs of our employers, now and in the future. We will support the talent pipeline with the skills and tools to make informed decisions about their future, and ensure people see Luton as a place within which productive and rewarding careers can be developed, and where entrepreneurship can thrive.

This Strategy has been prepared against the backdrop of the COVID-19 pandemic, and I am incredibly grateful to the 300+

individuals and organisations who committed their time and energy to co-produce it. The Strategy's development represents the essence of a collective effort and speaks to the priorities identified by an array of local stakeholders, at a time of great change.

Through this Strategy, partners are making a commitment to ensuring inclusive opportunity and equality is afforded to all, providing the basis for a healthy, active, and rewarding life. It is also an embodiment of a long-term deal with employers, to ensure the right systems and infrastructures are in place, and that the talent needed to propel a new wave of growth, articulated within Luton's 2040 Vision, is ready and available within the town.

By adopting a strategic and action-orientated approach, we will create a dynamic and flexible workforce for the future, engage and inspire those furthest from the labour market and work towards the ultimate objective of eliminating poverty, which has deprived too many people from reaching their full potential.

Luton has the assets to transform the life prospects of its residents and those excluded from the labour market, but only where we collaborate as a strong partnership, focused on realising the benefits of inclusive growth. By acknowledging our strengths and addressing our challenges, we stand the best chance of making lasting change for the people and businesses of our town.

We have much to do and this Strategy sharpens the focus for us to realise our shared vision.

CLLR KHAN SIGNATURE TO BE INSERTED

Contents:

1. Introduction

2. Strategic Context

3. Luton Today

4. Strategic Priorities and Actions

5. Making it Happen

A. Appendix

1

Introduction



Introduction

Welcome to the Luton Employment and Skills Strategy 2022 – 2027.

This Strategy has been developed by Luton's Employment and Skills Partnership Board (ESPB), comprising senior leaders from Luton Council, Barnfield College, Central Bedfordshire College, University of Bedfordshire, Luton Sixth Form College, school representatives, Bedfordshire Chamber of Commerce, South East Midlands Local Enterprise Partnership (SEMLEP), Department for Work and Pensions (DWP) and representatives from employers, such as London Luton Airport Operations Ltd (LAOL) and Vauxhall Motors, and the voluntary and community sector.

Together, we have co-created a Strategy that is founded on a rich and timely evidence base. Data has been combined with extensive stakeholder engagement to help us really understand Luton as a place and enable us to co-design our vision, objectives, and actions. Based on this, we have identified four key strategic priorities:

- 1. Skills driving economic recovery and growth**
- 2. Developing a pipeline of talented and resilient people**
- 3. Tackling long-term inequality and economic inactivity**
- 4. Creating an adaptable, upskilled workforce**

This can only be achieved through strong partnerships and it is through our collective effort that the benefits to people, businesses and communities will be greatest.

The Strategy is underpinned by the recognition of the importance of equality and inclusion and has a critical role to play in achieving the 2040 shared vision that Luton will be a healthy, fair, and sustainable town, where everyone can thrive, and no-one has to live in poverty.

Given the current economic uncertainty, the Strategy is designed to be flexible and responsive so that we can learn and adapt as we move towards economic recovery and reform. It embraces what works, building on the foundations already in place, but is resolute in focus – acknowledging urgent action is required in other areas.

Employment and Skills Strategy

Implementation Plan

Sitting alongside the strategy is a detailed Implementation Plan, including our key performance indicators (KPIs), which will be delivered through the ESPB and monitored by the Luton Inclusive Economy Board (IEB). The Luton Progression and Transition Board (PTB) will continue to oversee initiatives to improve opportunities for the development of young people in the town, and therefore play a key role in the Strategy's delivery, too.



Our Vision

At the heart of the Employment and Skills Strategy is a bold and action-focused vision. This has been carefully developed and co-created with employers, residents, communities, and partners, setting out our collective ambition to deliver inclusive growth in Luton, through skills and employment.

Our Vision is:

“Deliver inclusive growth where Luton’s residents are able to access the education, skills, and employment support they need to enable them to secure fulfilling, appropriate, sustainable careers throughout their lives, which supports the growth, diversity, resilience and prosperity of the local economy.”

It will be delivered by everyone in the town, including our key delivery partners: employers, Luton Council, Barnfield College, University of Bedfordshire, our schools and sixth form colleges, Central Bedfordshire College, DWP, SEMLEP, alongside the community and voluntary sector.



A Strategy for All

This Strategy has been developed to support all who live and work in Luton, emphasising the need and opportunity to support people at different life stages and contexts. Our Vision and strategic priorities will enable an inclusive approach that supports people to thrive, regardless of individual circumstances, backgrounds and characteristics.



Young People: giving our youth and future generations the choice, aspiration, credentials and baseline skills needed to develop a successful and meaningful career, within Luton or further afield.



Out of Work: ensuring those farthest from the labour market have access to skills and learning to support employability and ultimately make a positive economic contribution through secure work.



In Work: giving those in work the opportunity to pursue lifelong learning aligned to their on-the-job needs, through fairer work conditions and an employer commitment to staff development.



Innovators and Entrepreneurs: providing the infrastructure and support needed to activate a new wave of entrepreneur and build on Luton's identity as a place to start and grow a business.



Career Changers: supporting those seeking a career change or who are at the latter stages of working life change course and diversify, through access to clear skills and employment pathways.



Employers: enabling businesses to scale, innovate and diversify, as a result of access to suitable provision and skilled people, who are eager to secure local jobs and build Luton's economic profile.



2

Strategic Context



Our Strategic Context

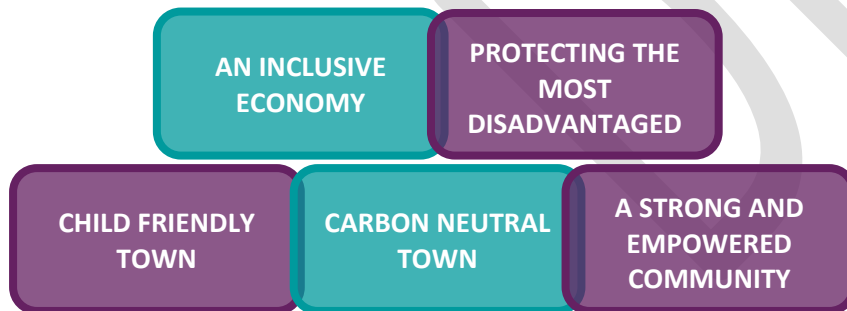
An Integrated Strategy

This Strategy does not sit in isolation – it is part of a greater sum of parts and is integrated by design. In line with the Luton 2020-2040 Vision, it builds on the significant momentum that was developed before the pandemic and reinforces our ambitions to deliver an Inclusive Economy in Luton. It follows on from the activities delivered through Luton's Skills and Employability Strategy 2016-2020 and builds on the work of the Inclusive Growth Commission, along with the COVID-19 Economic Recovery Plan.

It has also been produced in the context of national changes and policy development, particularly those captured within the Skills for Jobs White Paper (2020), School Gatsby Benchmarks, UK apprenticeship strategies and Post-16 Plan. It also dovetails with regional strategies, including the Oxford to Cambridge (OxCam) Arc Vision and SEMLEP's Skills Strategy and Local Industrial Strategy.

Luton 2020 - 2040 Vision

Luton's 2020 - 2040 shared vision is that "Luton will be a healthy, fair and sustainable town, where everyone can thrive, and no-one has to live in poverty". Within this there are a series of strategic priorities which resonate strongly with this Strategy:



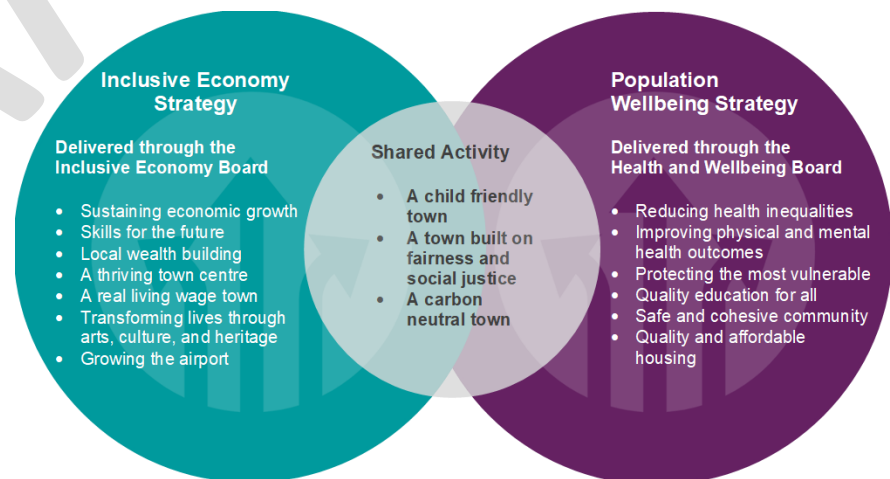
The Luton 2020-2040 Vision is being delivered through two strategic partnership boards – the Inclusive Economy Board and the Health and Wellbeing Board. Both have developed their own strategies to drive the delivery across their own key areas of focus, which complement and augment this Strategy.

Whilst this Strategy cuts across both boards and their respective strategies, it largely falls under the Inclusive Economy Board which is responsible for overseeing the delivery of the Inclusive Economy Strategy and has specific target outcomes for:

- **A skilled workforce that meets the needs of local employers.**
- **More of our residents in high-value, well-paid jobs within Luton.**

However, given the significant connection between health and work, it also closely ties into the Population Wellbeing Strategy owned by the Health and Wellbeing Board.

The focus of each Board's strategy is summarised below, emphasising the natural links and connections with the Employment and Skills Strategy.



Levelling Up Luton

Our Contribution to Levelling Up

Our Strategy has a pivotal role to play in Levelling Up – within Luton and as part of a broader agenda to tackle inequalities and ensure the benefits of growth are felt across the UK. This will have significant implications for Luton, through the direction and focus of policymaking and investment and will enable us to address the variance in outcomes that are seen across local communities, but also to better capitalise on the opportunities for growth.

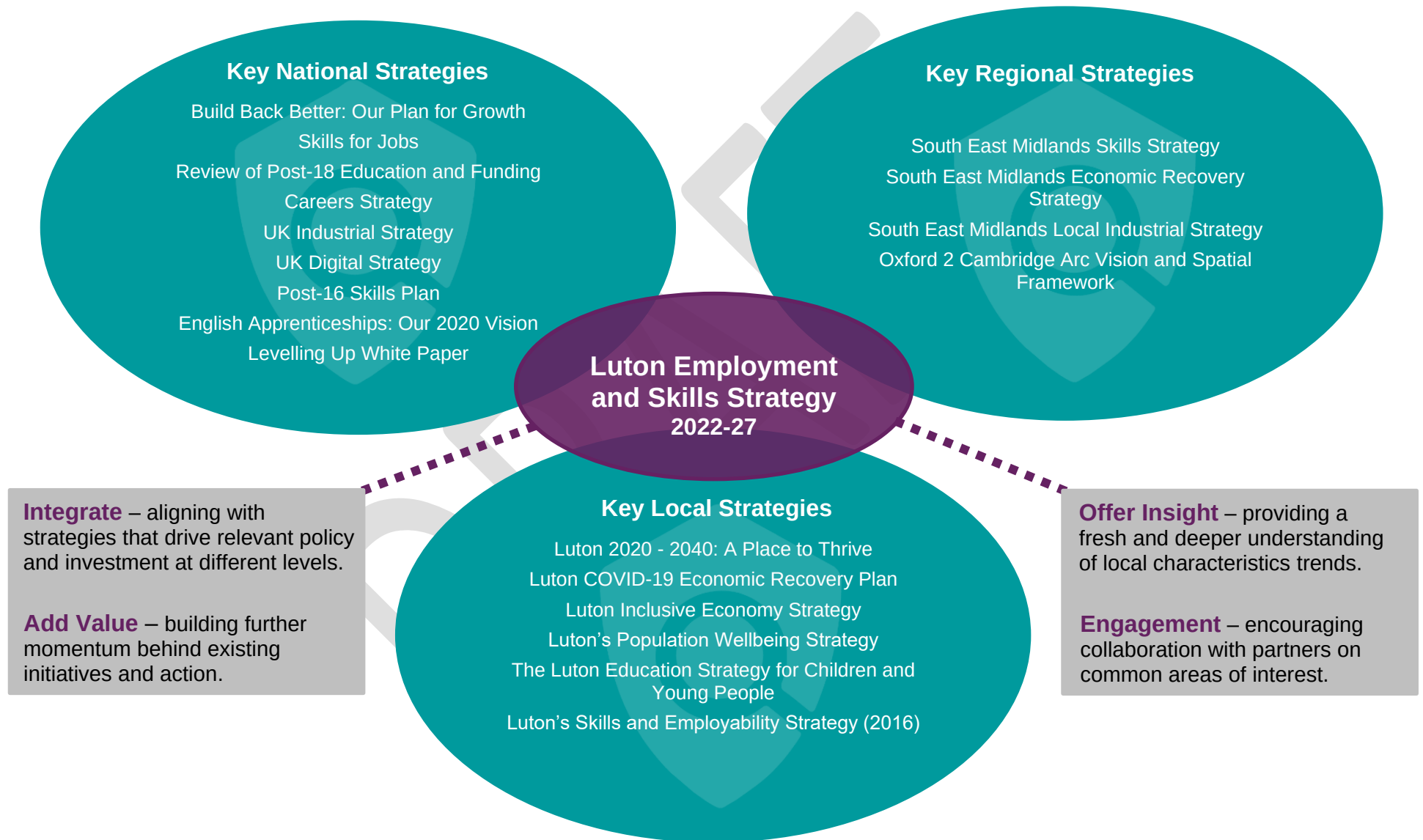
The central theme of the UK Government's Levelling Up White Paper is to ensure equal opportunities to succeed in all parts of the country, by tackling inequalities and reinforcing the message that by staying local, you can go far. It seeks to bring about transformative change by 2030, anchored around the delivery of 12 Missions. **Importantly, this provides a vital 'hook' for our Strategy, given how integral skills and employability will be to Levelling Up.**

Within these Missions, our Strategy will help to deliver against key actions, but it also takes cues from the areas that are likely to be the focus for Government attention. Some of those that resonate with the Strategy and will shape five-year delivery are:

- **Living Standards** – driving up levels of pay, employment and productivity and closing the inequalities in performance across regions and localities.
- **Education** – improving primary school attainment in reading, writing and maths, with more than 90% achieving the required standard.
- **Skills** – increasing the number of people completing high quality skills training, leading to 200,000 engaging with upskilling and learning on an annual basis.



Making the Connections – Strategic Alignment



Co-produced and Co-owned

Whilst an abundance of research has shaped the evidence base, the document is also a reflection of co-creation, with stakeholder perspectives and local knowledge offering great value to the ultimate shape and content of the Strategy.

We have directly engaged with more than 300 individuals and organisations as part of this process. This is just the start of the conversation that will continue for the lifetime of the Strategy, which will take place through a commitment to monitoring progress and adjusting our focus, where necessary.

Underpinning Evidence

The detailed evidence and stakeholder engagement that underpins the Strategy accompanies this report in the form of 3 technical appendices. These are:

1. **Evidence Baseline Report** – data and information relevant to employability and skills, including skills supply and demand.
2. **Policy and Literature Review Report** – relevant strategies, policies, and publications, identifying strategic drivers and summarising the funding and support ecosystem.
3. **Stakeholder Engagement Summary Report** – the key narratives and recurring themes that were drawn from stakeholder engagement and co-creation.

Collectively these provide a comprehensive evidence base from which the Strategy has been crafted. Each are also a powerful showcase for co-creation and reinforce our commitment to evidence-led and transparent policymaking.



3

Luton Today



Assessing the Evidence: Luton Today

Luton's Context

Luton is a vibrant, modern and diverse town with many unique features and much to celebrate. It has a population of 213,100 and is recognised as being one of the youngest and most diverse towns in the country. Alongside the many challenges facing the town, Luton also has a number of important strengths and assets. The town has an excellent strategic location, it is home to the fifth largest airport in the UK, less than 30 minutes from London and in the centre of the Oxford to Cambridge Arc (OxCam Arc). A strong local economy worth £7.5bn (2020) is underpinned by a cohesive town with a powerful sense of community spirit and support from local businesses. There are many good and outstanding schools and a strong higher and further education offer through the University of Bedfordshire, Barnfield College, Luton Sixth Form College and Central Bedfordshire College, Cranfield University, and the Open University just across the border.

In recent years, Luton had enjoyed economic success with high rates of economic growth and earnings close to the national average. Yet, whilst progress has been made, there are still sections of communities who have not benefited from this success and wider labour market changes have led to many having to rely on low quality or insecure work. The town faces high levels of deprivation, with 46% of children growing up in poverty, and inequalities between genders and races are laid bare too, as a result of lower wages, skills attainment, and rates of economic participation.

Key Challenge: Responding to the Pandemic

COVID-19 has significantly impacted the livelihoods of people and communities across the town. Indeed, Luton has been particularly hard hit, compared to other areas of the UK – seen

within job losses, furlough levels and business performance, which has accentuated poverty, and disproportionately impacted certain members of society, including young people.

As evidence of this, data recently highlighted Luton as having the 7th highest number of furloughed workers, with 32,000 jobs at risk and the 8th highest claimant counts for cities and large towns in the UK. Furthermore, with disruptions to education along with high numbers of young people finding themselves unemployed, there is a risk of these challenges deepening and perpetuating. Without action, the progress we have made in recent years on the levelling up agenda is under threat. Tackling inequality is therefore at the heart of the challenge we face within many of our communities.

Securing a strong economic recovery is absolutely essential if we are to continue growing our economy in a way that can benefit everyone in Luton. This is a central pillar of the Luton 2020 - 2040 Vision to ensure that everyone in Luton can thrive and no-one has to live in poverty. Indeed, the pandemic will continue to shape daily life, for some time to come – the town and its residents must be prepared for this eventuality.

Key Challenge: Luton's Inequalities

Central to the focus of the Strategy and fundamental to what makes Luton distinct from other areas is a picture of inequality. Compared to benchmark areas and looking at communities within Luton, evidence shows there is significant variance in individual outcomes, as a result of stark and perpetuating inequalities:

- **Wages** – significant imbalances persist between the wages attained of our residents and those of in-commuters, and there is also a pronounced gender pay gap and the town has a higher proportion of jobs which pay below the UK's living wage.

- **Economic inactivity** – levels are significantly higher than comparators and the national average, particularly for those from ethnic and migrant backgrounds, women, younger people and those physically or mentally impaired.
- **Employment** – Luton's overall rates of employment trail the national average, young people are less likely to be in work and the gap between male and female rates of employment is greater in the town.
- **Deprivation** – Whilst the picture has improved in recent years, Luton is currently ranked the 70th most deprived out of 317 local authorities with lower wages, qualifications and higher levels of worklessness all key drivers of poverty and inequality.
- **Hotspots of deprivation** – this picture of inequality correlates closely with areas of deprivation, with communities such as Biscot, Farley, Dallow, Northwell and South all particularly impacted by poverty, low skills and worklessness.
- **Health** – Luton's residents report lower levels of overall health and wellbeing than comparator areas, including poorer mental health and shorter life expectancies.
- **Skills** – Luton's residents are less skilled and less likely to achieve high attainment scores at GCSE and A level, whilst with those from disadvantaged backgrounds are least likely to progress.

Beyond the latest data, stakeholder engagement has highlighted:

- **The influence of ethnicity on progression**, racial bias, and how cultural influences impact participation – particularly evident within those from a Muslim background.
- **The need to consider how women can be supported** into more stable and higher paying employment.

- **The need for 'good employers'** who offer more flexible terms and conditions, to enable work-life balance and make the value of economic participation more overt.
- **The critical role of improving health and wellbeing** in order to help people participate in the labour market.
- **The complex reasons for underemployment and low levels economic participation** within certain groups.

Key Challenge: Barriers to Work and Skills

Within Luton, there are people who want and need to work but face certain conditions that may make steady employment and skills engagement difficult to acquire. People facing one or more of these barriers often experience bias and discrimination too, creating embedded issues that perpetuate and limit the opportunity of those eager to work. Individuals with such barriers may include:

- People within areas of high social deprivation and poverty
- Households on a single income with dependent children (challenges around affordable childcare / flexible working)
- Young people who are care leavers or are being supported (estimated that 140+ currently remain out of work)
- People who are (or at risk of) being (NEETs)
- People with disabilities, mental and physical health conditions or learning difficulties
- People from black and minority ethnic backgrounds
- People for whom English is a second language
- Returners to work with caring responsibilities
- Some people aged 50 or over with low levels of transferable and digital skills
- Individuals who are homeless, don't retain a permanent address or are in temporary accommodation
- Ex-offenders

Some of the most pronounced barriers driving a lack of participation in skills and work, and therefore individual outcomes and prosperity are:

Access to Transport and the Internet

There remains a need for people to be able to access learning and work, in an affordable and fair manner. This applies to physical access and efficient transport services, as well as access to the internet, as a gateway to host of services and a conduit for job delivery.

Systemic Inefficiencies

There is an opportunity for public services and support systems to be better integrated, to ensure those farthest from work can readily access the support they need. This approach is also key to fully incentivising the value of work and training, versus claiming benefits.

Health and Wellbeing

Those in poor health and with longstanding medical challenges which are less likely to engage in learning and work. There is a need to ensure support is in place to enable such groups to participate and preventative measures are taken to improve health and wellbeing.

Terms and Conditions of Work

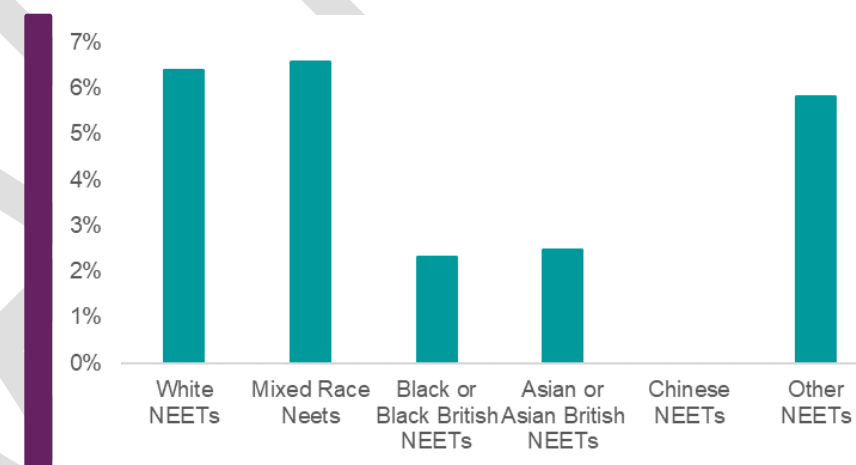
People increasingly need employers to offer more flexible terms and conditions, to enable work-life balance and make the value of economic participation more overt. This is particularly important for women, young families and those who are caring for dependants.

Key Challenge: NEETs and SEND

Whilst Luton has seen a reduction in the proportion of residents identified as NEET or unknown in the past 5 years, (from 8 in 2016 to 4% in 2020), this remains a concern and is at risk as a result of COVID-19. Despite the town's performance

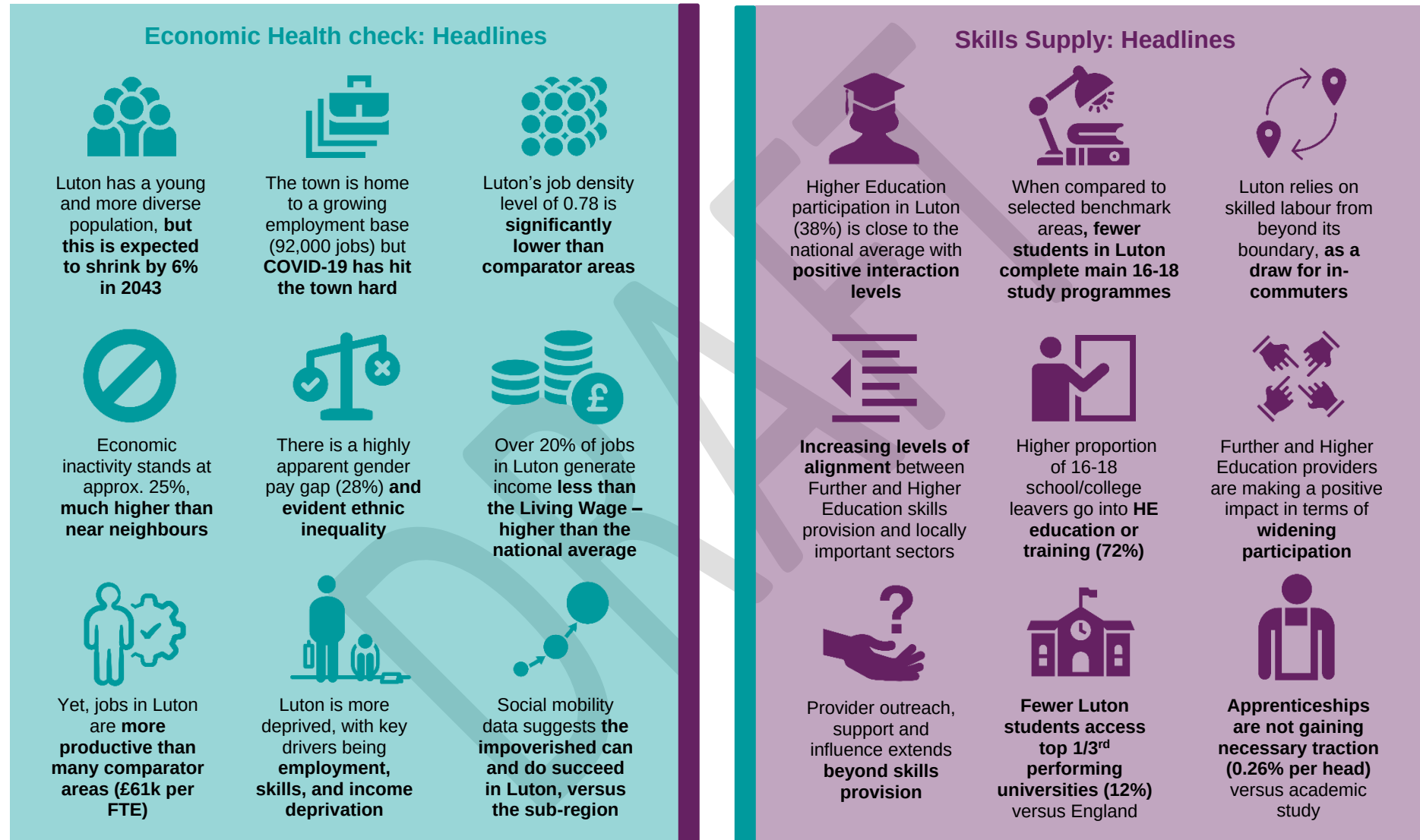
bucking the trend of comparators (such as Milton Keynes and Slough) and being below the English average, absolute NEET levels remain higher than other comparators (including Bedford and Northampton) and continue to highlight the opportunity cost of individuals not fulfilling their potential. Inequalities are again exposed here too – those of white and mixed race ethnicity are over two times as likely to be categorised as NEET than those of Asian or Black descent, and young males are more predisposed to be non-participants, versus female counterparts.

NEETs by Ethnicity as a % of Total Populations – Luton



These challenges extend beyond NEETs too, including those with special educational needs (SEND), who also face challenge, further constraining prospects and their ability to live a full life. Those residents identified as SEND and with learning difficulties and disabilities (LDD) are therefore a key concern and are being marginalised in terms of opportunities to participate in learning and work. More needs to be done to increase the mobility of this group, providing bespoke support and developing pathways that will improve prospects and unlock significant productive potential.

Snapshot: What the Data Says About Luton

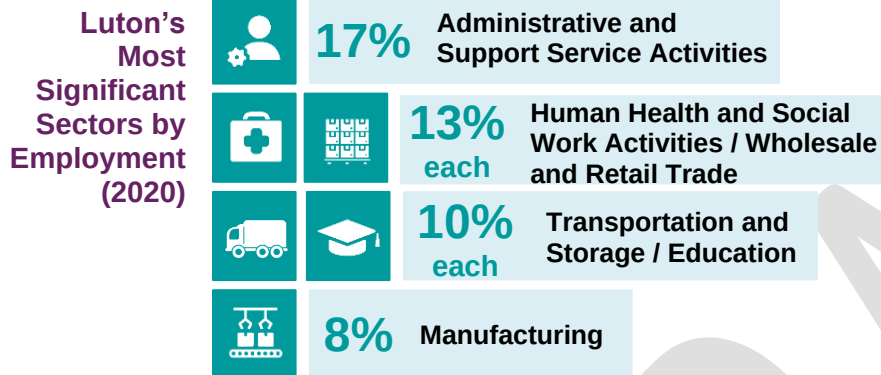




Note: Digital skills are broad in nature and straddles basic online searching and emailing to specialist programming and development. They have become essential within today's workplace with the economy shifting towards more digital industries and the adoption of technology, leading to an increased demand for digital skills.

Sectors Driving Demand – Now and Looking Ahead

Today, there are a number of sectors that are significant employers, create high quality jobs and have driven much of the town's labour demand. These are important in the context of ensuring people are engaged with work and that skills provision is aligned, extending too, to sectors that will propel future growth.



Sectors Driving Luton Growth and COVID-19 Recovery

Construction

- Construction activity accounts for more 5% of all jobs across the town
- An important sector in the context of regeneration and investment
- Has made effective use of apprenticeships and vocational pathways
- Increasingly shaped by automation and modern methods of construction
- Broader base of skills will be needed, including those with a green focus

Health and Social Care

- More than 13% of all jobs are provided within this expansive sector
- Growth and skills demand sensitive to changing demographics and Brexit
- Sector struggles with poor perception and low paying nature of roles
- COVID-19 pandemic expected to create new employment opportunities
- Wide range of roles and careers which need to be better communicated

Aerospace and Aviation

- Supplies more than 6% of all jobs in Luton, across a variety of roles
- London Luton Airport acts as an important anchor employer
- Airport jobs offer strong wages and boosts town productivity
- Airport development and expansion a key driver of future demand
- Skills needs include STEM, technical skills and raising diversity

Creative Arts and Media

- Highly specialised sector sustaining more than 2% of all Luton jobs
- Roots in local hat making but increasingly touched by technology
- Town a hub for computer systems, games, music, and film making
- An important driver of enterprise innovation, culture, and inclusion
- The sector is increasingly dependent on advanced digital skills

Advanced Manufacturing, Automotive & Engineering

- Circa 8% of all jobs are derived from manufacturing activities
- Vauxhall, Leonardo and SKF and global players within the sector
- The OxCam Arc is a key driver of sector innovation and advantage
- Primed to grasp vehicle electrification and battery tech opportunity
- Shortage of higher-level skills and digital aptitude key constraints

Information, Communication, and Technology

- Luton is a hub for tech firms, accounting for almost 2% of all jobs
- Expected to be the fastest growing local sector through to 2030
- Sub-region is a global science, tech, and innovation powerhouse
- ICT increasingly a cross-cutting influence on all Luton businesses
- Management of data, analytics and data security are all key skills

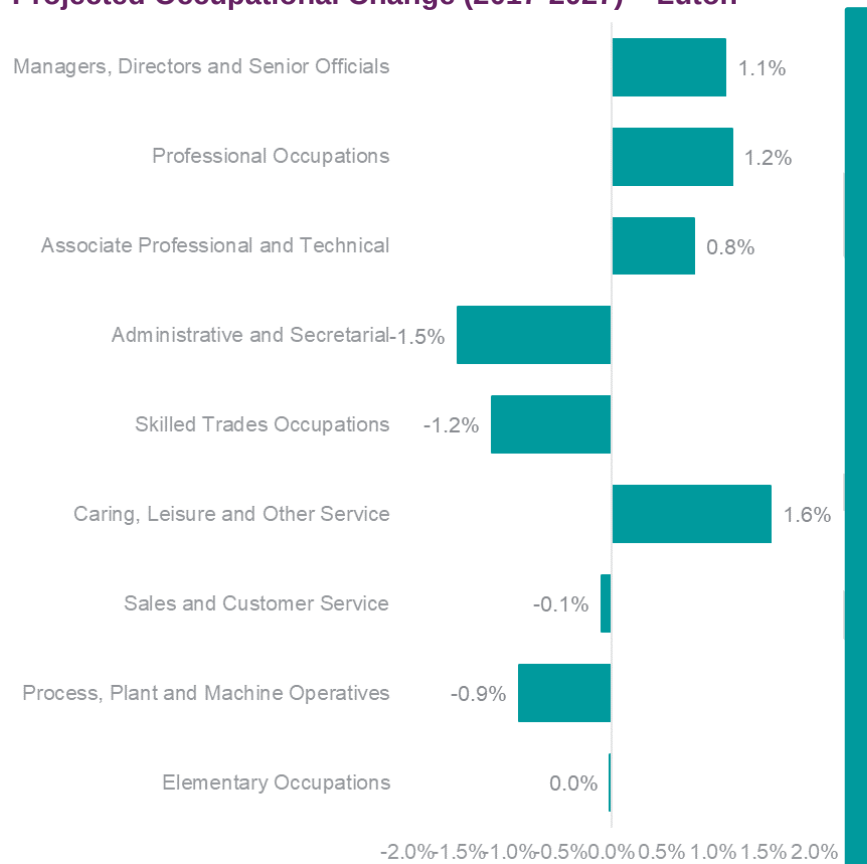
Green Economy

- All of Luton's sectors are expected to require a rapid green transition
- Imperative driven by Luton's 2020 Climate Emergency declaration
- UK's 2050 Net Zero targets propelling firm focus and investment
- London Luton Airport has bold plans to be the greenest in the UK
- Wide range of engineering, digital and trade-based skills in demand

Luton's Evolving Local Jobs Market

The local labour market is dynamic and subject to constant change. Using the latest data, it's clear that the local economy will continue to shift, creating new demand for occupations and skills, which in turn will require a sustained pipeline of skilled local talent.

Projected Occupational Change (2017-2027) – Luton



Greatest number of jobs vacancies in:

Health
Business Operations
Digital
Logistics
Education
Financial

(Past 5 years)

Future demand for higher level skills:

Doctorate +33%
Other Higher Degree +35%
First Degree +29%
HE Below Degree +23%

(2017-27)

Other Factors Shaping Demand

- Technological disruption
- Net Zero
- New firm formations
- Inward investment and expansion
- Migration and demographics

Changing Skills Perspectives

- Gradual shift away from traditional qualification/attainment focus
- Employers keen to assess overall applicant potential to recruit
- Business eagerness to deploy new recruitment methods and targeting

Post COVID-19 recruiting sectors:

Logistics
Health
Care
Education
Construction
Social Services
Real Estate

(2021)

Replacement demand driving skills need:

Wholesale and retail trade +58,000
Health and social work +45,000
Support services +38,000

(2017-27)

Key Opportunity: Luton's Evolution and Growth

Set within the 2040 Vision is a renewed ambition for greener and fairer growth making the link between local people and opportunity stronger, whilst benefitting from new norms emerging from the pandemic. As such, Luton is in the midst of one its most significant periods of regeneration, with major investments being made that will revitalise the town and redefine its image.

The expansion of the airport will create huge opportunities for Luton's economy creating new jobs and economic activity, and the town centre masterplan is providing the framework for the future with investments already underway and planned at the station, Hat District and Power Court Stadium. These will include design and construction activity and also the operation of new businesses, and workspaces creating diversity of employment and pathways.

