



Green Space Strategy Review
on behalf of Luton Borough Council



October 2015

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1. Introduction:

1.1 Background:

Luton Borough Council is currently producing a new Local Plan covering the period 2011-2031, in order to guide the future development of the town. It is important that all policies are based on the best and most up to date information, highlighting the importance of green spaces and setting appropriate standards of provision.

A Green Space Strategy (GSS) for Luton and South Bedfordshire was drafted in 2008 (hereon referred to as the "Draft GSS 2008"), driven by the Milton Keynes South Midlands Growth Area. It included a vision, priorities and actions for the following ten years and the final document was intended to provide:

- local standards for green space provision
- a strategy to ensure both the protection of green spaces and sustainable new provision,
- guidance on how management and maintenance of green space would meet the needs of existing and new communities, as well as visitors
- an adopted Supplementary Planning Document for the Local Development Framework.

However, the Consultation Draft needed significant further work and the project was delayed. Subsequently joint-working planning arrangements between Luton and South Bedfordshire ceased and the change of Government led to the abandonment of the Regional Spatial Strategies and the Growth Areas policies. The Draft GSS 2008 Action Plan was noted by the LBC Executive Committee, but not adopted. There is therefore something of a policy void in terms of greenspace, with only outdated 'saved' policies from the 2001-2011 Local Plan in place. The Council is reliant upon saved policies LC1 Protection and Preservation of Green Spaces and LC2 Provision of Green Space in its Luton Local Plan 2001-2011. It also uses the currently adopted standard of 2.43 hectares per thousand population set out in Appendix 2 of the Local Plan.

With Luton Borough Council renewing its Local Plan and concentrating upon making provision within its own boundary, many of the wider objectives of the Draft GSS 2008 are beyond its current remit.

It was therefore considered that a review of the Draft GSS 2008 should be carried out to ascertain where it is unsound, what can be taken forward from it, and ultimately informing policies in the 2011-2031 Local Plan. This is the report of the 2014 Review (hereon referred to as "this Review", "this 2014 Review" or "The 2014 Review"). It should be noted that it is a review and not a revision, update or standalone greenspace strategy. It was updated in October 2015 with revised housing and population projections, hence the final publication date is October 2015.

1.2 The National Planning Policy Framework (NPPF) and Planning Policy Guidance (PPGs):

The text in the NPPF (para 73) is consistent with the approach set out in PPG17 Planning for Open Space, Sport and Recreation. At paragraph 73 it states that 'Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-

being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required (NPPF, 2012)

While the PPGs have been replaced by the NPPF, the latter does not contain the level of detail required to provide technical guidance of the type that the PPGs did. Therefore, the PPGs and PPG17, in particular are used in this report as reference points, in the absence of detailed up to date guidance.

National Planning Practice Guidance is emerging, linked to the NPPF and available through the DCLG website. However, there is at the time of writing no specific guidance on greenspace strategies.

1.3 The Task:

The process of reviewing the Draft GSS 2008 was agreed and subsequently revised with officers from Luton Borough Council. The elements making up this Review are listed below:

- Assessment of Consultation responses to the Draft GSS 2008 received from various organisations and individuals
- Assessing typology and proposed standards (distance thresholds, quantitative and qualitative standards) created in Draft GSS 2008
- Assessing other existing qualitative data held (site surveys, 'Greenstat', community planning exercises)
- Making recommendations for standards within the 2011-2031 Local Plan and applying these.
- Consider the impact upon green space provision of an additional 50,000 residents by 2031
- Consider how green space in adjoining areas contributes to meeting local needs (and how development in adjoining areas will contribute to demand for greenspace).

1.4 Exclusions:

Of the elements covered in the Draft GSS 2008, Sports and Leisure sites are not included in this Review as these were considered to be covered by the 2012 Playing Pitch Strategy. However, some sites with a sports and leisure use have been included within the typologies used in this Review.

2. Assessment of Consultation Responses (GSS Consultation 2008)

The purpose of this exercise was to analyse the significant volume of responses received during the consultation stage of the Draft GSS 2008, identifying key areas and common issues which require resolution. Two documents have been created and are appended to this report:

Appendix 1: Consultation Response Summary (2008) – Key Issues

Appendix 2: Draft 2008 GSS Consultation – Full Response Matrix (only available electronically)

The key issues arising from the consultation and identified in **Appendix 1** are summarised below. Where solutions are not identified within the following sections relating to standards there is a section at the end of this document covering the outstanding issues (see **Section 5**):

- **Mapping & Data:** Many consultees picked up on the large number of mapping errors, and this led them to question the soundness of the data behind them, and therefore of the document.
- **Format:** Length and readability were key issues, for consultation purposes and later use.
- **Standards:** The application of broad-brush standards across the Luton and South Beds area was questioned (this should be less of an issue for the Luton-only context of the Local Plan Review).
- **The use of 'Best Current Position' to form the basis of quantitative standards** (rather than an ideal) was questioned.
- **Viability:** Developers felt high requirements could make developments non-viable
- **Typology:** It was felt that the typology needed to be clearer, with more rigorous application of sites to typologies.
- **Biodiversity:** Many raised issue that importance in biodiversity terms of greenspaces is not adequately acknowledged, and that those sites managed for biodiversity may not be resilient enough to cope with large numbers of visitors.
- **Accessibility:** Better integration with the Rights of Way network is required, as well as connectivity to spaces outside Luton.
- **Action Plans:** Need to be more specific and include resources required. A potential over-reliance on developer funding was identified.
- **Consultation Issues:** It was felt consultation had not been carried out widely enough, with children/young people highlighted as key omission and BME groups felt to be under-represented.

3. Typology and Hierarchy

3.1 Typology

Table 1 below compares the typology used in the 2008 GSS with the proposed 2013 typology (developed by a working group of Luton Borough Council officers from the Parks and Planning Departments) and fed into this Review. The same officers also re-audited all green spaces in the town and created a new comprehensive map of Luton’s greenspaces, coded by this typology – see **Figure 1 (Appendix 3a** - only available electronically), and accompanying spreadsheet (**Appendix 3** – also only available electronically). For further detail of the standard typology set out in PPG17 see **Appendix 4**.

Table 1: Typology Comparison

2008 Draft GSS Luton and South Bedfordshire	2014 Proposed Luton	PPG17 Typology
Urban Parks & Gardens	Urban Parks & Gardens	Parks & Gardens
Amenity Green Spaces & Recreation Grounds	Amenity Green Space	Amenity Green Space
	Amenity Green Space <0.2ha	
Green Corridors	Green Corridors	Green Corridors
Natural & Semi-Natural Greenspaces	Natural & Semi-Natural Greenspaces	Natural & Semi-Natural Urban Greenspaces
Allotments & leisure Gardens	Allotments	Allotments, Community Gardens & City (Urban) Farms
Churchyards & Cemeteries	Churchyards & Cemeteries	Cemeteries & Churchyards
Major Sports & Leisure Sites	Major Sports & Leisure Sites	Outdoor Sports Facilities
	Not included	Provision for Children & Teenagers
	Not included	Accessible Countryside in urban fringe areas
	Not included	Civic Spaces

As is evident from the table above, there is little difference between the 2008 and 2014 typologies (although there are some differences within the typologies in terms of hierarchy, as illustrated later in this review). The main difference between the two studies is that the sites have now been accurately

categorised and plotted, so the basis of this Review and any future work should be much more reliable.

Both the Draft GSS 2008 and the proposed 2013 typology look only at *publicly accessible* green spaces, whether publicly or privately owned. Some GSSs in other areas consider *all* green space, whether accessible or not. The CABE document “Open Space Strategies Best Practice Guidance” (2006) advocates that “all types of open spaces are considered (except private gardens) irrespective of ownership and public access”.

Therefore it could be considered that Luton Borough Council’s approach is contra to best practice. This was raised in the Draft GSS 2008 consultation. However, it is accessible green space that LBC considers is of benefit to local people who can make active use of it. Private green spaces are of nature conservation and landscape importance, so are important in terms of wider Green Infrastructure (and are accounted for in the Luton and Southern Bedfordshire GI Plan, 2010), but are less relevant to a greenspace strategy. They can offer limited access (where a public right of way passes through them) but this can be relatively constrained and is not considered access to a ‘space’.

The author considers the LBC approach to be valid, pragmatic and appropriate to the Luton context, and helps avoid the temptation to hide deficits. To include private assets would give a misleading picture and suggest deficits are not as great as they are in reality. However, private assets can be considered in any future planning, where there is potential to create an accessible space. In other areas where there is not a Green Infrastructure Plan or similar that takes into account non-accessible sites, then it is appropriate for a Greenspace strategy to consider these.

Both 2008 and 2014 typologies omit the word “urban” from Natural and Semi-Natural Greenspace, and do not use the PPG17 typology of “Accessible Countryside in Urban Fringe Areas”. This is acceptable as the majority of the accessible countryside in the urban fringe areas is Natural or Semi-Natural Greenspace, with a primary purpose of conservation/biodiversity, rather than access. They are used as accessible green spaces because of their appeal and because of a lack of other opportunities, but are not necessarily well-suited to high levels of access. Several such sites are fragile chalk downland habitats, which also contain steep slopes, making access difficult.

The PPG17 approach to typology is based on ‘Primary Purpose’, i.e. a site is considered to fall under a specific type depending on what its main use is. The Draft GSS 2008 did recognise that many sites will also have a secondary and even a tertiary purpose, particularly in the Luton context. This is a valid and important point – to have a ‘Primary’ purpose implies other uses. What is important is that the sites are classified under the right element of the typology. This is a combination of working to the typology but also making professional judgements, based on all relevant sector knowledge. It is considered that the process to create the 2014 typology and allocate greenspaces within it has done this, and has also answered the criticism that the application of sites to types was not rigorous enough.

The definition of Green Corridors in the Draft GSS 2008 was also criticised for not being clear or precise enough. It is considered that the definition captures all potential purposes, but does not reflect importance for biodiversity strongly enough. Neither does it reflect their importance in landscape terms. The description in PPG17 is actually less detailed than that provided in the Draft GSS

2008, and this is generally reflected in other strategies. The description in the Tower Hamlets Open Space Strategy perhaps provides a better reflection on the habitat value: “These are relatively continuous areas of open space leading through the built environment, which may be linked and may not be publicly accessible. They allow animals and plants to be found further into the built-up area than would otherwise be the case and provide an extension to the habitats of the sites they join”.

If the following was added to the end of this: “and provide structural diversity, strengthening the landscape character of the environment” then this would be even more helpful, though (as with Tower Hamlets) the full description may need to be contained in an appendix.

However, a fundamental difference between the Tower Hamlets strategy and Luton is that the former includes consideration of green corridors that are not publicly accessible. In Luton, only green corridors that are publicly accessible have been mapped, therefore the issue of primary purpose is especially pertinent.

The Draft GSS 2008 suggests a minimum area of 1ha for a Green Corridor. This is not entirely helpful, because they are linear features. The 2014 ‘definition’ includes a minimum width and length, which is more logical. However, the minimum length is quite long – there will be shorter (or intermittent) but still legitimate Green Corridors in existence. Locally Important Green Corridors are therefore included in the 2014 typology.

Both CABE and PPG17 recognise that small sites, particularly in dense urban areas, may be valuable locally and should be included in the assessment. The Draft GSS 2008 recognised this, and suggested that sites as small as 0.1ha could provide important benefits. The 2014 typology also reflects this pragmatism, though the minimum size threshold for sites mapped (and therefore considered as greenspace) was even lower, at 0.05ha in the “Amenity Green Spaces <0.2ha” typology (which is effectively part of the Amenity Greenspaces typology). Not all sites of this size were necessarily mapped, very small, irregular shaped sites with no obvious function were still excluded.

3.2 Hierarchy:

Table 2 below illustrates the division of the typologies into a hierarchy based on size, comparing the Draft GSS 2008 with the 2014 proposals:

Table 2 – Hierarchy Comparison:

Draft GSS 2008	2014 Proposals
	Amenity Green Spaces <0.2ha Min size 0.05ha
Amenity Green Space No minimum size stated	Amenity Green Space Min size 0.2ha
Neighbourhood Urban Parks & Gardens Min size 2ha	Neighbourhood Urban Parks & Gardens Min size 2ha
Borough/District Urban Parks & Gardens Min size 20ha	District Urban Parks & Gardens Min size 20ha
Local Natural & Semi-Natural Greenspace No minimum size stated	Local Natural & Semi-Natural Greenspace Min size 0.2ha
Borough/District Natural & Semi-Natural Greenspace Min size 20ha	District Natural & Semi-Natural Greenspace Min size 20ha
Strategic Natural & Semi-Natural Greenspace Min size 60ha	Strategic Natural & Semi-Natural Greenspace Min size 60ha
	Green Corridors Min 25m width, 500m length
	Locally Important Green Corridors (<1.25ha ¹)
	Allotments Min 20 plots
	Churchyards & Cemeteries No standards
	Major Sports and Leisure Sites

The main difference between 2008 and 2014 is that the minimum size of Amenity Greenspace sites is not specified in 2008, although it provides the flexibility to consider smaller sites. The 2014 hierarchy specifically includes the “Amenity Green Spaces <0.2ha” (as described above) and sets a minimum size of 0.05ha (sites below 0.05ha are considered too small to be considered at one-fifth of a tennis court).

As mentioned above, the CABE Best Practice Guidance supports any approach that allows these ‘small’ sites to be considered where appropriate.

¹ Expressed as an area as no minimum length/width apply.

Some Urban Parks and Gardens are recognised by Luton Borough Council (through the emerging Local Plan) as either “District” or “Neighbourhood” Parks, even though they do not necessarily meet the minimum size criteria. Their multi-functionality is considered sufficient to over-ride the minimum size requirement and they have been designated through executive approval of the list produced in the ‘Parks, Playing Pitch and Open Spaces Strategy for Luton Borough’ (2002).

Recommendations

- 1. That the proposed typology and hierarchy is accepted**
- 2. That privately owned assets continue to be excluded, where they are not publicly accessible**
- 3. That the approach to the smaller sites is endorsed**
- 4. That the text relating to green corridors is amended to reflect their role in biodiversity and landscape terms better.**
- 5. That the base map is taken as accurate (Appendix 3a - Figure 1)**

4. The Standards:

4.1 Quantitative Standards

Each element of the typology is considered separately in terms of setting a Quantitative Standard and applying this to the existing population (205,300 at 2011, LBC Local Plans Team) and future projections. The current projection for 2031 is a population of 245,587 (LBC Local Plans Team, SHMAA 2014) although only a fraction of this growth can be accommodated in the administrative boundary of Luton. It is estimated that the figure that can be accommodated is 7,700 dwellings (LBC Local Plan Team SHLAA 2015) which equates to a total population of 224,700. The report shows for each typology the future need based on the growth which can realistically be accommodated in Luton and the overall growth to 2031.

The approach to setting these standards does not include an up to date demand assessment as carrying out surveys was considered beyond the scope of this Review, but it is a recommendation of the NPPF (para 73) “The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space (...) to determine what open space, sports and recreational provision is required” and the CABE/City of London Guidance. Therefore the analysis of need/demand is based on the consultations carried out as part of the Draft 2008 GSS, which are considered inadequate in terms of *public* consultation. The results of this, or GreenStat analysis carried out at the same time, did not give any strong steer on quantitative provision. **Any future Greenspace Strategy would need to be based on an up to date assessment of need/demand through public consultation.**

An approach based on ‘Best current provision’ was applied when calculating the standards in the Draft GSS 2008. This was possible because information on provision in different sub-areas across the whole of Luton and South Bedfordshire was available. However, the variations across these sub-areas, particularly between very urban parts of Luton and rural south Bedfordshire, meant that the standards applied using this approach were unrealistic for some areas.

In the Luton-only context there is less variation of this nature, but it still exists. Also, any standard based on existing provision across the whole of the Borough would imply that existing provision is adequate. Neither the Draft GSS 2008, nor the “Parks, Playing Pitch and Open Spaces Strategy for Luton Borough” (Torkildsen Barclay, 2002) felt this was the case, so using such an approach would continue and compound existing deficiencies. Therefore an approach based on ‘Best Current Provision’ would need to be able to sub-divide the area and data. To look at the data on a ward-by-ward basis would be extremely complicated and prone to large variances due to the uneven distribution of greenspaces and the scale of wards (small in urban areas). This would still result in unrealistic standards.

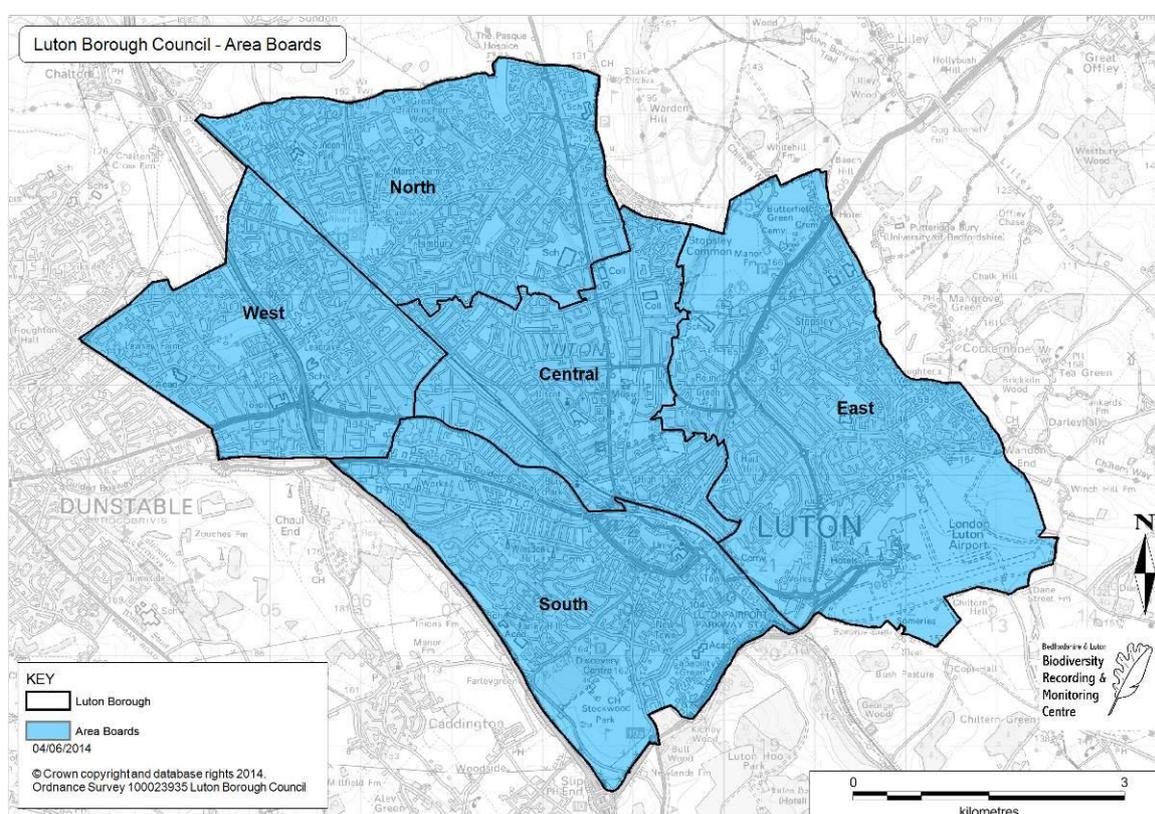
Luton Borough Council operates “Area Boards” which cover geographical groupings of wards and is part of the neighbourhood governance process. There are five Area Boards: North, East, South, West and Central. These are illustrated in **Figure 2** with population and ward information provided in **Table 3**. Each is made up of three to five wards. Importantly, the greenspace data can be broken down by these geographical areas (see **Appendix 3b**).