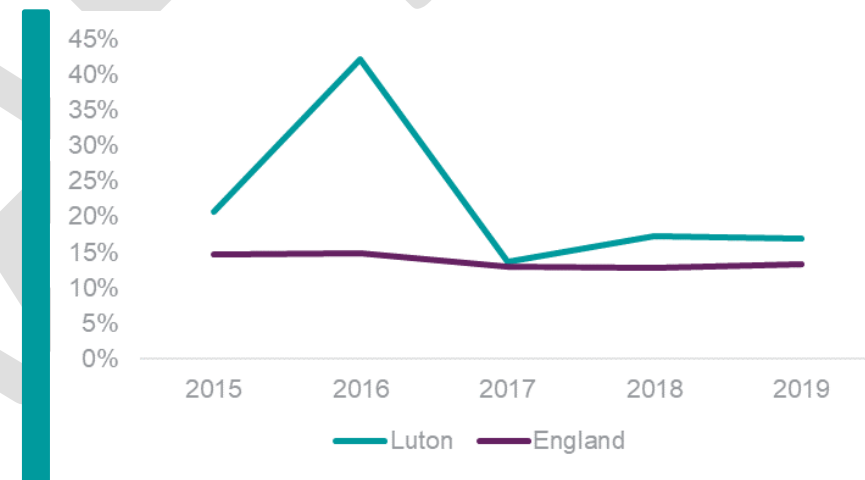
There is a huge opportunity to align growth and regeneration with local people, delivering significant benefits in the form of new jobs, training initiatives and infrastructure enhancements. The town must also make effective use of new learning facilities that have been developed, including the University of Bedfordshire Science Technology Engineering and Mathematics (STEM) Building and investments at Barnfield College and Luton Sixth Form.

The pandemic has also had a seismic effect on what were the norms of working and learning for many across Luton. Examples of this are visible across various facets of the economy, propelled by the effects of technology and an acceptance that a successful life and career can be pursued in a different way. Here, attitudes have shifted towards motivating factors such as greater work-life balance, workplace flexibility and better harnessing digital platforms to support learning and development. Looking ahead, this will have important implications for how jobs are conceived, fairer work conditions and the core skills needed within the labour market.

Key Opportunity: Enterprise

Employment and training opportunity arises not just from working for established businesses, but also as from starting new firms and as a result of thriving entrepreneurship. Start-ups are an important component of dynamic and productive economies and provide valuable outlets for innovative and creative capacity, providing opportunities for people from a wide range of backgrounds to contribute and prosper. Luton excels in developing and growing early-stage enterprise, which create a richness of activity in the town and drive the base of small businesses that are important to the fabric of the local economy.

Start-Ups as a Proportion of Total Active Businesses



It is vitally important that enterprise forms a central component of Luton's economic story moving forward, as a catalyst for growth and inclusive opportunity. Young people, those seeking a career change and the economically inactive should be aware of this and have the chance to unlock their entrepreneurial potential, with the skills provision and infrastructure in place to bring more into work.

Digging Deeper – Views from the Ground

The development of this Strategy has engaged stakeholders from across Luton and further afield, to create a deeper understanding of place and conditions. Stakeholder perspectives offer resonance with data and also highlight a series of recurrent themes.

Employer Views	Provider Views	Young Person Views	Community Views	Wider Views
 Acute skills shortages need to be addressed for vacancies to be filled Provision must respond to the future workplace and skills needs Stronger synergies between employers and providers are necessary A pipeline of rounded talent is more valued than just qualifications Career fluidity means people must prepare to upskill and be flexible Vocational routes need to be more accessible and affordable to firms There is a genuine desire to invest in and recruit local talent	 Accessible and clear skills and employment pathways are critical Seamless education and work transition (cradle to grave) is key Parents and families must be better informed to shape career choices Business must be able to deconstruct skills need in detail Improving readiness and awareness at a young age is key Digital skills need to keep pace with technological change STEM subjects should be core to provision and drive employability	 Perceptions of Luton as a place to develop a career are poor Balanced and more regular careers advice is a necessity Sense that employment is more important than continued learning Lack of awareness of the local business base and diversity of offer Business leaders should be more visible and act as mentors Eagerness for more work placement and experience opportunity Need to do more to promote enterprise as a rewarding career option	 Luton is not well articulated as a place or as a dynamic economy Town regeneration opportunities should unlock local benefits Digital skills need to be improved to open up access to employment All ages must be given the information and encouragement to work Value an emphasis on creating jobs that are fairer and better paid More should be done to celebrate success and raise aspirations Ethnic backgrounds and circumstances must be considered	 The visibility of job and learning opportunities needs to be greater The town needs to work harder to retain skilled and ambitious talent Grass roots solutions are needed to respond to local nuances Systems thinking is needed to ensure work is enriching and pays Employers need to be prepared to invest in workforce development All residents must have a baseline of digital competency to thrive Wellbeing must be viewed in the context of economic participation

4

Strategic Priorities and Actions



Our Strategic Priorities

Drawing on the evidence base developed, the Strategy has a focus on 4 key priorities, which frame the basis for local action.

Priority Emphasis

1	Skills driving economic recovery and growth	Investment in the right local skills will support a strong and rapid pandemic bounce-back and long-term growth , assisted by ecosystems to support job creation in emerging and growing sectors.
2	Developing a pipeline of talented and resilient people	The Strategy must ensure the next generation of Luton's workers are prepared for the world of work , understand the breadth of local opportunity, are flexible and ready for the career that they have chosen.
3	Tackling long-term inequality and economic inactivity	Increasing economic activity and participation in education and skills, to tackle poverty, deprivation and level-up across Luton , targeting those distant and disengaged from learning and work.
4	Creating an adaptable, upskilled workforce	Enabling people to understand the importance of lifelong learning and its necessity as part of career progression , whilst making sure businesses value and invest in their staff to support progression and growth.

Our Priorities

Our strategic priorities have emerged through research and stakeholder engagement. They align with those within the Luton 2040 Vision and our Inclusive Economy and Population Wellbeing Strategies. Critically, these will be owned and delivered by the key delivery partners across Luton and those which have an active interest in the town – securing a commitment to change.

The strategic priorities take account of the challenges we are facing now in the context of the pandemic, and the new jobs emerging as digital technology advances and the need for a green recovery comes into focus. The pace of change is rapid, but the opportunity to transform Luton's fortunes is significant too.

The action areas supporting each of our strategic priorities are set out below and will be supplemented by an accompanying Implementation Plan. The latter provides more detail within each action and sets out a more detailed approach to governance, accountability and monitoring.

The action areas are intended to be deliverable within the Strategy's 5-year duration and realistic in their intent. They will be reviewed annually and may be revised, subject to contextual change, policy and the ongoing economic performance of Luton. This is in keeping with the Strategy being a living and breathing entity – adaptable to change and always focused on the most important priorities.

Importantly too, the assigned actions build on existing activity and the delivery of initiatives across Luton. The objective is not to duplicate effort or create overlapping initiatives, rather to build on our strengths where foundations are in place and respond to gaps where they exist.

The Strategy is also shaped by a series of key drivers, which provide the context for a localised response and rationale for action. They are also fundamental to the balance of need and opportunity.



Strategic Priority 1: Skills Driving Economic Recovery and Growth

Rationale for Intervention:

- The pandemic has had a seismic effect on Luton in terms of unemployment and changing the way people learn.
- Furlough rates show that the town has been particularly exposed and local sectors may struggle to bounce back.
- The pandemic risks exacerbating longstanding issues associated with poverty, deprivation and economic inactivity.
- Green growth and the low carbon agenda are creating new opportunities and inspiring a fresh wave of job creation.
- Existing and proposed investments in skills infrastructure will support accelerated recovery and longer-term resilience.
- Levelling up investments in the town will act as a springboard for long-term recovery.
- The 2040 Vision provides a consistent goal from which Luton's sectors, clusters, and assets will develop.
- Key projects, such as London Luton Airport expansion, will provide the basis for landmark initiatives and action.
- The health crisis has placed a renewed awareness on the importance of skills development and training investment.
- Resident-based higher level qualifications lag comparator areas and pose a risk to future business growth.

Making a Difference Today:

There are a number of initiatives that are currently delivering positive outcomes for people and businesses in Luton. These will be expanded and built upon as part of our approach:

London Luton Airport Expansion - Employment & Skills Plans

London Luton Airport is embarking on a long-term expansion programme which will increase capacity and create new job opportunities. Within this, an Employment and Skills Strategy is being developed, drawing on the latest data and illustrating the airport's commitment to aligning job opportunities with local people.

Luton Social Work Academy

Luton's social work academy aims to support the recruitment, development, and retention of newly qualified social workers through a partnership with the University of Bedfordshire. Its primary aims are of stabilising and securing permanency in the Children's Social Work workforce and sustaining excellent practice through continuing professional development.

Passport to Employment

Luton Council's Passport to Employment programme aims to connect unemployed people with local job opportunities. The programme includes employability skills, CV writing, transferable skills, mock interviews and other core skills such as ESOL, English and maths. The programme includes guaranteed interviews with employers such as Vauxhall Motors and has proven to be particularly invaluable over the course of the pandemic, matching candidates with job openings.

Priority Actions

Priority Actions
1.1. Develop a seamless employment and skills ecosystem with employers at the centre to bridge the gap and ensure provision is based on the current and future needs of Luton's businesses and growth sectors, particularly SMEs who are the lifeblood of the local economy
1.2. Design clear learning and career pathways, making the connections at key stages and linking the curriculum to local jobs and work opportunity
1.3. Develop a joined-up and real-time approach to understanding and responding to emerging Green and Digital Sector skills requirements
1.4. Target skills development and employment initiatives on sectors and employers experiencing recruitment difficulties and shortages
1.5. Maximise local levers such as procurement and the opportunities of key regeneration and development in Luton, to create local job prospects and better connect to the local provider offer
1.6. Increase the engagement and involvement of businesses in our employment, skills and learning activity, especially SMEs
1.7. Embed enterprise education within local provision leading to more established entrepreneurship and start-up pathways and helping to inspire the next generation of new business owners

Example activities to be delivered through the Implementation Plan



Strategic Priority 2: Developing a Pipeline of Talented and Resilient People

Rationale for Intervention:

- Many local people lack awareness of the local economy, growth sectors and skills pathways, despite being ambitious.
- Gatsby benchmarks suggest Luton is performing well but some schools and colleges have room for improvement.
- Apprenticeships are not gaining traction locally and don't offer the variety to support individual and business needs.
- Employers and providers are eager to engage on existing and future skills needs and harness the power of data.
- Strong evidence of skills shortages and gaps that need to be addressed as part of future workforce development.
- Growth and development of the town has created new opportunities to inspire and retain the best talent in Luton.
- Work readiness and digital skills are becoming increasingly relevant to all jobs, but STEM remains essential too.
- Luton's population is expected to shrink and age, reducing the working age populace and tightening the labour market.
- There is evidence to suggest that school and skills provider performance could be improved, to better life prospects.
- It is vital to inform parents and those who will influence young persons' career decisions from an early age.

Making a Difference Today:

There are a number of initiatives that are currently delivering positive outcomes for people and businesses in Luton. These will be expanded and built upon as part of our approach:

Careers Hub Luton

Careers Hub Luton helps schools and colleges meet the Gatsby benchmarks, improving career aspiration outcomes for young people. The overall ambition is to bring together local schools and colleges and work closely with universities, training providers, employers, and career professionals to create a network and allow young people to make informed choices, drawing on resources such as Enterprise Advisers.

University of Bedfordshire STEM Building

Opened in 2019, the STEM Building is devoted to related teaching and research, creating a new hub for innovation, and providing the focus for stronger engagement with Luton-based employers. Within 6,000m² of teaching and laboratory space, the building has allowed the university to offer new courses and promote the value of science and engineering, through the Science and Engineering Outreach Centre.

Barnfield College Campus Development

The College is one of the anchors of Luton's further education provision and continues to invest in infrastructure and teaching facilities. The £25m redevelopment of the New Bedford Road campus will transform the College's offer and presence in the town. The investment includes a new Coding Centre, Digital Lab, Employer Zone, contemporary teaching space and the latest technology.

Priority Actions

Priority Actions
2.1. Support and encourage schools and colleges to develop provision which enables development of core employability skills that are in demand and will form the basis of future jobs, including STEM
2.2. Develop a more comprehensive vocational offer for young people through a wider variety of learning options
2.3 Create more regular employer touchpoints with local role models connecting to students, parents, and influencers to enable informed decisions on learning and work choices
2.4 Increase levels of awareness and aspiration and promote Luton in a positive way to encourage young people to stay in Luton

Example activities to be delivered through the Implementation Plan



Strategic Priority 3: Tackling Long-Term Inequality and Inactivity

Rationale for Intervention:

- Luton has pronounced issues associated with rates of economic inactivity and unemployment amongst residents.
- Stark inequalities are evident within Luton, linked to wages, skills levels and measures of poverty, limiting prospects.
- Poor physical and mental health are key contributors to economic inactivity and can be embedded within education.
- Women, certain ethnicities and young people are more likely to be disadvantaged by low pay and insecure work.
- Deprivation remains a major driver of individual outcomes and is holding some back from economic participation.
- The town's cultural diversity creates complexities in terms of the motivation to work and value placed on this.
- Whilst our 16-18 pre-NEETs and NEET figures are quite low, data indicates that we need to further look at diversity of options, different skills pathways, and alternative provision; something that is also required for SEND young people.
- Children in care or leaving supported services are at significant risk of disadvantage and lesser progression.
- With an ageing workforce, there will be competing demand for STEM, business operations, healthcare and education skills as the baby-boomer population accounts for a significant share of these jobs and are set to retire.
- The town is home to a larger than average proportion of jobs that pay below the national living wage.

Making a Difference Today:

There are a number of initiatives that are currently delivering positive outcomes for people and businesses in Luton. These will be expanded and built upon as part of our approach:

Community Led Programmes

Luton benefits from a number of programmes which target local organisations and community groups to improve cohesion, mobility and create locally led solutions. Funding sources include Community Learning, Community Led Local Development and Building Better Opportunities Funds, and these are designed to support and encourage voluntary, third sector and other not for profit organisations in supporting disadvantaged adults and addressing inequalities, with the aim of promoting social renewal.

Department for Work and Pensions Access to Work

The Access to Work programme helps people to get or stay in work if they have a physical or mental health condition or disability. Support offered is need dependent and includes a variety of direct services such as grants to help pay for practical support with work, advice about managing mental health, communication support at an interview, funding vehicle adaptations and alternative means of transport.

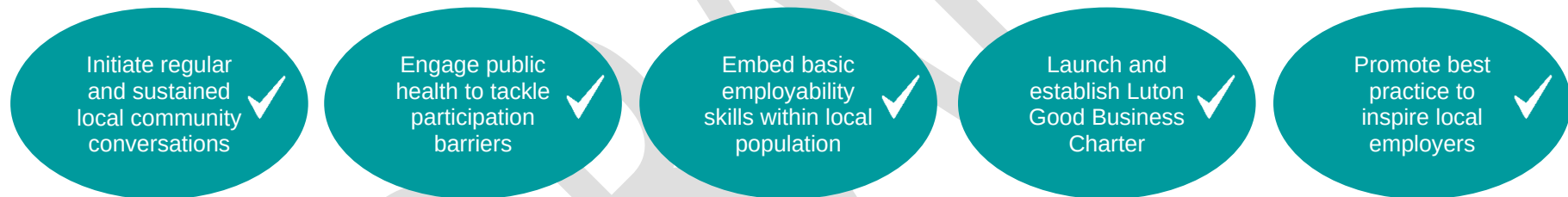
Luton Virtual School

Luton's virtual school promotes and coordinates educational support for looked after children and care leavers. The service tracks the progress of each young person and provides additional support to help them to fulfil their potential.

Priority Actions

Priority Actions
3.1. Provide joined up employment support for target groups that removes barriers to skills and work for disadvantaged groups, particularly women, returners to work, ethnic minority groups, disadvantaged community groups, some over 50s, people with physical and learning difficulties or disabilities, homeless or ex-offenders
3.2. Help individuals to be job-ready by providing high quality employment and skills support
3.3. Work with local businesses to embed best practice in real living wages, local recruitment, retention, and skills progression, addressing racism and other forms of discrimination

Example activities to be delivered through the Implementation Plan



Strategic Priority 4: Creating an Adaptable and Upskilled Workforce

Rationale for Intervention:

- The economy continues to evolve and the base of sector employment will change, shifting skills demand too.
- The town is particularly exposed to the effects of automation, requiring rapid workforce reskilling.
- Luton has been reliant on foreign labour and the effects of Brexit will increase the need to grow talent from within.
- Employers report that they expect to see a shift towards occupations that require more balanced individual skillsets.
- Work readiness skills are valued in employees, but technical and digital skills will also play a key role across key sectors.
- The effects of digitalisation and technological disruption are not expected to abate, accentuating the need for upskilling.
- Employers need to be encouraged to invest proactively in staff development and provide necessary in-job training.
- Luton benefits from an increasingly diverse and flexible range of providers, courses and Continuing Professional Development (CPD) options.
- Web-based learning offers opportunities to expand the scope and reach of skills development considerably.
- Luton businesses report acute challenges linked to staff not being fully proficient in their roles, limiting productivity.
- People lack awareness of the probability of a more free flowing career and the training implications of this.

Making a Difference Today:

There are a number of initiatives that are currently delivering positive outcomes for people and businesses in Luton. These will be expanded and built upon as part of our approach:

University of Bedfordshire CPD Courses

The university has developed an expansive programme of CPD courses which have been designed to support professional upskilling, continued learning and business competitiveness. With the 10th largest offer in the UK, courses focus on the needs of the modern workplace and local sectors, covering topics such as leadership, management, lean, digital skills, cyber security, healthcare, and social work.

Further Education Distance and Online Learning

Barnfield and Central Bedfordshire Colleges offer flexible study options, enabling students to learn remotely and in a way that can accommodate full time work, through distance and online learning. Some online courses are available at no cost, with modules accredited towards higher level certificates. Study options range from short courses to degrees, geared around adaptability and relevance.

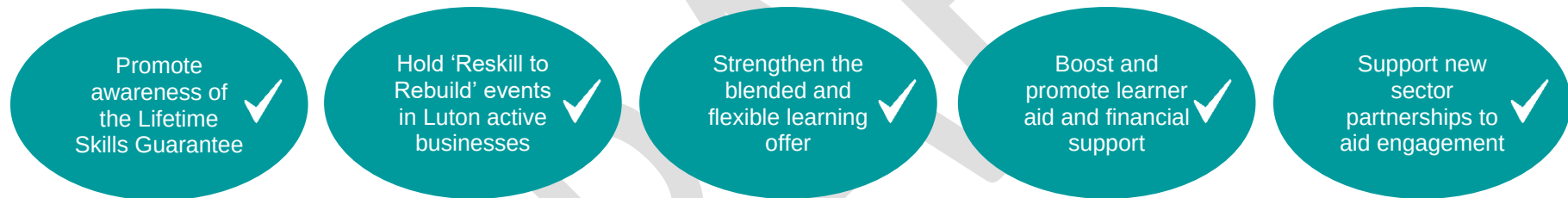
Case Study: Leonardo Growth Opportunity

As one of the town's most prominent employers, Leonardo has developed a programme to support staff development, growth, and progression. Through investment in bespoke skills development programmes, the company is building internal capability by nurturing existing talent, supporting individual ambition, and enhancing professional expertise, embedding this within the fabric of the firm's culture. Training and development focus on key competencies, accelerating internal mobility, career pathway identification and the transfer of practical knowledge and skills. The company continues to evolve its growth opportunity offer, as part of a commitment to grow the business founded in a loyal, responsive, and innovative workforce.

Priority Actions

Priority Actions
4.1. Encourage greater uptake of CPD and flexible learning by employers, particularly SMEs, and ensure apprenticeships are seen to be part of the upskilling solution
4.2. Help individuals to upskill and reskill building a workforce with transferrable skills
4.3. Stimulate employers to collaborate on shared areas of skills and learning interest, including potential pooling of resources and staff capacity, to help overcome training cost barriers

Example activities to be delivered through the Implementation Plan



5

Making it Happen



Making it Happen

A Collective Commitment

The Strategy's commitment to action can only be achieved as a result of sustained accountability, transparency and good governance. As such, there will be a collective responsibility to own and deliver the Strategy, with four underlying principles guiding this approach:



The Strategy is owned by the ESPB and monitored by the IEB. The PTB will continue to oversee initiatives to improve opportunities for the development of young people in the town.

The ESPB recognises that we need to play a range of different roles to achieve the positive changes in this strategy. These are:

- **Advocates** – for the involvement and leadership of people with lived experience, so that solutions and services are co-designed wherever possible, and lobbying to get the best deal for the borough

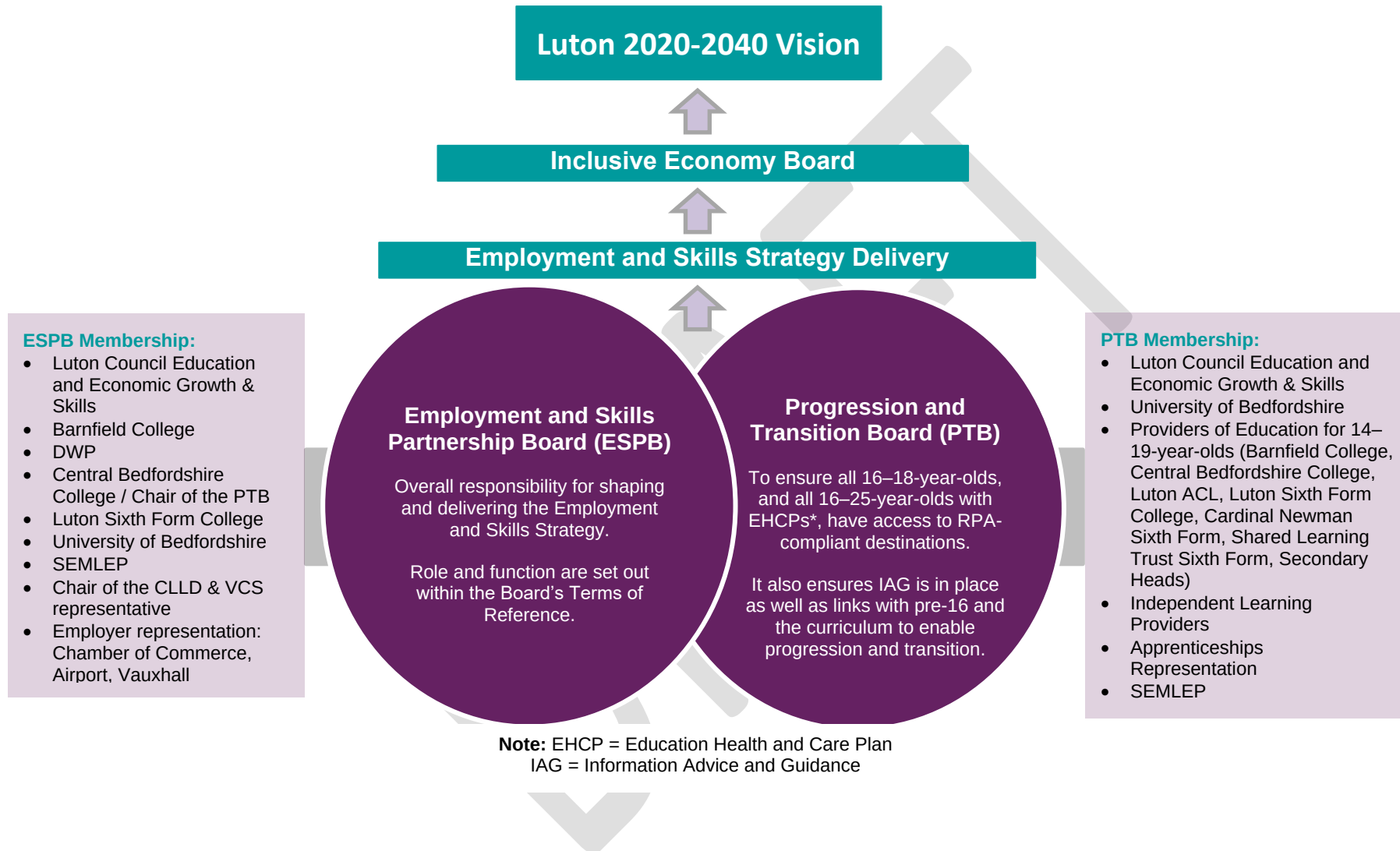
- **Navigators and coordinators** – developing a more integrated system for employment and skills, with clearer pathways across a range of provision to support people into good jobs based on well managed and maintained relationships with key employers and sectors
- **Funders and commissioners** – building and sharing an evidence-based approach to funding decisions on programmes and services
- **Anchor institutions** – ensuring jobs and opportunities are created directly within these employers, and through supply chains
- **Providers** – Luton has a large and responsive institutional and provider network, delivering education and a wide range of vocational training and employment support services
- **Employers and businesses** – providing good jobs and opportunities for local people, benefiting from a committed and skilled local workforce

The ESPB will leverage established and new relationships with key stakeholders to provide the right expertise, insight, energy and direction.

Good Governance

Effective governance will be the cornerstone of delivery and it will also be important to maintaining a commitment to accountability. The ESPB will interface regularly with the IEB and PTB throughout the Strategy's life, making best use of these relationships and the expertise within. Good governance will also allow the ESPB to straddle responsibilities and functions at both a strategic and operational level, where necessary. Overarching governance arrangements are set out below, with the ESPB bound by its own Terms of Reference.

Governance Overview



Tracking Change and Monitoring Impact

Aligned with governance processes and an overarching pledge of transparency, the Strategy will be subject to ongoing monitoring to track delivery progress. This will help to understand the extent to which the Strategy and identified actions are affecting change and what difference interventions are making. It will also support long-term impact assessment and enable the ESPB to report in a consistent manner.

The actions provide a 'hook' to achieve this and incorporate indicators which can be quantified and tracked over time. The accompanying Implementation Plan includes further detail with regards to each action and associated KPIs, as well as data sources which will underpin monitoring processes. Monitoring will occur at a minimum of an annual basis, with quarterly reporting to the ESPB and it is expected that evaluations will be commissioned periodically, aligned to delivery progress, to provide more detailed insights into achievements and impacts.

Monitoring – Areas for Focus

The following KPIs represent the key areas of focus for monitoring and reporting activity and highlight where the Strategy is intended to 'move the needle'. They will therefore be important measures of success and help determine the legacy of the Strategy over its 5-year duration. The ESPB and partners will maintain a resolute commitment to tracking progress, sharing data and using this to inform future decision-making.

Strategic Priorities	Outcome KPIs	Measure of Success	Data Source
1. Skills driving economic recovery and growth	Numbers of hard-to-fill vacancies	Decrease 	ONS Employer Skills Survey
	Proportion of residents in higher level occupations	Increase 	ONS Annual Population Survey
	Total number of jobs and job density	Increase 	ONS BRES / Jobs Density
	Per Worker Average Productivity (GVA)	Increase 	ONS Subregional Productivity
2. Developing a pipeline of talented and resilient people	Proportion of residents with 5+ GCSEs	Increase 	ONS Key State Performance Data
	Apprenticeship and traineeship completions	Increase 	ONS Apprenticeship and Internship Data
	Levels of HE and HE participation	Increase 	ONS FE Statistics / Office for Students
	Levels of FE and HE progression	Increase 	ONS FE Statistics / Office for Students
3. Tackling long-term inequality and economic inactivity	Proportion of benefit claimants	Decrease 	ONS Claimant Counts
	Proportion unemployed and economically inactive	Decrease 	ONS Annual Population Survey
	Proportion of jobs paying Real Living Wage / wage equality	Increase 	ONS Annual Survey of Hours and Earnings
	Proportion of total population registered as NEET	Decrease 	ONS NEET Data
4. Creating an adaptable, upskilled workforce	Level of reported business skills gaps and shortages	Decrease 	ONS Employer Skills Survey
	Adult and lifelong learning participation levels	Increase 	ONS Community Learning data
	Proportion of businesses investing in CPD and training	Increase 	ONS Employer Skills Survey
	Proportion of residents with no qualification or NVQ1	Decrease 	ONS Annual Population Survey

A

Appendix



Our Inspiration

Our Strategy and priority actions have drawn inspiration from further afield, to reflect on exemplar initiatives and what has worked, to maximise prospects for success in Luton. The following are examples that showcase a template from which to deliver our actions, locally.



Action: 1.3. Develop a joined-up and real-time approach to emerging Green and Digital Sector skills requirements

This action will help support females from an ethnic background to play a more active role in the local economy, providing encouragement and resources to help them invest in learning and to secure a job.

With the pace of change across the economy showing little evidence of slowing, and with digital technologies impacting all industries and sectors, there is an even more pressing need to understand the dynamics of the labour market. Data and statistics form a vital component of this requirement, with an increasingly rich array of information available to deconstruct labour supply and demand, including the changing nature of roles and role for upskilling. Whilst this data is gathered in Luton and across the wider sub-region, there is an opportunity to go further, both in approach, and the coordinated sharing of intelligence. Of particular relevance are digital skills and how these can be better understood in real time.



Wider Inspiration: South East LEP, Digital Skills Partnership

This project has been identified as a source of inspiration for Luton as it has formed the basis for understanding and better tackling digital skills, leveraging insights using innovative approaches. It also offers a model that could be replicated by local partners.

The government is working with LEPs and Combined Authorities (CAs) to help deliver Local Digital Skills Partnerships (Local DSPs) to tackle local digital skills challenges and build thriving and inclusive local economies. Six trailblazers were established across England, developing innovative models to improve digital skills, boost local economies and share best practice with other peers. Within the South East, there are five priorities which include providing support to SMEs, educators and students, residents and ensuring alignment between education and industry. Data plays a central role in decision-making and delivery, with new sources of information used to build a more definitive digital skills picture.



Action: 1.4. Target skills development and employment initiatives on sectors and employers experiencing recruitment difficulties and shortages

This action will build on success achieved to date, creating new opportunities for local people to benefit from growing sectors and regeneration, creating a pool of skilled talent support demand form employers.

Luton has benefitted from a Construction Skills Hub, developed to support key projects, such as the DART. The project spanned nearly two years and was the result of a partnership between VolkerFitzpatrick-Kier, Luton Council and London Luton Airport, to help people obtain the skills needed to enter the construction industry. Training more than 700 people, the Hub provided a rich source of talent to meet local demand. As Luton embarks on a further phase of redevelopment and green growth, there is an opportunity to leverage this model and develop a successor initiative, creating a valuable employment pathway. In turn, key projects, such as airport expansion, stadium development and new housing will be delivered, to the benefit of local people and town.

MAYOR OF LONDON

Greater London, Mayor's Construction Academy Hubs

This initiative has been identified as a source of inspiration for Luton given its track record of success, delivery at scale and the commitment it has secured across a wide range of partners. It has also gained a high profile and driven apprenticeship take-up

The Mayor's Construction Academy (MCA) brings together seven Hubs across London, aligning the many opportunities in London to undertake skills training with employers and those interesting in pursuing a related career. The MCA Hubs seek to bring this together, making the offer more compelling, bringing local people into contact with local job opportunities. Hub coordinators are the connecting point between all the organisations helping develop the workforce, acting as an interface between the College of North East London, London Boroughs of Barking and Dagenham, Camden and Newham, London South Bank University, South London and Partners and West London College.



Action: 2.2. Develop a more comprehensive vocational offer for young people through a wider variety of learning options

This action will deliver activities that enable more effective use of funds that will support apprenticeship uptake and encourage development of new vocational pathways, benefitting individuals and employers.

There is a prime opportunity in Luton, to develop an apprenticeship model that better supports the needs of employers and individuals, creating more choice and raising participation. At the core of this is thinking smarter and being innovative – harnessing the resources available through the Apprenticeship Levy in a different way, making funding more widely available, especially to smaller businesses which have struggled to find the resources needed to take on an apprentice. This action will build on critical thinking and work undertaken to date, to create an Apprenticeship Levy Hub, which will collect and recycle unused funds, with these being made available to non-levy paying businesses and SMEs, with additional flexibility in terms of supporting elements of apprenticeship costs.



West Midlands, Apprenticeship Transfer Fund

This scheme has been identified as a source of inspiration for Luton given its relevance to local challenges associated with Levy take-up, distribution and underspend. It could be built upon to shape a local solution, which goes further and expands the apprenticeship offer.

The Apprenticeship Levy Transfer Fund, coordinated delivered by West Midlands Combined Authority, enabled levy paying businesses to transfer up to 25% of their funds to non-levy payers and smaller businesses. The scheme means that unspent levy monies are retained, for use in sectors within the county where apprenticeship programmes provide an effective skills development and recruitment tool. In doing so, larger employers are assisting SMEs and businesses within their supply chains, helping them to meet the training costs of providing an apprenticeship. Other examples of levy pooling include Islington Borough Council, New Anglia LEP and Hertfordshire County Council's schemes.



Action: 3.1. Provide joined up employment support for target groups that removes barriers to skills and work for disadvantaged groups

This action will help support females from an ethnic background to play a more active role in the local economy, providing encouragement and resources to help them invest in learning and to secure a job.

Luton's diversity is one of its greatest assets but is also integral to the town's complexity and is also a driver of some of the employability challenges observed locally. In this context and with an urgent need to address Luton's economic inactivity and worklessness issues, particularly among women from an ethnic minority background, there is an opportunity to establish fresh initiatives that will inspire a wave of labour market entrants. The underlying need is nuanced and will likely require a multifaceted response, which address key barriers such as a lack of English language competency, self-confidence and childcare obligations. It is also apparent that such initiatives will need significant trust to be established within communities, if support is to succeed.



Tower Hamlets, Women's Inclusive Team

This project has been identified as a source of inspiration for Luton as it has supported and helped mobilise ethnic groups that have been unable to make an economic contribution. It provides a template for local ethnic community engagement.

Since 2004, Women's Inclusive Team has been supporting black and ethnic minority communities in Tower Hamlets through youth programmes, women's empowerment projects, mental health support and food banks. Building from its roots in children's play sessions and the development of safe environments for BAME females, the organisation evolved to support adult women, through empowerment projects. Now delivered via a women's only centre in Bethnal Green, services include advice and guidance, focusing on mental health, parenting, community integration and English language learning. With 28 staff members, the organisation is guided by a Board which includes 20 women.



Action: 4.1. Encourage greater uptake of CPD and flexible learning by employers, particularly SMEs, and ensure apprenticeships are seen to be part of the upskilling solution

This action will engage employers to ensure they are making the most of vocational pathways, are investing in workforce development and creating progression routes for employees, into higher value roles.

Apprenticeships and vocational pathways offer businesses the opportunity to not only establish a pipeline of talent, but to also upskill the existing workforce and meet immediate skills demand. In some cases, businesses lack awareness of the potential for apprenticeships to address their workforce development needs and are not making effective use of the presence of local provision and funds associated with the Apprenticeship Levy. Within this background, there is significant scope to harness the capacity of local businesses who have benefitted from vocational pathways, and leverage positive experiences and outcomes to increase engagement, particularly from SMEs.



East of England, Apprenticeship Ambassador Network

This Initiative has been identified as a source of inspiration for Luton as it has successfully developed a base of business champions who advocate celebrate the benefits of apprenticeships. There is the potential to better leverage this network to raise awareness locally.

The Apprenticeship Ambassador Network has 9 regional networks across England – this includes one with an East of England focus. The network consists of a group of business leaders whose main aim is to spearhead the drive to engage new employers to recruit apprentices across England. Ambassadors undertake their role on a voluntary basis, by supporting and influencing a wide range of key stakeholders including schools, colleges, employers and their supply chains, trade associations and employment bodies. Ambassadors are recruited on the basis of a high commitment to apprenticeships in their own workforce, a high profile in their area and as a represent a diverse range of employment sectors.

Supporting Information

This Appendix provides supplementary information which supports the content of the Strategy. Additional information is available in the accompanying Technical Appendices:

- **Evidence Baseline Document**
- **Policy and Literature Review**
- **Stakeholder Consultation Summary**

Each of these are available, via the [Luton Council website](#).

Evidence Sources

The Strategy has been informed by a wide array of evidence, amassed from statistical and qualitative sources. This includes the following, with further detail provided within accompanying Technical Appendices:

- **The Office for National Statistics** (including NOMIS and specific data sources published within)
- **Government Departments** (including the Department for Education, Business Innovation and Industrial Strategy, Department for Levelling Up Housing and Communities, Health etc)
- **Luton Council** (including specific departments within and Careers Hub Luton)
- **SEMLEP** (and associated labour market and skills reports)
- **Learning institutions** (such as Barnfield and Central Beds Colleges and the University of Bedfordshire)
- **London Luton Airport** (including emerging employment and skills plans)
- **Surveys** (such as those disseminated by partner organisations)
- **Other Feedback** (via workshops and questionnaires)

Data Contextualisation

To aid data analysis and understand Luton's relative performance, the town has been compared to other geographies. These have been chosen on the basis of statistical boundaries, location, and socioeconomic characteristics. Comparator areas used are:

- **England**
- **OxCam Arc**
- **SEMLEP**
- **Bedford**
- **Milton Keynes**
- **Northampton**
- **Slough**

Further information

For more information on the Strategy, work being undertaken to deliver the Implementation Plan and opportunities to get involved, please contact the [Luton Economic Growth and Skills team](#).