Table 3 – Luton’s Area Boards

Area Board	Wards Included	Population
North	Bramingham, Icknield, Limbury, Northwell & Sundon Park	38,842
East	Crawley, Round Green, Stopsley & Wigmore	36,714
South	Dallow, Farley & South	42,376
West	Challney, Leagrave & Lewsey	37,987
Central	Barnfield, Biscot, High Town & Saints	47,282

Population data from 2011 Census

Figure 2 - Area Board areas



The Area Board areas (referred to hereon as “Sub-Areas”) are significant enough in size to make analysis meaningful and provide enough of a breakdown to enable an approach for calculating standards taking account of varying provision and identifying ‘Best current provision’. **Table 4** below provides a breakdown by Sub-Area for each element of the typology, and total greenspace.

Table 4 – Breakdown by Sub-Area and Typology

Sub Area	Small Amenity GS (ha)	Amenity GS (ha)	Neigh Urban Parks (ha)	Dist Urban Parks (ha)	Local Nat GS (ha)	Dist Nat GS (ha)	Strat Nat GS (ha)	Allot's (ha)	Total (ha)
North	2.53	15.89	30.77	14.64	61.80	0	0	8.54	134.17
East	2.13	14.21	36.66	35.92	38.84	25.14	0	3.97	185.03
South	0.47	5.56	15.81	44.89	34.77	26.02	0	7.26	140.17
West	1.09	13.02	11.7	22.27	0.97	0	0	8.27	59.51
Central	0	5.39	23.3	19.17	11.1	0	0	4.58	63.54

Full analysis by typology is carried out below, but the table does highlight deficiencies geographically. In terms of total greenspace, it is clear that the West and Central Areas have significantly less overall greenspace. This is compounded by their location, being separated from open countryside by built up areas. This is discussed further when looking at accessibility standards in **Section 4.2** below.

Analysis by Typology

Each element of the typology is considered separately below in terms of setting a Quantitative Standard and applying this to the existing population and using population forecasting for likely future scenarios (using the maximum and minimum future projections specified above).

The totals above were converted to m²/person, using the population totals in **Table 3**. Due to significant variances in provision across the 'Sub-Areas', the use of the highest figure (a true reflection of 'Best Current Provision') under each typology would have resulted in very high (and in practice unrealistic) standards. Therefore the mean of the three highest figures was used. The resulting figures were then rounded up or down to the nearest half-unit.

a. Amenity Green Spaces of less than 0.2ha:

Due to their small size (less than 0.2ha) and relatively small contribution toward overall totals, these sites are not generally considered when looking at quantitative standards. They have been identified and mapped as part of this Review as it is acknowledged that in Luton they do play a role, particularly where no other provision is available nearby. They are included in the accessibility analysis (see Section 4.2 below) when looking at all greenspaces together for this very reason.

In terms of provision across the different Sub-Areas, South and West have little by way of these greenspaces, and Central has none.

b. Amenity Greenspace

In the Draft GSS 2008 the NPFA standard is cited, with a figure of 4m² per person for "Informal Open Space". The figure of 6.22m² per person quoted for Luton (based on their analysis) therefore seems to compare favourably, but according to the authors this "does not reflect deficiencies in provision and poor distribution". The Draft GSS 2008 (which looked at the whole of Luton and South Bedfordshire)

noted the relatively high number of amenity greenspace sites of greater than 2ha and suggested that in setting the quantitative standard these be removed and included within the Urban Parks and Gardens typology. This reduced the provision figure for Luton to 1.54m² per person. This runs counter to the whole concept of a typology and should be disregarded. Only sites that meet the criteria to be an Urban Park should be considered as such.

The Draft GSS 2008 took a “best current provision” approach to set the standards, but it was based on looking at the whole of the Luton and South Bedfordshire area, which included a great deal of variability, with three other main towns and large rural areas. The best current provision for Local Amenity Greenspace was found in Leighton-Linslade (4.33m²) and the standard was rounded up from this to 5m². Looking elsewhere, the Draft GSS 2008 compared other “comparable” (noting the wider coverage of the 2008 Strategy) district and borough authorities, which had a range of 10.9 – 15.1m²/person, giving an average of 13.3m².

In terms of standards set by other authorities, Middlesborough’s Open Space Strategy includes a standard of 6.5m²/person for Amenity Greenspaces, while Bedford Borough has a standard of 0.5ha/1000 (5m²/person). Leeds sets a standard of 0.2ha/20 dwellings, which equates to a considerable 40m²/person (assuming 2.5 people per household as an average). These figures demonstrate how an approach based on current provision can lead to a wide range of standards depending upon local circumstances.

In order to set a quantitative standard for Amenity Greenspace, the current provision across the five sub-areas was taken into account as described above (note the detailed calculation is described here but not in the following typologies). The top three figures were 4.09m²/person, 3.87m²/person and 3.43m²/person. The mean of these is 3.80m²/person. To set a standard, this figure should be rounded up to **4m²/person**. This is the same as the standard set in the Draft 2008 GSS.

Recommended Provision Standard: 4m²/person

Current provision is 54.07ha.

Table 5a: Application of the new standard:

	Requirement based on Standard	Surplus/Deficit
Current population (205,300)	82.1ha	-28.0ha
2031 Population Projection – 245,587	98.23ha	-44.16ha
2031 Population growth accommodated in Luton 224,700	89.88 ha	-35.81ha

Therefore it can be considered that there is an existing current deficit of 28ha, and by 2031 this deficit would be more significant (as a minimum 35.81.ha) if no further Amenity Greenspace is created.

In terms of current provision across the Sub-Areas, South and Central have the lowest provision. North, East and West have the better (and similar) provision.

c. Urban Parks and Gardens

The Draft GSS 2008 used the provision figure of 5.09m²/person for Luton, but as mentioned above added amenity greenspaces of over 2ha to arrive at a figure of 9.77m²/person. Best current provision in the area was in Dunstable and Houghton Regis (10.22m²/person) and the proposed standard, based on “best current provision” of 11m²/person.

The comparison in the Draft GSS 2008 with other similar authorities shows a significant range in parks provision, from 2 to 16m²/person, with an average of 7.55m²/person. The standard set in the Tower Hamlets Open Space Strategy, which is based on current provision, is 1.2m²/person, reflecting the highly built up nature of the borough. Bedford Borough has a standard of 5m²/person for all Parks and Gardens while the standard for Middlesbrough is 13m²/person. Therefore the proposed figure is within the range of what would be considered acceptable, but again that range is wide (due to current provision being so variable).

The Draft GSS 2008 does not distinguish between ‘Neighbourhood’ and ‘Borough/District’ Parks & Gardens in setting quantitative standards, therefore the 11m² figure is for all Urban Parks and Gardens. In order to set a quantitative standard for Urban Parks and Gardens, the mean of the top three Sub-Area figures was 7.61m²/person (Neighbourhood) and 8.74m²/person (District)

To set a standard, these figures should be rounded up/down to **7.5m²/person (Neighbourhood)** and **8.5m²/person (District)**. Comparing to the Draft 2008 GSS, the fairest comparison is with the combined Parks figure of 11m²/person, so the combined figure of 16.0m²/person here is higher but equal to the maximum found elsewhere.

Total current provision is 102.22ha (Neighbourhood) and 152.91ha (District).

Recommended Provision Standards:

Neighbourhood: 7.5m²/person

District: 8.5m²/person

Table 5b: Application of the new standard:

	Requirement based on Standard	Suplus/Deficit
Current population (205,300)	Neighbourhood =154.0 ha District = 174.5ha	-51.8ha -21.59ha
2031 Population growth accommodated in Luton 224,700	Neighbourhood 168.526 ha District 200.00ha	-66.3ha -47.09ha
2031 Population Projection – 245,587	Neighbourhood = 184.2ha District = 208.7haha	-81.98 ha -55.8 ha

Deficits are greater at the Neighbourhood level. The current situation suggests a further 21.59ha of District level space is required, which equates to one new Park. This fits with the picture on the ground – there is a reasonable number of District Parks, relatively evenly spread across the town. Over 50ha of Neighbourhood Parks are currently needed to meet the current shortfall in provision. By 2031 this shortfall could be as great as 82ha, with a 55ha shortfall in District Parks (up to 3 new Parks) when considering the whole projected growth, and of almost 2 parks when considering the population growth that can be realistically accommodated in Luton as per the SHLAA Review 2014. The breakdown by Sub-Area in **Table 4** reflects the current situation, with a reasonable spread of Neighbourhood Parks (though South and West have lower provision) and each Sub-Area has at least one District Park (though North has only one site, sub-optimal in size and Central is similar).

d. Natural and Semi-Natural Greenspace:

Here the Draft GSS 2008 does distinguish between the levels of the hierarchy and provides different standards, though it only subdivides into “Strategic” and “Non-strategic”. This Review uses a hierarchy of Strategic, District and Local as described above.

The “strategic” provision figure quoted in the Draft GSS 2008 was 5.43m². This was the average for whole area, with no specific figure given for Luton – it is assumed it was 0. Due to the identified need for strategic greenspace to facilitate significant proposed development the standard was set at 17m². This was based on the provision of at least one 60ha (minimum size) site for each of the three sub-areas within the Draft GSS 2008 (Chalk Arc Multi-functional Greenspace Study, Kit Campbell, 2008).

The “non-strategic” provision figure for Luton in the Draft GSS 2008 was 11.3m²/person, the “best current provision” across the area was 17.76m², so the standard was set at 18m²/person.

Total current provision is 147.48ha (Local), 51.16ha (District) and 0ha (Strategic).

Using the mean of the highest three figures for provision across the Sub-Areas, this equates to 11.6m²/person (Local), and 4.3m²/person (District). Obviously a different approach is required to set a standard at the Strategic level, due to the current zero provision.

To convert these into quantitative standards they are rounded up/down to **11.5m²/person** (Local) and **4.5m²/person** (District).

To set a standard for the Strategic level, the logical suggestion is to use the Draft 2008 GSS figure. However, 17m²/person is extremely high and would result in a current requirement of 349ha. This is a highly unrealistic aspiration and would be extremely difficult to achieve in a settlement with its urban edge very tight to the administrative boundary (even with significant development to facilitate this). The Draft 2008 GSS estimated current provision across the whole area at 5.43m²/person. This equates to a more realistic current requirement of 111.5ha. The Chalk Arc Multi-Functional Greenspace Study recommends at least one additional (minimum) 60ha site for Luton. Given the size, geography and journey times across Luton, a single site of this nature would not serve the whole population well, therefore two sites are recommended (this is explored further through accessibility standards below). This would equate to a requirement of 120ha. Rounding 5.43m²/person up to **5.5m²/person** provides a total of 112.9ha, which is relatively close.

When combined (16m²/person), the suggested standards for the Local and District level is lower than the Draft GSS 2008 'non-strategic' figure of 18m² but is considered more realistic for the Luton scenario.

Of the other Greenspace Strategies looked at, there was high variability in terms of quantitative standards for the same or similar typologies, with Bedford Borough's standard being set at 5m²/person for all Accessible Natural Greenspace, while Middlesborough's standard is 19m²/person for all Natural Greenspaces. The standards suggested are within (but at the bottom of) this range.

Recommended provision Standards:

Strategic Natural & Semi-Natural Greenspace: 5.5m²/person

District Natural & Semi-Natural Greenspace: 4.5m²/person

Local Natural & Semi-Natural Greenspace: 11.5m²/person

Total Natural and Semi-Natural Greenspace: 21.5m²/person

Table 5c - Application of the new standard:

	Requirement based on Standard	Suplus/Deficit
Current population (205,300)	Strategic = 112.9ha District = 92.4ha Local = 236.1ha	-112.9ha -41.2ha -88.6ha
2031 Population growth accommodated in Luton 224,700	Strategic = 123.58ha District= 101.11ha Local=258.40ha	-123.58ha -49.95ha 110.92ha
2031 Population Projection – 245,587	Strategic = 135.1ha District = 110.5 ha Local = 282.4 ha	-135.1 ha-59.34ha -134.92 ha

Total current provision is 147.48ha (Local), 51.16ha (District) and 0ha (Strategic). As mentioned above, the existing shortfall in Strategic sites is equivalent to just under two new sites of the minimum size (60ha). If these are well located and designed, and are either provided slightly larger than the minimum or with capacity to expand, then these two sites could provide the needs at this level at least to 2031.

The deficit in terms of the Local level is more significant than that at the District level, both currently and into the future. The comparison across the Sub-Areas shows good/reasonable provision at the local level across the North, East and South, but in Central it is much lower and in the West almost non-existent. At the District level the difference is even more marked, with the East and South having

some provision (but only one site in each) and the rest having no provision. This further exacerbates the low provision of Local sites in the West and Central Sub-Areas.

Future provision of District level sites of this type will need to be carefully planned. With restricted space within the urban area the periphery becomes more important, particularly as this is where the majority of existing natural and semi-natural habitats are likely to be found. However, this could compound issues in the West and Central Sub-Areas.

e. Green Corridors:

As the Primary Purpose of green Corridors in Luton is likely to be access (promoting walking and cycling), biodiversity, landscape or heritage conservation, and these are often opportunity-led, it is not possible to set quantitative standards.

f. Allotments:

The Draft GSS 2008 notes provision in Luton was 36.97ha, or 2m²/person. Provision in 2014 is lower, at 32.62ha, or 1.59m²/person. This may be partly explained by the fact that sites with less than 20 plots were included in the Draft 2008 GSS, but not in the 2014 assessment. It is also possible that some sites have been lost to development. It should also be noted that 4 of the 16 sites included in the Draft 2008 GSS calculations were noted as “closed” at the time but their provision still counted.

Elsewhere, for example in Leeds and Middlesborough, there are separate Allotments Strategies, acting as sister-documents to the Greenspace Strategy. Such an Allotments Strategy could look at issues such as loss of allotments, demand and provision standards in more detail.

Using an average plot size of 5 poles (125m²) this equates to an estimate of 2609.6 plots overall. This equates to 0.013 plots/person based on the 2011 population figure, and compares favourably with figures listed in the Draft GSS 2008 for other Bedfordshire towns, including Flitwick (0.014), Ampthill (0.012), Biggleswade (0.010) and Dunstable (0.006). It was also noted in 2008 that demand was at nearly 90% of provision and rising. The factors behind this have not changed, with high inflation and incomes static/declining in real terms driving demand further.

The standard set in the Draft GSS 2008 was 2.5m²/person, based on the average for the urban areas of Luton (2.03m²), Dunstable and Houghton Regis (2.58m²) and Leighton Linlade (3.11m²). To calculate a Quantity Standard, the mean of the top three Sub-Area figures is also 2.03m²/person. This is rounded down to provide a recommended standard of **2m²/person**. This equates to 0.016 plots /person.

Recommended Provision Standard: 2m²/person

Table 5d - Application of the new standard:

	Requirement based on Standard	Suplus/Deficit
Current population (205,300)	41.1ha	-8.48ha
2031 Population growth accommodated in Luton: 224,700	44.94ha	-12.32ha
2031 Population Projection: 245,587	49.1ha	-16.5ha

There is an existing shortfall of over 8ha. With an average of 80 plots/ha this equates to 640 plots. Looking ahead, unless further allotments are provided there will be a significant shortfall in the period to 2031 (as high as 16.5ha or 1320 plots for the whole projected growth and of 12.32ha for the projected growth within Luton boundaries, or 986 plots. This deficit will become even more significant if further allotments are lost to development.

g. Churchyards & Cemeteries:

As PPG17 (Companion Guide) notes, “as churchyards can only exist where there is a church the only form of provision standards which will be required is a qualitative one”. Additionally, while there is finite existing capacity and a steady need for more, calculating future demand is a complex process and the authors of the Draft GSS 2008 felt it was beyond the scope of that Strategy. This is not disputed, and a separate Churchyards & Cemeteries Strategy is required.

Table 6 below summarises the Quantitative Standards described above:

Table 6 – Quantitative Standards

Type of Site	Minimum Size	Current Provision	Quantitative Standard	Needs		
				2011 Population 205,300 Requirement (& Deficit)	2031 Population Projection (within Luton Boundary) 224,700 Requirement (& Deficit)	2031 Population Projection (overall) 245,587 Requirement (& Deficit)
Small Amenity Greenspaces of Local Importance	0.05 - 0.2ha	6.2ha	None set			
Amenity Greenspace	0.2ha	54.1ha	4m ² /person	82.1ha (-28.0ha)	89.88ha (-35.81)	98.23ha (-44.16ha)
District Urban Parks & Gardens	20ha	152.9ha	8.5m ² /person	174.5ha (-21.6ha)	200.00ha (-47.09ha)	208.7ha (-55.8ha)
Neighbourhood Urban Parks & Gardens	2ha	102.2ha	7.5m ² /person	154.0ha (-51.8ha)	168.52ha (-66.30ha)	184.2ha (-81.98ha)
Strategic Natural & Semi-Natural Greenspace	60ha	0ha	5.5m ² /person	112.9ha (-112.9ha)	123.58ha (-123.58ha)	135.1ha (-135.1ha)
District Natural & Semi-Natural Greenspace	20ha	51.2ha	4.5m ² /person	92.4ha (-41.2ha)	101.11ha (-49.95ha)	110.5ha (-59.34ha)
Local Natural & Semi-Natural Greenspace	0.2ha	147.5ha	11.5m ² /person	236.1ha (-88.6ha)	258.40ha (-110.92ha)	282.4ha (-134.92ha)
Churchyards & Cemeteries	No Min	27.4ha	None set			
Allotments	Min 20 plots	32.6ha	2m ² /person	41.1ha (-8.4ha)	44.94ha (12.32ha)	49.1ha (-16.5ha)
Green Corridors	1.25ha	8.4ha	None set			

h. A Multi-Functional Greenspace Standard

The Draft GSS 2008 creates a “Multifunctional Greenspace Standard” by totalling the figures for each component:

Amenity Greenspace (5m²) + Natural & Semi-Natural Greenspace (18m²) + Strategic Natural & Semi-Natural Greenspace (17m²) + Parks & Gardens (11m²) = 51m²

The 2014 “Multifunctional Greenspace Standard” equates to: **41.5m²/person**:

Amenity Greenspace (4m²) + Neighbourhood Parks (7.5m²) + District Parks (8.5m²) + Strategic Natural & Semi-Natural Greenspace (5.5m²) + District Natural and Semi-Natural Greenspace (4.5m²) + Local Natural and Semi-Natural Greenspace (11.5m²).

As with the individual standards, although significantly lower this figure is considered more realistic.

Recommendations:

- **That the proposed quantity standards highlighted above are adopted within the 2011-2031 Local Plan Review**
- **That an Allotments Strategy is considered to further investigate wider issues.**
- **That a Churchyard and Cemeteries Strategy is produced to identify quantitative standards and ensure future provision meets demand.**

4.2 Accessibility Standards

The Draft GSS 2008 considers accessibility thresholds in some detail, taking into account various national standards set by different bodies, including the National Playing Fields Association, English Nature's (now Natural England) Accessible Natural Greenspace Standard, and the London Planning Advisory Committee Standard (used by CABE in their 2006 Best Practice Guide). It also took account of local factors, such as journey times reported through GreenStat surveys in Luton. The straight line distance thresholds are shown below in **Table 7**.