Luton Employment & Skills Strategy 2022-2027

Implementation Plan

Luton 2020 - 2040
A place to thrive



Our Partnership Pledges

Partnership is fundamental to the Luton Employment and Skills Strategy and sets the tone for a sustained pledge from key partners and collaborators, which will drive delivery and can be regularly assessed. We see a wide variety of organisations being critical to our strategic success, but broadly these can be defined as employers, skills providers, local government, sub-regional agencies, our communities and specialist organisations.

The pledges below are direct, simple and designed to ensure that partner commitments are maintained and monitored.



Our pledges will require focus and will necessitate partners to make a commitment to the ongoing delivery of the Strategy and this Implementation Plan. **To substantiate this commitment, we would expect to see the following from pledging organisations:**

Pledge 1: Actively using the Strategy as a document which frames individual or organisational activity, supports the case for investment, project development, collaboration and contributes to raising the profile of the employment and skills agenda.

Formal endorsement of the Strategy
Active engagement with key partnerships and groups

Pledge 2: Delivering and adding value to the actions within the Implementation Plan where identified, whilst keeping track of other positive interventions made, such that progress can be effectively reviewed through monitoring and evaluation processes.

Delivering or supporting identified actions
Openly communicating success and best practice

Pledge 3: Socialising insights and information on an ongoing basis to support an improved understanding of Luton's performance as a place, and to pinpoint issues and opportunities which allow the Strategy to be a living and breathing document.

Sharing of data and intelligence to aid understanding
Attendance at the employment and skills conference

1

Introduction

Introduction

Implementation Plan Purpose

This Implementation Plan has been developed to accompany our 2022-27 Luton Employment and Skills Strategy. It builds on the delivery focus of the Strategy and places more detail around the key actions that will drive change and inclusive prosperity. These actions straddle our **4 strategic priorities**:



Action and Delivery

This Plan acts as a focal document for the **Luton Employment and Skills Partnership Board (ESPB)** and key partners, who will be tasked with delivering the Strategy and maintaining oversight of progress and performance. It has therefore been configured to:

- Provide a natural focus for local delivery
- Be practical, actionable and owned
- Complement other action-focused documents
- Include Specific, Measurable, Attainable, Relevant and Time-bound (SMART) indicators of performance
- Be a living document, which may flex and can be updated to reflect changing contexts and priorities (in tandem with any updates to the Strategy itself)

The Plan therefore forms the basis for accountability, transparency and collective ownership and will play a key role moving forward in:

- **Advocacy and case making**
- **Monitoring and evaluation**
- **Partnership building**
- **Influencing and lobbying**
- **Celebrating success**

Consistent with the Strategy itself, the Plan has been co-created, with partner organisations, businesses and residents of Luton all helping to shape the scope of interventions within.

Strategic Priority Actions

As identified within the Strategy, each strategic priority is characterised by a series of key actions. These respond to the evidence base and the emphasis of challenge and opportunity in Luton. They build on activities that are already in progress and take inspiration from farther afield, such that change will be focused in the areas where it is needed most, and the returns will be greatest.

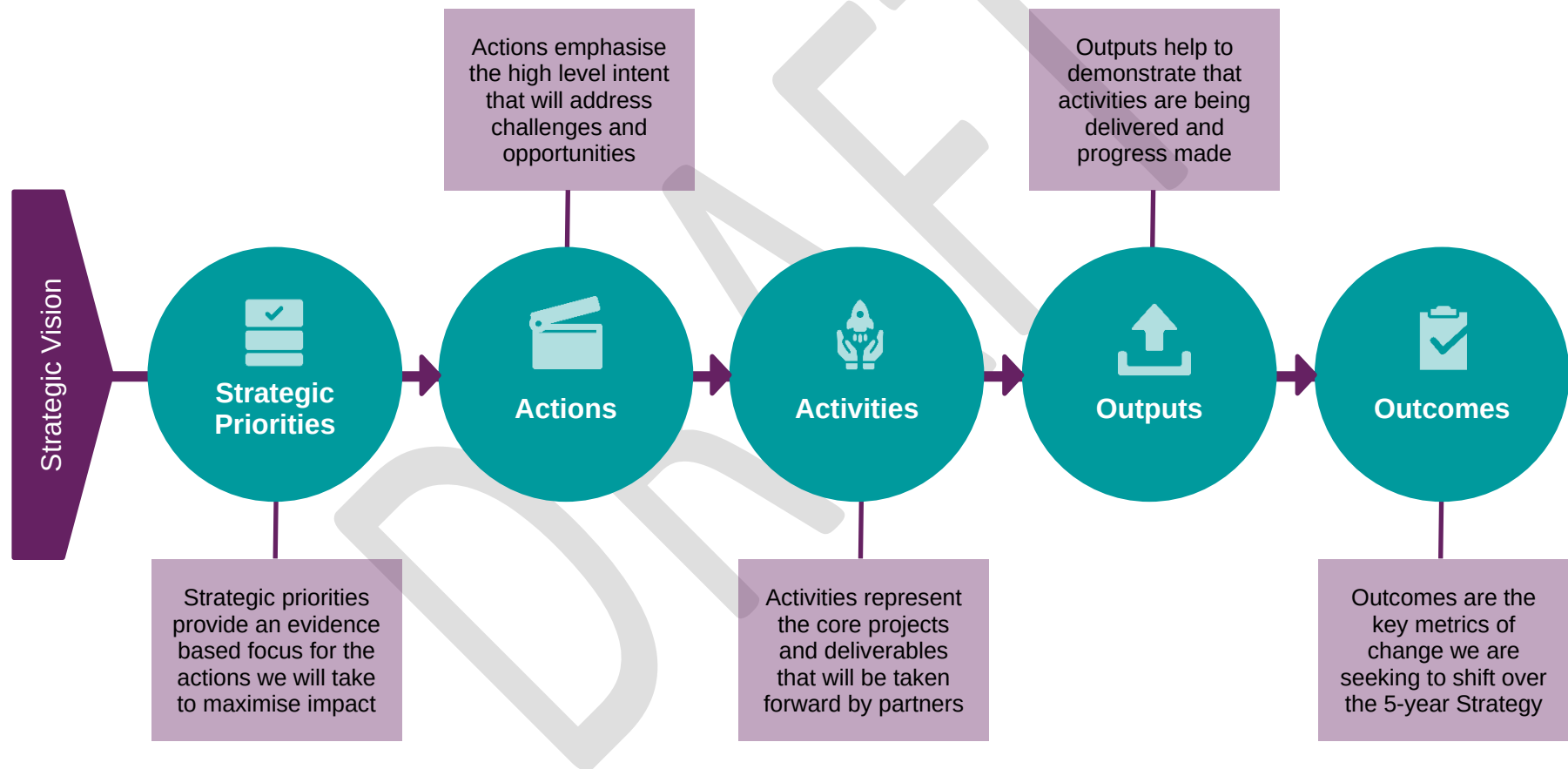
The actions for each of the strategic priorities are set out below, with action tables being structured around the following dimensions:

- **Headline action**
- **Key delivery activities**
- **Delivery timeframe (within the 5-year duration)**
- **Delivery owners**
- **Delivery partners**
- **Delivery outputs**
- **Measures of success**

The results outlined within the action plans align with a series of higher level KPIs, which provide the focus for monitoring.

Implementation Plan – Vision to Outcomes

Our Implementation Plan adopts a logic chain, to highlight the tangible difference we are seeking to make across Luton. This is articulated simply below, and frames the overarching approach taken to the delivery of the Strategy, with a focus on accountability, transparency and continuity of approach.



2

Action Plan

Our Action Plan

Strategic Priority 1: Skills Driving Economic Recovery and Growth

Headline Action	Key Delivery Activity	Timeframe	Delivery Owners	Delivery Partners	Delivery Outputs	Measures of Success ¹
1.1 Develop a seamless employment and skills ecosystem with employers at the centre to bridge the gap and ensure provision is based on the current and future needs of Luton's businesses and growth sectors, particularly SMEs who are the lifeblood of the local economy	Facilitate partnership working and new forms of collaboration through the ESPB, PTB and annual Employment and Skills Partnership Conference	Ongoing	Luton Council Economic Growth and Skills, Luton Council Education Services, Careers Hub Luton	Colleges, ESPB, Government Departments (BEIS, DfE, DLUHC), PTB	Number of events and conferences held	Increase in the number of relevant events held versus baseline
	Develop shared data and insight mechanisms, drawing on relevant data (including labour market, skills gaps need data, NEET, destination data) and business perspectives to shape provision and explore automated approaches	Year 1	UoB		Number of new data insights and visualisation tools developed and deployed	Increase in the number of data tools and mechanisms versus baseline
	Work with businesses to better understand their skills and detailed recruitment needs	Ongoing	CoC, FSB and SEMLEP		Evidence of business liaison (meetings, diagnostics, forums etc)	Increase in the scale and regularity of business engagement versus baseline
	Publish and circulate a bi-annual labour market update report	Year 1, 2, 3, 4, 5	Luton Council Economic Growth and Skills, SEMLEP		Annual Luton labour market report published	Increase in the frequency of updates published versus baseline
1.2 Design clear learning and career pathways, making the connections at key stages and linking the curriculum to local jobs and work opportunity	Strengthen sector partnerships between education, providers and employers for Luton's growth and employment sectors ²	Year 1, 2	Careers Hub Luton, Luton Council Economic Growth and Skills	CoC, Colleges, Employers, ESPB, FSB, Government Departments (BEIS, DfE, DLUHC), SEMLEP, PTB, Schools	Number of priority sector partnerships established / number of sector-focused collaborative projects established	Increase in the number of sector partnerships/projects established versus baseline
	Develop a comprehensive skills pathways route map based on Luton's growth and employment sectors, identifying and responding to gaps	Year 2, 3	Careers Hub Luton, Luton Council Economic Growth and Skills		Number of sector specific pathways route maps published	Increase in number of published skills pathway maps published versus baseline

¹ Note: Baseline refers to the position at the start of Year 1 of Implementation Plan delivery.

² Note: Luton's priority growth and employment sectors are Aviation and Aerospace, Advanced Manufacturing, Automotive and Engineering, Creative Arts and Media; Construction and Health and Social Care.

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Headline Action	Key Delivery Activity	Timeframe	Delivery Owners	Delivery Partners	Delivery Outputs	Measures of Success ¹
1.3 Develop a joined-up and real-time approach to understanding and responding to emerging Green and Digital Sector skills requirements	Establish a Green Skills Group and supporting action plan to better understand the roles this will create and the skills that will be in high demand	Year 1	Luton Council Economic Growth and Skills, SEMLEP	Employers, ESPB, Government Departments (BEIS, DfE, DLUHC), PTB, CoC, FSB	Green Skills Group established / evidence of Group activity and associated outputs	Increase in the levels of green sector skills engagement and activity versus baseline
	Develop detailed green skills requirements and pathway plan to support local employers and expected sector growth	Year 2	Luton Council Economic Growth and Skills, SEMLEP		Evidence of green skills pathway mapping development and provider response	Increase in the number of green skills pathway assets versus baseline
1.4 Target skills development and employment initiatives on sectors and employers experiencing recruitment difficulties and shortages	Work with local businesses to trial value-based recruitment, targeted locally with simplified job specifications and candidate selection deployed	Year 1, 2	Luton Council Economic Growth and Skills, DWP	CoC, Employers, ESPB, FSB, Government Departments (BEIS, DfE, DLUHC), PTB, SEMLEP,	Value based recruitment model developed / evidence of successful value-based recruitment into local jobs	Increased adoption of value-based recruitment by employers versus baseline
	Further develop sector-based skills academies, where demand for labour is strongest and immediate, such as the Construction Skills Hub and the Social Work Academy	Ongoing	Luton Council Economic Growth and Skills, DWP		Number of skills academies in development / number of active skills academies	Increase in number of operational skills academies versus baseline
	Create apprenticeship and traineeship pathways to support Luton's sectors and provide a greater balance of choice	Ongoing	Luton Council Education Services, Luton Council Economic Growth and Skills		Number of apprenticeships offered in Luton by standard or qualification	Increase in apprenticeships and traineeship pathway options versus baseline
	Deliver redundancy support packages as part of the economic recovery with a focus on transferable skills aligned with sectors where there are recruitment difficulties or expected jobs growth	Year 1, 2	Luton Council Economic Growth and Skills, DWP		Number of active redundancy support programmes / take-up of redundancy support programmes	Increase in support programme availability and support versus baseline
	Hold job fairs promoting live vacancies and supported with quality careers advice	Ongoing	DWP, Careers Hub Luton		Number of job fairs held / number of vacancies filled as a result of job fairs	Increase in the number of jobs fairs held versus baseline

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Headline Action	Key Delivery Activity	Timeframe	Delivery Owners	Delivery Partners	Delivery Outputs	Measures of Success ¹
1.5 Maximise local levers such as procurement and the opportunities of key regeneration and development in Luton, to create local job prospects and better connect to the local provider offer	As part of the Good Business Charter, establish an Anchors Procurement Group to maximise social value on delivery of local recruitment, apprenticeships, work experience etc	Year 1	Luton Council Economic Growth and Skills	CoC, Developers, Employers, LLAOL, SEMLEP	Anchors Procurement Group Established / Number apprenticeships and jobs secured through anchor procurements	Increase in apprenticeships and jobs secured through anchor procurements versus baseline
	Develop Employment and Skills Supplementary Planning Guidance to support planning submissions from developers	Year 2, 3	Luton Council Planning, DWP		Supplementary Planning Guidance published / evidence of anchor and developer commitments within planning applications	Increase in employment and skills evidence within planning applications versus baseline
	Support the London Luton Airport in its ambitions around local recruitment, employment and skills, aligned to their strategy	Ongoing	Luton Council Economic Growth and Skills		Evidence of local people being employed and trained at the Airport	Increase in Luton-based employees at the airport versus baseline
	Maximise employment and skills opportunities from key developments such as Power Court and Newlands Park	Year 2, 3, 4, 5	Luton Council Economic Growth and Skills		Evidence of recruitment activity/ local people in training and job positions linked to key developments	Increase in local people employed through development and regeneration versus baseline
1.6 Increase the engagement and involvement of businesses in our employment, skills and learning activity, especially SMEs	Launch the new Barnfield College Employer Zone and full range of employer events and activities to increase involvement in curriculum design and other initiatives	Year 1	Barnfield College	CoC, Employers, ESPB, FSB, PTB, SEMLEP	Barnfield Employer Zone operational / total interactions	Increase in employer engagements with the College versus baseline
	Strengthen employer engagement with Careers Hub Luton, particularly SMEs	Ongoing	Careers Hub Luton, Luton Council Economic Growth and Skills		Total employer engagements / sector engagement breakdown	Increase in number of employers formally engaged versus baseline
	Strengthen links with Luton Council Economic Growth Team's employer engagement programme with inclusion of skills and recruitment assessments	Year 1	Luton Council Economic Growth and Skills		Skills assessment process established / Number of skills and recruitment assessments completed	Increase in number of completed skills and recruitment assessments versus baseline

Appendix D - Implementation Plan

Headline Action	Key Delivery Activity	Timeframe	Delivery Owners	Delivery Partners	Delivery Outputs	Measures of Success ¹
	Employer representation on the ESPB and PTB increased	Ongoing	Luton Council Economic Growth and Skills, Luton Council Education Services		Number and breakdown of ESPB/PTB directors	Increase in number of ESPB employer representatives versus baseline
	Use the Think Luton Business newsletter to engage employers on activity that can support their skills and recruitment needs	Ongoing	Luton Council Economic Growth and Skills		Number of relevant articles in newsletter / evidence of relevant business contributions to the newsletter	Increase in number of related articles in newsletter versus baseline
1.7 Embed enterprise education within local provision leading to more established entrepreneurship and start-up pathways and helping to inspire the next generation of new business owners	Coordinate a Luton Enterprise Event, which draws attention to the innovative and creative capacity of Luton's residents	Year 2	UoB, Colleges	ESPB, Government Departments (BEIS, DfE, DLUHC), SEMLEP, Schools, Wenta	Luton Enterprise event delivered / participation levels in event	Increase in the number of enterprise events held versus baseline
	Work with Headteachers Forum and Careers Hub Luton to explore potential for an entrepreneurial programme for schools, to raise awareness within pre-16 age groups	Year 2	Careers Hub Luton, PTB		Evidence of entrepreneurial programme development / entrepreneurial programme deployment	Increase in the number of operational entrepreneurial programmes versus baseline
	Work with and support local start-up support agencies such as Wenta	Ongoing	Luton Council Economic Growth and Skills		Evidence of engagement with relevant start-up agencies	Increase in engagement levels with relevant agencies versus baseline
	Launch a 'Pathways into Self Employment' programme at UoB with a package of support for progress, pursuit and profit	Year 2	UoB		Programme launched and operational / levels of participation in programme	Increase in number of programmes and packages versus baseline
	Support job seekers to explore self-employment as a viable option and to raise aware of enterprise opportunities	Ongoing	DWP, Luton Council Economic Growth and Skills		Evidence of support focusing on enterprise opportunity / number of job seekers pursuing self-employment	Increase in number of job seekers pursuing self-employment versus baseline

Strategic Priority 2: Developing a Pipeline of Talented and Resilient People

Headline Action	Key Delivery Activity	Timeframe	Delivery Owners	Delivery Partners	Delivery Outputs	Measures of Success
2.1 Support and encourage schools and colleges to develop provision which enables development of core employability skills that are in demand and will form the basis of future jobs, including STEM	Develop and promote project-based learning in schools aligned with key themes, such as the green economy	Year 2	Luton Council Education Services, Careers Hub Luton, SEMLEP	Colleges, Employers, ESPB, Government Departments (BEIS, DfE, DLUHC), PTB, Schools	Evidence of project-based learning development / number of project-based learning programmes	Increase in number of project-based learning programmes versus baseline
	Promote Careers Hub Luton and other CEC relevant resources, seeking further commitment from schools and colleges	Ongoing	Luton Council Education Services, Careers Hub Luton, SEMLEP		Evidence of Careers Hub and CEC promotion / number of schools and colleges signed-up	Increase in number of schools and colleges affiliated with Hub versus baseline
	Increase engagement and activity with work placements, work experience, apprenticeships, T Levels, internships	Ongoing	Luton Council Education Services, Careers Hub Luton, SEMLEP, Luton Council Economic Growth and Skills		Numbers of relevant places available / take-up of relevant programmes, courses, apprenticeships and internships	Increase in number of and take-up of relevant programmes and courses versus baseline
	Continue to strengthen the Passport to Employment Programme	Ongoing	Careers Hub Luton		Evidence of programme development	Increase in number of programme engagements versus baseline
	Explore opportunities for closer linkages with UoB's STEM Facility, increasing exposure to STEM opportunities for young people and residents	Year 1	UoB		Number of established relationships with school and college courses / student take-up of STEM courses (FE/HE)	Increase in number of school/college relationships with STEM Facility versus baseline
	Strengthen the STEM apprenticeship offer	Year 2	UoB		Number/type of STEM apprenticeships available	Increase in apprenticeships numbers versus baseline
	Launch and promote Barnfield College's new Digital Lab	Year 2	Barnfield College		Barnfield College Digital Lab operational	Increase in engagement with Digital Lab versus baseline
	Establish the employer 'Skillmaker' initiative across Luton and the near regions to further develop links between employers and vocational and occupation training and education	Year 2	Barnfield College		Evidence of Initiative in development / initiative operational and links established	Increase in presence of related initiatives and engagement versus baseline

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Headline Action	Key Delivery Activity	Timeframe	Delivery Owners	Delivery Partners	Delivery Outputs	Measures of Success
	Establish the Barnfield College GAP programme to generate and sustain on-the-job training opportunities for young people studying vocational and occupational qualifications	Year 2	Barnfield College		Evidence of programme in development / programme take-up levels	Increase in programme take-up levels versus baseline
2.2 Develop a more comprehensive vocational offer for young people through a wider variety of learning options	Further develop engagement with young people to understand their specific learning needs	Ongoing	Luton Council Education Services, Careers Hub Luton	DWP, Employers, ESPB, Government Departments (BEIS, DfE, DLUHC), NHS SEMLEP, Schools	Evidence of student surveying / detailed analysis of young person skills and employability needs	Increase in number and frequency of student surveying versus baseline
	Ensure young people are supported by careers education in schools as described by the Gatsby Benchmarks	Ongoing	Luton Council Education Services, Careers Hub Luton		Gatsby Benchmark results recorded and analysed	Increase in Luton Gatsby Benchmark performance versus baseline
	Explore options for the continuation of Careers Hub Luton beyond current funding	Year 1, 2	Luton Council Education Services, Careers Hub Luton		Evidence of Careers Hub Luton proposition development / level of further funding secured	Increase in funding committed to the Hub versus baseline
	Undertake strategic pupil place planning for 16-18 year-olds who need specialist provision, ensuring diversity of options	Ongoing	Luton Council Education Services		Evidence of strategic pupil place planning	Increase in number of place-planning assessments completed versus baseline
	Map the vocational offer for young people in 16-18 and 19-25 and fill any gaps in provision	Year 1, 2, 3	Luton Council Education Services		Comprehensive provision mapping completed / evidence of new provision being developed	Increase in availability of relevant pathway maps versus baseline
	Ensure there is a package of support in place for vulnerable young people who are registered as NEET or at imminent risk	Ongoing	Luton Council Education Services		Evidence of targeted NEET support / levels of engagement with support programmes	Increase in availability of support packages versus baseline
	Develop the market around SEND provision, and increase the number of supported	Ongoing	Luton Council Education Services,			

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Headline Action	Key Delivery Activity	Timeframe	Delivery Owners	Delivery Partners	Delivery Outputs	Measures of Success
	internships, volunteering and employment for young people (16-25) with SEND	Year 1, 2	Luton Council Adult Social Care		Evidence of scope and focus of SEND provision / number of SEND focused internships and volunteering placements	Increase in number of internships and volunteering opportunities versus baseline
	Develop and promote alternative education pathways and transition between them		Luton Council Education Services		Evidence of education pathways / promotion of pathways	Increase in promotion and marketing of pathways versus baseline
	Identify learner issues/barriers in navigating pathways and seek ways to remove these and support learner progression	Year 1	Luton Council Education Services		Learner barriers identified / response to mitigate learner barriers developed	Increased awareness of learner barriers versus baseline
	Continue to strengthen support for young people in care or care leavers (mentors, experience and guaranteed interviews)	Ongoing	Luton Council Virtual School, Luton Council Education Services		Number of programmes aimed at supporting those in or leaving care	Increase in number of related programmes versus baseline
	Develop and implement curriculum innovations that maximise available funding to provide young people with a long and short qualification/skills offer	Ongoing	Colleges, UoB		Evidence of new curriculum development / audit of short and long course offer	Increase in number of related courses and provision versus baseline
2.3 Create more regular employer touchpoints with local role models connecting to students, parents, and influencers to enable informed decisions on learning and work choices	Increase Cornerstone Employers and Enterprise Advisors as part of Careers Hub Luton	Ongoing	Careers Hub Luton, Luton Council Economic Growth and Skills	CoC, Employers, ESPB, FSB, SEMLEP	Number of Cornerstone Employers and Enterprise Advisors / sector representation	Increase in number of engaged employers and advisors versus baseline
	Identify and engage key influential figures in Luton as role models that local people can identify with and be inspired by	Year 1	Luton Council Economic Growth and Skills		Mentors and influencers identified / number of actively engaged business leaders	Increased number of influencers mobilised versus baseline
	Share accessible 'live' labour market information and provide	Ongoing	Careers Hub Luton, PTB, Colleges, Schools		Labour market information available / evidence of data being used by	

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Headline Action	Key Delivery Activity	Timeframe	Delivery Owners	Delivery Partners	Delivery Outputs	Measures of Success
	labour market CPD information to upskill teaching staff				providers and teaching staff	Increase in dissemination of labour market information versus baseline
	Deliver a suite of engagement activities for young people, parents and carers on labour market information and careers	Ongoing	Careers Hub Luton, PTB, Colleges, Schools		Evidence of engagement activity with target audiences / numbers accessing labour market information and careers advice	Increase in number of engagement activities versus baseline
	Use Family Learning as an opportunity to connect parents with labour market understanding	Ongoing	Luton Council Economic Growth and Skills		Family Learning developed to include labour market information	Increase in Family Learning collaborations versus baseline
2.4 Increase levels of awareness and aspiration and promote Luton in a positive way to encourage young people to stay in Luton	Showcase local education and training resources including colleges, universities (national) and online learning and provide exposure points for local people	Ongoing	Luton Council Education Services, colleges, UoB	CoC, FSB, Employers, ESPB, PTB, SEMLEP	Evidence of relevant resource promotion and advocacy / number of exposure points mapped	Increase in level of promotion and advocacy versus baseline
	Showcase future job opportunities and career pathways as part of the regeneration of Luton through Careers Hub Luton	Ongoing	PTB, Careers Hub		Number of events and showcase engagements held / evidence of promotion and marketing	Increase in number of events and showcases versus baseline
	Promote current job vacancies through the Passport to Employment jobs portal	Year 1	Luton Council Economic Growth and Skills		Number of vacancies promoted via the portal	Increased number of vacancies promoted through portal versus baseline
	Produce Luton Inward Investment Prospectus and associated campaign	Ongoing	Luton Council Economic Growth and Skills		Inward Investment prospectus published / associated campaign launched and marketed	Increase in inward investment profile and campaigns versus baseline

Strategic Priority 3: Tackling Long-Term Inequality and Economic Inactivity

Headline Action	Key Delivery Activity	Timeframe	Delivery Owners	Delivery Partners	Delivery Outputs	Measures of Success
3.1 Provide joined up employment support for target groups that removes barriers to skills and work for disadvantaged groups, particularly women, returners to work, ethnic minority groups, disadvantaged community groups, some over 50s, people with physical and learning difficulties or disabilities, homeless or ex-offenders	Initiate a programme of community conversations to develop a nuanced understanding of the solutions needed to address inequality and structural disadvantage	Ongoing	Luton Council Economic Growth and Skills, Luton Council Social Justice Team	BLCF, Colleges, Community Groups, Employers, Government Departments (BEIS, DfE, DLUHC) Raise Up Foundation, Schools	Evidence of community engagement / spatial focus of community engagement / evidence of key issues	Increase in the number and regularity of community conversations versus baseline
	Identify community champions to support in engaging customers and promoting provision	Ongoing	DWP, Luton Council Economic Growth and Skills, Luton Council Social Justice Team		Community champions identified / number of champions signed up	Increase in number of active community champions versus baseline
	Target existing and future funding (such as ESFA, BBO & CLLD) towards areas of high deprivation or disadvantage with community-based provision	Ongoing	DWP, Luton Council Economic Growth and Skills, Luton Council Social Justice Team		Number of funding bids developed and submitted / value of funding secured	Increase in the value of funding allocated to related projects versus baseline
	Explore and agree a joint action plan to support our black and minority ethnic communities to access and progress in employment	Year 2	DWP, Luton Council Economic Growth and Skills, Luton Council Social Justice Team		Development of action plan / action plan approved and activated	Increase in number of targeted actions delivered versus baseline
	Seek external funding to support targeted provision	Ongoing	ESPB, PTB		Funding sources identified / value of funding secured	Increase in value of external funding secured versus baseline
	Leverage national programmes such as Disability Confident, Access to Work and BITC resources	Ongoing	DWP, ESPB		Evidence of programme engagement / take-up of programmes in Luton	Increase in direct links with related programmes versus baseline
	Explore supported employment opportunities for individuals with higher support needs / SEND / LDD, including supported internships, apprenticeships, job carving	Year 1, 2	Luton Council Adult Social Services		Evidence of supported employment opportunities / numbers of participating individuals	Increase in number of supported employment and learning opportunities versus baseline

Appendix D - Implementation Plan

Headline Action	Key Delivery Activity	Timeframe	Delivery Owners	Delivery Partners	Delivery Outputs	Measures of Success
	Work with Public Health to address health barriers to work and promote wellbeing	Ongoing	Luton Council Economic Growth and Skills, Luton Council Population Wellbeing		Evidence of engagement and partnership working / development of new approaches	Increase in engagements with partners versus baseline
	Encourage cross referrals and raise awareness of local need through an annual employment and skills partnership conference	Year 1 and ongoing	Luton Council Economic Growth and Skills		Evidence of cross referrals / employment and skills partnership conference held	Increase in numbers of cross referrals versus baseline
	Strengthen join up with Luton Access and the Council Tax Reduction Scheme	Ongoing	Luton Council Economic Growth and Skills		Evidence of improved alignment and incentivisation	Increase in engagements with schemes versus baseline
	Explore the appetite for employer led learner grants that will promote equal access to higher level provision and accelerate skills development within the most deprived communities	Year 2	Luton Council Economic Growth and Skills		Evidence of engagement with employers / value of employer led learner grants available	Increase in number and value of grants versus baseline
3.2 Help individuals to be job-ready by providing high quality employment and skills support	Encourage 'soft' entry programmes to engage people with learning	Year 2	Luton Council Economic Growth and Skills, colleges, DWP	Community Groups, Employers, ESPB, Government Departments (BEIS, DfE, DLUHC), Raise Up Foundation, SEMLEP	Evidence of 'soft' entry programme development / launch	Increase in number of 'soft' entry programmes versus baseline
	Deliver basic skills (English, numeracy, digital, ESOL)	Ongoing	Luton Council Education Services, colleges, DWP		Number of relevant courses and take-up of relevant courses	Increase in number of relevant courses versus baseline
	Develop a digital Inclusion programme	Year 1, 2	Luton Council Economic Growth and Skills, DWP		Evidence of digital inclusion programme development / launch of programme	Increase in number of operational programmes versus baseline
	Support local events such as the Luton Employability Day and jobs fairs	Year 1	Luton Council Education Services, Luton Council Economic Growth and Skills, DWP		Number of events focused on promotion of skills and employability	Increase in number of relevant events versus baseline

Appendix D - Implementation Plan

Headline Action	Key Delivery Activity	Timeframe	Delivery Owners	Delivery Partners	Delivery Outputs	Measures of Success
	Create opportunities for volunteering as a gateway to wider participation	Ongoing	Luton Council Economic Growth and Skills, DWP		Numbers of available volunteering opportunities / take-up of volunteering opportunities	Increase in number of volunteering opportunities versus baseline
	Provide accessible high quality careers guidance for all	Year 1, 2	Luton Council Economic Growth and Skills, Careers Hub Luton, DWP		Evidence of all generation career guidance developed / launched	Increase in breadth of career guidance available versus baseline
	Deliver employer focused training through schemes such as Passport to Employment	Ongoing	Luton Council Economic Growth and Skills, DWP		Number of relevant support schemes / scheme take-up	Increase in active schemes versus baseline
3.3 Work with local businesses to embed best practice in real living wages, local recruitment, retention and skills progression, addressing racism and discrimination	Launch Luton as a Good Business Charter Town to guide employer behaviours	Year 1	Luton Council Economic Growth and Skills	BLCF, Community Groups, Employers, SEMLEP	Luton Good Business Charter scheme operational	Increase in businesses signed up to charter versus baseline
	Explore the potential for a Luton Employer Hub which connects residents to high quality job opportunities at all levels	Year 1	Luton Council Economic Growth and Skills		Evidence of project development and partner engagement	Increase in employer engagement via Hub versus baseline
	Promote examples of good practice to local employers	Year 2	Beds CoC, FSB, SEMLEP, Luton Council Economic Growth and Skills		Evidence of best practice promotion and marketing	Increase in promotional campaigns and marketing versus baseline
	Identify and respond to jobs where there are underrepresented groups e.g. gender divide, ethnicity, returners to work etc	Year 1, 2	DWP, Luton Council Economic Growth and Skills		Evidence of analysis undertaken to define gaps / evidence of response to identified gaps and inequalities	Increase in activities designed to support underrepresented groups versus baseline

Strategic Priority 4: Creating an Adaptable, Upskilled Workforce

Headline Action	Key Delivery Activity	Timeframe	Delivery Owners	Delivery Partners	Delivery Outputs	Measures of Success
4.1 Encourage greater uptake of CPD and flexible learning by employers, particularly SMEs, and ensure apprenticeships are seen to be part of the upskilling solution	Promote and signpost employers and residents to local and government initiatives such as the Lifetime Skills Guarantee	Ongoing	Luton Council Economic Growth and Skills, Colleges, CoC, FSB, SEMLEP, PTB, UoB	Employers, Government Departments (BEIS, DfE, DLUHC), Other Skills and Training Providers	Take-up of Lifetime Skills Guarantee	Increase in number of skills guarantee beneficiaries versus baseline
	Ensure employer engagement highlights benefits of CPD in terms of improved productivity, staff retention etc	Year 1	Luton Council Economic Growth and Skills, CoC, FSB, SEMLEP		Evidence of related employer engagements and advocacy	Increase in number of businesses engaged on CPD versus baseline
	Identify Apprenticeship Ambassadors to promote benefits to employers	Ongoing	Luton Council Economic Growth and Skills		Evidence of ambassador identification / recruitment	Increase in number of Apprenticeship Ambassadors versus baseline
	Hold 'Reskill to Rebuild' events for businesses across Luton	Year 2	Luton Council Economic Growth and Skills		Number of events scheduled and held	Increase in number of events held versus baseline
	Offer 'Skills Boot Camps' to provide short and intensive skills training in skills shortages	Ongoing	Barnfield College, UoB, DWP		Number of boot camps and events held	Increase in number of boot camps delivered versus baseline
	Develop and implement a range of CPD qualifications and skills that are highly accessible to in-work candidates	Ongoing	Barnfield College, UoB		Number of CPD qualifications under development / delivered	Increase in number of CPD courses available and take-up versus baseline
4.2 Help individuals to upskill and reskill, building a workforce with transferrable skills	Strengthen, promote and signpost the blended learning offer and online platforms such as UoB, colleges, private providers	Ongoing	Luton Council Economic Growth and Skills, colleges, CoC, FSB, SEMLEP, UoB	DWP, Employers, Government Departments (BEIS, DfE, DLUHC), Other Skills and Training Providers	Evidence of breadth of the blended online learning offer / promotion of flexible learning	Increase in related learning provision versus baseline
	Reinforce and advocate Access Learning, Bitesize Learning	Ongoing	UoB, Barnfield College		Number and take-up of relevant learning opportunities	Increase in number and take-up of relevant learning opportunities versus baseline

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Headline Action	Key Delivery Activity	Timeframe	Delivery Owners	Delivery Partners	Delivery Outputs	Measures of Success
	Promote higher education pathways and strengthen options around higher apprenticeships, higher technical qualifications and foundation years	Ongoing	UoB, Luton Council Economic Growth and Skills, colleges		Number of higher apprenticeships and technical qualifications available and take-up	Increase in number of available higher level apprenticeships and take-up versus baseline
	Deliver provision during flexible hours to enable out of work hours learning	Ongoing	UoB, Colleges, Luton Council Economic Growth & Skills		Number of courses available flexible hours (evenings/weekends)	Increase in the number of courses available flexible hours versus baseline
	Promote and strengthen financial support options such as advanced learner loans, appetite for employer sponsorship / full cost training	Ongoing	UoB, Colleges, Luton Council Economic Growth & Skills		Number of learner loans and sponsored training options	Increase in the number of learner loans and sponsored training versus baseline
	Advocate and support transferrable skills in sectors facing recruitment challenges	Ongoing	UoB, Colleges, Luton Council Economic Growth and Skills		Evidence of hard-to-recruit vacancies in key sectors	Decrease in number of hard-to-recruit vacancies in key sectors versus baseline
4.3 Stimulate employers to collaborate on shared areas of skills and learning interest, including potential pooling of resources and staff capacity, to help overcome training cost barriers	Develop sector partnerships between education, providers and employers	Ongoing	UoB, Luton Council Economic Growth and Skills	CoC, Employers, Other Skills and Training Providers, SEMLEP	Number of sector partnerships established	Increase in number of sector partnerships established versus baseline
	Leverage the Think Luton Business newsletter to promote opportunities to employers	Ongoing	Luton Council Economic Growth and Skills		Number of newsletters promoting employment opportunities	Increase in number of newsletters promoting employment opportunities

Our Outcomes – Key Performance Indicators

Informed by our vision, the thrust of the strategic priorities, actions and the delivery outputs that will allow us to actively record progress, we have established a series of high-level Key Performance Indicators (KPIs). These reflect the outcomes that partners are seeking to deliver over the duration of the Strategy and are where there is a collective commitment to fundamentally 'move the needle'. The KPIs therefore represent the measures by which success will ultimately be assessed and be the primary mechanism by which this is measured and reported to external audiences and wider stakeholders. The KPIs have been selected on the basis of:

- Their alignment with the strategic priorities and identified actions within
- The ability to measure and analysis performance in a consistent and repeatable fashion
- The robustness of underlying data sources
- The ability to contextualise Luton's performance versus comparators and consider change over time

Our KPIs may be added to over time, where there is a rationale to do so and new data becomes available. At this stage, it is agreed that the KPIs will form the basis for annual monitoring and assessment, which is both proportionate and aligns with data release cycles. There will also be the prospect to overlay qualitative insights in addition to statistics, to further an understanding change and local conditions.

Strategic Priorities	Outcome KPIs	Measure of Success	Data Source
1. Skills driving economic recovery and growth	Numbers of hard to fill vacancies Proportion of residents in higher level occupations Total number of jobs and job density Per Job Average Productivity (GVA)	Decrease  Increase  Increase  Increase 	ONS Employer Skills Survey ONS Annual Population Survey ONS BRES / Jobs Density ONS Subregional Productivity
2. Developing a pipeline of talented and resilient people	Proportion of residents with 5+ GCSEs Apprenticeship and traineeship completions Levels of HE and HE participation Levels of FE and HE progression	Increase  Increase  Increase  Increase 	ONS Key State Performance Data ONS Apprenticeship and Internship Data ONS FE Statistics / Office for Students ONS FE Statistics / Office for Students
3. Tackling long-term inequality and economic inactivity	Proportion of benefit claimants Proportion unemployed and economically inactive Proportion of jobs paying Real Living Wage / wage equality Proportion of total population registered as NEET	Decrease  Decrease  Increase  Decrease 	ONS Claimant Counts ONS Annual Population Survey ONS Annual Survey of Hours and Earnings ONS NEET Data
4. Creating an adaptable, upskilled workforce	Level of reported business skills gaps and shortages Adult and lifelong learning participation levels Proportion of businesses investing in CPD and training Proportion of residents with no qualification or NVQ1	Decrease  Increase  Increase  Decrease 	ONS Employer Skills Survey ONS Community Learning data ONS Employer Skills Survey ONS Annual Population Survey

3

Delivery

Monitoring and Evaluation

Value of Monitoring

The value of embedding measurement and monitoring processes into strategy delivery is multi-faceted and well established. In the context of our Strategy, the importance of a deliberate approach to measuring and monitoring is clear, and this rationale is geared around the following:

- Real-time understanding of place and local conditions
- Demonstrating accountability and collective ownership
- Supporting better decision-making and planning
- Enabling learning and knowledge exchange
- Valuing change in social and environmental terms
- Advocacy and showcasing the value of strategic focus
- Showing where action can facilitate transformational change

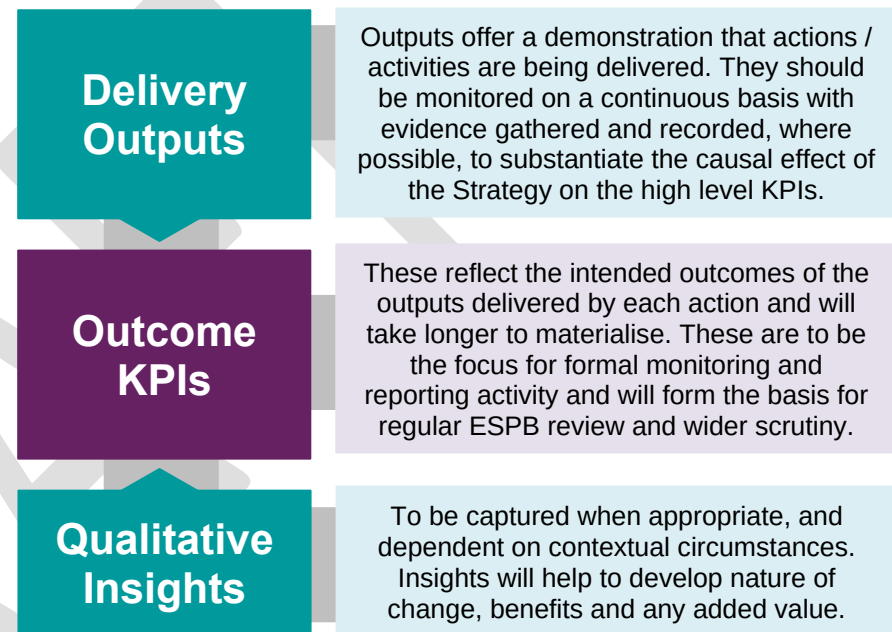
Fundamentals of the Approach

The fundamentals of our approach to measurement and monitoring are key to the Strategy's future value, relevance and success. These reflect factors of best practice and the importance of taking a deliberately flexible approach to monitoring, accounting for elements that may be out of the ESPB's direct control (such as contextual, environmental or political change) and inevitable deviation in the continuity or approach to data release and reporting where there is a reliance on other organisations.

Our monitoring approach therefore calls for a focus on data that can be quantified and, largely, is captured through existing processes. That said, there may be opportunities over the course of Strategy delivery to accumulate additional insights that will deepen an understanding of place and impact, such as through the collation of qualitative research and administering of surveys.

Our monitoring approach also calls for a focus on:

- **Making a distinction between delivery outputs and outcomes**
- **Proportionality of monitoring regularity**
- **Structured integration with governance processes**



The monitoring of KPIs will be undertaken within the following:

- **Annual monitoring and analysis of each indicator**
- **Annual reporting of the performance of each indicator**
- **Tracking performance over time (versus year-1 baseline)**
- **Benchmarking versus select comparator areas**
- **Deeper analysis where possible (by age, gender, ethnic background and disability)**

Evaluation and Longer-Term Impact Tracking

To further awareness and support informed decision-making, there may also be an opportunity to ensure that evaluation is factored into our delivery approach. In order to be practicable, it is likely that this will be driven at the level of activities, especially if there is a need to assess longer-term impact and value for money (VfM). Insights derived from this level of evaluation will enable the longer-term benefits of activities to be understood, the VfM of projects to be assessed and, at an aggregate level, for the additionality of the Strategy to be tested. Evaluation will also help to uncover the added value derived from interventions and to understand performance from a strategic added value perspective.

Any evaluation process will be designed and coordinated in line with direct investments made in projects, and evaluation guidance will be developed for projects, clearly setting out requirements, expected outputs and how performance data should be fed back to support ongoing monitoring. Key reference points to enable a robust and consistent evaluation approach to be developed at a local level include:

- **HM Government Magenta Book**
- **What Works Centre for Local Economic Growth (How to Evaluate)**
- **SEMLEP evaluation guidance and toolkits**

There may also be an opportunity to collate and assess evaluation intelligence generated by partner organisations and those delivering projects aligned to our Implementation Plan. This will be subject to feasibility, the permissibility of information exchange, alignment with reporting methods/timescales and available resources, but could help to deepen understanding and support the sharing of learning and best practice in other intervention contexts.



Making it Happen

Key Principles

The Strategy can only be achieved as a result of sustained accountability, transparency and good governance. As such, there will be a collective responsibility to truly own and deliver the Strategy, with four underlying principles guiding this approach:



Whilst the Implementation Plan will be primarily owned by the ESPB, these principles will also need to be embedded within those organisations who identify and engage with the Strategy, thereby enabling its delivery.

The ESPB recognises that we need to play a range of different roles to achieve the positive changes in this strategy. These can be summarised as:

- **Advocates** – for the involvement and leadership of people with lived experience, so that solutions and services are co-

designed wherever possible, and lobbying to get the best deal for the borough

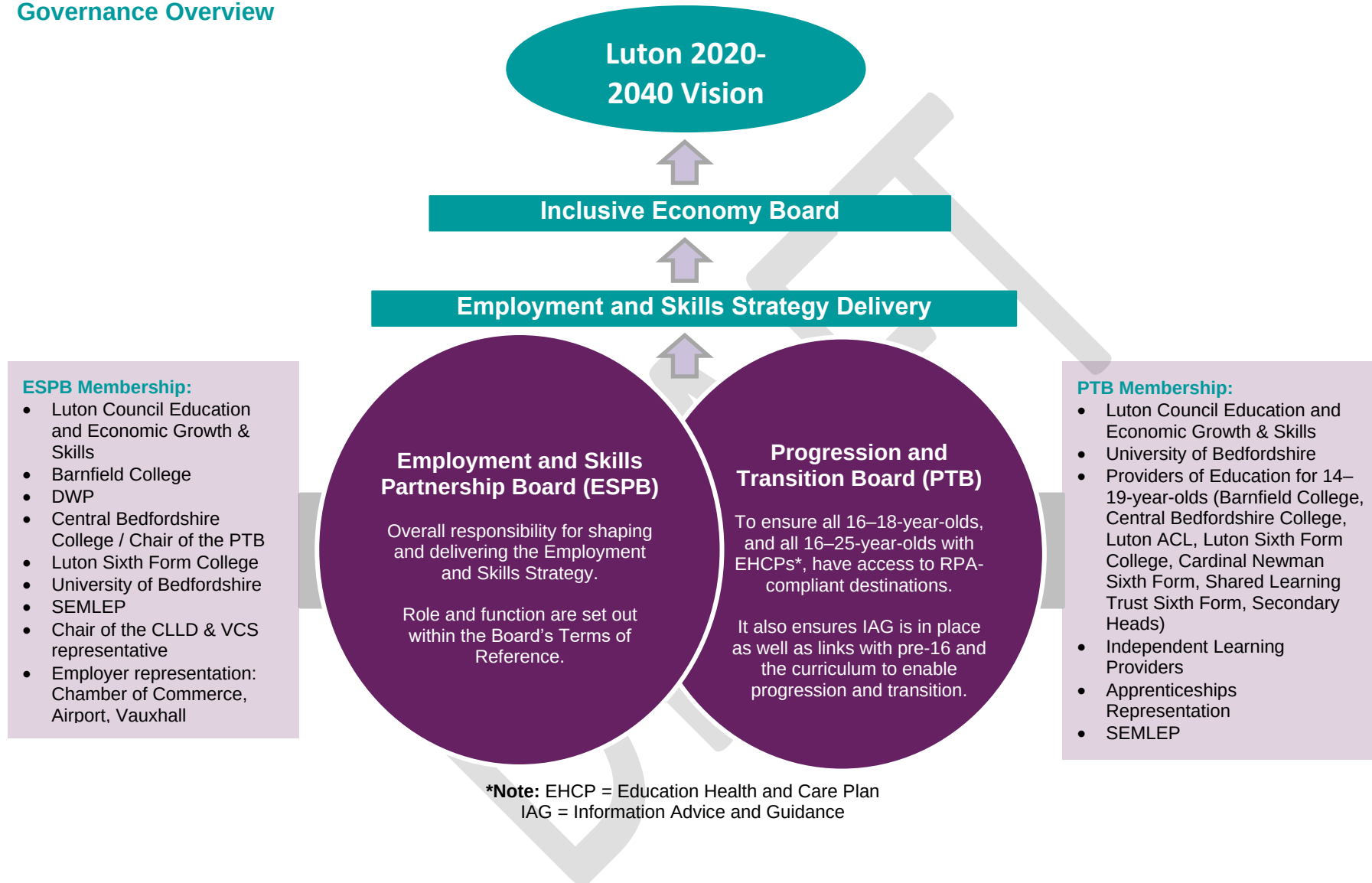
- **Navigators and coordinators** – developing a more integrated system for employment and skills, with clearer pathways across a range of provision to support people into good jobs based on well managed and maintained relationships with key employers and sectors
- **Funders and commissioners** – building and sharing an evidence-based approach to funding decisions on programmes and services
- **Anchor institutions** – ensuring jobs and opportunities are created directly within these employers, and through supply chains
- **Providers** – Luton has a large and responsive institutional and provider network, delivering education and a wide range of vocational training and employment support services
- **Employers and businesses** – providing good jobs and opportunities for local people, benefiting from a committed and skilled local workforce

The ESPB will leverage established and new relationships with key stakeholders to provide the right expertise, insight, energy and direction.

Good Governance

Effective governance will be the cornerstone of delivery and it will also be important to maintaining a commitment to accountability. The ESPB must be prepared to interface regularly with the IEB and PTB throughout the Strategy's life, making best use of these relationships and the expertise within. Good governance will also allow the ESPB to straddle responsibilities and functions at both a strategic and operational level, where necessary. Overarching governance arrangements are set out below, with the ESPB bound by its own Terms of Reference.

Governance Overview



Resourcing

The action and activities within this plan will require resources to deliver – in terms of capital and operational investment, through in-kind contributions and as a result of the voluntary capacity of individual organisations. The ESPB will work closely with partners to ensure actions can be delivered and to ensure resources are identified to maximise certainty.

Given the dynamic nature of funding at the time of the Strategy's launch and with future policy announcements expected to alter the most likely sources of funding, it is difficult to say with absolute certainty what resources will be called upon. However, at this stage we believe some of the most relevant funding sources that will support capital and revenue expenditure are:

- **Luton Council resources**
- **Partner organisation resources**
- **SEMLEP funding programmes**
- **Central government funding programmes (including European Structural Fund replacements)**
- **Voluntary resources**

Project and Activity Development

Key to delivery too will be to ensure that actions are underpinned by robust project outlines which better define activities and, ultimately, fully developed business cases, which articulate rationale and expected impacts in sufficient detail. Where new projects are being developed and the ESPB may have a role in sanctioning their approval, due rigour should be observed, to ensure projects are predicated on solid foundations and necessary due diligence has been undertaken. This will maximise opportunities for success and ensure the fit with strategic intent is as strong as possible.



A

Appendix

Organisational Acronyms

- **Department of Business Industrial Strategy and Energy** = BEIS
- **Chamber of Commerce** = CoC
- **Department for Education** = DfE
- **Department for Levelling Up Housing and Communities** = DLUHC
- **Department for Work and Pensions** = DWP
- **Federation of Small Businesses** = FSB
- **London Luton Airport Operations Limited** = LLAOL
- **South East Midlands Local Enterprise Partnership** = SEMLEP
- **University of Buckingham** = UoB

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Employment & Skills Strategy for Luton 2022 – 2027: Consultation Timeline

Date	Meeting / activity	Internal	External	Notes
September 2021				
17/09/2021	Children's Trust Board		✓	Agenda item. Presented early findings to group, highlighting consultation opportunities.
23/09/2021	CLMT	✓		Agenda item. Presented early findings to group and outlined the proposed consultation process and timeline
27/09/2021	Careers Hub Luton Management Group		✓	Agenda item. Presented early findings to group, highlighting consultation opportunities.
29/09/2021	Housing Association Liaison Meeting		✓	Agenda item. Presented early findings to group, highlighting consultation opportunities.
29/09/2021	Progression and Transition Board	✓		Agenda item. Presented early findings to group, highlighting consultation opportunities.
30/09/2021	Online Survey <i>Let's Talk Luton</i> public consultation open		✓	
30/09/2021	Climate Change Officer Working Group		✓	Agenda item. Presented early findings to group, highlighting consultation opportunities. Interest in green skills for Luton housing stock insulation and energy efficiency / carbon reduction
October				
03/10/2021	Luton Education Leaders		✓	Agenda item. Presented early findings to group, highlighting consultation opportunities
12/10/2021	Business Focus Group		✓	Employers being more flexible to meet current recruitment pressures. Importance of strengthening local skills pipelines. No formal plans for 50+ recruitment and training
14/10/2021	Business Focus Group		✓	See 12/10/2021
18/10/2021	Monthly Community Forum		✓	Agenda item highlighting consultation opportunities
19/10/2021	Luton Employment and Skills Providers Conference		✓	63 delegates for a key co-production online event, chaired by Nicola Monk, Corporate Director for Inclusive Economy. Initial findings presented followed by panel discussion with SEMLEP, Heritage Care Homes, and Leonardo and Kier Construction looking at employer skills

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				shortages and strategic skills supply interventions. Workshops on skills challenges and opportunities and own organisation's actions and future plans to address local skills shortages identified the following skills needs: * self-leadership / initiative * employability skills and job application techniques * core competencies * confidence (especially for post-lockdown children) * Digital literacy
19/10/2021	Members Workshop	✓		ESS a major toll for lifting people out of poverty by 2040. Geographical and social areas of high deprivation must be prioritised. Emphasis on enabling Luton residents access Luton skills and employment opportunities. Important to maximise skills and employment initiatives and funding streams e.g. Apprenticeship Levy, Passport to Employment, Kickstart, Restart Scheme etc. across Luton. Use of Luton training providers and educational establishments to deliver the skills required by Luton employers.
21/10/2021	Business Focus Group		✓	See 12/10/2021
22/10/2021	Working with the community on Skills Development		✓	Group discussion with Council Leader Cllr Simmons. Importance of co-creation via engagement with local communities in shaping ESS and its delivery.
22/10/2021	Employment & Skills Partnership Board		✓	Commented on draft ESS, providing insight and recommendations for action during consultation period.
November				
01/11/2021	Housing Association Liaison Meeting		✓	Agenda item. Highlighted link between housing stock availability and high-earn talent retention within Luton.
02/11/2021	Children Families and Education, People DMT	✓		Agenda item. Vital that LAC, SEND students and Care Leavers are supported in their transition into employment
02/11/2021	Community Focus Group		✓	Presented key findings to group, survey link circulated
03/11/2021	Adult Learners Focus Group		✓	Key Skills Gaps of English Language, Numeracy and Literacy, Digital Skills form barriers to employment. Employment patterns not always

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				aligned with personal circumstances / availability e.g. shift work, none part-time.
03/11/2021	Population Wellbeing DMT	✓		Presented key findings to group
04/11/2021	Community Focus Group		✓	Presented key findings to group, survey link circulated
04/11/2021	Inclusive Economy DMT	✓		Agenda item. Presented key findings to group
08/11/2021	Reimagining Mental Health Collaborative		✓	Agenda item. Presented key findings to group
10/11/2021	Apprenticeships Steering Group	✓		Approval for proposed Levy Brokerage model
10/11/2021	Luton Marmot Town Steering Group		✓	Strong connection between ESS and health and deprivation indicators recognised. Detailed Luton data available
12/11/2021	Online Survey <i>Let's Talk Luton</i> public consultation closed		✓	
24/11/2021	Luton Secondary Heads Group		✓	Agreed the need for engagement with employers much earlier than at Year 10 work experience stage
17/11/2021	COMF & Fairness Taskforce event		✓	
December				
02/12/2021	Health Inequalities Board	✓		Presented key findings to group, survey link circulated
03/12/2021	Barnfield College Student Focus Group		✓	16 learners attended. Low awareness of Luton employers and opportunities. Getting a first job seen as a higher priority than skills / career development
08/12/2021	Progression and Transition Board	✓		Presented key findings to group, survey link circulated
13/12/2021	Meeting with Regional Trade Union Officers	✓		Engagement with and input from UNISON, Unite and GMB representatives
14/12/2021	Online Survey <i>Let's Talk Luton</i> public consultation open		✓	
January 2022				
07/01/2022	Online Survey <i>Let's Talk Luton</i> public consultation closed		✓	79 responses received (15 full, 64 partial)
11/01/2022	Luton Green Skills Group		✓	Raised link between Luton housing stock availability and high-earn talent retention. Need to link activity to Climate Change Action Plan

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14/01/2022	Employment & Skills Partnership Board		✓	Presented updated draft ESS and Implementation Plan to group and asked for comments / approval. Lead organisations sought for action threads within the Implementation Plan
17/01/2022	Climate Change Officer Working Group	✓		Update group on key findings
20/01/2022	Luton 6th Form College Student Focus Group		✓	
February				
10/02/2022	Policy Group	✓		
15/02/2022	Health & Wellbeing Board	✓		
28/02/2022	Overview and Scrutiny Board	✓		
March				
07/03/2022	Executive	✓		

Luton Employment & Skills Strategy

2022-2027

Luton 2020 - 2040
A place to thrive

Our Key Challenges

Poverty and inequality	Economic inactivity	Learning/work barriers
Skills shortages/gaps	Career pathways	Systemic engagement

Our Key Opportunities

Regeneration	Levelling up	Ecosystem investment
Pipeline projects	Entrepreneurship	Greener growth

Our Vision

“Deliver inclusive growth where Luton’s residents are able to access the education, skills, and employment support they need to enable them to secure fulfilling, appropriate, sustainable careers throughout their lives, which supports the growth, diversity, resilience and prosperity of the local economy.”

Our Strategic Priorities

- 1 Skills driving economic recovery and growth**
- 2 Developing a pipeline of talented and resilient people**
- 3 Tackling long-term inequality and economic inactivity**
- 4 Creating an adaptable, upskilled workforce**

Our Emphasis

Investment in the right local skills will support a strong and rapid pandemic bounce-back and long-term growth, assisted by ecosystems to support job creation in emerging and growing sectors.

The Strategy must ensure the next generation of Luton’s workers are prepared for the world of work, understand the breadth of local opportunity, are flexible and ready for the career that they have chosen.

Increasing economic activity and participation in education and skills, to tackle poverty, deprivation and level-up across Luton, targeting those distant and disengaged from learning and work.

Enabling people to understand the importance of lifelong learning and its necessity as part of career progression, whilst making sure businesses value and invest in their staff to support progression and growth.

Our Action

Implementation Plan



Our Commitment

Partnership Led
Evidence Driven
Forward Facing
Accountable for Change

Our Influence

Hard to fill vacancies ↓	Residents with 5+ GCSEs ↑	Benefit claimants ↓	Skills gaps and shortages ↓
Higher level occupations ↑	Apprenticeship take-up ↑	Economic inactivity ↓	Lifelong learning levels ↑
Total employment ↑	FE and HE participation ↑	Living Wage jobs ↓	Business CPD investment ↑
Per job productivity ↑	FE and HE progression ↑	Registered NEETs ↓	NVQ qualification levels ↑

Committee:	Overview & Scrutiny Board
Date of Meeting:	28 February 2022
Subject:	Luton Rising (LLAL) Annual Business Plan 2022/23
Report Author:	Service Director, LLAL & Monitoring Officer
Contact Officer:	Mark Turner
Wards Affected:	None

Purpose

1. The purpose of this report is to enable Overview and Scrutiny Board to review the Luton Rising (LLAL) Annual Business Plan for 2022/23 and to express any views it wishes to make known to the Executive.

Recommendations

2. The Committee is recommended to review the Luton Rising Annual Business Plan for 2022/23 and to express any views it wishes to make known to the Executive.

Report

3. The Executive meets on 7th March 2022 to consider whether, acting as shareholder of LLAL, to give consent to the adoption by the Board of Directors of the company of the Annual Business Plan for 2022/23.
4. The report to the Executive is attached at Appendix A to this report. Key points for consideration are addressed in that report. The Annual Business Plan itself is attached at Appendix A to the Executive report.
5. It should be noted that there are two versions of the report: this version for publication and a version for internal use only which contains exempt information and is considered at the private part of the agenda.

Appendix

6. Appendix A – report to the Executive meeting of 7th March 2022 on the Luton Rising (LLAL) Annual Business Plan 2022/23 – publication version

List of Background Papers - Local Government Act 1972, Section 100D

7. None

Report For:	Executive
Date of Meeting:	07 March 2022
Report Of:	Chief Executive
Report by:	Chief Executive
Contact Officer:	Robin Porter
Subject:	Luton Rising– shareholder consent to the adoption of the Annual Business Plan 2022/23
Lead Executive Member(s):	Cllr Simmons
Wards Affected:	All
Consultations:	Councillors ☐ Scrutiny ☒ Stakeholders ☐ Others ☐

Recommendations

1. The Executive is recommended to approve the Luton Rising Annual Business Plan 2022/23 and to instruct the Chief Executive to inform the Board of Directors of London Luton Airport Limited that the shareholder consents to its adoption.

Background

2. As part of its review of governance, to promote good practice, to give clarity and to meet the requirements of the Luton Shareholder Group, Luton Rising (the trading name of London Luton Airport Ltd) has prepared this, the first of its annual Business Plans, to set out its corporate and business unit objectives for the coming year.

The Current Position

3. The aim of the Plan is to provide a framework within which the company is free to operate; it strives, therefore, to achieve a balance between detailed information and milestones where appropriate and the flexibility to respond to emerging or, as yet, unidentified opportunities.
4. The Business Plan is heavily focussed on existing activities, such as the delivery of the company's development projects such as the Luton DART and DCO and, therefore, contains nothing in that respect the Council as shareholder is not already aware of through progress reports. It also identifies a number of opportunities for new activities, many of which have the potential to be carried out in partnership with either the Council or the airport operator.
5. The Plan has been prepared in two versions: a version for publication which is attached at Appendix A and a version which contains exempt information and which is reported separately to the Executive in the private part of the agenda.

Goals and Objectives

6. The objective of producing the Business Plan is to provide information to the shareholder and other interested parties on the company's plans and objectives for the coming year. It enables the shareholder to be reassured that there is sufficient and

Appendix A – Executive Report

clear oversight of activities that might affect the public interest and to ensure that the assets of the company are being used responsibly and sensibly in generating greater value and social benefit.

Proposal

7. It is proposed that the Executive approve the Business Plan and instruct the Chief Executive to inform the Board of Directors of LLAL that the shareholder consents to its adoption.

Key Risks

8. The adoption of the Business Plan will enable to the company to operate within clearly defined guidelines and enable the Council as shareholder to have effective oversight of activity. Whilst this has always been the case, the Business Plan enhances the level of assurance in the stewardship of the company's assets.

Consultations

9. The Overview and Scrutiny Board will be consulted on the Business Plan at its meeting scheduled for 28th February 2022 and any comments made by the Board will be reported orally to the Executive.

Alternative options considered and rejected (please specify)

10. It would be possible to continue without a specific document called a Business Plan but this would not meet the objectives set out in this report.

Appendices Attached

11. Appendix A – Winning the Recovery – Luton Rising's Annual Business Plan 2022/23

List of Background Papers - Local Government Act 1972, Section 100D

12. None

Implications - an appropriate officer must clear all statements

For CLMT only Legal and Finance are required

Required

Item	Details	Clearance Agreed By	Dated
Legal	There are no direct legal implications for the Council arising from this report. The Business Plan supports the directors of the company in meeting their obligation under section 172 of the Companies Act 2006 to promote the success of the company.	Michelle Mwangi (Solicitor)	07.02.2022
Finance	Financial implications are considered in the private report.		
Equalities / Cohesion / Inclusion	Luton Rising (LLAL) is not subject to the Public Sector Equality Duty and the Council's Legal Service has advised that an IIA is not required. Nevertheless, as a company that strives to		

Appendix A – Executive Report

Item	Details	Clearance Agreed By	Dated
(Social Justice)	have a positive impact on the community, it takes its responsibilities in regard to social justice very seriously as can be seen from the tone and content of the Business Plan.		
Environment	There are no direct implications for the environment arising from this report. The Business Plan sets out the company's approach to environmental issues.	Shaun Askins – Service Manager Strategy & Sustainability	4 th February 2022
Health	There are no direct implications for public health arising from this report.		

Optional

Item	Details	Clearance Agreed By	Dated
Community Safety			
Staffing			
Other			

Winning the Recovery

Annual Business Plan 2022-23



Foreword

Luton Rising is the new trading name of London Luton Airport Limited – a new identity for a new era in the history of Luton Council’s airport company.

Luton Rising is about being more than an airport; it is about the social, environmental and economic benefits that can be created through the skilful management of strategic assets and working in partnership with those who share our values and ambitions.

The aim of **Luton Rising** is:

- To create prosperity and opportunity in order to make Luton a place where everyone can thrive and no-one has to live in poverty
- To make places where technology can flourish and contribute to regional success as the international gateway to the Oxford-Cambridge arc, England’s Economic Heartland and the Central Area
- To demonstrate how an airport can be developed in a way that puts environmental concerns at the head and heart
- To deliver substantial and sustainable total stakeholder returns through a compelling combination of the entrepreneurial spirit and public sector ethos

The **Luton Rising** Group is a collection of business units – currently all forming part of the single legal entity, London Luton Airport Limited (LLAL) – which demonstrate the breadth of the company’s involvement in a range of strategic assets, business opportunities and enterprises that make a significant positive impact to the community of Luton and beyond.

This Annual Business Plan sets the framework for the **Luton Rising** Group to carry out its business in the coming year and with an eye to future opportunities.

It also sets out how we will support our shareholder, Luton Council, in driving and delivering on the strategic priorities for Luton 2040 as a town built on fairness where everyone can thrive.

Contents

A. Corporate

Our Vision, Mission, Values and business principles

1. Overview of the business: Crisis to stabilisation
2. Corporate strategies: Green Controlled Growth
 Sustainability/net Zero
 Investment
 Engagement
 Partnerships: LBC (Luton 2040/JV schemes)
 LLAOL
3. Corporate Policy review: Dividend, Financial Regulations, Scheme of Delegation
 Equality & Diversity
4. SWOT/PESTLE analysis
5. Corporate Risk – strategy and management
6. Governance
7. Resources

B. Current Business Units

Aviation, DART, Place-making

- a. Focus of the business unit
- b. Overview
- c. Objectives – Years 1, 3 and 5
- d. Target market & competition – risks and opportunities
- e. Marketing, pricing and promotions
- f. Milestones and key metrics
- g. Resources

C. Community Involvement

D. Potential Business Opportunities

E. Reporting

The **Luton Rising** Group's **Vision** is:

Protecting the world we live in and creating a place of opportunity for everyone

Our **Mission** is:

Working towards Luton 2040 by delivering enduring total stakeholder return through the intelligent and creative management of assets and opportunities

We have adopted the **Values** of our shareholder, Luton Council. For us, they particularly mean the following:

Collaborative – we work in productive partnership with those who share our values and ambitions

Ambitious – we set our sights high without forgetting that it's what happens on the ground that matters

Respectful – we run a well-governed and socially conscious business, respecting the rights of others and their opinions

Empowering – we give people the opportunity to define how they make a difference through the work we do together

Supportive – we do not blame others when things go wrong; we put them right together. Trust and encouragement make for success

We run our business in accordance with the following **Principles**, beliefs and behaviours:

Transparency – we openly and honestly engage with the community for the benefit of all

Sustainability – we are passionate about making things better for our people, place and our planet

Innovation – we drive visionary partnerships to improve people's futures

Success – we exceed expectations to deliver value in everything we do

Trust – we have confidence in the integrity of those we deal with and inspire trust in those that deal with us

Respect – we respect our environment, our stewardship responsibility, and our duty to protect and plan for the future

Communication: we communicate our vision, mission and values with belief and passion

Ownership – we accept responsibility for actions and outcomes

Consistency – we are consistent in our dealings with others and in delivering excellent results

Excellence – we deliver services of exceptional quality to give the best stakeholder return possible

A. Corporate

1. Overview of the business

Where we are now

Both the current year and the one preceding it have been dominated by the impact of the Covid-19 pandemic and the consequent restrictions on travel on the aviation industry. From an all-time high of almost 18 million in the year to March 2020, passenger numbers fell to under 2.9 million. 2021/22 has seen a partial recovery with that number having been exceeded at the time of writing but the figure for the year to March 2022 is not expected to reach 40% of the total passenger capacity of the airport.

Throughout the period of crisis, the company and its shareholder, Luton Council, have worked tirelessly to protect the future of Luton's single greatest asset and, in collaboration and negotiation, with the airport operator have reached a settlement that helps to stabilise Luton's aviation system as a whole.

Key features of the coming year

- Morton House, our Business, Skills and Innovation Centre, a Luton Rising project in collaboration with Luton Council and SEMLEP will open.
- Luton DART will commence service, enabling passengers to get from Central London to the Central Terminal Area of London Luton Airport in environment-friendly fashion in little more than half an hour
- Building on extensive pre-consultation engagement, we will carry out a high quality public consultation early in the year on the company's revised proposals for airport expansion through an application for development consent to the Planning Inspectorate being made by the end of the year
- We will develop a compelling business case capable of attracting external funding for development at Green Horizons Park; we will seek out a credible business partner to develop Bartlett Square.
- We will continue to review and revise our governance arrangements through the establishment of an Executive Committee of directors and the appointment of independent non-executive directors
- We will continue to explore opportunities for working in partnership with colleagues at Luton Council to combine expertise and resources on joint ventures that can make a significant difference to the lives of Luton's people
- We will continue to review our company structures and staffing requirements to ensure that we are capable of delivering on our ambitions. If not already put into effect during 2021/22, we will, subject to shareholder consent to the case for change, establish Luton DART as a subsidiary company of LLAL.

2. Corporate Strategies

Luton 2040

Our strategies, policies and activities are, and will remain, fully focussed on supporting the achievement of the strategic priorities for Luton 2040 as evidenced throughout this document.

Green Controlled Growth

A key principle and core message of our expansion proposals is that all future aviation growth will be sustainable, with the message green growth or no growth. Our goal is to go further than any other airport has gone before in locking in environmental considerations when growing the airport. Our approach will put environmental factors on an even footing with commercial, social and economic considerations.

Green Controlled Growth (GCG) is our core strategy linked to the Development Consent Order (DCO) application to bring this ambition to life, it is the framework for delivery of future aviation growth at our airport. GCG aims to set a series of ambitious targets for key areas of environmental impacts related directly to passenger throughput, with any one of those limits acting as a ceiling on growth such that growth in passenger throughput will only be permissible if it is contained within all of the limits set. It will have flexibility to change over time in response to a changing physical and operational environment and technological advancement.

An important aspect of the strategy, reflecting our community airport status and giving a stronger voice to local people on the operation of their airport, is involvement of the local community within the GCG approach. We will do this by reserving space in each of the technical groups which will advise the independent monitoring body for representation from Luton's community.

Compliance with the strategy will be independently monitored by a new body with powers to approve or reject plans for growth and/or mitigating impacts if limits are forecast to be breached.

GCG will be established through the DCO.

Sustainability/Net Zero

Our sustainability and net zero strategies were approved by the Board at its meetings held on 25th May and 20th July 2021 respectively as working documents and have been through a thorough review process in light of COP 26, the finalisation of the DCO consultation environmental documents and will be published early 2022.

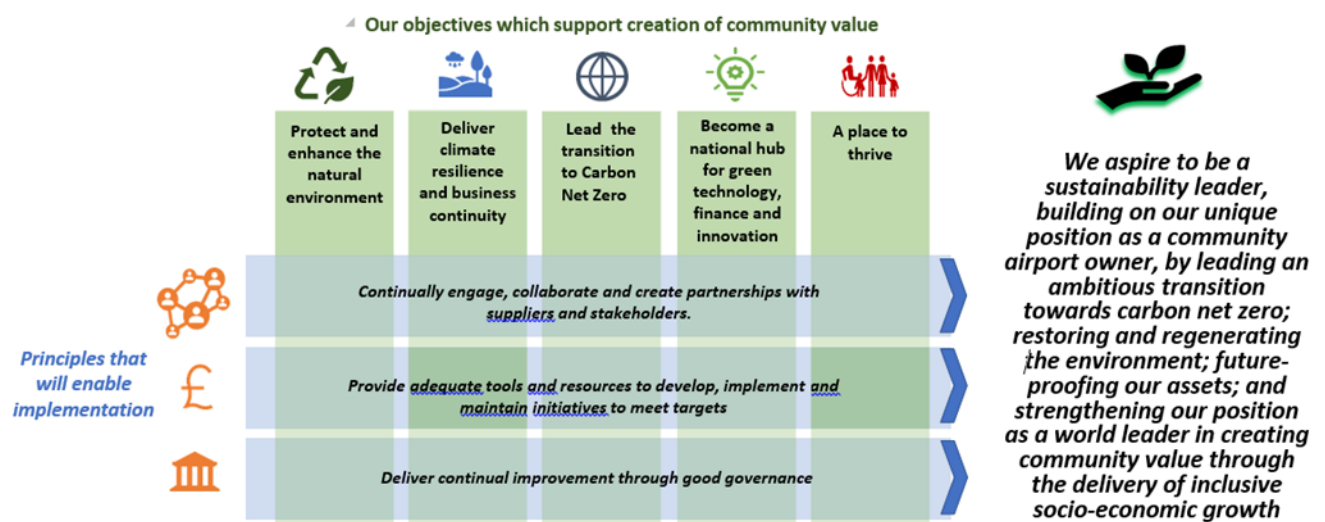
Our sustainability and net zero strategies are, we believe, the most far-reaching commitment to minimising environmental impacts ever put forward by a UK airport and confirms our aspiration to be a sustainability leader, building on our unique position as a community airport owner, and act as a key driver for our shareholder Luton Borough Council's 2020-

2040 vision for Luton to be a place to thrive, a carbon neutral town, and where no-one needs to live in poverty.