Accessibility varies from area to area, depending on a range of factors including physical barriers and severance, signage, deprivation (resulting in lower levels of car ownership) and accessibility of public transport. Gradients and the location of access points are also important, both in terms of getting to and getting around a greenspace. A suggested approach in PPG17 is that of "Effective Catchments", basing the distance/journey time on that of 75-80% of users. The Draft GSS 2008, through analysis of GreenStat results, found that 78% of journeys to greenspaces in Luton were less than 10 minutes. Unfortunately there is no breakdown by typology so this can only be used as a very general guide.

In terms of stakeholder consultation responses to the Draft GSS 2008, the main point was that the application of the same standard across the whole area was questioned. This is considered less of a factor when considering Luton alone. No GreenStat data relating to accessing greenspaces was provided (and with GreenSpace in receivership it is not possible to access GreenStat data), so a more up to date version of the figure above is not available.

Variability in accessibility is evident when looking at accessibility standards in other greenspace strategies, and direct comparisons are further hampered by different typologies used (or lack of a hierarchy).

The recommended Accessibility Standards illustrated below have therefore been calculated on the basis of a combination of best practice guidance and standards used in similar scenarios, and are illustrated in **Table 7** alongside the 2008 recommended standards. **It is recommended that in any future Greenspace Strategy public consultation is undertaken to ascertain typical journey times, and that these are asked for on the basis of the current typology.**

With car ownership relatively low in Luton (the Draft GSS 2008 notes 26.4% of households do not have a car or van, compared to the 19.8% figure for the East of England) it is considered helpful to include accessibility thresholds for cycling so that this option can be taken into account when planning greenspace provision or improving access. Cycling is also the primary means of transport for young people for distances greater than they can walk, and cycle routes can also be part of green corridors.

Any facility to which cycle access is encouraged should have or be able to accommodate infrastructure (such as stands for locking bikes to) in an appropriate manner.

It would also be helpful for any future Greenspace Strategy to include threshold journey times for public transport, recognising that these would not be straight line journeys, as being an urban area Luton has a relatively comprehensive public transport service, though further analysis of the accessibility of green spaces by public transport is required. When considering this it is also important to consider how accessible public transport stops and stations are to people.

It is recognised that straight line distance thresholds are a useful but limited tool, and that while people may live within the appropriate catchment for a green space, access may still be difficult due to barriers (motorway, major road, railway, industrial areas, airport) or terrain/gradients, with the actual journey distances exceeding the stated maximum. While the straight line approach is considered acceptable when looking at the strategic picture, it is noted that Luton Borough Council has carried out 'Accession Modelling' for other services, which looks at accessibility in terms of the actual journeys people make. This is therefore significantly more sophisticated than straight line modelling. Primarily this has focused on Neighbourhood Centres and people's access to these facilities, but if it is feasible to utilise any of this work for any future Greenspace Strategy (or to carry out a similar exercise) this could feed into any revision of greenspace catchments and increase their level of usefulness and robustness. It could also be applied to specific development proposals. However, the access standards set in this Review are still completely valid, and are based on nationally recognised good practice.

Each element of the typology is considered below, and in combination with **Table 7** summarises the standards and compares to best practice guidance and other Greenspace Strategies. The accompanying **Figures 3-9** illustrate the proposed walking, cycling and driving catchments for each element of the typology (as appropriate), highlighting areas outside the thresholds. The Figures also show the 'Strategic Housing Allocations' for Luton (adapted from the 2001-2011 Local Plan in consultation with LBC officers) and the relevant strategic allocations for neighbouring Central Bedfordshire (taken from the Draft Central Bedfordshire Development Strategy), illustrating where potential housing could be delivered and where this relates to areas of greenspace deficit. Where appropriate, greenspaces outside of Luton's administrative boundary have been included with a catchment equal to that suggested here for Luton greenspaces, as these can extend into the town (and in reality do help serve the town's population). While this creates a more realistic analysis, it has to be noted that the forthcoming Central Bedfordshire Recreation and Open Space Strategy (part of their Leisure Strategy) may not recommend the same catchments exactly.

Table 7: Accessibility Thresholds

Draft GSS 2008	2014 Recommended Standard	ANGSt	TCPA Biodiversity by Design	Other Examples
	Amenity Green Spaces of <0.2ha 100m			Bedford: 100m (1-2 min walk) London: 400m Middlesborough: At least 0.1ha within 100m of houses suitable for families
Local Amenity Green Space 300m	Amenity Green Space 300m			Bedford: 100m (1-2 minute walk) London: 400m Middlesborough: 350m
Neighbourhood Urban Parks & Gardens 600m	Neighbourhood Urban Parks & Gardens 600m			Bedford: 1000m (15 minute walk) London: 400m Middlesborough: 600m (walking), 1.5k (cycling), 3.3k (driving).
Borough/District Urban Parks & Gardens 900m	District Urban Parks & Gardens 900m walking 1.5km cycling 3.2km driving			Bedford: 1000m (15 minute walk) London: 1.2km Middlesborough: 600m (walking), 1.5k (cycling), 3.3k (driving).
Local Natural & Semi-Natural Greenspace 300m	Local Natural & Semi-Natural Greenspace 300m	300m (but min 2ha not 0.2)	300m (minimum size 2ha)	Bedford: 300m (5 minute walk)
Borough/District Natural & Semi-Natural Greenspace 1.2km	District Natural & Semi-Natural Greenspace 1.2km walking 2km cycling	2km	1.2km	Middlesborough: 950m
Strategic Natural & Semi-Natural Greenspace 3.2km 7.5km driving	Strategic Natural & Semi-Natural Greenspace 3.2km walking 5km cycling 7.5km driving	5km (100ha site)	3.2km	
Allotments 1km (sites <50 plots) 1.5km (>50)	720m			Leeds = 720m Bromsgrove = 720m East Northants = 720m

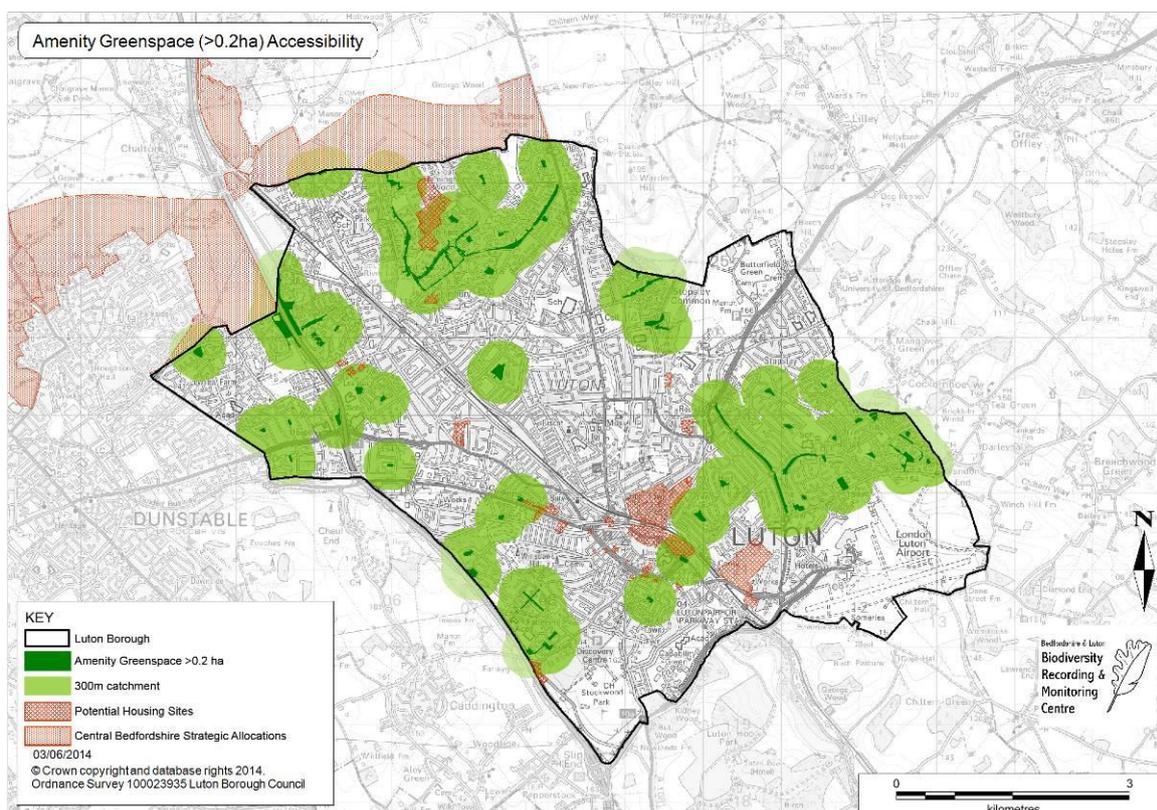
a. Amenity Green Spaces of <0.2ha:

The 100m distance is consistent with a 1-2 minute walk to a local space. In dense urban areas small sites can be of local value, and the CABE/Mayor of London Guidance suggests they should be included in any assessment. It must be understood however, that this standard is included to allow for inclusion in the assessment of existing accessibility, and provision of such small sites should not be permitted in any new development. The catchments of all sites within this typology have not yet been mapped.

b. Amenity Green Space

The 300m distance is consistent with no more than a 5-6 minute walk to a local space and the distance young children could walk. It is consistent with the Natural England Accessible Natural Greenspace Standard (ANGSt) Standard, and is also consistent with other greenspace strategies researched.