Our strategies set out strategic objectives and goals across the full scope of LLAL's activities, looking at current activities and capital development, working with partners and suppliers.

The strategies will change the way we manage our future developments in collaboration with our stakeholders, how we design and construct our assets and infrastructure and how this impacts our activities.

Our sustainability vision



The scope covers the airport and other assets and activities, including commercial assets and applies to construction, operations, surface access and aviation.

Our Strategies to the long term and requires sustained investment and effort, as well as collaboration with key stakeholders. We also recognise that for our strategies to be truly sustainable and deliver reduced emissions, it has to reflect Government Policy and also the interests and ambitions of all our stakeholders and supporting their aspirations, in particular Luton Borough Council.

As we look to deliver against these strategies, we recognise that certain aspects of our business fall under our direct control, such as construction and operations and other aspects fall outside our control, such as aviation, and require ongoing engagement and collaboration with our stakeholders to enable the success of our strategy.

Our Net Zero Strategy sets out our plan to support LBC's objective, building on both our 2019 Sustainability Strategy and supporting our ambition to become a leader among the UK's most sustainable airports over the next 20 years.

The first step to achieving either carbon neutral or net zero is to reduce our emissions to the maximum extent and work with our partners to reduce theirs.

Our definitions of carbon neutral and net zero are:

- carbon neutral as achieved when all residual CO₂ emissions are balanced by **carbon reduction offsets** (in line with the BSI).
- net zero as achieved when all residual CO₂ emissions are balanced by **carbon removal offsets** (in line with IPCC).

We will use carbon offsets to achieve carbon neutral surface access.

We will use local, land-based community measures, where possible, to achieve net zero operations.

Our Strategy identifies how we will reduce emissions, and when those reductions will occur, by 2040. We use a hierarchy of actions to tackle our emissions:

- Innovate, where we focus on those emissions which can be avoided by making changes to our current activities to lower emissions
- Transition, where we use technology or behaviour changes to deliver the same output with lower emissions
- Transform, where we decarbonise the energy sources upstream to allow those benefits to filter through to downstream activities
- Removal, where we use local, community-based projects to remove residual emissions from the atmosphere, achieving Net Zero

Investment

We will continue to invest in opportunities that maximise total stakeholder return. This means that we will be prepared to take a lower yield or internal rate of return on some of our investments provided that they produce social benefits that contribute to our corporate social responsibility objectives or to our overall strategic aims and ambitions as a business. Morton House is a good example of where we have been prepared to accept a lower internal rate of return as a consequence of incorporating activities and facilities, such as the learning and skills centre, which are not yield-producing but make a significant contribution both towards our aim of improving the skills base of the Luton workforce to the longer-term benefit of our business and to achieving our shareholder's strategic vision for Luton 2040.

All investment proposals will have been subjected, prior to any substantial or irrevocable commitment being made, to satisfactory legal, financial and commercial due diligence assessments covering at least, but not limited to, feasibility, viability and financing.

Engagement

Not only in preparation for its aviation division's DCO consultation, but also as a core attribute of its business, the Luton Rising Group will put effective, meaningful and appropriate engagement at the heart of change; the community and stakeholder engagement strategy is essential to achieving this.

Over the lifetime of our projects, the political, economic and operational environment is likely to undergo periods of significant change at various times; our engagement strategy needs, therefore, to align to phases in the development of our business over the next 20 years.

We recognise that our shareholder, Luton Council, has substantial experience and expertise in engaging with the community and, therefore, we will work collaboratively to ensure that our work complements and enhances that already being undertaken. We will ensure that our engagement is underpinned by a thorough and sensitive understanding of Luton: its diverse community, its many challenges, its resilience and resolve and of the very different attributes, expectations, interests and concerns of our neighbouring communities.

We will develop an authentic and compelling core narrative and messaging, and use an appropriate range of engagement methods to allow all members of the community to participate, thereby increasing the probability of successfully communicating our vision for the future of the business and contributing to an effective and excellent DCO consultation .

We will operate to the following guiding principles:

- **Building mutually respectful relationships:** we act in an honest, open and respectful way at all times to build strong relationships and partnerships with all stakeholders whatever their views;
- **Clarity of purpose:** we will be clear about why and how we are engaging and what the community can expect from us;
- **Inclusivity:** we will ensure the broadest range of stakeholders can participate;
- **Coordinated and organised:** we will work with others to ensure our engagement activities are coordinated, well documented and that feedback is reviewed and addressed where appropriate;
- **Learning from practice:** we will constantly evaluate our engagement activities and learn from the feedback that has been provided.

Our **overall aim** is to inspire community pride in our airport as an asset to the town: a source of prosperity and wellbeing both individually and collectively, a gateway to opportunities to explore other places and cultures, a supporter of Luton's thriving and incredible voluntary and community sector and to share in our aspirations for its future; and, for our neighbours, to help develop a balanced and sensitive shared appreciation of the advantages and disadvantages of proximity to a thriving international airport.

We will develop a comprehensive and nuanced stakeholder engagement plan that enables us to tailor our core narrative, without losing authenticity, to the interests and concerns of the following stakeholder groups:

- Residents and those who work in Luton

- Community organisations
- The health and education sectors
- Businesses
 - Local
 - National
- Interest Groups
 - Local
 - National
- Local Authorities
- Statutory bodies

We will develop a programme of **education outreach** on aviation, climate change and biodiversity which will be delivered either through visiting places of education or, in partnership with the airport operator, at a facility provided initially, on a trial basis) at the Central Terminal Area which would enable the educational element to be combined with a journey on the DART and a visit to the airport itself. We would also to look to ensure that facility could be used by casual visitors for the purposes of viewing aircraft.

Partnership

With our shareholder and our contribution to Luton 2040

We are committed to supporting the achievement of our shareholder's strategic priorities for Luton 2040 as a town built on fairness where everyone can thrive.

We have already revised our Community Funding Policy so that it reflects those strategic priorities and this will be used by our administering body, the Bedfordshire and Luton Community Foundation, in informing the awards they make.

We will work with colleagues across the Council to ensure that our Community Funding Programme remains relevant to the needs of Luton's people.

We will continue to build on our connections with the Council's Inclusive Economy department to identify, explore and develop opportunities for joint working that creates greater positive impact and value.

We have already identified Clean Energy as one of those opportunities and we will be undertaking further work to establish proof of concept and viability and, if proven, to produce a business case which is sufficiently robust to enable us to seek external funding.

A joint approach to tackling climate change is also one of the areas we wish to explore further.

That Luton is thriving and prosperous is critical to our success as a business and the regeneration of the town centre is key to generating greater prosperity and a sense of civic pride and ownership. We will contribute 50% towards the cost of a Town Centre Regeneration Manager to ensure that there is complementarity between our development proposals and those of the Council.

With our airport operator

We will continue dialogue with the airport operator with a view to building on our collaborative and equitable partnership, in particular in relation to support for and involvement in, our application for development consent and the opportunities that will provide for further growth in passenger capacity at the airport within the current Concession Term.

With airlines

We recognise that the airport operator has primacy in regard to relationship with airlines but we also need to ensure that the airlines see in us an airport owner that is to be trusted and is authentic in its dealings with them and in our commitment to London Luton as the UK's leading community airport. To that end, we will continue to develop relationships that are independent of, but complementary to, those of the operator.

3. Corporate Policies

Distributions, Dividend and Reserves

In accordance with the expectations of the Stabilisation Plan approved by the shareholder on 28th June 2021, no dividend is expected to be declared for the year ending 31st March 2023.

The shareholder will continue to benefit from distributions by the company relating to the purchase of services, including staffing, from the Council and the payment of rent and interest, and the community from the company's Community Funding Programme.

Should the company be in a position to declare a dividend in the future, it is recommended that a cash-backed reserve, based on an assessment of known commitments for the coming year and risks, is retained in the company's balance sheet and that this should be at least equivalent to 10% of turnover. This is an increase from 5% and reflects the potential impact on reserves of business interruption and is a prudent measure.

Financial Regulations

The company's Financial Regulations and associated policies were approved by the Board at its meeting held on 1st October 2018 and will be reviewed during the year.

Scheme of Delegation

The company's current Scheme of Delegation was adopted by the Board at its meeting held on 6th February 2019 and will be reviewed during the year to ensure that it is in compliance with recent changes in governance and reflective of the Schedule of Reserved Matters agreed with the Luton Shareholder Group.

Equality, Diversity & Inclusion

Given the importance placed on the Luton Rising Group's engagement with Luton's diverse communities and, indeed, with those markedly different communities outside the boundaries of the town, we will develop and Equality, Diversity and Inclusion policy specifically for our business as well as contributing to our shareholder's strategic priority of making Luton a town built on fairness.

Other policies

We will continue to review our policy framework to ensure that it remains up to date, relevant and responsive to any changes that may take place in the business environment and to develop and adopt such other policies as become necessary as a result.

4. SWOT/PESTLE

A workshop was held in December 2021 to enable members of the Board to identify what they believed to be the key points for consideration.

S trengths	Clearly identified as a community airport Relationship with LBC Proximity to London and good transport links Gives good impression of Luton Able to attract low-cost airlines
W eaknesses	Increasing complexity of business Relatively short runway limiting route development Challenges facing key business outcomes Achieving balance between assets and returns
O pportunities	Direct relationship with airlines & whole system Partnership development Educational outreach Engagement with business community Closer alignment with Luton 2040 Commercial property development
T hreats	Spare capacity in system and effect on price Launch of new business units in uncertain time and environment Climate change and impact on passenger behaviour Continued uncertainty Concession agreement

P olitical	Change in national policy towards aviation Lobbying Change in local control Brexit – geopolitical environment Ward level pressures
E conomic	Changes in GDP Changes in subsidy on aviation fuel Use of fiscal and direct taxation levers Polluter pays principle – increasing cost to consumers
S ocial	International travel increasingly seen as socially unacceptable thereby limiting choice Increased support for environmental activism
T echnological	Slow pace of development of alternative technologies Cost of technological change leading to higher prices Need to be seen to be associated with change
L egal	Climate change/carbon regulations Changes to slot regulation increasing competition Public health-related restrictions more likely to be imposed in future

E nvironmental	Global – climate change increasingly recognised , understood and accepted as a threat and driver for change Impact of development on local amenity and biodiversity Impact of changes in weather systems on operations and the lifecycle of assets

5. Corporate Risk – strategy and management

Enterprise Risk Management (ERM) is a well-established and globally recognised framework that consists of 5 key components that integrates the business strategy, governance and culture, risk, business performance, reporting and communication in an effective and cohesive manner. These five components holistically link directly to the future vision, mission and culture of the business going forward.

As Luton Rising seeks to develop and transform its business through its recovery and growth stages it will inevitably incur new and emerging risk as it looks to expand its operations. It is essential that it adapts and ensure it has the appropriate best practice systems and processes in place to enable both the Board and Management in its decision making and in its timely identification and mitigation of risks.

The benefits of implementing ERM include:

- Enterprise risk management is integral to achieving **strategy and business objectives**
- Management can identify **opportunities** for the entity and unique challenges associated with current and future opportunities
- Improve its ability to identify risks and establish appropriate **responses**, increasing positive outcomes while reducing negative surprises and related costs or losses
- For some entities, the challenge is less about surprises and losses, and more about managing **performance variability**,
- Obtaining robust information on risk allows management to assess overall resource needs and helps to optimize **resource allocation**
- Anticipate and **respond to change**, not only to survive but also to evolve and thrive.
- The ERM framework is aligned and complimentary to the adoption of **Integrated Reporting Framework** as approved by the LLAL Executive Board earlier in the year.
- The ERM framework will address the need to link future strategy with key **measurable objectives** across each business area and to identify risks as they emerge, helping LLAL to mitigate and manage these risks appropriately to enhance the creation of value. This can be seen in figure 1 below.



Figure 1

- Enterprise Risk Management extends a discipline for the Board and the Management team to agree and consider its appetite to risk and its tolerance to variation in risks. The reporting of risk is intended to be more comprehensive, focussed and holistic with a focus on how it impacts performance.
- The scope of risk management will include risk at project and corporate level

The reporting of risks will follow the guiding principles and 5 components as set out at Figure 2 below.



Figure 2 – Principles governing the reporting of risks

	Key risks	Description
1	Developing Strategic Partnerships	Transforming partnership with LLAOL through to creating philanthropic relationships
2	Business Planning	Matching resources needed to deliver balanced growth plan
3	Complexity of the business	Business transformation programme combined with developing new diversified businesses
4	DART (entering into commercial service)	Creating a new commercial business and operational readiness
5	DCO (external politics)	Potential political external factors outside of our control to be carefully managed
5+1	Resourcing capacity	A growth strategy that will require additional and specific people capacity to deliver success

Table 1 – Key risks for the Luton Rising Group

6. Governance

We will continue to develop our governance arrangements to respond to the challenges of the present and prepare for the opportunities of the future.

We will work with our shareholder to review the composition of the Board of Directors so that it has the right mix of skill, expertise and diversity of thought.

In line with the requirements of the Stabilisation Plan, we will recruit suitably qualified and experienced independent non-executive directors who understand and share our values and business ethos.

We will establish an Executive Committee to take responsibility for the day-to-day governance of the company in all matters save those reserved to the Full Board or shareholder. Initially, this will consist of the Chief Executive Officer and Executive Director, Governance & Company Secretary supported by the Interim Chief Finance Officer, Legal and Commercial Director and Engagement Director (in a non-voting capacity until such time as these posts are established on a permanent basis at which time they will become full members of the Committee with the Chief Finance Officer being appointed as a statutory director).

We will review the structure of the company to ensure that, where there is a clear rationale for doing so, the assets of our most significant business units are separately corporatised. We will begin this process by developing a case for change to justify, subject to shareholder consent, establishing a separate private limited company for the Luton DART, with LLAL as the sole shareholder, and with a Board of Directors that includes representation from LLAL as well as at least one independent non-executive director with experience in the business of DART.

We will develop a more strategic agenda for the Full Board of LLAL, enabling it to focus on matters of particular interest and importance and which will be critical to the achievement of the Luton Rising ambitions and objectives. This is likely, in the first instance, to include the setting-up of sub-committees dealing with audit and risk.

We will work constructively with the Luton Shareholder Group to ensure that the governance of the company and its alignment to shareholder objectives is of the highest standard possible and that there is clarity in regard to need for appropriate balance between accountability and the stewardship of public funds and commercial freedom and business efficiency.

We will commission the Council's Audit service to develop and deliver a comprehensive audit plan to be delivered over the next three years.

7. Resources

Staffing schedule			
LBC title	Luton Rising title	Tenure	Form
	(where different)		
Corporate Division			
Executive team			
Corporate Director, Airport	Chief Executive Officer	P	E
Service Director, LLAL	Executive Director, Governance	P	E
NEW	Commercial & Legal Director	T to P	E
NEW	Chief Finance Officer	T to P	E
NEW	Sustainability Director	T to P	E
NEW	Engagement Director	T to P	E
Commercial and Legal team			
	Consultant to Luton Rising	T	C
Communications team			
Communications & Marketing Manager		P	SE
	Public Affairs Officer	T	A
NEW	Public Affairs & Social Media Officer	P	E
Finance Team			
Finance & CSR Manager		P	E
Assistant Accountant		P	E
Shared Services team			
Business Services Manager	Shared Services Manager	P	E
Personal Assistant	PA to CEO	P	E
Apprentice		T	E
NEW	Administrative Assistants x2	P	E

LBC title	Luton Rising title	Tenure	Form
	(where different)		
DART Division			
	Interim General Manager	T	C
Strategic Development Manager	Programme Director (DART)	P	E
	Integration Consultant (DART)	T	C
Senior Project Manager		P	SE
	Marketing Manager	T	C
	Progress Chaser		
Project Co-ordinator		P	E
DCO Division			
Strategic Development Manager	Programme Director (DCO)	P	E
	Integration Consultant (DCO)	T	C
	Consultation Manager	T	A
Project Co-ordinator		P	E
Place-making division			
NEW	Construction Director (SRO)	T	A
Strategic Development Manager	Programme Director (Commercial)	P	E
Commercial Property Facilities Manager		P	E
Facilities & Admin Officer		P	E
Tenure:			
P = Permanent	T = Temporary T to P Temp to Perm		
Form:			
E = Employee	A = Agency employee		
SE = Seconded employee	C = Contract for services		

The aim of the structure is to establish a core team to provide stability and continuity as the organisation continues to evolve with the flexibility to bring in additional resources on a temporary and short-term basis to undertake specific pieces of work or address specific issues. This will reduce our reliance on external consultants, be a more cost-effective approach and increase the amount of knowledge, expertise and understanding that is retained within the business.

It is probably that, during 2022/23, some posts will need to be brought in on an agency or contract basis for a temporary period. This will be managed within existing budgets and, in some cases, the cost can be capitalised.

It may be necessary to bring in additional staffing resources through the year as emergent business opportunities are developed; these will be clearly identified in the business case.

Training and development

Once the staff structure has been agreed and the permanent staff recruited, a skills analysis will be undertaken and a training and development plan drawn up to address any areas of perceived weakness and to provide job enrichment opportunities. The plan will also place emphasis on succession planning and the transfer of skills – both within Luton Rising and across Luton Council as a whole – whether from external consultants or agency staff or permanent employees considering retirement.

B. The Luton Rising Group Business Units

1. Aviation

a. Focus of the business unit

The planning and consenting of future expansion of the airport operation such that optimal economic, social and environmental benefits are secured for the local population. This includes significant contributions to the shareholders' twin strategic objectives of tackling poverty and achieving net zero by 2040.

The focus is therefore to establish plans which drive stable short term and long term growth in a sustainable manner, using Green Controlled Growth as the legal framework for doing so.

b. Overview

At the time of writing this document, a second statutory consultation on the Development Consent Order (DCO) proposals is shortly to commence (February and March 2022). It is expected that a DCO application will be prepared and submitted to the Planning Inspectorate before the end of the calendar year, with an Examination during 2023 and a final decision from the Secretary of state for Transport by mid-2024.

c. Objectives

Year	Objectives
1	Consideration of feedback from Statutory Consultation (including appropriate changes to proposals)
	Agree DCO position with LLAOL (Statement of Common Ground or better)
	Submission of application to PINS
3	DCO Secured & GCG implemented
	Partnership with LLAOL 'live'
	Delivery underway of Phase 1 of consented development
5	Approaching decision point for Phase 2 expansion (in partnership)

d. Challenges/key risks & mitigations

<u>Challenge/risk</u>	<u>Mitigation</u>
Viability (especially beyond Phase 1)	• Further consideration of options for business case • Flexibility in proposals to hold development where appropriate • Modular design of expansion proposals
Extent of flexibility sought	• Keep under review in discussion with PINS and advice from Counsel, maximising permissible flexibility in proposals

	• Use GCG opportunity to maximise Phase 1 throughput • Consider options for alternative means of consenting growth beyond described Phase 1
Buy-in from key stakeholders	• Transparent dialogue with key stakeholders in advance of consultation & application • Narrow areas of disagreement / gain clear understanding of areas of difference through ongoing engagement • Demonstrate with application extent of pre-application engagement outside of formal consultation process • Alternative arrangement in place in case of lack of operator support • Contribute to development of future partnership arrangements with LLAOL
Changing policy context	• Engagement with policy makers where appropriate • Watching brief on Govt. responses to other airport expansion proposals • Flexibility built into proposals through presenting sensitivity tests on range of assessments and through GCG
Deliverability of meaningful GCG proposal	• Continued engagement with interested parties (principally airlines, operator, host authorities) to establish right balance between ambitious targets and commercial deliverability.
Tight programme and budget	• Regular monitoring, reporting and management with clear escalation parameters.

e. Aviation Engagement

Dialogue has begun with airlines about our proposals for future growth, what their needs and requirements are and how they can help to inform future plans. Regular meetings are also being arranged with the Department for Transport to ensure ongoing awareness within government of our proposals and to gain early insight into future direction of travel on policy and how we may be placed to influence matters. We will continue to work more closely with the airport operator in the spirit of partnership, particularly in the further development of the DCO and in preparation of the application; this will run alongside the ongoing partnership negotiations. Part of that work with the operator will include gaining a better understanding of their Business Development plans to encourage new entrants and how we can influence this.

f. Growth post consent (strategy)

We continue to work closely with LLAOL as they bring forward their plans for 19 million passengers per annum (mppa) (assuming that planning permission is confirmed) in advance of the DCO being consented.

Ongoing discussion with LLAOL includes detail matters around how and when the planning regime should switch from the current 18 mppa (or 19 mppa) local planning conditions to those contained in the DCO and how DCO consented works can be delivered. The current working assumption is that this will be done through a progressive partnership with negotiations ongoing to establish this at the earliest opportunity. DCO consented growth would then be delivered through the new partnership with costs and benefits shared more equitably than is currently the case. The DCO will make provision for growth through the existing terminal to be extended to circa 23 mppa to ease the path to further growth by reducing the likelihood of prolonged periods of stagnation. The progressive partnership approach is anticipated to include provision to trigger further extension of the partnership to deliver a second terminal and additional infrastructure before the existing airport becomes capacity constrained.

g. Milestones FY 2022/3

- a. Q1 - Complete Review of consultation feedback
- b. Q2 – Agreed principles for future partnership with LLAOL
- c. Q3 – Submission of DCO application
- d. Q4 – commencement of Examination period

2. Luton DART

a. Focus of the business unit

The construction and bringing into operation of a mass passenger transit system that delivers a modal shift away from cars to rail for passengers, visitors and staff of London Luton Airport. This includes future proofing to meet the needs of an expanded airport and supporting the shareholder in delivery of Luton 2040 including the provision of local employment. It now includes supporting recovery of the airport.

Luton DART is currently undergoing its transition from a construction project to a business. As a result, reviews are currently under way of the staffing structure needed to operate the business such that it is compliant with all relevant laws and regulations and is relentless in its pursuit of the highest standards of passenger safety and service.

At the same time we will be reviewing the income-generating capability of the business through reviewing the pricing strategy and identifying and assessing sources of income beyond the fare-box.

The outcome of these activities will inevitably be a change to the estimates currently included in the Medium-Term Financial Plan, although it is not possible at this stage to say what that change will be. By optimising both operational expenditure and income, the aim is to maintain, if not improve upon, the current level of operating profit.

b. Overview

Luton DART is on programme to open during 2022/23, delivering a high quality and environmentally friendly service for accessing the airport and national rail services. It will gradually transition through a period of sustained operation with any major snagging completed and achieve Business As Usual (BAU) in the latter part of 2022/23.

c. Objectives

Year	Objectives
1	Fully operational DART
	Achieve Business as Usual Status
	Delivery of high quality customer care
3	Secure long term Facilities management and Customer Care contract (following on from 2 year trial)
	Secure modal shift of at least 10% from start up
	Delivery of high and sustained quality customer care
5	Secure modal shift of at least 15% from start up
	Delivery of high and sustained quality customer care

d. Target market & competition – risks and opportunities

Risks	Response
Impact of Covid putting people off of public transport / air travel impacting use and also income	Partnership approach to reassure
Would be passengers not knowing about the improved service i.e. not aware of Luton DART	Robust marketing and promotion plan developed with partners and stakeholders to encourage passengers to adopt a train to plane journey
Low satisfaction rates	Adopt an agile management approach to enable real time feedback from passengers to influence evolving approach to customer care with contract providers.
Interfaces between parties not correct impacting service	Key role for proposed Luton DART Operations Manager linked to constant review of performance
Delays may delay operations commencing in late 2021/22	Develop soft launch plans which do not depend on completing the new overbridge (uses existing overbridge)
Opportunities	
Selection of green power tariff options	Test readings now taking place for train to verify power requirements, then a green energy package can be put in place.
Parkway DART station sized for future means space in the DART station	Options for difference uses to be explored

e. Marketing, pricing and promotions

Marketing plan being developed by Engagement Director and LBC communications team. Discussions underway with rail operators to agree actions and contributions. Content requirements for DART website and integration with LTN website linked closely to assisted travel service under development.

An initial decision on pricing was made by the LLAL Board of Directors at its meeting in September 2021 but will continue to be kept under review to ensure that the financial performance of the business unit can be optimised. Research has been commissioned from specialist consultants in order to identify the potential for income maximisation whilst encouraging modal shift.

f. Milestones and key metrics

Milestones 2022

- a. Open Summer 2022
- b. Establish baseline usage on opening
- c. Formal opening second half of 2022

- d. Achieve business as usual second half 2022
- e. Deliver first 2million passengers (to be reviewed based on recovery of LTN)

g. Resources

The DART business unit is currently transitioning from a construction project to an operating transport system and resourcing requirements are dictated by the need to prepare for operational readiness of the system and organisation in the short-term and a safe, sustainable and efficient customer experience once the transit system goes live.

An interim General Manager has been appointed to lead the team over this period and additional staff are currently being recruited, initially on a temporary basis, to contribute towards that preparedness. Initially, this will include a Contracts Manager to oversee the contracts with Doppelmayr for the operation and maintenance of the transport system and LLAOL for the management of the station facilities and customer service; an HSQE Manager to prepare the necessary documentation for certification and accreditation to ensure compliance with regulations; and a Marketing Manager to promote the service and encourage modal shift and to arrange the many visits and events that will precede the formal commencement of operations.

Operational readiness is focussed on the following work packages: Physical Build, Green Strategy, Marketing and Events, Contracts, Create Business, HSQE and Operations supported by Project Co-ordination and Risk Management and Project Finance. This is supported by small mobilisation teams of our (sub-) contractors.

The staffing structure and operating budget for the “business as usual” or “steady state” operation of the DART are currently under development.

3. Place-making

1. Morton House

a. Progress update

It is anticipated the refurb works will be completed in stages as follows:

- Structural works complete by 31st May 2022
- Refurb works complete by 30th November 2022 – NB if there is a requirement for the Adult Learning Centre to be open by the start of the academic year – the lower ground floor refurb could be prioritised and open in Sept 2022
- Subsequent delivery of the “green” elements subject to the availability of capex and production of an acceptable business case

b. Key milestones for the year

Target completion of the refurb and fit out works is now the end of November 2022, to enable the building to fully open in January 2023.

Recruitment of a receptionist/office manager should have commenced by September 2022, ready for someone to be in place in advance of opening.

Arrangements for operational contracts (e.g. consumables, maintenance etc.) should be in place by October 2022 in readiness for opening.

Marketing of the office spaces will be undertaken by agents currently engaged at Hart House. Marketing will commence 6 months in advance of completion of the office refurb.

Terms of the lease of the café area to be agreed by April 2022 in readiness for opening.

Launch PR event to take place in February 2023 once the building has been up and running for a few weeks.

c. Challenges & mitigation

Ensure overall project remains on programme and within budget – carry out weekly project reviews with LBC PM Team and with the contractor

SRO will be the Construction Director

2. Bartlett Square

a. Progress update

It is anticipated that the pathway linking the DART/LAP stations to Kimpton Road, the public realm outside the DART station and an emergency pedestrian route will have been completed.

The next phase will involve appointing a contractor to complete the remaining works (taxi rank/DART replacement bus route) once VFK have vacated the site. It is

anticipated these works will begin in June 2022, will take approx. 12 weeks to carry out.

In the interim period, taxis will use the existing rank outside the Hampton Inn Hotel and the DART replacement buses would use the existing arrangements in use outside the LAP station.

There will also be a temporary extension to the existing car park at the rear of Hart House for use by tenants renting office space at Morton House. Access to this temporary area will be via the existing entry point to the side of Hart House.

A permanent solution to providing sufficient car parking for Morton House and Hart House is anticipated to involve reinstatement of the tiered car park in Vauxhall Road and to create a pedestrian access to Bartlett Square via the pedestrian tunnel running underneath the railway adjacent to the tiered car park. It is estimated these A planning application will be required for the new pedestrian access into Bartlett Square from the railway tunnel.

b. Key milestones for the year

Remaining works to provide the taxi rank and bus replacement route should be complete by October 2022.

Planning consent for the pedestrian access to the Square obtained by June 2022
Construction of the pedestrian access and reinstatement of the tiered car park complete by March 2023

We will be engaging a property consultant to assist with the marketing of Bartlett Square as a development opportunity and will work vigorously with that developer partner to ensure that the site is developed to its full potential for jobs and business opportunities.

The steps in the process to develop the rest of the Square are as follows:

- Property consultant to be appointed Q1 2022 to advise on an updated scheme for the Square and to engage a third party developer to bring forward a suitable scheme
- Consultant to run a process to secure a suitable developer by the end of 2022
- Third party developer to bring forward a scheme for planning approval during 2023

This process will also need to recognise the separate development of the Hotel (should this proceed) and to cater for the parking requirements of the Hotel

SRO for the above will be the Construction Director and resource to deliver the project would be provided by the Programme Director (Commercial) and the

Commercial Property Facilities Manager, Project Admin Apprentice with support from LBC's Property & Infrastructure Team.

c. Challenges & mitigation

Cost of pedestrian access is prohibitively high. LLAL to commission initial design work so an accurate costing can be produced. This will give greater cost certainty before proceeding. If the cost of the works is greater than the value of the land available for disposal on Bartlett Square, then consider options to provide parking on the Square itself.

Planning consent for the pedestrian access – carry out a pre-app in order to flush out any planning issues at an early stage

3. Green Horizons Park (previously New Century Park)

Following the difficulty in securing funding for the Century Park Access Road (CPAR) – an essential prerequisite to the development of the New Century Park site – we will be taking a fresh approach to unlocking this essential employment site.

We will continue to work with the Service Director, Property & Infrastructure at Luton Council (who will act as the SRO for the “access road” element of the project) and his team and with Cranfield University, Arup and the airport operator to develop an exciting and compelling vision for Luton Rising's land at Century Park and the Airport Business Park as a state of the art development ideally suited to the requirements of businesses working in the field of advanced technology with particular emphasis on aviation and modern manufacturing. The business case that demonstrates how this vision will be delivered and the benefits it brings, will be capable of supporting bids for external funding. At the time of writing, a report from Avison Young on the potential for development has been received and is being assessed with a view to it forming the basis for a business case. This is yet to be commissioned and we continue to seek external funding for it. In the meantime, work continues on building the relationships that are critical to the successful delivery of the project.

The SRO for the project (excluding the “access road” element) will be an appropriate member of the LLAL Executive team, yet to be identified but sitting with the CEO for the time being.

4. Wigmore Valley Park

a. Progress update

Assuming the long term lease for the park is granted during the first six months of the 2022/23 financial year prepare business case for improvement works to WVP as per the planning consent for NCP/CPAR. The SRO will be the Construction Director.

b. Key milestones

Obtain funding approval from LBC by July 2022 in order for planting works to commence in the autumn.

Main programme of civils works to commence in Feb/Mar 2023 once the initial planting works have been completed

c. Challenges & mitigation

Delays to granting the long term lease will have a knock on effect on the programme of works.

As the Park has ACV status there will be a 6 month moratorium before the lease can be granted. On the current programme this should enable the lease to complete in April 2022

Cost inflation causes an increase in the cost of the works. Work with key suppliers to confirm costs/rates of work. Scope of works to be tailored accordingly to fit the available budget

5. Other Properties

Lease renewals are negotiated on behalf of Luton Rising by LBC's Property Investment & Acquisition Manager. Oversight of negotiations is provided by the Programme Director (Commercial). Day to day management of the relationship with the tenants lies with the Commercial Property Facilities Manager.

C. Community involvement

Positive social impact is at the core of our business and our aim is to manage our portfolio of assets in such a way as to maximise the benefit to the local community whether through environmental responsibility or the promotion of social justice.

Luton Rising's Community Funding Programme has made a substantial contribution to improving the lives of many thousands of people. Since 2004/5, Luton Rising has contributed over £150 million to voluntary and community organisations delivering services in Luton.

Much of our funding is managed independently. The administering body for our largest fund, the Community Investment Fund, and the smaller Small Grants and Near Neighbour Funds is the Bedfordshire and Luton Community Foundation (BLCF).

We have budgeted to maintain our Community Funding Programme at its current level of £7.4m..

We will maintain funding for our Community Engagement Programme at £250,000 per annum, and look to Luton Council to continue administering that funding on our behalf to ensure that it contributes to a cohesive programme of community and cultural events.

We have committed to allocating to our budget for charitable giving £1 of the concession fee we earn on every additional passenger travelling through Luton as a result of our DCO growth proposals. That could amount to an additional £13m which will be shared between Luton and the neighbouring communities through our Community First scheme.

D. Emergent Business Opportunities

1. Clean Energy – carbon-offsetting & alternative sources

Carbon off-setting

We identified some pilot carbon-offsetting initiatives that could, if funding were available, be introduced at an early stage to demonstrate our commitment. These include:

Project	Carbon abatement (tCO ₂ /yr)	Range of project costs	Overall carbon price (£/tCO ₂)	Units needed for Scope 1 emissions	Estimated total pilot scheme cost
Social housing energy improvements: Installation of triple glazing, PV, battery storage, and insulation top-up	0.82 (per household)	~£10,000 (per household)	~380	213 homes (using average figure)	~£2 million (average)
Schools and corporate estate energy efficiency programme	~10-45 (per school)	~£75,000-£310,000 (per school)	~250-350	5 schools (using average figure)	~£950,000 (average)
Demo homes: Derelict council houses to be refurbished to carbon neutral/PassiveHaus standard to serve as eco education centres for residents, installers, and landlords	1-2 (per house)	~£50,000-£200,000 (per household)	~2,000-3,000	1 home (using average figure)	~£124,000 (average)
				113 homes (using average figure)	~£14 million (average)

We will work with the Strategy and Sustainability Manager at Luton Council and with other partners and key stakeholders to identify how Luton Rising can best support and enhance current initiatives and in raising funding to carry out a programme of activities.

Alternative sources of energy

With our Sustainability Director taking the lead, we will continue to work with the Service Director for Property & Infrastructure at Luton Council and his team to identify, based on work previously undertaken and newly commissioned work, the feasibility, affordability and long-term prospects for successful delivery of a company for Luton generating energy from alternative sources such as solar and wind.

Progress update

Luton Rising has identified and is evaluating the economic and financial viability of developing solar PV solution that would result in low energy cost and a reduction in carbon footprint.

The current proposition involves working in partnership with LLAOL to explore a range of partnership options that would reduce the energy cost and consumption at London Luton Airport whilst reducing the energy cost for the DART.

At present the DART is supplied via a grid connection at Bartlett square and has high variable energy demand. Connecting DART to solar generation at the airport would create even further cost and carbon savings.

This proposed solution to develop a Solar PV is timely as expected power prices are likely to be particularly uncertain and volatile in the near future.

The current solar PV strategy proposes the development of a 7MW solar farm near the airport.

Different options are under review with LLAOL where consideration is given whereas:

- Luton Rising agrees a Purchase Power Agreement (PPA) to the airport with a fixed discount to retail electricity tariffs, or
- Solar PV infrastructure is owned in a partnership with benefits shared in relation to risk, or
- Where LLAOL owns infrastructure on-site or through a private wire. This raises a legal question as to what happens end of the defined Concession period.

Any option above is flexible enough to have a degree of community ownership to share the opportunity and reduce risk.

In addition, this development solution has the flexibility to be considered as a stand-alone project withstanding the need for an extended concession partnership.

Key milestones

- To proactively engage with LLAOL to consider extended partnership arrangement to provide certainty and equitable financial distribution of benefits and returns (Q4 2021/22).
- Explore a partnership arrangement on Solar development (7 MW Solar PV development) (Q4 2021/22)
- Design, plan and build (FY22/23)

Challenges and mitigations

In assessing the proposition there are risks and mitigations.

- Failure to secure a 'future proof' long term PPA (off take agreement) would provide uncertainty in financial and investment returns. The ability to provide certainty in pricing and set prices at an agreed price formula with a link to market prices and an estimated collar price of 4.5p/kWh would provide cost certainty.
- Negotiating an acceptable deal with landowners is important. There is the need to review options of acquiring land further away from the airport which would be cheaper yet balancing off against more expensive connection route and electrical losses. This would require working closely with local highway departments to achieve benefits and mitigate non-systematic risk.
- Planning risk can be overcome by a combination of careful site selections and encouraging local community and other local authorities in becoming shareholders.
- Construction risk can be reduced significantly by passing over the construction to well-known solar EPC (Engineering Procurement and Construction) providers.

Scalable aspirations

Luton Rising strategy for new project initiatives is to develop small scale solution, develop internal expertise and learning and grow in a scalable and responsible manner.

To build real and measureable shareholder value in its future partnerships and Joint venture arrangements with the aim to re-cycle capital into the system to fund other initiatives and create increasing social and economic value through managing the 6 Capitals.

In respect of further solar developments, the longer term big aspirations could include further phases of solar, both onsite and offsite, and wind generation at >3km from airport to give more consistent renewable power.

To be at the forefront of renewable and aviation green technology through its considered T2 expansion, Green Horizons Business Park proposition, and becoming a forerunner in the adoption of Electric Vehicles and Hydrogen production.

2. Digital architecture and the Smart City

We will continue to work with the Service Director for Customer and Organisational Development at Luton Council and his team to identify the requirements for, and potential uses of, a data strategy and digital architecture to transform Luton into a smart

city. We have already received a proposal from Arup to carry out a preliminary piece of work into this initiative; this is yet to be commissioned.

The outcome of this piece of work will be a report setting out:

Vision – to articulate the vision for data use and the objectives of stakeholders

Use cases – to agree a prioritised list of use cases including criteria and value articulation

Data discovery – findings in relation to the sources of data

Governance – data principles, data roles and data governance

Roadmap – high-level initiatives to deliver proposed actions and recommendations

Resourcing of these business opportunities

Luton Rising has a small provision within its approved budget to enable some preliminary feasibility work to be undertaken into these opportunities. For further developmental work, for delivery of the projects and for their future operations, additional funding will be required and this will be clearly set out in the business cases that come forward for consideration at investment stage; these will also set out the benefits – financial, economic, social and environmental – that can be expected to accrue in order to justify the investment required.

E. Reporting

Integrated Reporting

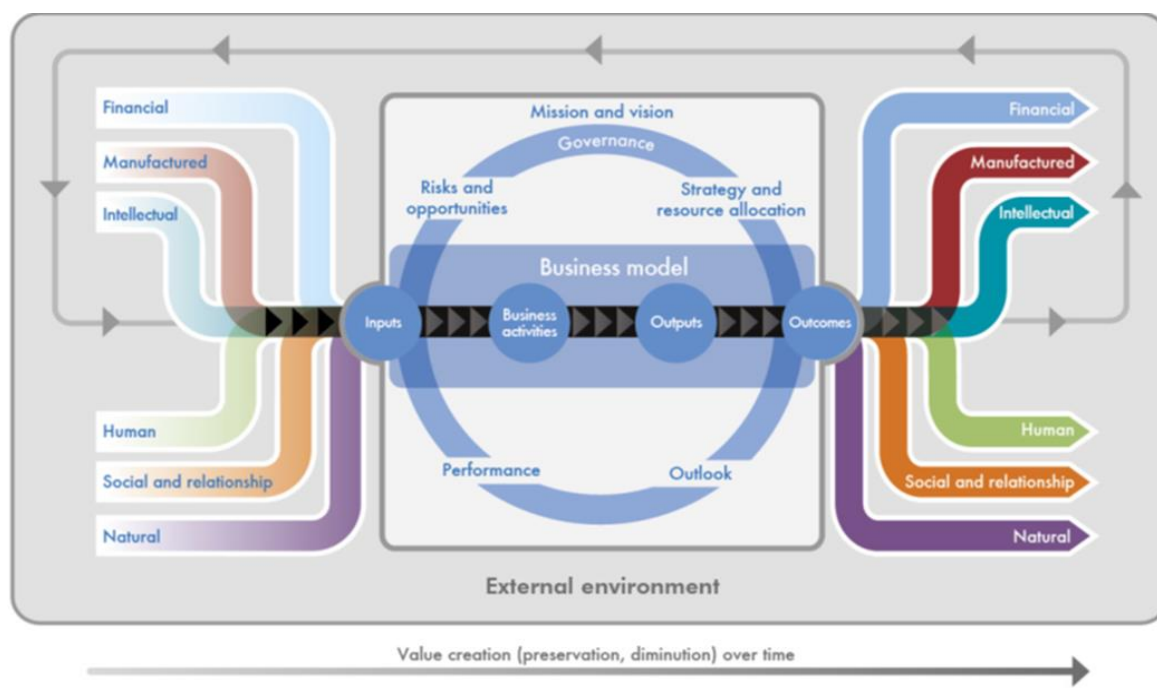
Integrated reporting (IR) is fairly new and the International Integrated Reporting Framework (IIRF) was issued in 2013. The IIRF was created to provide the principles based guidance and content elements required to complete a comprehensive integrated report, requiring integrated thinking within the whole company to provide a holistic view of the company for both financial and non- financial information, showing how a company creates value over a period of time, which is becoming extremely popular with companies, stakeholders and investors.

Integrated thinking brings all the resources and relationships we depend on into everyday decision-making. It helps us to identify and consider the broader strategic, social and natural impacts of decisions, as well as the effect on the financial bottom line

An Integrated Report (IR) explains how we create value over time, is a forward facing document including financial and non-financial information. It provides a full and holistic overview of the business model and includes inputs, outputs, relationships and resources.

Luton Rising demonstrates impact through the value we create for our shareholder, stakeholders, employees, our impact on the environment, our reputation and how we engage with the community; in a phrase, **total stakeholder return**.

Value is created through the business model and takes inputs from the following resources - financial, manufactured, intellectual, human, social and relationship and finally nature and transforms them through business activities and interactions to produce outputs and outcomes that over the short, medium and long-term create or destroy value for our business, stakeholders, society and environment. This is shown graphically at Figure 3 below.

**Figure 3**

The report must follow the guiding principles and content elements as per the table below.

Fundamental Concept	Guiding Principles	Content Elements
In its efforts to create value an organisations' business model draws on various capital which the organisation uses and affects.	An IR must follow these principles -	An IR should include the following elements -
	Strategic Focus & Future Orientation	Organisational overview & external environment
	Connectivity of Information	Governance
	Stakeholders Responsiveness	Opportunities & risks
	Materiality & Conciseness	Strategy & resource allocation
	Reliability & Completeness	Business Model
	Consistency & comparability	Performance
		Future outlook
		Basis of presentation

Further detail on the principles and practice of Integrated Reporting was set out in a positioning paper presented to the Board of Directors at its meeting held on 20th July 2021. Luton Rising aims to produce its first annual report prepared on an integrated reporting basis for the year ending 31st March 2023.

Scrutiny Committee:	Overview & Scrutiny Board (OSB)
Date of Meeting:	28 February 2022
Subject:	OSB Work Programme Report 2021/22 & Executive Forward Plan – March 2022 onwards
Report by:	Service Director Policy, Citizen Engagement & Legal Services
Contact Officer:	Eunice Lewis – Democracy & Scrutiny Officer

Purpose

1. To enable the Overview and Scrutiny Board to plan and determine its work programme

Recommendations

2. That the OSB examines the current work programme attached at Appendix A and make any amendments or comments accordingly.
3. Note additional items – marked NEW and revised reporting dates on the Work Programme and determine which items on the Executive Forward Plan attached at Appendix B, the Board wishes to include on the work programme.
4. Note items that have been moved or removed from the work programme that were previously on the work programme for this meeting.
5. That responsibility for making any urgent changes to the work programme between meetings be delegated to the Democracy Manager, in consultation with the Chair of the Overview and Scrutiny Board.
6. To agree on the changes as set out at paragraph 8.

Report

7. The Overview and Scrutiny Board is responsible for managing the Overview and Scrutiny work programme.
8. Any urgent changes to the work programme between publication of this agenda and report and the Board meeting will be reported to the meeting by the Democracy and Scrutiny Officer.
9. Members are asked to consider and note the report and appendices and, if necessary, decide on any new items for its future work programme, as appropriate.

Appendix (if any)

Appendix A – Draft Overview and Scrutiny Board Work Programme 2021/2022

Appendix B - Executive Forward Plan – 10 March 2022 onwards

List of Background Papers (if any)

None

Overview and Scrutiny Board (OSB) – App-A Draft Work Programme – 2021-22

(This work programme is updated regularly following each meeting of the committee and as required, in consultation with the Chair)

OVERVIEW AND SCRUTINY – CRIME AND DISORDER COMMITTEE

Meeting Date:	10 March 2022	Time:	6.00 pm	Committee Room:
Executive Meeting: 04.04.22				
Reminder Date:				
Deadline for Titles:				
Deadline for Reports submission:				
Democracy & Scrutiny Officer:				

Agenda items	Report Author/ Format and Comments
Chair's Update	Oral update (Standing item)
Introduction:	Chair of the CSP (Verbal Update)
Item 1 – Community Policing and Enforcement in Luton:	Police: Superintendent Jaki Whittred/Chief Inspector Jamie Langwith (Beds Police) Council: Nicola Monk/Sarah Hall (Luton Council)
Member Questions	
Item 2 – Preventing criminal exploitation and tackling serious organised crime:	Youth Offending Service – David Collins Police: Detective Chief Inspector Katie Dounias Reducing Violence and Exploitation – Kimberley Lamb/Lisa Robinson (VERU)
Member Questions	
Public Questions	
CDC Work programme and Dates of Future Meetings:	Democracy and Scrutiny Officer Written Report (Standing item)
Dates of Future Meetings: Mon. 11.04.22	

Overview and Scrutiny Board (OSB) – App-A Draft Work Programme – 2021-22

(This work programme is updated regularly following each meeting of the committee and as required, in consultation with the Chair)

Meeting Date: 11 April 2022	Time: 6.00 pm	Committee Room:
Executive Meeting: 25.04.22		
Reminder Date:		
Deadline for Titles:		
Deadline for Reports submission:		
Democracy & Scrutiny Officer:		

Agenda items	Report Author/ Format and Comments
Chair's Update	Oral Update (Standing item)
Corporate Performance Report 2021/22 Quarter 4	Zoe Bulmer/Aurora Dune Written Report
Stockwood Park Masterplan	Roger Kirk Written report
Refugee status update Report to include: - intention of Home Office - unaccompanied children - demand on services - timescales	Adam Divney Written report (requested at 20/9 meeting – moved from 22/11) Moved to 4.4.22 meeting at chair's request following work programme review).
Luton 2040 six monthly report	Sinead McNamara - Written report
Banning of Estate agents boards - To address issues illegally placed estate agents notice boards in Luton - They are being banned in other places – best practice	Officer – Sue Frost/Sarah Hall?? – Yet to confirm reporting department and officer. So moved to April with agreement of the Chair.
Dates of Future Meetings: Only if required or until June 2021	

Potential Future items for the work programme

Outline Business Case for work place parking Levy - Steven Lain - Written report (tbc)

LUTON COUNCIL

Forward Plan of Key Decisions from 7 March 2022

Executive Membership: Councillors Simmons (Chair) Goding, A. Hussain, J. Hussain, Khan, Malcolm, K. Malik, Roche, T. Saleem and Shaw

Commencing from Wednesday 9 February 2022 the council plans to make key decisions on the issues set out below. Key decisions relate to those which are likely:

- ◇ to result in the local authority incurring expenditure which is, or the making of savings which are, significant having regard to the Council's budget for the service or function to which the decision relates; or
- ◇ to be significant in terms of its effects on communities living or working in an area comprising two or more wards or electoral divisions in the area of the Borough.

The forward plan lists the business undertaken by or on behalf of the Executive and will be published 28 days prior to each Executive meeting. Those items identified for decision more than 28 days in advance may change in forthcoming plans. There may also be occasions where a key decision is deferred to a later meeting. Each new Plan supersedes the previous Plan. Any questions regarding individual issues should be addressed to the contact specified in the Plan.

The agendas and forward plans for meetings of the Executive will be published as follows:

<u>Forward Plan Published</u>	<u>Publication of Agenda</u>	<u>Executive Meeting Date</u>	<u>Forward Plan Published</u>	<u>Publication of Agenda</u>	<u>Executive Meeting Date</u>
07 February 2022	24 February 2022	07 March 2022			
04 March 2022	24 March 2022	04 April 2022			
25 March 2022	12 April 2022	25 April 2022			

Link to published Executive agendas, reports and decisions: <http://democracy.luton.gov.uk/cm5public/Documents/PublicDocuments.aspx>

Note:

From time to time there will be a necessity to consider issues which will result in key decisions being taken which are not included in the forward plan, e.g. items of extreme urgency for Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012. (4(2)(a) Confidential information. 4(2)(b) Exempt Information. 4(2)(c) lawful power to exclude person to maintain orderly conduct of the meeting.)

This is a Formal Notice under the Local Authorities (Executive Arrangements)(Meetings and Access to Information)(England) Regulations 2012 that part of the Executive meeting listed in this Forward Plan will be held in private because the agenda and reports for the meeting will contain exempt information under Part 1 of Schedule 12A to the Local Government Act 1972 (as amended) and that the public interest in withholding the information outweighs the public interest in disclosing it.

The last page of this document sets out the definitions of Exempt Information under Paragraphs of Part 1 of Schedule 12A of the Local Government Act 1972.

Any correspondence to be addressed to: The Service Director, Policy Communities and Engagement, Luton Borough Council, Town Hall, Luton, LU1 2BQ unless otherwise stated.

Appendix B – OSB Work Programme

Title	Key decisions and key issues	Decision maker	Date of decision	Documents submitted for consideration	Should exclusion of the public be considered	Contacts/ Lead Executive Member(s)
Treasury Management decisions on borrowing and investments to optimise the Council's financial position	To borrow and invest, and to restructure borrowings where appropriate, in order to optimise the Council's financial position while minimising risk and ensuring that all actions are in accord with the Council's treasury management policy and strategy.	Head of Corporate Finance	Ongoing with dates dependent on financial market conditions	Record of decisions	N/A	Dev Gopal (01582) 546087 Cllr Malcolm
NEW – Insurance Services	To consider and approve a 3 month contract extension	Executive	7 March 2022	Report	No	Gloria Johnson-Ashman/Dev Gopal (01582 547044/6087) Cllr Goding
NEW – Luton Employment and Skills Implementation Plan	To consider and approve the plan	Executive	7 March 2022	Report	No	Debbie Poole-Hunt (01582 548419) Cllr Goding
NEW – Retrospective endorsement of energy contract 2020-24	To retrospectively endorse the energy contract 2020-22	Executive	7 March 2022	Report	No	Sue Davies/Roger Kirk (07824 409050/01582 548268) Cllr Goding
2022/2023 Highways Capital Work Programme	To approve the highways works capital programme implementation from 1 April 2022	Executive	7 March 2022 (9 February 2022)	Report	No	Sandra Comerasamy/Steve Lain (01582 547320/546047) Cllr Roche

Appendix B – OSB Work Programme

Title	Key Decisions and key issues	Decision Maker	Date of decision	Documents submitted for consideration	Should exclusion of the public be considered	Contacts/Lead Executive Member(s)
Luton Rising Group (LLAL) Consultation on and adoption of the Airport business plan 2022/23	To adopt the business plan	Executive	7 March 2022	Report	No	Mark Turner (07920 150427) Cllr Simmons
Draft Housing Strategy 2022/27	To agree the draft Housing Strategy 2022-27 for public consultation	Executive	7 March 2022	Report	No	Claire Astbury/Colin Moone (01582 546969/6002) Cllr Shaw
Luton Tree Policy and Tree Management Strategy	The adoption by Council of the Luton Tree Policy and Tree Management Strategy 2021-2030	Executive	7 March 2022	Report	No	Steve Battlebury/Matt Seal (01582 546761/07903763546) Cllr A. Hussain
Budget Monitoring Qtr. 3 Reports 2021/22	To note the results of the budget monitoring forecasts for 2021/22 and to approve any recommendations arising from the latest budget position	Executive	7 March 2022	Report	No	Dev Gopal/Tim Lee (01582 546087/6094) Cllr Malcolm
Amalgamation of Foxhall Infant and Junior School	To approve the amalgamation of Foxhall Infant and Junior School	Executive	7 March 2022 (6 December 2021)	Report	No	Nicholas Nel (07542228108) Cllr Khan
Vehicle Engine Idling	To agree to adopt the powers to allow fixed penalty notice to be issued to stationery vehicles with its engine running	Executive	7 March 2022	Report	No	Tony Stefano (01582 548521) Cllr Roche
Moving Traffic Contraventions	To consider and agree the proposal	Executive	4 April 2022	Report	No	Tony Stefano (01582 548521) Cllr Roche

Appendix B – OSB Work Programme

Title	Key Decisions and key issues	Decision Maker	Date of decision	Documents submitted for consideration	Should exclusion of the public be considered	Contacts/Lead Executive Member(s)
Adult Social Care Strategy	To approve the publication of an adult social care strategy	Executive	25 April 2022 (31 January 2022) (17 January 2022) (8 November 2021)	Report	No	Elaine Healy/Tamara James (07860593229) Councillor J. I. Hussain
Adult Social Care Delivery Options	To consider and agree the delivery options for adult social care	Executive	25 April 2022 (4 April 2022)	Report	No	Tamara James/ Luke O'Byrne (07880 588326) Cllr J.I. Hussain
Stockwood Park Masterplan	To approve the commission of a expert company to develop and produce the master for public and stakeholder consultation	Executive	25 April 2022 (16 August 2021) (28 June 2021)	Report	No	Roger Kirk (01582 548268) Cllr Goding
Luton 2040 six monthly update	To agree and note the updates	Executive	25 April 2022 (31 January 2021) (16 August 2021)	Report	No	Sinead McNamara (01582 546265) Cllr Simmons
Equality Diversity and Inclusion Strategy	To agree the final draft for consultation	Executive	25 April 2022	Report	No	Adam Divney/Marek Lubelski (01582 546073/8779) Cllr Simmons
NEW Central Area Growth Board	To agree the Terms of reference and standing orders.	Executive	25 April 2022	Report	No	Nicola Monk Councillor Simmons

**EXEMPT INFORMATION
SUMMARY OF THOSE MATTERS WHICH BY VIRTUE OF PART 1 OF SCHEDULE 12A OF THE
LOCAL GOVERNMENT ACT 1972 MAY BE DISCUSSED IN PRIVATE**

Paragraph
No.

1. Information relating to any individual.
2. Information which is likely to reveal the identity of an individual.
3. Information relating to the financial or business affairs of any particular person (including the authority holding that information).
4. Information relating to any consultations or negotiations, or contemplated consultations or negotiations, in connection with any labour related matter arising between the authority or a Minister of the Crown and employees of, or office holders under, the authority.
5. Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.
6. Information which reveals that the authority proposes:
 - (a) to give under any enactment a notice under or by virtue of which requirements are imposed on a person; or
 - (b) to make an order or direction under any enactment.
7. Information relating to any action taken or to be taken in connection with the prevention, investigation or prosecution of crime.

Evidence WR GHP r

Notice of Meeting

Scrutiny Finance Review Group

Date : Thursday, 03 March 2022

Time : 18:00

Place : Council Chamber
Town Hall, Luton

Councillors : Young (Chair) Masood
U. Ali Moore
Ahmed Skepelhorn
Franks Waheed
M. Hussain

Quorum: 3 Members

Contact Officer: Matthew Hussey [REDACTED]
Email [REDACTED]@luton.gov.uk

Livestream Meeting Link

PURPOSE

To provide an overview and scrutiny function relating to Luton Council's finances and budget, to advise/make recommendations to the Executive to inform and enhance decision-making on spending priorities and to promote transparency and accountability in the use of public funds.

This meeting is open to the public and you are welcome to attend.

For further information, or to see the papers, please contact us at the Town Hall:

IN PERSON, 9 am to 5 pm, Monday to Friday, or

 CALL the Contact Officer (shown above).

An induction loop  facility is available for meetings held in Committee Room 3.

Arrangements can be made for access to meetings for  disabled people.

If you would like us to arrange this for you, please call the Contact Officer (shown above).

NOTE:

Members of the public are entitled to take photographs, film, audio-record and report on all public meetings in accordance with the Openness of Local Government Bodies Regulations 2014. People may not however act in anyway considered to be disruptive and may be asked to leave. Notice of these rights will be given verbally at the meeting, as appropriate.

EMERGENCY EVACUATION PROCEDURE

Committee Rooms 1, 2, 4 & Council Chamber:

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

Committee Room 3:

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

AGENDA

<i>Agenda Item</i>	<i>Subject</i>	<i>Page No.</i>
1.	Apologies for Absence	
2.	Minutes	
	1. 27th January 2022	6 - 12
	2. 1st February 2022	13 - 16
3.	Disclosures of Interest	

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

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

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

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

4. Section 106, Local Government Finance Act 1992

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

5. Urgent Business

The Chair to report on any business which is considered to be urgent and which should be discussed at the meeting in accordance with Section 100B(4)(b) of the Local Government Act 1972 and to determine when, during the meeting, any such business should be discussed.

6. References from committees and other bodies

7. Chair's Announcements

Reports

8. Finance Updates

To update the Committee on any financial matters arising since the previous meeting.

(Report of the Service Director Finance and Audit)

**9. Budget Monitoring Quarter 3 Reports 2021-22
- To Follow**

(Report of the Director, Finance, Revenues & Benefits)

10. Rent Deposit Scheme

17 - 20

(Report of the Service Director, Housing)

(Report of the Service Director Citizen Engagement and Legal Services)

12. **Local Government Act 1972, Part VA**

To consider whether to pass a resolution under Section 100A(4) of the Local Government Act 1972 to exclude the public from the meeting during consideration of any item listed above if it is likely that if members of the public were present during those items there would be disclosure to them of exempt information falling within the Paragraphs of Part1 of Schedule12A to the Local Government Act 1972.

13. **Minutes****1. 1st February 2022**

- Paragraph (3) - Information relating to the financial or business affairs of any particular person (including the authority holding that information).

14. **Luton Rising LLAL Annual Business Plan 2022.23 - Copy**

- Paragraph (1) - Information relating to any individual.
- Paragraph (3) - Information relating to the financial or business affairs of any particular person (including the authority holding that information).

Scrutiny Finance Review Group Meeting

Minutes

27 January 2022 at 6.00 pm

Present:

Councillors: U. Ali, Ahmed, Franks, Ghulam (Substitute for Councillor M. Hussain), Mead (Substitute for Councillor Skepelhorn) Masood and Moore.

In Attendance:

Councillors: Adrees, Burnett, D. Chapman, A. Hussain, J. Hussain, Malcolm and Underwood.

Note: In the absence of the Cllr Young, the Chair, Cllr Franks was elected to take the Chair for this meeting only.

Members of the Audit & Governance Committee had been invited to attend the meeting and only participated in the discussion at the invitation of the Chair and did not vote on the items.

11 Apologies for absence (Ref 1)

Apologies for absence from the meeting were received on behalf of Councillors M. Hussain and Skepelhorn.

12 Minutes (Ref 2.1)

Resolved: That the Minutes of the meeting held on 11 January 2022 be taken as read and approved as a correct record and signed by the Chair.

13 EY Audit Results Report 2018/19 (Ref 5.1)

The External Auditors (EY) presented the report in regard to the Audit Results Report for 2018/19. Members were reminded that FRG had requested an update on the progress to finalising the financial statements for the year ending 31st March 2019.

Janet Dawson, Partner, Ernst & Young LLP informed Members that the report summarised EYs provisional audit conclusions in relation to the audit of Luton Borough Council for 2018/19 financial year. EY had substantially completed its audit of Luton Borough Council ('the Council') for the year ended 31 March 2019 and their provisional audit conclusions were subject to final quality assurance review procedures and professional practice consultations.

Neil Harris, EY advised that there were a couple of critical judgements in the report, in particular around the area of valuation and capitalisation of the airport of the airport which needed to be ironed out with officers, it was felt that the level of audit had been increased to a position where it was felt that a partner of EY needed to be involved.

Janet Dawson, Partner, Ernst & Young LLP added that subject to concluding the outstanding matters listed in the report, particularly the outcome of professional practice consultations, EY confirmed that they anticipated issuing a qualified audit opinion on the financial statements. EY also reported a number of matters about the councils arrangements to secure economy, efficiency and effectiveness in its use of resources, and it was EYs intention to qualify the value for money conclusion for the year ended 31 March 2019. Specifically:

- Audit procedures had concluded that a material value of capitalised expenditure at the end of 2018/19 on Luton Airport expansion schemes in the Council's group financial statements does not meet capitalisation criteria under IAS 16. Unless this was adjusted for EY therefore proposed, subject to a professional practice consultation, to qualify the 2018/19 financial statements opinion. As part of this process, EY had asked for and obtained management's final assessment on the justification that the expenditure on expansion schemes does meet capitalisation criteria under IAS16.
- As a result of significant weaknesses in the Council's procurement and contract management arrangements and related breaches of laws and regulations, EY had concluded the Council did not have proper arrangements to ensure it took properly informed decisions and deployed resources to achieve planned and sustainable outcomes for taxpayers and local people. EY therefore proposed to issue an adverse qualification of our 2018/19 Value for Money conclusion.

As a result of the external auditors work the Council had also re-engaged its valuation specialist to produce an updated valuation of Luton Airport as they were concerned that the valuation in the draft group financial statements contains material accounting and disclosure errors. EY had recently received a revised draft valuation from LLALs management specialist which would need to be reviewed with specialist support. She added that EY anticipate that the revised valuation was likely to result in material amendments to the financial statements, disclosure notes and prior period comparators. Prior to issuing its audit report, there were additional internal consultation processes in respect of our audit opinion which we need to conclude. A draft of the audit report following the consultation would therefore be communicated to the Audit & Governance Committee as part of the updated and final Audit Results Report to be issued in due course.

She continued that throughout the course of our audit, EY had consulted with its professional practice team on the risk designation for the Council's audit and the safeguards needed to put in place as a result. Changes had been made during the course of the audit to introduce additional safeguards to reflect the heightened complexity, risks and judgements had been considered. As a major local audit, EY had already an engagement quality control reviewer who had the appropriate skills, knowledge and expertise to independently ensure their audit work and judgements meet the quality standards you would expect of us.

EY had also ensured the composition of the audit team had included appropriate Senior Audit Manager resource, and had drawn extensively on specialist resource, particularly from our corporate finance team with aviation expertise, to support its group audit procedures on accounting for LLAL Airport expansion schemes, valuation of the Airport and implications for the Council's going concern disclosures on the LLAL stabilisation plan.

In light of the significant nature of the potential disagreement in the accounting for Airport expansion schemes, and the difficulties we have experienced agreeing the content of our audit reporting with management, the audit risk designation has been increased from a higher risk to close monitoring. In practice, we believe there are no additional safeguards we need to put in place because of this, not least because of the composition of the audit team we have in place and that we will be continuing to draw on specialist resource and professional practice consultations prior to concluding our audit and issuing our audit report.

Janet Dawson, Partner, Ernst & Young LLP reported that in the Audit Planning Report presented at the 6 March 2019 Audit & Governance Committee meeting, EY provided an overview of its audit scope and approach for the audit. EY subsequently presented a detailed Audit Progress Report to the 4 March 2020 meeting of the Committee in which they set out revisions to the planned scope and detailed findings up to that point in time for each of the risks identified in our Audit Planning Report. Shortly after issue of our Audit Progress Report the advent of the Covid-19 pandemic resulted in the imposition of physical restrictions on movement from late March 2020 which continued to impact both the Council's operations and finances for the remainder of the 2019/20 and 2020/21 financial years.

Although this occurred after the year of account, some of the impacts of the pandemic were relevant to the 2018/19 financial statements and audit responsibilities. There was a specific risk to the Council's ability to maintain continuity of service provision, where Covid-19 had created a number of financial pressures throughout local government, creating financial stress in either, or a combination of, increasing service demand leading to increased expenditure in specific services, and reductions in income sources. This was particularly relevant to the Council due to the significant adverse impact of Covid-19 on the operations and finances of London Luton Airport and therefore the Council's wholly owned subsidiary London Luton Airport Limited (LLAL) which was consolidated into the Council's group financial statements. To gain assurance in respect of going concern the external auditors were required to consider the Council's liquidity for a 12-month period from the date of the audit report by reference to management's assessment, supported by appropriate evidence including a detailed cashflow forecast, covering this same period. EY had therefore determined assessment and disclosures on going concern and events after the balance sheet date to be a significant risk relevant to our audit of the Council's 2018/19 financial statements.

EY had also considered other developments relevant to our 2018/19 audit responsibilities subsequent to the issue of their Audit Progress Report. This had resulted in the identification of one further significant risk in respect of the Council's arrangements to secure value for money relating to weaknesses identified by Internal Audit in the Council's procurement and contract management arrangements and related breaches of laws and regulations.

In regard to Materiality, in the Audit Planning Report, EY had communicated that its audit procedures would be performed using a materiality of £6.3m, with performance materiality, at 50% of overall materiality, of £3.1m for the single entity financial statements.

The external auditors had updated their planning materiality assessment using the draft accounts and had reconsidered its risk assessment which had been communicated in the Audit Progress Report. Based on their materiality measure of gross expenditure on provision of services, EY had updated the overall materiality assessment to £6.4m. This resulted in updated performance materiality, at 50% of overall materiality, of £3.2m. The threshold for reporting misstatements that had an effect on the primary statements was £320k. There had been no further changes to the assessment of materiality subject to issue of the Audit Progress Report.

EY had completed a significant proportion of its audit of Luton Borough Council's financial statements for the year ended 31 March 2019 and had performed the procedures. After completion of the outstanding items, particularly the conclusion of quality assurance review procedures and consultations with the professional practice team, EY expected to issue a qualified opinion on the Council's group financial statements in respect of the inappropriate valuation of material capitalised costs for two Airport expansion schemes, the Development Control Order (DCO) and Century Park Access Road (CPAR).

The external auditors also expected the Council to include a disclosure in its financial statements on the basis of preparation of the accounts that sets out the risks and uncertainties to the continuity of service provision arising from the impact of additional financial commitments entered into by the Council to stabilise LLAL following the adverse impact of Covid-19 on Luton Airport's operations and finances. It was expected to include a material uncertainty paragraph in the audit report, which was not a modification of the audit report, highlighting this disclosure. Until EY's work was fully complete, further amendments may arise.

In regard to Audit differences, EY had highlight the following misstatements to the financial statements and/or disclosures which had not yet been corrected by management:

- EY had concluded that £26.4 million of capitalised expenditure incurred at the end of 2018/19 on airport expansion schemes did not meet the recognition criteria under IAS 16. The recognition criteria states that an item of PP&E or investment property should be recognised and included as an asset in the statement of financial position only if 'it is probable that future economic benefits associated with the item will flow to the entity' (IAS 16.7). EY did not believe these criteria had been met. The total value of relevant expenditure is material to our responsibilities. If no adjustment was made to impair the capitalised costs we therefore expect to qualify the audit report on the 2018/19 financial statements to reflect this.
- EY had concluded that there were material errors in the valuation assumptions for London Luton Airport based on the work of our Corporate Finance aviation specialists. The Council had obtained a draft revised valuation for the Airport which would be reviewed by real estates and corporate finance specialists. EY therefore expected that adjustments, including adjustments to prior year comparatives, would be made in the final version of the Council's group financial statements.

The Chief Executive raised a point of clarity in that the issue in regard to the airport was the large increase in its valuation.

The external auditors Audit Planning Report and Audit Progress Update identified key areas of focus for the audit of Luton Borough Council's financial statements, which had been updated as part of the Audit Results Report. The report also sets out EY's observations and conclusions, including views on areas which might be conservative, and where there was potential risk and exposure.

In respect of control observations, as part of work to inform the 2018/19 value for money conclusion, EY identified significant weaknesses in the Council's arrangements for procurement and contract management. Those weaknesses, which were considered to be indicative of significant deficiencies or material weaknesses in either the design or operation of internal controls, were outlined in the report.

Members were informed in regard to Value for Money, EY had considered the council's arrangements to deploy resources in a sustainable manner; take informed decisions; and work with partners and other third parties. The external auditors had identified the following significant risks:

- The Council's arrangements for financial resilience and sustainability.
- The Council's arrangements to progress the proposed Century Park Access Road (CPAR) scheme.

EY had provided an update on the Council's arrangements to progress the CPAR scheme as part of our Audit Progress Report. It was specifically noted that a planned decision on the business case for the CPAR scheme would not be taken by the end of 2018/19 and that the CPAR scheme was being revised to make sure it is more prudent, affordable and sustainable. As a result, EY concluded that the decision on the CPAR scheme would no longer be a significant value for money risk relevant to the 2018/19 audit. It was noted that although planning consent remained in place for CPAR there was still no approved business case.

EY had also considered other developments relevant to the 2018/19 audit responsibilities subsequent to the issue of our Audit Progress Report. This had resulted in the identification of one further significant risk in respect of the Council's arrangements for procurement and contract management. Having now completed a significant proportion of its procedures to assess the Council's value for money arrangements EY proposed to issue an adverse qualification of the 2018/19 value for money conclusion, that was that the Council does not have adequate arrangements to deploy resources in a sustainable manner, take informed decisions or work with partners and other third parties. This was as a result of the significant weaknesses identified in the Council's procurement arrangements.

The external auditors had reviewed the information presented in the Annual Governance Statement for consistency with its knowledge of the Council. The Annual Governance Statement included in the Statement of Accounts was generally consistent with their knowledge of the Council. However, although the Annual Governance Statement referred to some weaknesses in the Council's contract management arrangements it required further updating to refer more fully to the weaknesses in the Council's procurement and contract management arrangements that had led to EY's proposed adverse qualification of the 2018/19 Value for Money Conclusion, and the continuing and proposed actions of the Council to address those weaknesses.

A Councillor enquired if there had been any development since the publication of the report.

Janet Dawson, Partner, Ernst & Young LLP replied that things had moved on. However, although the report was still relevant, work was still ongoing as there were final areas of the audit that needed to be concluded.

Neil Harris, EY commented that the 2018/19 Audit had been a journey, as there had been complicated circumstances and that all parties wanted to get it right. However, there were still several facts, circumstances and principles that needed to be nailed down before the external auditors issued its final report. He added that EY had also employed its internal Corporate Finance Team and specialists in the aviation and real-estate.

A Councillor commented that he appreciated all of the hard work by council officers and EY and felt that things were finally moving in the right direction. He added that the issues were clear surrounding the DCO and hoped that the 2018/19 Audits Results Report would be finalised within the next month.

A Councillor enquired what disagreements in respect of the DCO there had been between the external auditors and the council and if the issues could be resolved between all parties?

Janet Dawson, Partner, Ernst & Young LLP replied that DCO costs sat within LLALs accounts and was a management decision on how those accounts were accounted for, and what principles were used and what measurement value. She added that the accounts were then audited by the 'big four' auditors prior to coming into the group account, which management needed to agree upon, before the accounts came to the external auditors. Therefore that were already four parties looking at the technical requirements and accountancy principles associated with something that was uncertain in its nature, not the DCO itself. She added that the probability of the DCO going ahead needed to be looked, how much it costs and whether it could be 'fair valued', or whether it could be included in the councils accounts at direct cost.

She continued that at the time of writing the report, EY were in a position where it did not have a clear picture, but were now at a point where it had much more clarity and were much more comfortable that the principles and measurements and number could be agreed. It was hoped that EY could therefore avoid qualifying the accounts.

The Director, Finance , Revenues & Benefits clarified that EY were discussing the group accounts. In regards to the council accounts, there were no major concerns, it was only the group accounts where there were areas of judgement that needed further discussion. He added that officers had followed all of the advice that had been received from external experts. In terms of the judgements used by the LLAL management team and the council had been signed off by LLAL's auditors Price Waterhouse Coopers.

He added that the valuation of the airport had increased three-fold and would add additions value on the balance sheet of the airport. He continued that significant progress had been made in terms of cash flow and significant stress testing of the councils budget had been conducted with various reports being submitted to the Executive, and scrutinised by FRG prior to the 2022/23 Budget being approved by Full Council.