Figure 3 – Amenity Greenspace Accessibility



It is clear from **Figure 3** that access to Amenity Greenspace in Luton is very patchy, with some significant areas not being within the proposed catchments across the town. The best coverage is in the north, east and parts of the west. Several of the potential housing sites are in areas of deficit, and if developed without significant Amenity Greenspace provision would result in further exacerbation of the situation. There are also areas of deficit on the northern edge of the town, adjacent to the Central Bedfordshire Strategic Allocation areas.

c. Neighbourhood Urban Parks and Gardens

The 600m figure is consistent with no more than a 15 minute walk, the Commission for Architecture and the Built Environment (CABE)/London standards and National Playing Fields Association (NPFA) thresholds. It is greater than the Torkildsen Barclay (2003) recommendation of 300m, but this related to a typology which included sites now under “Amenity Green Space”. This standard is consistent with other greenspace strategies researched.

Figure 4 – Neighbourhood Urban Parks & Gardens Accessibility

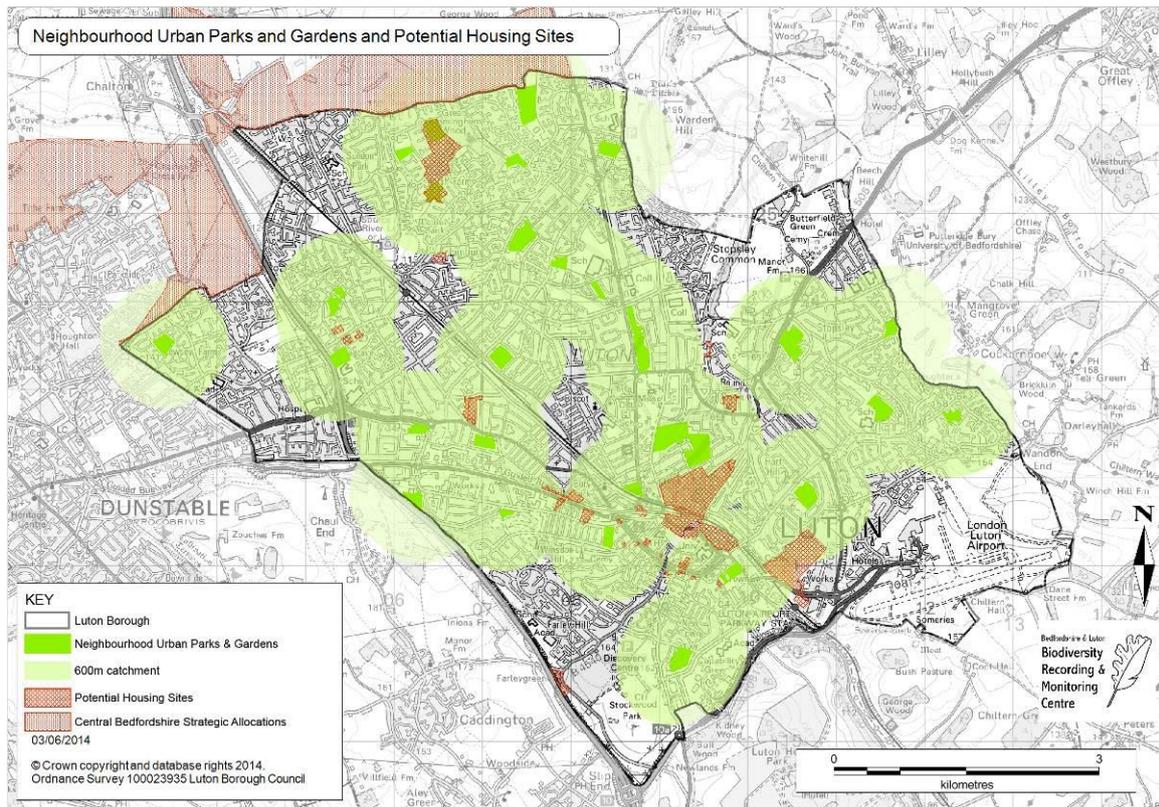


Figure 4 shows that access to Neighbourhood Urban Parks and Gardens in Luton is relatively good across the whole of the Borough, but there are areas of deficit in various locations. The vast majority of strategic allocation sites are within the catchments of existing sites. This does not mean that such developments should not contribute to Neighbourhood Urban Parks and Gardens, but it may mean that enhancement of existing sites is a good alternative where it is not possible to create new ones.

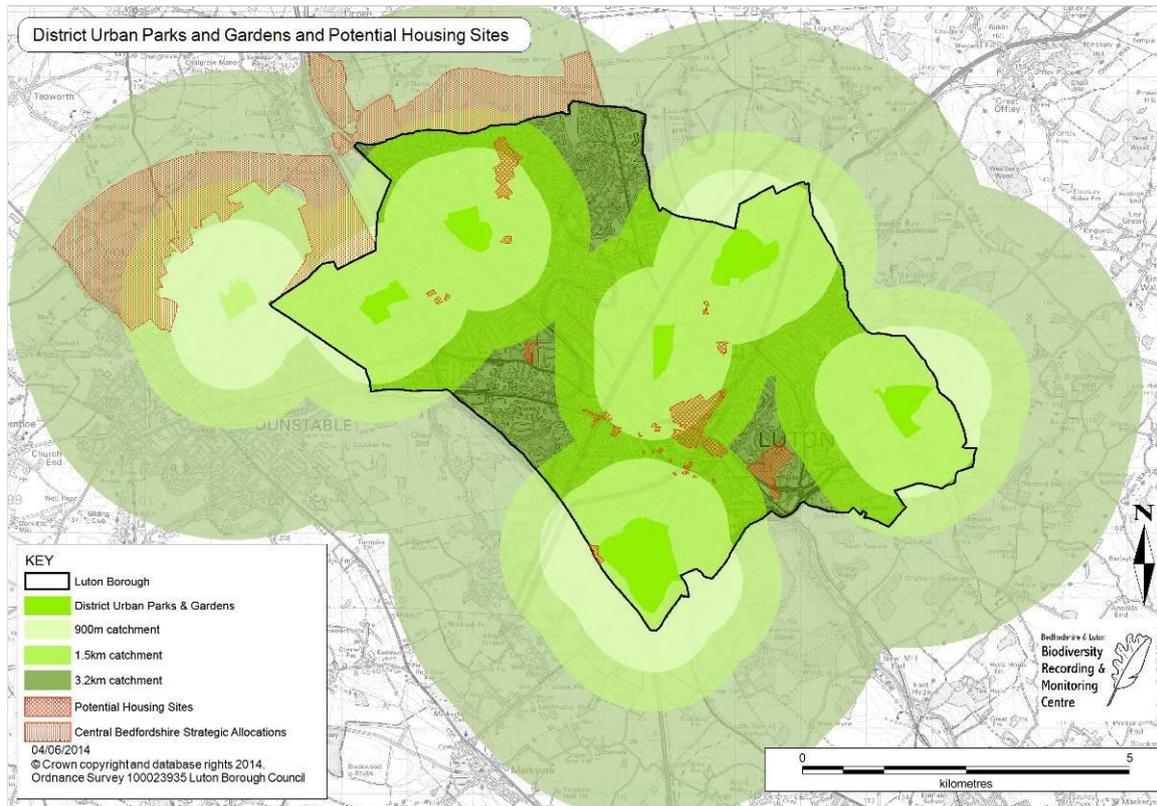
All of the Sub-Areas have significant areas of deficiency in terms of access. This particularly compounds the issue of low quantity provision in the South and West Sub-Areas. Wards including Dallow, Farley, Biscot, and Northwell, which also suffer much wider deprivation issues (as noted by the Index of Multiple Deprivation 2010), are poorly served in terms of accessibility.

Some areas of deficit in the north-west are close to the Central Bedfordshire Strategic Allocation sites, so collaboration will be required to ensure any resulting development does not compound deficiencies in Luton.

d. District Urban Parks and Gardens

The 900m distance is consistent with the NPFA (1000m) and CABE/London Standards for this type of facility, and with other greenspace strategies researched. Distances for cycling and driving are also provided, recognising that people do travel from further afield via these means, and that facilities (such as car parks) are provided.

Figure 5 – District Urban Parks and Gardens Accessibility



As **Figure 5** shows, accessibility to District Urban Parks and Gardens is reasonable, with a good geographical spread across the town. However there are significant areas of deficit in between them in terms of the walking catchments. Large parts of the East, Central and North Sub-Areas are not within the walking threshold, compounding low quantity provision in Central and North. Some of the most deprived wards in the Borough (including Dallow and South) are particularly affected.

Some potential housing sites are within these areas of deficit, meaning that unless there is new provision the situation will be further compounded. In the north of the town there is an area of deficit close to the Central Bedfordshire Strategic Allocation. To the west, Houghton Hall Park (a site in Central Bedfordshire) has been included with appropriate catchments, though these only extend a short distance into the town (particularly in terms of the walking catchment).

e. Local Natural and Semi-Natural Greenspace

The 300m figure is consistent with the ANGSt recommendation that no-one should live more than 300m from their nearest area of natural green space.