Members enquired if the valuation of the airport would need to be assessed due to the effects of the pandemic.

The Director, Finance, Revenues & Benefits replied that the main variables were the assumptions of the number of passengers both pre and post pandemic. The post pandemic valuation reflected the recovery in passenger numbers. Other variables which had caused an increase in valuation was the increase in passengers to 18m in two to three years time and the reversionary value in that in 2032 the airport would contractually and legally come back to the council without any debt.

Resolved: That the EY Audit Results Report 2018/19 report be noted.

14 LBC Response to EY Audit Results Report 2018/19 (Ref 9)

The Director, Finance, Revenues & Benefits informed Members that the LBC response to EY Audit Results Report 2018/19 was a matter for the Audit & Governance Committee to consider.

Resolved: That the LBC Response to EY Audit Results Report 2018/19 be noted.

(Note: The meeting ended at 6.58 pm)

Scrutiny Finance Review Group Meeting

Minutes

1 February 2022 at 6.00 pm

Present:

Councillors: U. Ali, Ahmed, Franks, Ghulam (Substitute for Councillor M. Hussain), Masood, Moore and Skepelhorn.

In Attendance:

Councillor Malcolm

Note: In the absence of the Cllr Young, the Chair, Cllr Skepelhorn was elected to take the Chair for this meeting only.

15 Apologies for absence (Ref 1)

Apologies for absence from the meeting were received on behalf of Councillors M. Hussain and Skepelhorn.

16 Finance Updates (Ref 8)

The Director, Finance, Revenues & Benefits informed Members that work on the Budget Monitoring Quarter 3 Reports 2021-22 was currently being conducted and it was expected to be finalised within the next few weeks.

Resolved: That the Finance Update report be noted.

17 Budget Update Presentation (Ref 9)

The Director, Finance, Revenues & Benefits gave a presentation in regard to the budget 2022/23.

Members were reminded that:

- MTFP had been by and large in line with the latest forecast despite significant uncertainties and COVID pressures except for the latest inflation pressures.
- Current budget 2021/22 is forecast a deficit of £0.7m – work was being done to address this and achieve a balanced budget
- 2022/23 budget was very complex and challenging and based on a very uncertain financial environment – both COVID and demographic changes
- Spending Review was not favourable and had yet to deal with Social Care pressures and housing.
- C Tax limited to 1.99% increase and Social care precepts limited to only 1%
- Challenges: COVID, financial crisis, Climate change, Care sector, Supply chain, Inclusive growth, governance, etc.

Main Budget Assumptions for 2022/23 – subject to Council's approval:

- pay award - 2.25% and 2% for future years
- increase in capital programme limited to headroom available resulting from fall out from previous cap ex. and funded by future capital receipts. Additional projects were subject to prudence, affordability and sustainability tests.
- growth included statutory, inflation and unavoidable budget pressures e.g. pay and contractual, inflation, 1.25% NI.
- additional growth in some key service areas amounting to £3.3m
- one off income not to be used for balancing budget i.e. recurrent costs
- business rates subject to business rates retention scheme. No increase other than multiplier.
- No COVID 19 pressures reimbursed by government. One off fund set aside.
- C tax 1.99% plus precepts 1% in 2022/23 and for future years (subject to members approval, fair funding review and proper funding for social care).
- demographic changes managed through demand management and 2022/23 savings
- LLAL Income (dividend) removed – future income only to be used to fund future capital programme subject to stabilising LLAL.

Growth Requests for 2022/23

- Investment in services:

• Neighbourhood services inc. street cleansing (modelling wip)	1.000
• Enforcement	0.200
• Waste management – COVID impact may receive funding	0.421
• Highways	0.196
• Neighbourhood services – market supplement	0.143
• Agency Cost for Best Interest Assessors and Section 12 Doctors (DOLS)	0.191
• Supplies & Services - 18+ Leaving Care Provisions	0.270
- Departmental pressures – enabling services legal and Finance support to various directorates 0.170
- ICT contract costs previously covered by reserves and service credits 0.700

Total for 2022/23 **£3.291m**

Resolved: That the Budget 2022/23 presentation be noted report be noted.

18 Treasury Management Investment Strategy 2022/23 Presentation (Ref 10)

The Director, Finance, Revenues & Benefits gave a presentation in regard to the Treasury Management Investment Strategy 2022/23.

Members were informed that the strategy was dependant on the following:

- LLAL stabilisation and recovery plan – subject to further COVID impact
- the future support to LLAL might be at a lower interest rate but above cost of borrowing for the Council, DLUHC/CIPFA report – timing and recommendations
- external borrowings and forward interest rate - impact of inflation on gilts
- return on investment including LLAL – no reliance place on dividend for the foreseeable future
- a further review of capital programme – prudence, affordability, sustainability, delivery models, and financing options.

Resolved: That the Treasury Management Investment Strategy 2022/23 presentation be noted.

19 CIPFA Financial Management Code Presentation (Ref 11)

The Director, Finance, Revenues & Benefits gave a presentation in regard to the CIPFA Financial Management (FM)Code.

Members were informed that the Financial Management Code was a means to measure a local authority's quality of financial management against a the set of principles and standards set out by CIPFA. The aim was to achieve financial sustainability across 6 principles of good financial management:

1. Organisational Leadership
2. Accountability
3. Transparency
4. Professional Standards
5. Assurance.
6. Long-Term Sustainability

He added that one of the cornerstones of the code was that good financial management was the collective responsibility of the whole organisation including elected members, the Chief Executive, the Chief Finance Officer (S151) and professional colleagues in the leadership teams. Compliance was encouraged by 1 April 2022 and non-compliance would have an impact on the auditor's opinion on Value for Money and Governance.

Members were informed that in regard to Lutons compliance, a report had been submitted to CLMT on 14th October 2021, FRG 1 Feb 2022 and the Executive in April. In order to demonstrate conformity with the FM Code's standards, a self assessment had been carried out and a framework established to monitor and report on the Council's compliance (as Red, Amber or Green). This provided evidence to demonstrate compliance by referencing the component parts of the Council's:

- Constitution, including the Financial Regulations and Budget Policy Framework;
- Governance structure;
- Interviews with Officers and the S151
- Financial documents;
- Financial reporting processes and practices;
- Performance reporting.

He added that the approach to ensure FM Code compliance for Luton BC included:

- Initial actions taken includes a full programme of CIPFA Training for Officers and Members commencing in October 2021

- Finance Improvement Plan will cover more of the detail
- Responsible Officers need to be identified to address any areas of weakness
- Further progress updates will be reported as required and will include deeper dives into the actions and progress of the responsible officers for each financial standard

The Director, Finance, Revenues & Benefits reported that the improvement plan was underway and progress was being made. He added that areas for improvements to be addressed before 1 April 2022, and that a further report would be submitted to CLMT and Executive. He concluded the Council was committed to achieve: Good financial management, improve financial resilience and a sustainable public service.

Resolved: That the CIPFA Financial Management Code Presentation be noted.

20 Work Programme Report (Ref 12)

The Democracy and Scrutiny Officer presented the FRG draft work programme and dates of meetings for 2021-22 and advised the programme would be appropriately amended and updated as resolved by the Committee below.

Resolved: (i) That the FRG Work Programme be noted and approved

(ii) That the following dates for future meetings of FRG 2020-21 be noted:

- 3rd March 2022
- 14th April 2022

21 Local Government Act 1972, Part VA (Ref 13)

Resolved: That, under Section 100A(4) of the Local Government Act 1972, the public be excluded from the remainder of the meeting as it is likely that if members of the public were present during consideration of the Item Ref 14, there would be disclosure to them of exempt information falling within Paragraph 3 of Part 1 of Schedule 12A to the Local Government Act 1972 as amended.

22. Future Ready Programme & Transformation Update (Ref 14)

The Transformation Programme Manager reported on the development of the Future Ready Programme and Strategic Change work programme.

Resolved: That the Report (Ref: 14) be noted.

(Note: The meeting ended at 6.58 pm)

Scrutiny Committee:	Finance Review Group (FRG)
Date of Meeting:	3 rd March 2022
Subject:	Rent Deposit Scheme
Report Author:	Colin Moone

Purpose

1. To outline the operating arrangements for the current rent deposit scheme.

Recommendations

2. The Finance Review Group are requested to:-
 - (i) note the report and
 - (ii) note the challenges in administering a loan scheme for rent deposits.

Report

3. Support to access a private rented tenancy is one of the options used in preventing and relieving homelessness. For households who cannot afford a deposit to access a tenancy, but can afford regular rental payments (including those who can cover rent from benefit payments), the rent deposit scheme helps potentially homeless individuals and households to settle into a new home. Funding can cover a deposit and a month's rent in advance. A typical rent deposit/rent in advance payment for a single person is around £1,100, rising to £2,200 for a family.
4. The scheme also increases our engagement with the private rented sector, providing an opportunity to influence the quality of homes and management. Below is an extract from the 5 Year Temporary Accommodation Reduction Plan. The Plan is updated with the January 2022 Actuals, which shows the current direction of travel.

Year 1: Temporary Accommodation Reduction Plan - 2021/22

Item	Target 21/22	January 2022 Actuals
In Temporary Acc'	1,220	1,139 (12/21)
Homeless Approaches	3,200	3,201
Acceptance Rate (25%)	800	193/1,227 (16%)
Prevention	370	115
Relief	230	158
Council Lets	180	150

Private Sector Lets	150	46
Total end of Year	1,079	1,112
Reduction	141	108

5. Helping households to access a tenancy reduces the demand for temporary accommodation and also it is an important way of supporting households out of temporary accommodation into a sustainable tenancy. In this way, our rent deposit option supports the council's temporary accommodation reduction plan above. This activity is evidenced through the Prevention and Relief columns. Essentially, both do the same things although in the Relief Stage a household may already be in temporary accommodation.
6. Rent deposit support is offered to households who have identified suitable accommodation and this activity is managed through Housing Solutions Officers. Applications for rent deposits are assessed for affordability and subject to sign off by a manager. Deposits and rent in advance are offered on a loan basis, with a repayment arrangement agreed at the start of the agreement.
7. During 2021/22 so far officers have spent £73,396 and assisted 54 households with rent deposits.
8. As this is a loan facility, the overall debt is £592,525.55 – from March 2015. This is a combination of the current bad debt and current debt. Of the debt stated, 79 cases are with Legal for recovery, accounting for £107,856.39.
9. Legal action has been placed on hold waiting a decision whether officers should proceed to court and the likely outcome of such action. A further 276 cases totalling £398,144.88 are awaiting a decision for write off or to pursue through legal channels.
10. This whole area is subject to review.

Challenges of the Current Scheme

11. As stated above, rent deposits help potential homeless households to access accommodation, where ordinarily they would have presented themselves as homeless and be placed into temporary accommodation. A decision was made a number of years ago to stop giving these deposits as grants but loans. In many local authorities it is general convention that deposits are just paid by the local authorities and these deposits are placed in a government protection scheme that is only accessed when the tenancy ends where this is either paid back to the Council or is used in full or part to pay for tenant damages. In the private rented sector, generally, this is how private renting operates.
12. The current scheme has a number of problems associated with it:-
 - It's a loan and it has to be paid back – this creates another layer of bureaucracy of debt collecting for officers who are not skilled in this area;

- This directly conflicts with the Luton 2040 vision of no one being in poverty, as these arrangements usually put households in difficulties paying the loan back;
- The loan deters potentially homeless households from accessing the scheme, which eventually leads to them being homeless;
- In the current economic climate households are reluctant to take on more debt;
- There have been examples where taking on this loan have impacted on the households' ability to pay their rent – in turn this could lead to the landlord evicting them and the Council deeming the household intentionally homeless for non-payment of rent and
- The debt, at nearly £600k has become difficult to collect and staff resources are insufficient to work on this effectively.

13. Deposit schemes run by Councils are generally speaking grant funded – from government. Officers have not come across any Councils, which run these schemes as loans. This practice deters many households from accessing deposits and promotes homelessness. Given that Luton must use the private rented sector more, as access to affordable housing is limited, this is a serious weakness in the Council's prevention strategy. Although the Temporary Accommodation Reduction Plan is working, homeless approaches remain high and is predicted to continue to rise. Preventing homelessness is essential to ensure the Council manages down the high numbers in temporary accommodation.

14. Of the cases who have accessed the private rented sector through the deposit scheme, 6 have had to be accommodated because the arrangements broke down. This has demonstrated that the deposit scheme, for the purpose of preventing households accessing temporary accommodation has been successful.

Some Case Studies

15. Case study 1. In 2021, a single male was made homeless by his wife whilst he was in hospital having tried to commit suicide. Whilst he was unwell his wife transferred the bank accounts and the property into her name. He has adjustment disorder secondary to psycho-social and found accommodation in London where he was able to take his dog with help from the rent deposit and rent in advance of £2,000. To take him to court will trigger off his mental health, if not already and would have to be placed in alternative care. Living in London makes the process of recovery harder and we may not manage to get him into court and he is unlikely to have goods to seize to the value he owes and our losses. No temporary accommodation was required. If officers did not pay the deposit and rent in advance he would have remained in temporary accommodation for us to find alternative permanent accommodation at a later point. Debt owing - £1,500.

16. Case study 2. In November 2020 a mother approached as homeless with her 4 children. She was a victim of harassment and stalking. She found a property in London but needed a deposit due to limited funds. She needed a complete resettlement plan. It has been 14 months since the deposit had been given. The cost

of procuring nightly let accommodation out of the borough with no exit plan would have been far greater. Debt owing £2600.

- 17. Case study 3.** Single male prevented from homelessness in November 2016. Many vulnerabilities – and being dealt with through MARAC (Multi-Agency Risk Assessment Conferences) - Bipolar, Schizophrenia and ADHD. Was in secure accommodation. Council would have had to provide accommodation if not prevented. Debt written off as little chance of recovery. Taking the case to court, he is unlikely to turn up and/or have anything of value to seize to clear the debt of £900.

Conclusion

- 18.** This report highlights the role rent deposits play in preventing homelessness. However, the administration of the scheme is particularly difficult given that households are reluctant to take on additional debt, in the current economic climate, but this is an essential homeless prevention tool.

Proposal/Option

- 19.** To note the report.

Appendix

- 20.** N/A.

Background Papers

- 21.** None.

Committee:	Finance Review Group			
Date of Meeting:	03 March 2022			
Subject:	Work Programme 2020/21 & Executive Forward Plan			
Report Author:	Service Director, Citizen Engagement and Legal Services			
Contact Officer:	Matthew Hussey Tel: 01582 546032			
Implications:	Legal	☐	Community Safety	☐
	Equalities	☐	Environment	☐
	Financial	☐	Consultations	☐
	Staffing	☐	Other	☐
Wards Affected:	All			

Purpose

1. To inform FRG of its outline work programme and future meeting dates to enable it to plan its work in 2021/22.

Recommendations

2. That the FRG:
 - (i) Determines and approves its work programme, as appropriate; (marked Appendix A);
 - (ii) Determines whether to include for scrutiny on its work programme, any of the items from the Executive Forward Plan; (marked Appendix B);
 - (iii) Delegate's responsibility for developing and updating its work programme between meetings, to the Democracy and Scrutiny Team Leader, after consultation with the Chair.

Report

- 3 The draft work programme for future meetings of the Committee is attached at **Appendix A**. The latest Executive Forward Plan is attached as **Appendix B**. The most up-to-date plan will be provided nearer the time if updated. Members are requested to review the documents and determine the items they wish to include on the future programme.

3. The FRG dates for 2021/22 are as follows:

- 14th April 2022

Appendix (if any)

Appendix A – FRG Work Programme
Appendix B – Executive Forward Plan

List of Background Papers (if any)

None

SCRUTINY: FINANCE REVIEW GROUP

WORK PROGRAMME - MUNICIPAL YEAR 2021/22

(This work programme is updated regularly following each meeting of the committee and as required, in consultation with the Chair. Unallocated potential future items are listed at the end of this document)

Meeting Date: 14th April 2022	Time: 6.00pm	Committee Room: 3
Reminder Date:	03/02/21	
Deadline for Titles:	10/02/21	
Deadline for Reports submission:	30/03/21	
Democracy & Scrutiny Officer:	Matthew Hussey	

Agenda Items	Report Author/Format/Comments
Chair's Updates (Standing item)	Oral Report
Finance Updates (Standing item)	Dev Gopal Oral Report
2022/23 Highways Capital Work Programme	Sandra Comerasamy/Roger Kirk Written Report
Property Investment Performance (Moved from 23 September 2021 & 1 February 2022)	Richard Morgan/Roger Kirk Written Report
Overarching Impact of Financial Measures /Cuts undertaken by the Council in 2020/21 to Citizens (Moved from 3 March 2022)	Maureen Drummond Written Report
Work Programme (Standing item)	Democracy and Scrutiny Officer Written Report
Dates of Future Meetings:	Democracy & Scrutiny Officer

Future Items:

- Update on the missing £1.1m SEMLEP Funding – To be submitted to a future meeting.

Deferred Until Executive Date Known:

- Report on the Civica contract situation – Aidan Wilkie
- Active Luton SSC – Information Communication Technology Proposal – Matthew Hudson
- Options for the Future of Community Centres – Mark turner/Roger Kirk
- Proposed Lease to Wigmore Valley Park to LLAL (PRIVATE) – Richard Morgan
- Property Investment Performance - Richard Morgan
- Town Centre Regeneration Programme – Toby Maloy

SCRUTINY: FINANCE REVIEW GROUP

WORK PROGRAMME - MUNICIPAL YEAR 2021/22

(This work programme is updated regularly following each meeting of the committee and as required, in consultation with the Chair. Unallocated potential future items are listed at the end of this document)

- Library Strategy - Matthew Hudson (August 2020)
- Active Luton and Luton Culture PRIVATE (June 2020)
- Supplemental Agreement to the Concession Agreement relating to LLA in relation to project cobalt and project 32 (PRIVATE) (Executive Date To Be confirmed) – Mark Turner

Potential future items for inclusion in the work programme when arranged:

- **Report on the Civica contract situation – Aidan Wilkie (waiting for information and confirmation from Aidan)**

Forward Plan of Key Decisions from 7 March 2022

Executive Membership: Councillors Simmons (Chair) Goding, A. Hussain, J. Hussain, Khan, Malcolm, K. Malik, Roche, T. Saleem and Shaw

Commencing from Wednesday 9 February 2022 the council plans to make key decisions on the issues set out below. Key decisions relate to those which are likely:

- ◇ to result in the local authority incurring expenditure which is, or the making of savings which are, significant having regard to the Council's budget for the service or function to which the decision relates; or
- ◇ to be significant in terms of its effects on communities living or working in an area comprising two or more wards or electoral divisions in the area of the Borough.

The forward plan lists the business undertaken by or on behalf of the Executive and will be published 28 days prior to each Executive meeting. Those items identified for decision more than 28 days in advance may change in forthcoming plans. There may also be occasions where a key decision is deferred to a later meeting. Each new Plan supersedes the previous Plan. Any questions regarding individual issues should be addressed to the contact specified in the Plan.

The agendas and forward plans for meetings of the Executive will be published as follows:

<u>Forward Plan Published</u>	<u>Publication of Agenda</u>	<u>Executive Meeting Date</u>	<u>Forward Plan Published</u>	<u>Publication of Agenda</u>	<u>Executive Meeting Date</u>
07 February 2022	24 February 2022	07 March 2022			
04 March 2022	24 March 2022	04 April 2022			
25 March 2022	12 April 2022	25 April 2022			

Link to published Executive agendas, reports and decisions: <http://democracy.luton.gov.uk/cm5public/Documents/PublicDocuments.aspx>

Note:

From time to time there will be a necessity to consider issues which will result in key decisions being taken which are not included in the forward plan, e.g. items of extreme urgency for Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012. (4(2)(a) Confidential information. 4(2)(b) Exempt Information. 4(2)(c) lawful power to exclude person to maintain orderly conduct of the meeting.)

This is a Formal Notice under the Local Authorities (Executive Arrangements)(Meetings and Access to Information)(England) Regulations 2012 that part of the Executive meeting listed in this Forward Plan will be held in private because the agenda and reports for the meeting will contain exempt information under Part 1 of Schedule 12A to the Local Government Act 1972 (as amended) and that the public interest in withholding the information outweighs the public interest in disclosing it.

The last page of this document sets out the definitions of Exempt Information under Paragraphs of Part 1 of Schedule 12A of the Local Government Act 1972.

Any correspondence to be addressed to: The Service Director, Policy Communities and Engagement, Luton Borough Council, Town Hall, Luton, LU1 2BQ unless otherwise stated.

**LUTON BOROUGH COUNCIL
FORWARD PLAN OF KEY DECISIONS AND KEY ISSUES**

Title	Key decisions and key issues	Decision maker	Date of decision	Documents submitted for consideration	Should exclusion of the public be considered	Contacts/ Lead Executive Member(s)
Treasury Management decisions on borrowing and investments to optimise the Council's financial position	To borrow and invest, and to restructure borrowings where appropriate, in order to optimise the Council's financial position while minimising risk and ensuring that all actions are in accord with the Council's treasury management policy and strategy.	Head of Corporate Finance	Ongoing with dates dependent on financial market conditions	Record of decisions	N/A	Dev Gopal [REDACTED] Cllr Malcolm
NEW – Insurance Services	To consider and approve a 3 month contract extension	Executive	7 March 2022	Report	No	Gloria Johnson-Ashman/Dev Gopal [REDACTED] Cllr Goding
NEW – Luton Employment and Skills Implementation Plan	To consider and approve the plan	Executive	7 March 2022	Report	No	Debbie Poole-Hunt [REDACTED] [REDACTED] Cllr Goding
NEW – Retrospective endorsement of energy contract 2020-24	To retrospectively endorse the energy contract 2020-22	Executive	7 March 2022	Report	No	Sue Davies/Roger Kirk [REDACTED] Cllr Goding
2022/2023 Highways Capital Work Programme	To approve the highways works capital programme implementation from 1 April 2022	Executive	7 March 2022 (9 February 2022)	Report	No	Sandra Comerasamy/Steve Laine [REDACTED] Cllr Roche

**LUTON BOROUGH COUNCIL
FORWARD PLAN OF KEY DECISIONS AND KEY ISSUES**

Title	Key Decisions and key issues	Decision Maker	Date of decision	Documents submitted for consideration	Should exclusion of the public be considered	Contacts/Lead Executive Member(s)
Luton Rising Group (LLAL) Consultation on and adoption of the Airport business plan 2022/23	To adopt the business plan	Executive	7 March 2022	Report	No	Mark Turner Cllr Simmons
Draft Housing Strategy 2022/27	To agree the draft Housing Strategy 2022-27 for public consultation	Executive	7 March 2022	Report	No	Claire Astbury/Colin Moone Cllr Shaw
Luton Tree Policy and Tree Management Strategy	The adoption by Council of the Luton Tree Policy and Tree Management Strategy 2021-2030	Executive	7 March 2022	Report	No	Steve Battlebury/Matt Seal Cllr A. Hussain
Budget Monitoring Qtr. 3 Reports 2021/22	To note the results of the budget monitoring forecasts for 2021/22 and to approve any recommendations arising from the latest budget position	Executive	7 March 2022	Report	No	Dev Gopal/Tim Lee Cllr Malcolm
Amalgamation of Foxdell Infant and Junior School	To approve the amalgamation of Foxhall Infant and Junior School	Executive	7 March 2022 (6 December 2021)	Report	No	Nicholas Nel Cllr Khan
Vehicle Engine Idling	To agree to adopt the powers to allow fixed penalty notice to be issued to stationery vehicles with its engine running	Executive	7 March 2022	Report	No	Tony Stefano Cllr Roche
Moving Traffic Contraventions	To consider and agree the proposal	Executive	4 April 2022	Report	No	Tony Stefano Cllr Roche

**LUTON BOROUGH COUNCIL
FORWARD PLAN OF KEY DECISIONS AND KEY ISSUES**

Title	Key Decisions and key issues	Decision Maker	Date of decision	Documents submitted for consideration	Should exclusion of the public be considered	Contacts/Lead Executive Member(s)
Adult Social Care Strategy	To approve the publication of an adult social care strategy	Executive	25 April 2022 (31 January 2022) (17 January 2022) (8 November 2021)	Report	No	Elaine Healy/Tamara James Councillor J. I. Hussain
Adult Social Care Delivery Options	To consider and agree the delivery options for adult social care	Executive	25 April 2022 (4 April 2022)	Report	No	Tamara James/ Luke O'Byrne Cllr J.I. Hussain
Stockwood Park Masterplan	To approve the commission of a expert company to develop and produce the master for public and stakeholder consultation	Executive	25 April 2022 (16 August 2021) (28 June 2021)	Report	No	Roger Kirk Cllr Goding
Luton 2040 six monthly update	To agree and note the updates	Executive	25 April 2022 (31 January 2021) (16 August 2021)	Report	No	Sinead McNamara Cllr Simmons
Equality Diversity and Inclusion Strategy	To agree the final draft for consultation	Executive	25 April 2022	Report	No	Adam Divney/Marek Lubelski Cllr Simmons
NEW Central Area Growth Board	To agree the Terms of reference and standing orders.	Executive	25 April 2022	Report	No	Nicola Monk Councillor Simmons

**LUTON BOROUGH COUNCIL
FORWARD PLAN OF KEY DECISIONS AND KEY ISSUES**

**EXEMPT INFORMATION
SUMMARY OF THOSE MATTERS WHICH BY VIRTUE OF PART 1 OF SCHEDULE 12A OF THE
LOCAL GOVERNMENT ACT 1972 MAY BE DISCUSSED IN PRIVATE**

Paragraph
No.

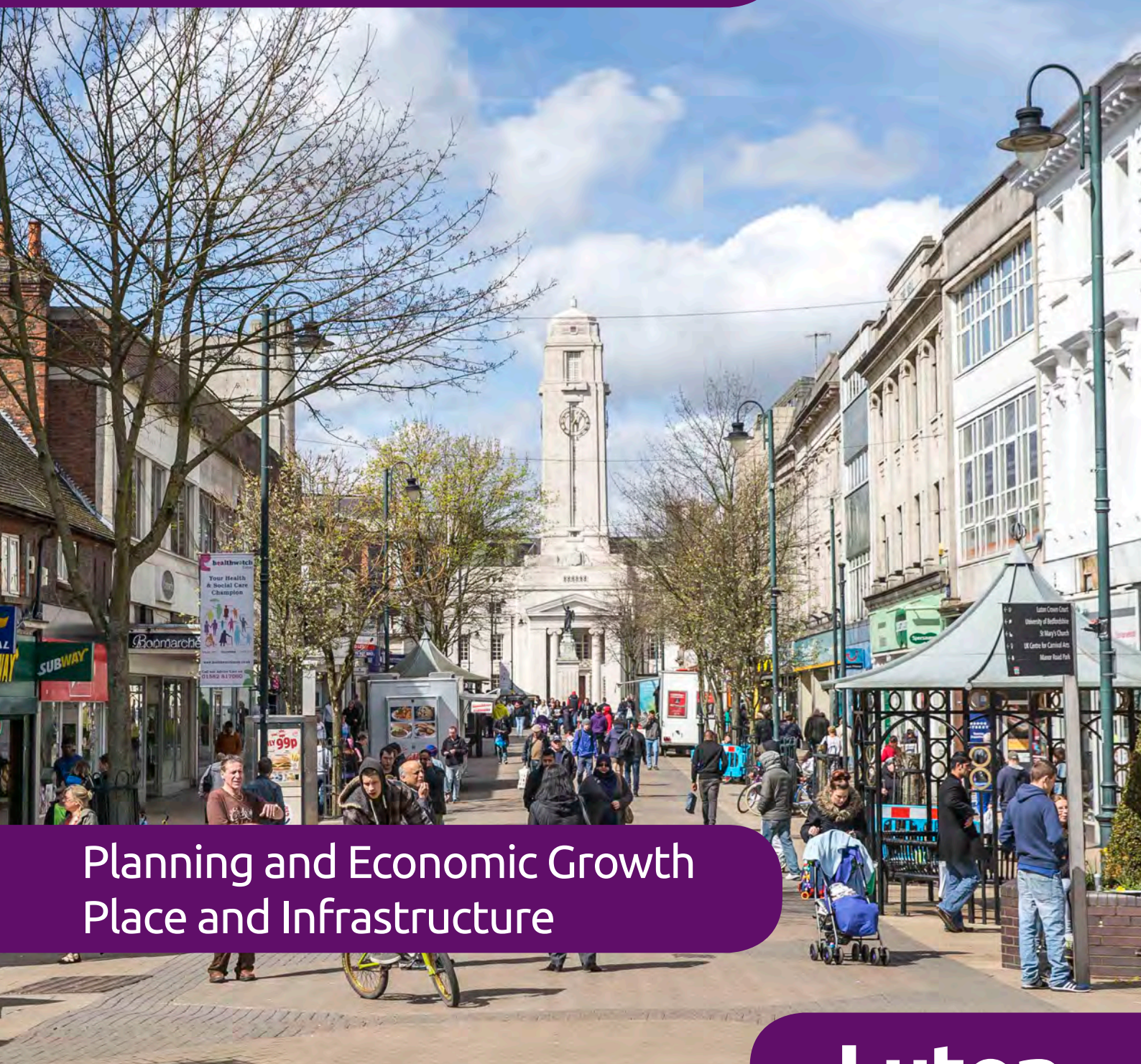
1. Information relating to any individual.
2. Information which is likely to reveal the identity of an individual.
3. Information relating to the financial or business affairs of any particular person (including the authority holding that information).
4. Information relating to any consultations or negotiations, or contemplated consultations or negotiations, in connection with any labour related matter arising between the authority or a Minister of the Crown and employees of, or office holders under, the authority.
5. Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.
6. Information which reveals that the authority proposes:
 - (a) to give under any enactment a notice under or by virtue of which requirements are imposed on a person; or
 - (b) to make an order or direction under any enactment.
7. Information relating to any action taken or to be taken in connection with the prevention, investigation or prosecution of crime.

Evidence WR GHP s



Local Luton 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.

Telephone	01582 547087
Email	strategicplanningteam@luton.gov.uk
Address	Strategic Planning Group LUTON BOROUGH COUNCIL TOWN HALL GEORGE STREET LUTON LU1 2BR

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 July 2016 to January 2017 to consider the legality and soundness of the plan. To be considered a 'sound' plan (see paragraph 182 of the National Planning Policy Framework) it 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 be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** - the plan should be deliverable over its period and 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 and 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 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. These plan making stages and timetable followed are as follows:

July 2012 - August 2012	'Local Plan - What do you think' Consultation (Regulation 18)
June 2014 - August 2014	Draft Local Plan for Luton Consultation (Regulation 18)
October 2015 - December 2015	Pre-Submission Period for Representation (6 weeks, Regulation 19)
April 2016	Submission to Secretary of State
July 2016 - 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 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 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 live, work and visit.

1.9 The Plan then sets out site allocations and both 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 27th 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 (and 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, with 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 6th March 2014 the Department for Communities and Local Government (DCLG) launched its planning practice guidance web-based resource which provides further guidance to the NPPF ⁽²⁾. The PPG was accompanied by a Written Ministerial Statement which includes a list of the previous planning practice guidance documents 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 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 business 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 by 2020 grow the economy by £10.2billion, 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 Whilst 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 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 its adjoining authorities' areas 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 need 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 ongoing basis. For Luton they comprise:

- Environment Agency
- Historic England
- Natural England

1 . Introduction and Background

- 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

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) its members were drawn 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 last of the prospectus' 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: 3. Healthier and more independent adults and older people. At the heart of this prospectus is a three point plan:

- to increase income from business growth
- to better equip residents of all ages to get jobs through investment in education and training
- to work efficiently with the Police (including the new Police and Crime Commissioner), the NHS, schools and academies, the university, the voluntary sector and Job Centre Plus to ensure the most vulnerable in Luton are safe and supported.

Luton Borough Council Corporate Plan (2014 - 2017)

1.20 This Corporate Plan draws together all the key elements of Luton Borough Council's proposals for 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 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:

- 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, 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 have an important role in supporting the reduction of inequalities in health and improving social interaction and 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 to be 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 and minerals and waste development will be guided by the strategic policies of the 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 through this legislation, can prepare Neighbourhood

Plans, 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.

Policies Map

1.28 The Policies Map which is published alongside this Plan is a comprehensive map which displays the spatial boundary of all relevant development plan policies.

1.29 Where policies have a spatial boundary or location, for example a development boundary or designated employment areas, 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 are 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

1 . Introduction and Background

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 over 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 the Local Plan meets these requirements and to ensure the proposals have a reasonable prospect of delivery over 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 therefore viability testing has 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.

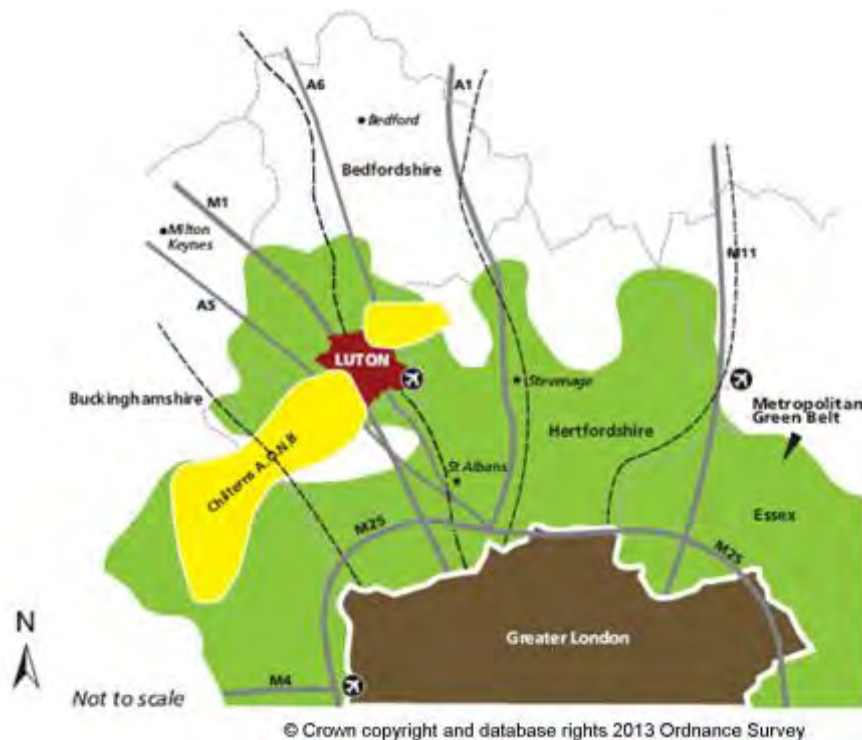
2 Setting the Scene

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 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 to 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 is 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 which played an important role in the early development of the town. Its original 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 large expansion during the 19th century in which 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 the engineering and automotive industries grew rapidly in the 20th century. Vauxhall located 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 Leagrave. London Luton Airport was officially opened on 16 July 1938 as 'Luton Municipal Airport' and the M1 was built in 1959, with the central library

2 . Setting the Scene

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

2.4 As part of an ongoing programme of regeneration in 2007 St Georges Square was redeveloped and the Luton - Dunstable Busway, a high-quality service linking Houghton Regis, Dunstable and Luton, was opened in 2014. Today the population of Luton is approximately 216,800 people (ONS, mid-year estimate, 2016) and London Luton Airport is one of the UK's largest airports and carried 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 indeed 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 (e.g. the prestige Capability Green business park is fully occupied while Butterfield Green research park continues to develop).

2.6 The town's industrial legacy including some older manufacturing areas greatly contributes 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 whilst 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 historically 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 fall behind rising market rents and house prices. 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 centre, District and Neighbourhood Centres hierarchy, for Luton's many communities to access jobs, housing, schools, healthy

nutrition, leisure and green space locally within the town, 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 Green Belt. The 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 Wigmore Valley Park, is proposed in the Local Plan.

2.13 The town is attractive to business and investment as evidenced in the 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, 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 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 business 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

2 . Setting the Scene

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 its economy expands and diversifies to meet the needs of local residents.

2.19 To ensure that Luton remains both attractive to investors and the economic 'heart' of the Luton Housing Market Area, quality employment allocations must be protected and other industrial land should only be released for housing and other uses 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 with 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 which 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 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 in order 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 which bring important benefits in terms of health and wellbeing. In particular

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

3 . Vision and Objectives

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,

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 appropriate mix of dwelling types, sizes and tenures to offer local residents 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 educational attainment. 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 the car 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 to by train, bus, walking and cycling. 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 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 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

3 . Vision and Objectives

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; 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 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 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 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.
- **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.