Figure 6 – Local Natural and Semi-Natural Greenspace Accessibility

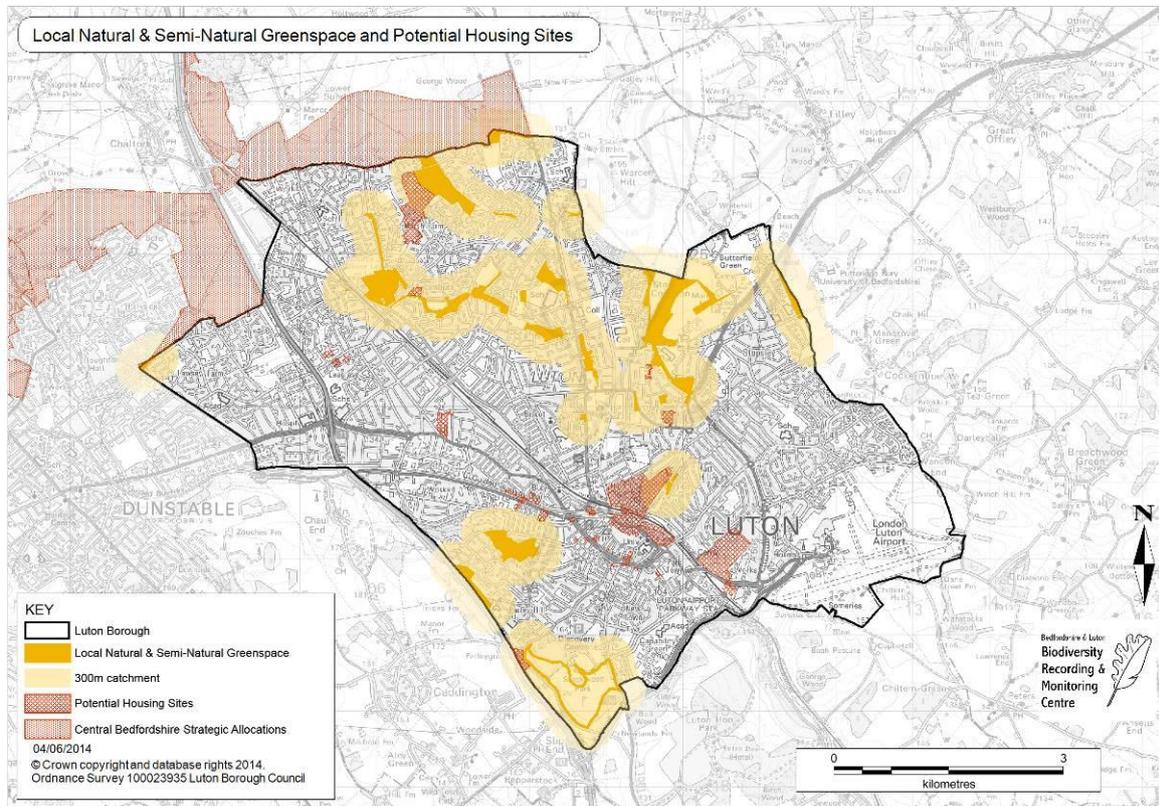
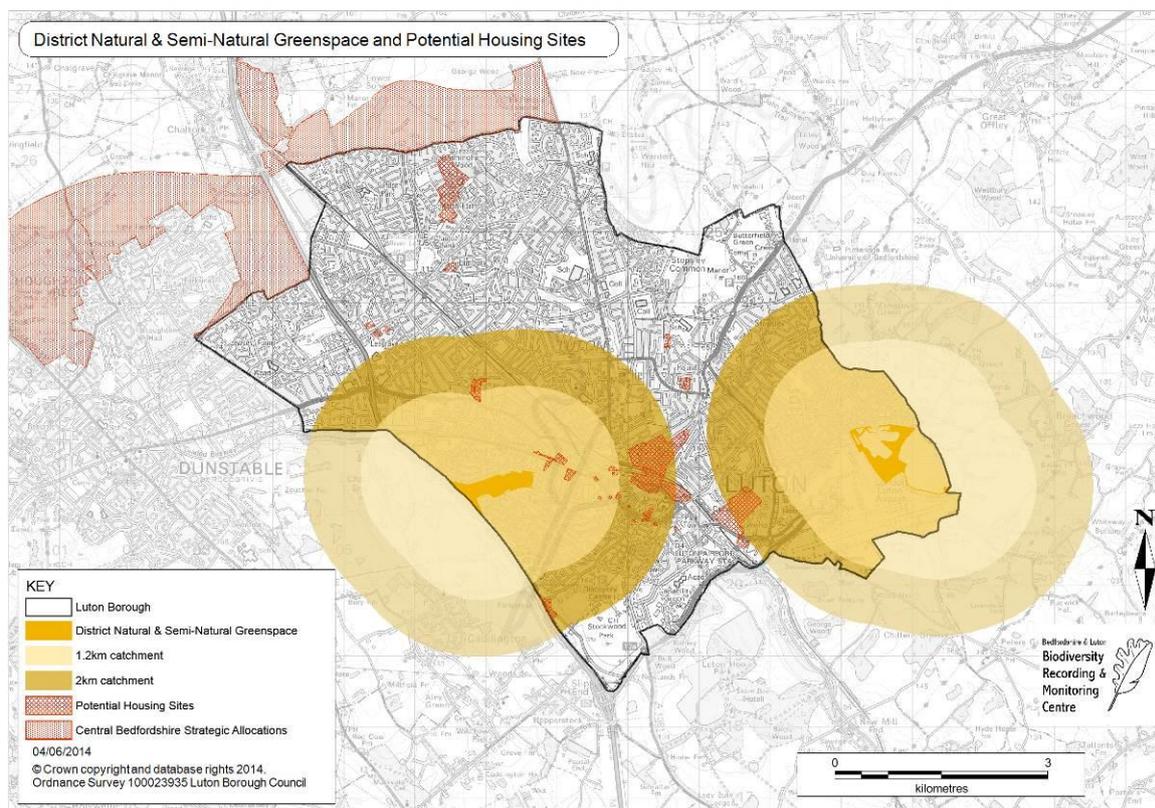


Figure 6 shows that access to Local Natural and Semi-Natural Greenspaces in Luton is quite poor, with relatively few sites in the typology and uneven distribution focused on the north and east, and to a degree the south-west. Significant areas are not within the proposed catchments across the town, including many of the most deprived wards. Some of the potential housing sites are in areas of deficit, and provision of new sites within this element of the typology is difficult in the majority of the town due to its urban nature – meaning that such sites in the rural-urban fringe are extremely valuable but are also subject to increasing pressure. This is especially likely in the north, where existing sites are adjacent to the Central Bedfordshire Strategic Allocation area.

f. District Natural and Semi-Natural Greenspace

The 1.2km figure is consistent with the TCPA standard and ANGSt. While this is further than the comparable Urban Parks and Gardens threshold (900m), it is still considered appropriate as the actual ANGSt distance is 2km. A cycling threshold has also been included.

Figure 7 – District Natural and Semi-Natural Greenspace Accessibility



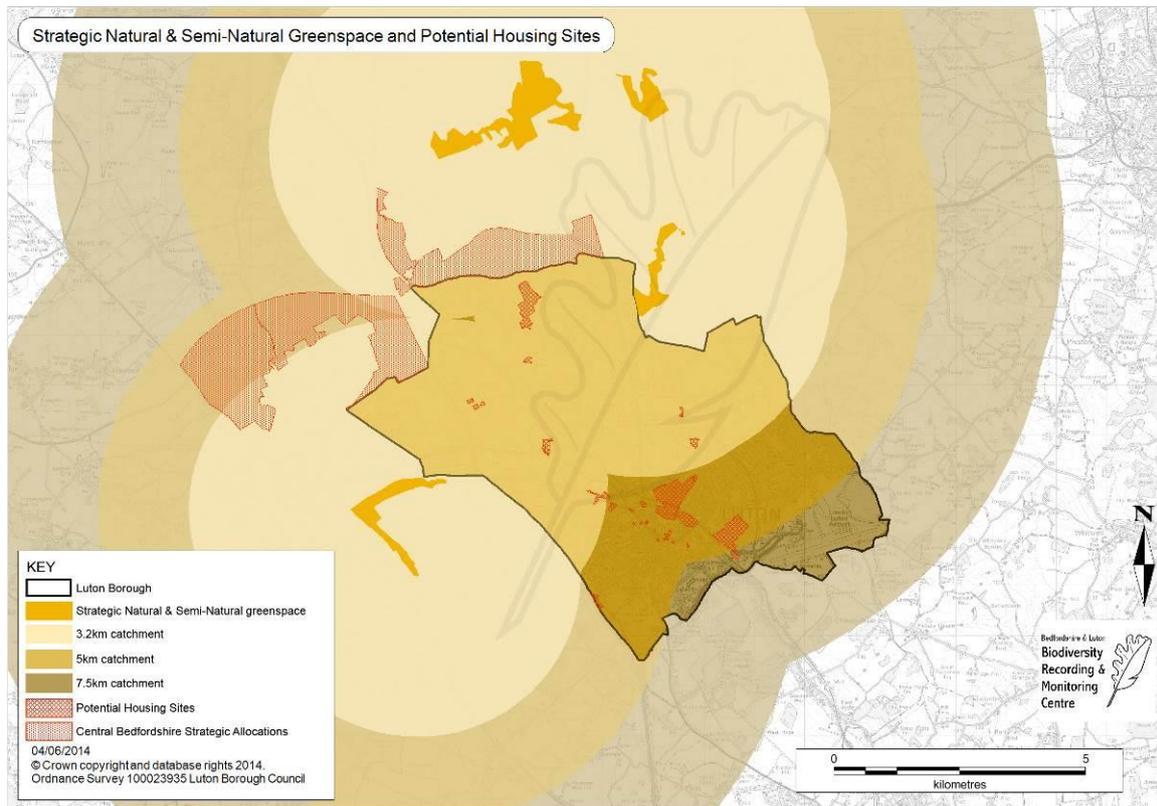
As is illustrated in **Figure 7**, there are only two sites within Luton in this element of the typology. Although catchments at this point in the hierarchy are quite large, there are very significant areas outside even the cycling catchments. Provision is skewed to the south, with no sites in the north. All of the North Sub-Area, and significant parts of the West and East Sub-Areas are outside of both cycling and walking catchments for either site, and even in the better served South and East Sub-Areas, significant areas are outside of walking catchments.

This situation is compounded by the potential impact of the large potential housing site in the north and the Central Bedfordshire Strategic Allocations immediately across the northern boundary of the Borough. Creation of sites of the size and nature appropriate to the typology will be difficult within the urban boundary, so it is important that the urban fringe is targeted to ensure future provision benefitting both Luton and Central Bedfordshire residents.

g. Strategic Natural and Semi-Natural Greenspace

The 3.2km figure is shorter than the ANGSt figure of 5k, but the latter applies to sites of 100ha and above, while the hierarchy here begins at 60ha. 3.2km is consistent with both the Town and Country Planning Association and London Standards. While this is an appropriate standard, it is not possible to achieve it everywhere in Luton. Cycling and driving standards are also provided.