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 ongoing 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 to determining its preferred policy approach. The Plan does this by:

4 . Spatial Strategy

- 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;
- 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 would 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 which can be approved without delay.

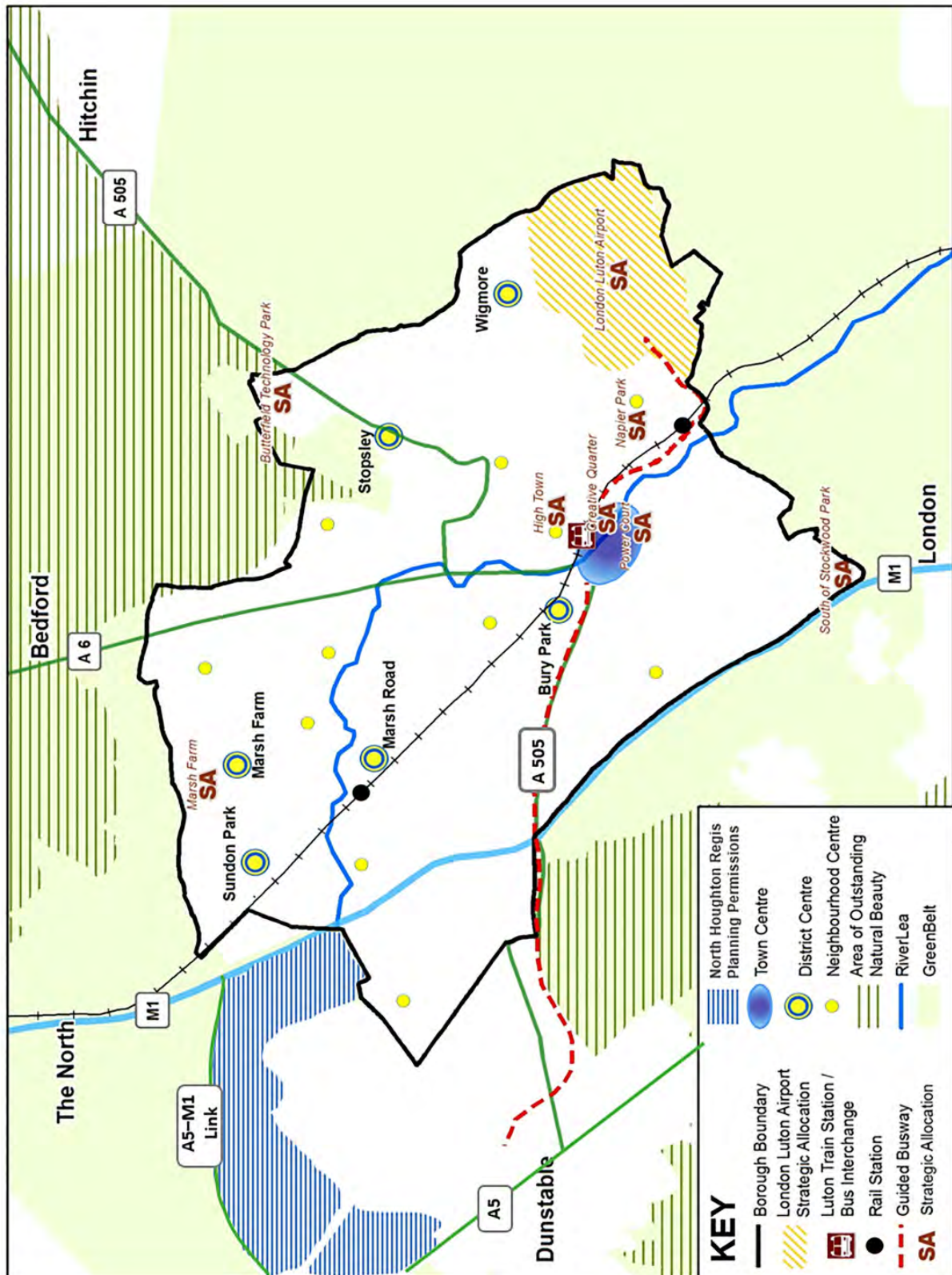
- A. Planning permission will be granted where applications accord with local plan policies (and, where relevant, with policies in neighbourhood plans) when taken as a whole, unless other material considerations indicate otherwise.
- B. The Council will require all new development in the borough to contribute 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 identity of the Borough.

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

Growth in homes, jobs and services that constitutes sustainable development will be welcomed; provided 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

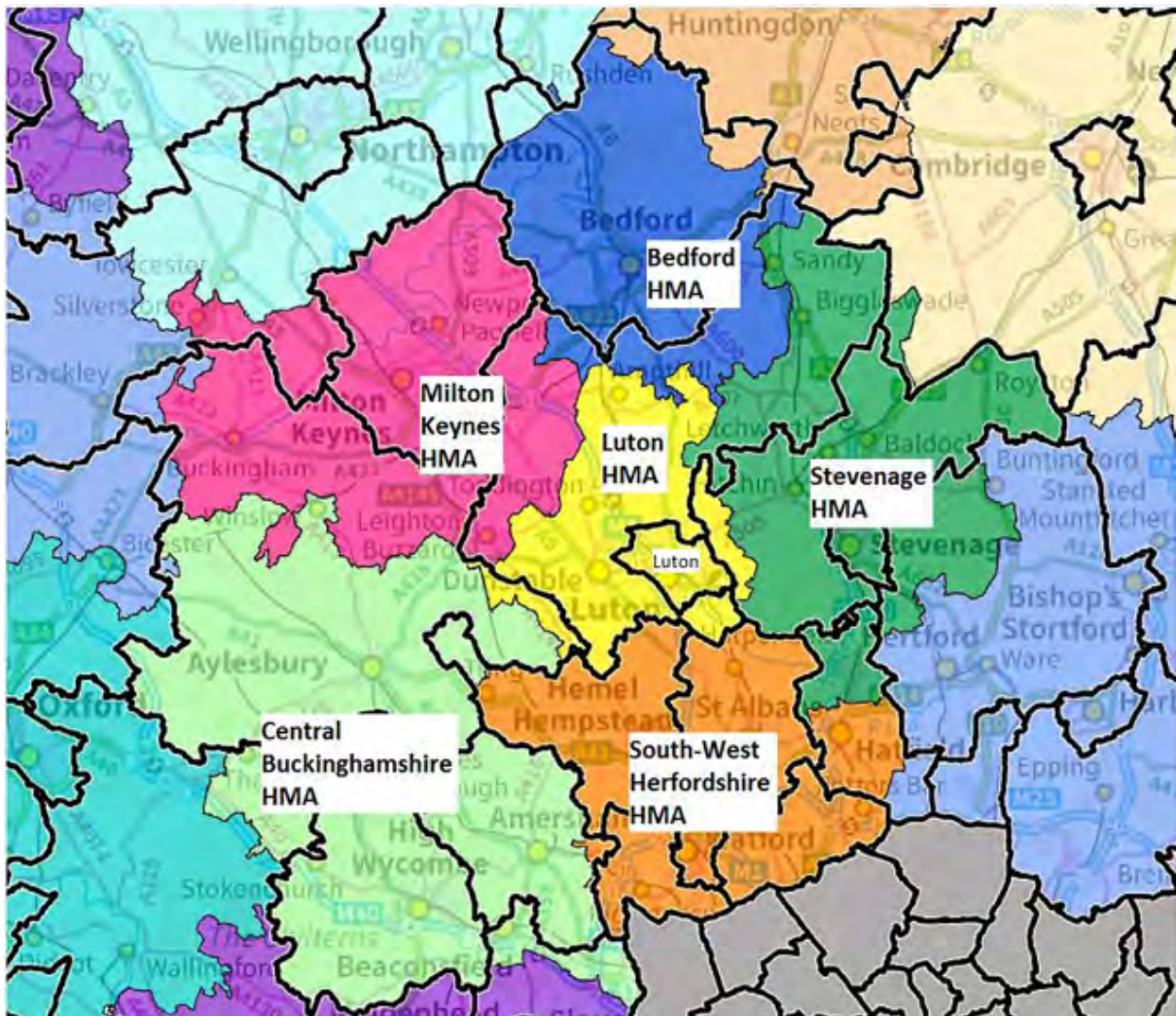
Spatial Development Strategy

4.4 This policy sets out the quantum of objectively assessed development need 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 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 need, 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.



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 seek 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 need that 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 the 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

4 . Spatial Strategy

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 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' which 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 Appendix11.

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

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 on 20 July 2010 to support development West of Luton.

which are not specifically allocated for housing 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 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*);
 - 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;
 - v. phasing and delivery of schools capacity including new provision, necessary to support the needs of Luton's population.

4 . Spatial Strategy

- 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, 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, 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 vitality and viability of the town centre.

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 the connections in particular with the south and west of the town centre. This issues impacts also on 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 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 associated 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 is and 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 in the town centre 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

4 . Spatial Strategy

above that already committed/allocated); and b) a quantitative need for 10,300sqm net of Class A3 floorspace to 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 for choice locally.

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 which are complementary to this regeneration approach including the 'Creative Quarter', 'Power Court' and 'High Town' which will focus on an 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 and 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 which feature in the Town Centre Strategy and are also subject to their own specific policies:

- Power Court Policy LLP9.
- 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;
- Castle Quarter



Policy LLP3 - Luton Town Centre Strategy

Luton Town Centre will be a location for positive change and will be 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 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 which 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 3,400 sqm net convenience retail floorspace in the current period and provide circa 4,420 sqm of non-bulky comparison goods for the period to 2020 and 30,096 sqm 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 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 which 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

4 . Spatial Strategy

- 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 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;
 - 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;
 - 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 Green Belt being their 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.

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 increase of new dwellings, jobs, retail, and improvements to the built and natural environment.

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 . Spatial Strategy

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).

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 which 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;
 - 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:

- 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;

- 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 which use and rely on the airport from neighbouring local authorities' areas, in particular Bedfordshire, Hertfordshire and Buckinghamshire.

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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, operation of cranes, which impact on the flight path or radar or on development which 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). PSZ's 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 PSZ 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 is 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 is 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 which

are important for Luton, the sub-regional economy, and for regenerating the wider conurbation.

Airport Safeguarding

- A. 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 which will over time result in a significant diminution and betterment of the effects of aircraft operations on the amenity of local residents and 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 in particular which 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.

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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 detriment to 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 on 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 Percieval 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 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; and
 - 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; and

- 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, 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 other 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 good quality employment site.

4.54 The analysis indicates 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

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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 as much as possible their impact on the natural environment.

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:

(a) the development of high quality B1 and B2 uses which 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.

(b) 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.

(c). 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).

(d) other uses such as small scale retail (A1 and A3), 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;
- 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 minor replacement elsewhere in order to achieve this and to

- 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;
- xi. B2 and B8 elements will only be permitted where the

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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 a 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) are 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 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;
- 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 (formed by the guided bus, the bus interchange and the main train

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station) of the town, 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 Chapel viaduct Stuart Street Critical Drainage Area and surface water flooding shows 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 may 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 3,393 sq 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 make 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 the St Mary 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 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 3,393 sqm 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 which 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 to preserve, and seek opportunities to enhance, 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);
- vii. land decontamination and works affecting the River Lea should be carried out in line with best practice available and be in accordance with Policy LP38 to avoid any harmful impact on the water resources.

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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 through time. The parade of shops retain the original urban fabric of the area and provide 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 and 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 significant further private sector investment to fully realise the opportunities of the area as a vibrant historic mixed use neighbourhood with opportunities for start up business 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 as 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 which 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 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 have 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 High Town 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, 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.j
- D. Development proposals which 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 Plaiter'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 Plaiter'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 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 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 for a 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 which 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 which have always gravitated around the Hat Factory and now also around Mill Yard. The Employment Land Review (2013) using EFFM projections and historical trend in the Region and in the local market foresees that jobs related to Art and 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 create 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 . Spatial Strategy

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 by 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 for a 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 respect the original urban grain of this historical area.
- 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.

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 which 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 ground floor which 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);
- vi. provide car parking in suitable discreet locations.

3. North of St Georges 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,

4 . Spatial Strategy

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;
 - 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 1960's and early 1970's, 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 by the 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 has 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 which would cater for local needs and attract also 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 1,000 sqm 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

- 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 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 which characterise the area;
- viii. Accesses 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

and 10,000 non B class jobs) over the plan period. 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% floor space 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) which 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, are needed to serve aviation engineering, business and logistics related growth and some small scale B2 accommodation for local businesses.

5.8 South of Stockwood Park 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 . Growing Luton's Economy

5.11 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 which 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 sqm. 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 will be provided 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;
- 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 and 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 which 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; and
 - 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 which 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.

6 Housing

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 identify and update annually 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 which 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 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 housing need for 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.

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 Annex2 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 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, 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.

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%

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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; which 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 move home are likely to need accessible housing.

6.23 The CLG guide to available disability data(6) 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 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).

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, and PPG (Paragraph 21) states that the Government wants to enable more people to build their own home and wants to 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);

- 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 more scarce 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

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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;
- Be available - the site should be available now or there should be a reasonable prospect that the site is available at the point envisaged;
- Be 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 may 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 traveller show person 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 will their housing needs need to 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 on Gypsies and Travellers needs which may now change and consequently 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 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 provides benefits to the community which outweighs 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 which have a combined floorspace of more than 1.000 sq 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

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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 which will apply on resale, but where there is no equity that is owned by an 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.

- ii. the accommodation units conform with adopted licensing and amenity standards and to design requirements as set out in Local Plan Policy LP25 (High Quality Design);
- 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 which they are primarily intended to serve, or are close to established 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.

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

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);
 - 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 through physical adaptations and energy efficiency enhancements; and
 - ii. alterations to the external appearance do not harm the character of the surrounding area.

- 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 which are spacious in character;
 - 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,

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 which is in keeping with the original roof;
 - iv. The proposed extension does not adversely affect the amenity of nearby occupiers,

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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; and
- ii. the site has adequate road access and is well related to the primary road network; and
- 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



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 2,500sqm, 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.⁽¹¹⁾ 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 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 are relatively low.

7.12 The 2015 study found that a locally set impact threshold policy would ensure that development proposals providing greater than 1,000sqm 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 which may 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 any additional floorspace is directed to the Creative Quarter within the Town Centre and 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

11 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.

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

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

7.15 For qualitative reasons the additional food floor space required currently in 2015 will be provided at Power Court. Up to 2020 an additional 2,900 sqm 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) will support the strategic upgrading of this centre to Neighbourhood Centre status; and a further foodstore commitment (for an Aldi store) at Sundon Park will support upgrading of that Neighbourhood Centre to a district Centre function.

Net Additional Comparison Floor Space*				
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.'

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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;
- 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 1,000 sqm 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:
- convenience retail; and
 - comparison (non bulky) retail floor space; and
 - 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:

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

7 . Luton Town Centre & District & Neighbourhood Centres

District and Neighbourhood Shopping Areas and Shopping Parades

Policy LLP23 - District & Neighbourhood Areas & Shopping Parades

The Council will approve planning applications which 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 which:
- i. strengthens the functional role, vitality and viability of the centre; and
 - ii. increase the mix of uses in the area; and
 - iii. maintains A1 retail on 75% of the shopping frontage; and
 - iv. provide no more than two adjacent non A1 units; and
 - v. provide a service principally to visiting members of the public; and
 - vi. retain existing window displays above ground level; and
 - vii. proposes 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;
 - 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



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 The 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 demand 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 green field land);
- development tends not to be viable within Luton on brownfield land

8 . Education and Other Community Facilities

and so there is likely to be 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 the rationalising and making more effective use of schools and services (e.g. shared use of libraries and community centres). In some cases facilities may 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, 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 which 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 para 37).

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

8 . Education and Other Community Facilities

meet forecast demands including strategic infrastructure and nationally significant infrastructure (NPPF para 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 para 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 para 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 size 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 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 which 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 which 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 School and a 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; and
 - it would not adversely affect the viability and vitality of a District or Neighbourhood centre; and
 - there would be no unacceptable effect on the amenity of any surrounding residential dwellings and other uses; and
 - 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;
 - 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 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 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 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.

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 LP37 and LP38) 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 which 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 which 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;

9 . High Quality Design

- safe and accessible environments where crime and 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 (e.g. there is an under-provision of allotments to fully meet demand in Luton and therefore, development should include layouts and design features to provide opportunities for allotments but also 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:

- i. 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;
- ii. 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;
- 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 avoiding 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 ⁽¹²⁾;
- 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 will 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 which do not:
 - i. adversely affect the character or appearance of the building or area; or
 - ii. hinder the view of a valued landscape, or feature; or
 - iii. cover important decorative features of a historic building; or
 - 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 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 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 which 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 bodies in order to maintain

an up to date evidence base using objective and local expertise including with; Bedfordshire & Luton Wildlife Working Group (and its various sub-groups); the Bedfordshire Local Nature Partnership; Upper River Lea Catchment Partnership; Greensand Trust, Luton Friends of Parks and Green Spaces and 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 and 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) including within 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 as well as school and community ecological projects (and potentially within other public or institutional land) which plays 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 which 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 sum, management costs.

10 . Natural & Historic Environment

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, among which carbon reduction, filtering from noise and intrusion, cooling effects and together with hedgerows also act as strategic wildlife corridors and havens harbouring many diverse plant and animal species which 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) via an Environmental Statement and in cases where forms of development not proscribed in regulations 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 and Queen Elizabeth II Playing Fields, as well as 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, where required bringing them back into an appropriate use which 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 (which include listed buildings, conservation areas and scheduled monuments) and non-designated heritage assets (which include 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 which affects 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
- 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 para 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 para 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 para 109, 115 and 116 and NPPG para 0003: Ref ID: 8-003-20140306); recognising the wider benefits of ecosystem services (NPPF para 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 para 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 para 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 para 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 para 169);

10.24 Planning (Listed Buildings and Conservation Areas) Act 1990 requires that: It shall be the duty of local planning authorities from time to time to formulate and publish proposals for the preservation and enhancement of any parts of their area which are conservation areas. A key issue for Luton's Conservation Areas and particularly Plaiters Lea CA 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 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 . Natural & Historic Environment

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

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 are 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

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- Lewsey Park
- Wigmore Rural
- Upper Lea Valley
- Putteridge Edge

This LCA evidence also identifies Landscape Opportunity Areas which provide guidance on where the Council in partnership with another agencies and bodies may 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 which 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 which 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.

Development on Open Space

- C. Development will only be permitted on parks, playing fields and 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 which 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;
- 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; or
- Tier 1 National Biodiversity Action Plan; or
- Tier 1 Habitats and Species listed in section 41 of the Natural Environment & Rural Communities Act (2006); or

- Tier 1 Species protected by law; or
- Tier 1 or 2 Ancient Woodland; or
- Tier 2 Local Nature Reserves including those previously proposed; or
- Tier 2 County Wildlife Sites; or
- Tier 2 Sites of Heritage Interest to Natural England; or
- Tier 2 Local Biodiversity Action Plan; or
- 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:

Tier 1 National landscape areas

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

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

v. **Areas of Great Landscape Value (AGLV)** which 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

vi. **Areas of Local Landscape Value (ALLV)** which 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 which 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 and 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, 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;

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- iii. historic landscape features such as the Chilterns and River Lea;
- 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 which 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 where necessary 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 which are to be lost (wholly or in part). The recording will be in a manner proportionate to their 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.

11.2 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;
- 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 which 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 and district and neighbourhood centres to support sustainable local service delivery, housing, and jobs, linked trips and accessible destinations;
- 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 LP6), will be delivered through:

- Measures to ensure there is capacity at strategically important junctions;
- 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:

- 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 business 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, 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

- 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;
 - 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

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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 axes, 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.

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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; or

- B. short-stay car parking (where the maximum stay is expected to be less than six hours); or
- C. sorting depots or retail warehouses; or
- D. children's playgrounds, playing fields or sports grounds; or
- 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.

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, 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

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telecommunications system, or determine health safeguards if the proposal meets International Commission guidelines for public exposure (Paragraph 46).

facilitate the implementation of broadband services.

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; and
- 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; and
- C. The equipment does not detract from the appearance of the building on which it is proposed to be erected; and
- 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; and
- E. The proposed installation complies with the national guidelines in respect of exposure of members of the public to electromagnetic fields; and
- F. The proposal should include the necessary ducting infrastructure to

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 within 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 and therefore, the need for sustainable drainage systems to address this issue and have regard also to policy LP38.

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 para 94). They should take account of climate change over the longer term, including factors such as flood risk (NPPF para 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 para 100) and give priority to the use of sustainable drainage systems (NPPF para 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 para 100). If necessary, the Exception Test (NPPF para 100) should be applied and should this be the case a Level 2 SFRA will be required which 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 para 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 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 of rates for Houghton and Lewsey Brook and 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:-

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- 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;
- 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 or 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:
- i. directing new development to areas with the lowest probability of flooding;
 - ii. ensuring that all new development addresses flood resilience, the effective management of flood risk including opportunities for appropriate dry access for emergency vehicles;
 - iii. ensuring that development does not increase the risk of flooding elsewhere including cumulative impact on adjoining and surrounding land and in the wider catchment;
 - iv. 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 (SuDS) 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 which replace flood plain and enhance natural forms of drainage (this could include, but is not limited to: floodplain creation; green roofs; surface water storage and; 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:-

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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 design policies and identify locations which maximise renewable and low carbon energy development while ensuring that adverse impacts including cumulative landscape and visual impacts are mitigated; the provision of supporting infrastructure to encourage such sources; support community-led initiatives including proposals via neighbourhood planning; 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 which contribute towards mitigation, and adaptation to climate change through energy use reduction and 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:
 - a. consider reducing energy and water demand;
 - b. consider energy generation from low and zeros carbon sources on site;
 - c. consider decentralised energy networks and generation; and
 - d. 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 which may 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 have 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 para 7 bullet 3; para 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 para 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, eg solvents;
- gases;

- asbestos;
- 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
 - 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 which 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; or
 - ii. threaten the structural integrity of any existing or proposed building on, or adjoining, the site; or
 - 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 is the new mechanism through which contributions will be pooled from April 2015.

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

12.3 The Borough may have to implement Compulsory Purchase Powers for infrastructure provision which 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 which requires multi-council support. Central Government funding however through DfT and CLG may be reduced so more schemes may 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 . Infrastructure Delivery, Monitoring and Review of the Local Plan

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 Community Infrastructure Levy (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 which 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;
 - 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; and
 - 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 Authority's Monitoring Report.

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

During the public examination hearings into the Local Plan held 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:

- (i) 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,
- (ii) The objective assessment of housing needs including a reassessment of migration trends and projections,
- (iii) The capacity to accommodate housing within Luton,
- (iv) The outcomes of separate Luton and Central Bedfordshire Functional Economic Market Area (FEMA) studies,
- (v) 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.
- (vi) Provision for the relocation of Luton Town Football Club
- (vii) Retail needs of the Borough and how they will be provided for.
- (viii) 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)	An Authority Monitoring Report is prepared by councils and 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.

Appendix 1 Glossary

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.

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	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 which come under Green Space can include:- • 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.

Appendix 1 Glossary

	• Allotments and community gardens - which includes 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 which 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

	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).
Local Plan	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
Locally significant Flooding	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.
Local Strategic Partnership (LSP)	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 quality of life in that area
Local Transport Plans (LTPs)	This strategy is prepared under the guidance of the Transport Act 2000, setting out the transport strategy for the district for improving local transport.
Luton Dunstable Busway	A guided busway operating along a former disused railway line linking Luton town centre with Dunstable and Houghton Regis town centres.
Master Plans	Sets out the proposals for space and land-use and matches these to a framework for investment and implementation.
Mixed Use	Provision of a mix of complementary uses, such as residential, community and leisure uses, on a site or within a particular area.
Modal Shift	The process of encouraging people to move from one transport method (e.g. the car) to another (e.g. buses).
National Planning Policy Framework	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.
Older people's housing	Accommodation serving the needs of people of retirement age.

Appendix 1 Glossary

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 which 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 which 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 of Luton. 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 are registered as 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
Sites of Special Scientific Interest (SSSI)	These are statutorily protected sites which comprise the country's best wildlife and geological sites
Spatial Planning	Spatial planning goes beyond traditional and use planning to integrate policies and programmes which 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. It's 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.

Appendix 1 Glossary

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	Is 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 which 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 1,000 sq m)	Standard to be considered on individual merits, subject to Council approval
A1	Retail - Non-Food (over 1,000 sq m)	
A1	General Retail (under 1,000 sq m)	
A2	Offices (Business & Professional)	1 space per 30 sq m
A3 to A5	Cafes, Restaurants, Public Houses, Wine Bars etc	1 space per 30 sq m
B1	Business Use	1 space per 30 sq m
B2	Industry	1 space per 30 sq m
B8	Warehousing, Storage & General Distribution	1 space per 50 sq 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	1space 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 30 sq m
SG	PHV Offices	1 space per 30 sq 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

1. 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.
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

Appendix 2 Parking and Cycling Standards

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 250 sq m)	1 space per 5 staff
A1	Retail - Food (250 - 500 sq m)	1 space per 10 staff
A1	Retail - Food (500 - 1,000 sq m)	1 space per 10 staff + 1 space per 250 sqm
A1	Retail - Food (over 1,000 sq m)	1 space per 10 staff + 1 space per 150 sqm
A1	Retail - Non-Food (under 1,000 sq m)	1 space per 10 staff (on site at one time)
A1	Retail - Non-Food (over 1,000 sq m)	1 space per 10 staff (on site at one time) + 1 space per 350 sqm
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)
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)

Appendix 2 Parking and Cycling Standards

Use Class	Description	Standard (Minima)
	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 sites (includes north and south of Newlands Road) near airport and accessed of J10 a) 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 10 a)
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 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 7 Carry.
Capability Green	Large successful premium business park accessed via M1 Junction 10 (a) 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 LP3 (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 22
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 22

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 LP3 (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 edge of 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

Appendix 3 Employment Sites: Categories A & B

Name	Description
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 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

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.

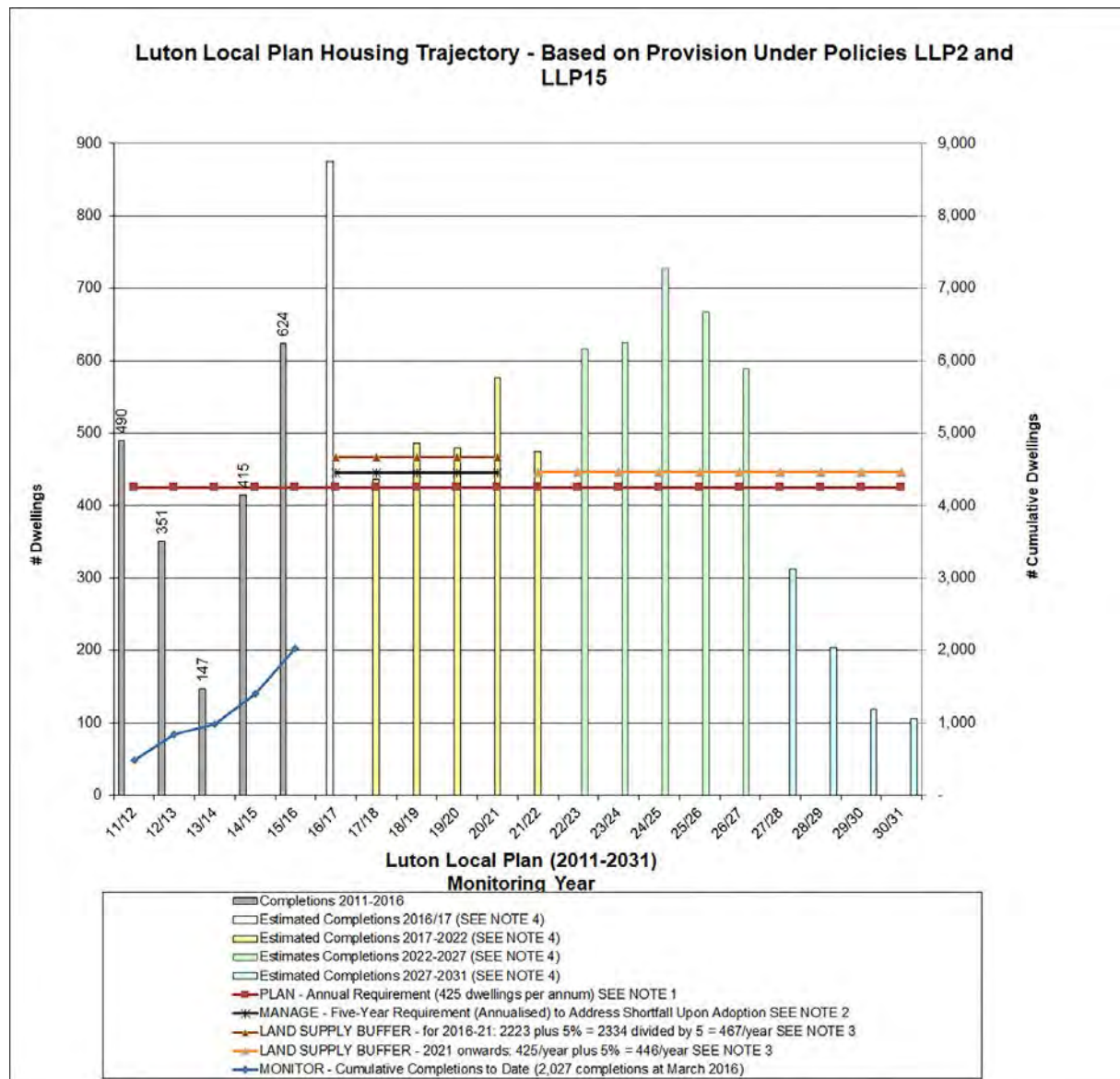
2. Land at Stockingstone Road - The indoor bowls facility, outdoor bowls facility and ancillary parking provision should be retained or replaced within the allocation site with equivalent or better provision in terms of quantity and quality as part of the redevelopment of the site. Alternatively, these 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 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 5 sq m of private outdoor space should be provided for 1-2 persons flats and maisonettes and an extra 1 sq 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 1500 mm.
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 90 sqm 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 which 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;
- (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
- 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 1,000 sqm gross floorspace;

(ii) offices and other B1 uses in excess of 2,500 sqm 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 which 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 which 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

Objectives	Policy	Target	Indicator/s	Reported within	Action
Open Space and Natural Environment					
SA Objectives 1 and 10 Also Plan Policies LP1, 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 LP1, 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
					2 Bedroom 2791 3 Bedroom 1204 3 + Bedroom 234 In addition, there were 966 families in temporary accommodation.
Strategic Objectives 2 and 3	LLP15		Sites to deliver a mix of house types and sizes in line with that recommended by the most recent housing market assessment. The mix to be assessed against completions and the 5-year supply (% by type) and plan period (total number). See Appendix 5 for methodology for calculation of the 5-year supply.	AMR Annually	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.
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	Refuse permission for schemes yielding less than 20% when the number of permitted schemes within the 5 year supply failing the target exceeds 10%. Evidence of improved viability will trigger a refresh of housing policy. An interim provision of 25% will be sought pending any review.
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).		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.

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 500 sq 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

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 borough
GE27	Aftercare	No mineral extraction or waste landfill sites proposed within 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.

List of key technical evidence studies informing this plan

- ## 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. See: <http://luton.gov.uk/Environment/Environmental%20health/air%20pollution/2/Air%20Quality/pages/Pollution%20control%20-%20air%202.aspx>
 - 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 at the following URL www.bedscape.org.uk/BRMC/newsite/index.php 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: <http://www.centralbedfords.gov.uk/environet/main/mecapx>
 - 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

Appendix 10 Technical Evidence Studies

- Luton and Central Bedfordshire Strategic Housing Market Assessment Refresh, 2014, ORS
- Luton and Central Bedfordshire Strategic Housing Market Assessment, 2015, ORS
- 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

Appendix 10 Technical Evidence Studies

- 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

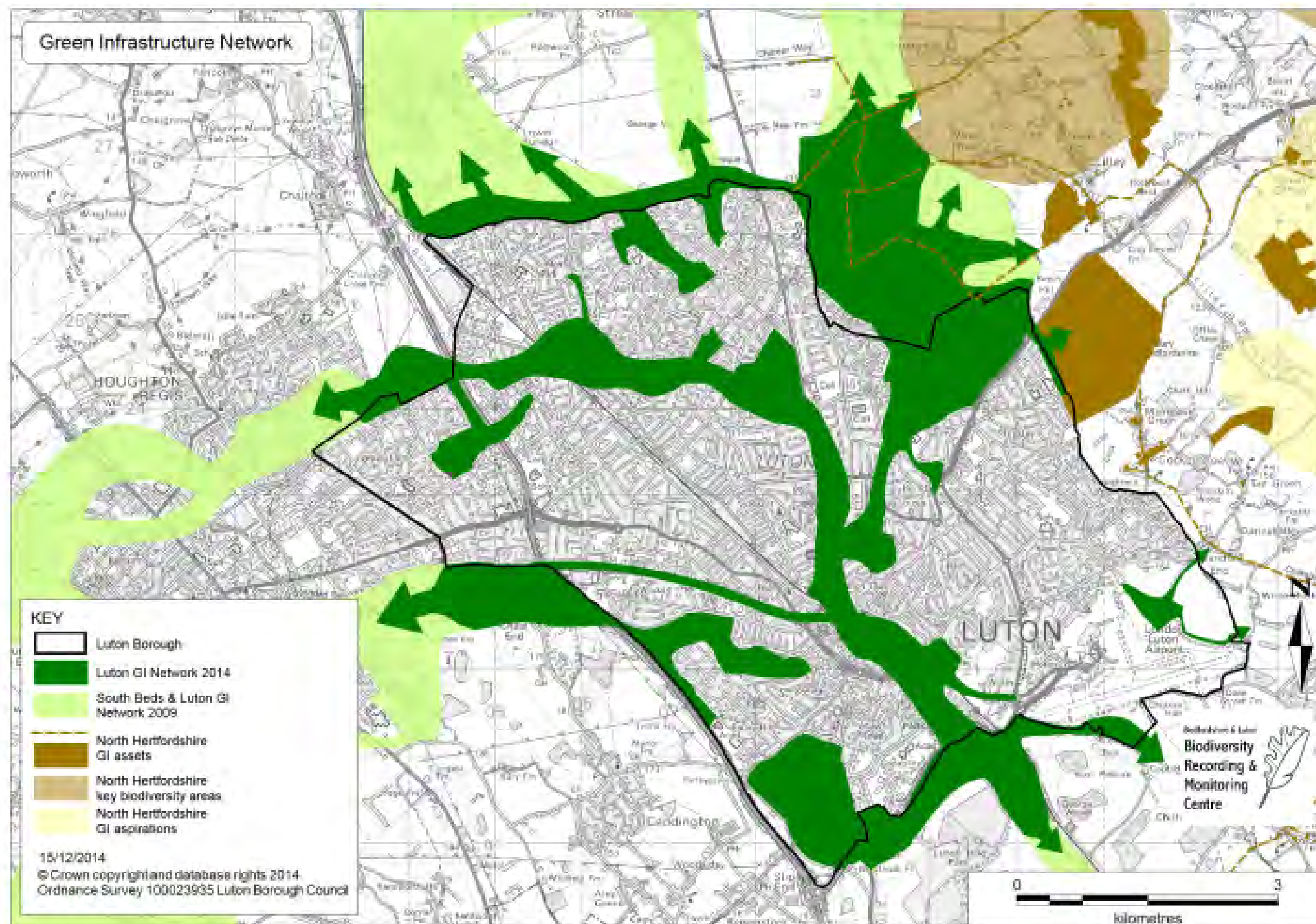
Typology of Greenspace	Current Requirement 2011 (Ha) Population 205,300	Current Provision (Ha)	Current Surplus/deficit (+-) (Ha)	Quantitative Standard
Amenity Greenspace	82.1	54.1	-28.04	4m ² /person
District Urban Park & Gardens	174.5	152.9	-21.6	8.5m ² /person
Neighbourhood Urban Parks & Gardens	154.0	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.

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



Appendix 13 Map Showing
Luton Enterprise Zone

Luton Local Plan (2011-2031) November 2017