Figure 8 – Strategic Natural and Semi-Natural Greenspace Accessibility



There are no sites of this type in Luton. However, as **Figure 8** shows, there are four sites which fit the typology beyond the Borough boundary with catchments extending into Luton. These are all to the north and west of the town. This creates an accessibility deficit in walking terms in large parts of the South and East Sub-Areas of the town, including areas of high social deprivation in the South ward. In terms of cycling access, there is only a relatively small part of the East and South Sub-Areas not within the catchment, and the number of people impacted by this is relatively small, as the majority of this area is taken up by Luton Airport.

h. Green Corridors:

Distance thresholds are not provided for Green Corridors, due to their variable and linear nature. Their role as potential transport corridors should be noted, helping people access greenspaces easily and safely. Where they do perform this function in terms of helping people access larger greenspaces, this can help mitigate where these larger spaces are not within the required distance thresholds and it would be impossible to create new greenspaces of the required scale. This approach should also look to better integrate rights of way.

i. Churchyards and Cemeteries:

Distance thresholds are not provided for Churchyards and Cemeteries as provision is largely based on requirements for burial space. However, accessibility should be a key consideration.

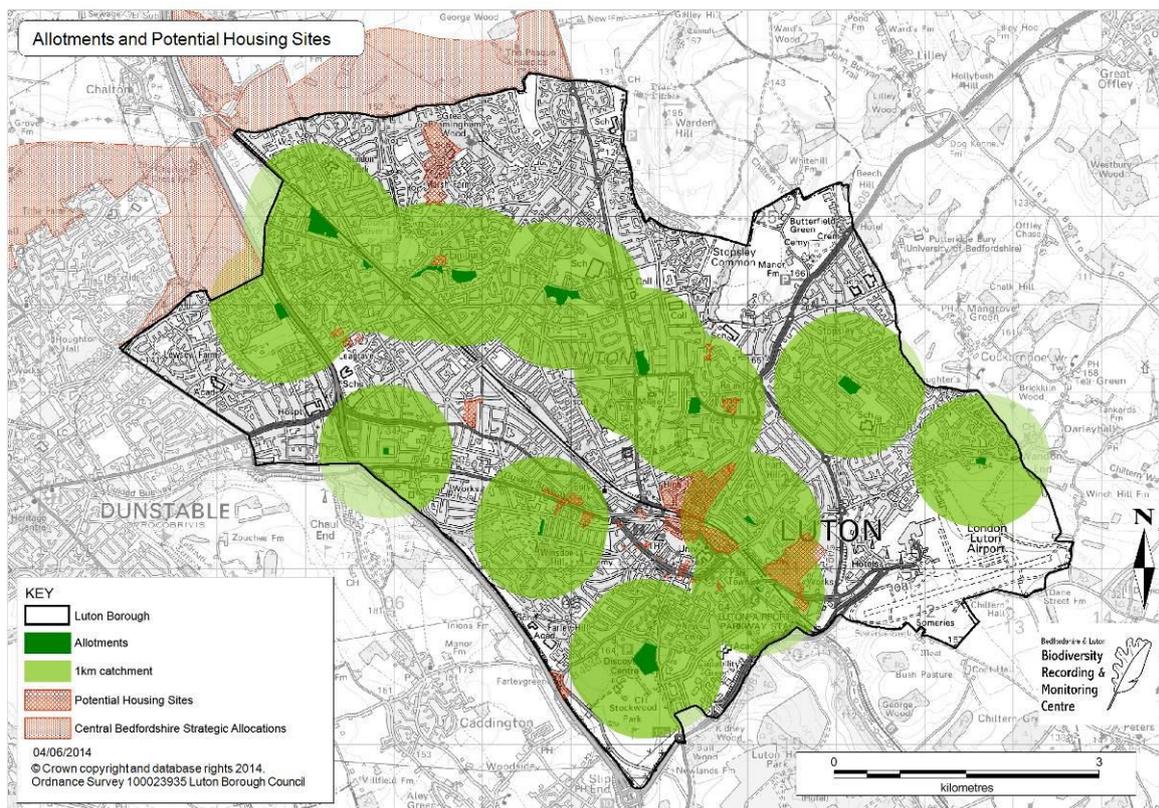
j. Allotments:

The Draft GSS 2008 recommended straight-line thresholds of 1000m for sites with up to 50 plots, and 1500m for sites with over 50 plots. These thresholds are larger than those for 'local' spaces described elsewhere which it would be logical to compare allotments with, but the Draft GSS 2008 suggests that higher levels of motivation and the "specialist" nature of this activity justify longer travel distances. However, comparisons with other local authority areas show that these distances are excessive, with 720m or a 15 minute walk being the norm elsewhere. Some people may travel to allotments by car, but many do not (and car ownership in Luton is lower than the average for Bedfordshire and England) so longer travel distances are not considered appropriate.

The Draft GSS 2008 offers no explanation behind the hierarchy for allotments, resulting in a two-tier threshold. While a hierarchy might help with planning allotments across an area, users are generally only interested in 'their' allotment, so the overall size of the site is less relevant.

Therefore it is recommended that a **720m** distance threshold is used, providing a reasonable travel distance.

Figure 9 – Allotments Accessibility



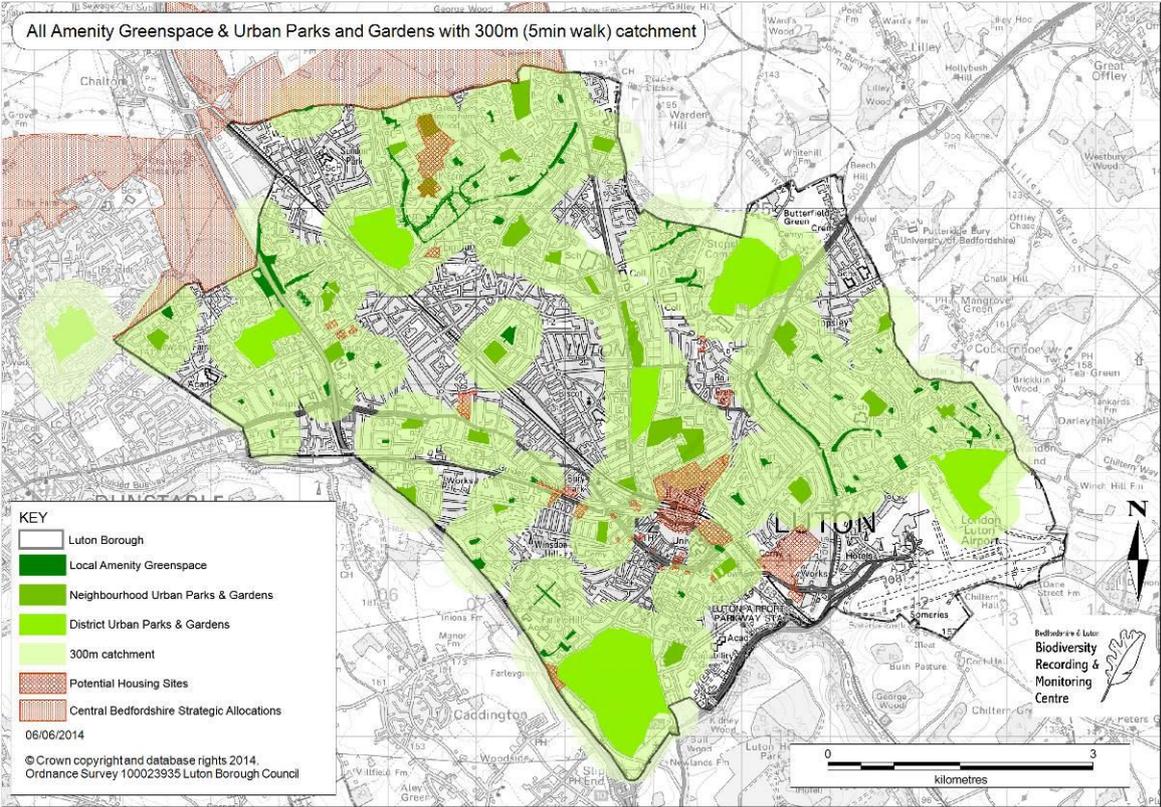
As **Figure 9** demonstrates, accessibility to allotments across Luton is patchy. Much of the North and East sub-Areas are in an area of deficit, including the majority of the area adjacent to the Central Bedfordshire Strategic Allocation to the north of the town. There is another swathe of deficit across

the Central Sub-Area. Several of the potential housing sites within Luton are also in areas of deficit, as are some of the more socially deprived wards. Provision along the corridor of the River Lea is good, perhaps because this is where the best soils are likely to be found.

The patchy distribution and significant areas of deficit identified add weight to the recommendation made earlier in this Review that an Allotments Strategy is required to focus on the issues and identify potential new sites.

k. Composite Accessibility Maps

Recognising that while looking at accessibility according to typology and hierarchy is a very useful tool in helping guide provision within each, it is also helpful to look at a broader picture. Therefore the following map (**Figure 10**) illustrates all Amenity Greenspace (above 0.2ha) and Parks and Gardens, grouping these elements of the hierarchy together as they share some similarities in terms of how they are used. It uses a 300m (5 minute walk) catchment only – the larger catchments reflecting longer walking distances or driving/cycling catchments, have not been included. This is to demonstrate a basic level of accessibility only – what is easily accessed by everyone. It also enables the fact that sites higher up the hierarchy, at the ‘district’ or ‘strategic’ level are used by people as their ‘local’ or ‘neighbourhood’ greenspace if they are nearby – regardless of size.

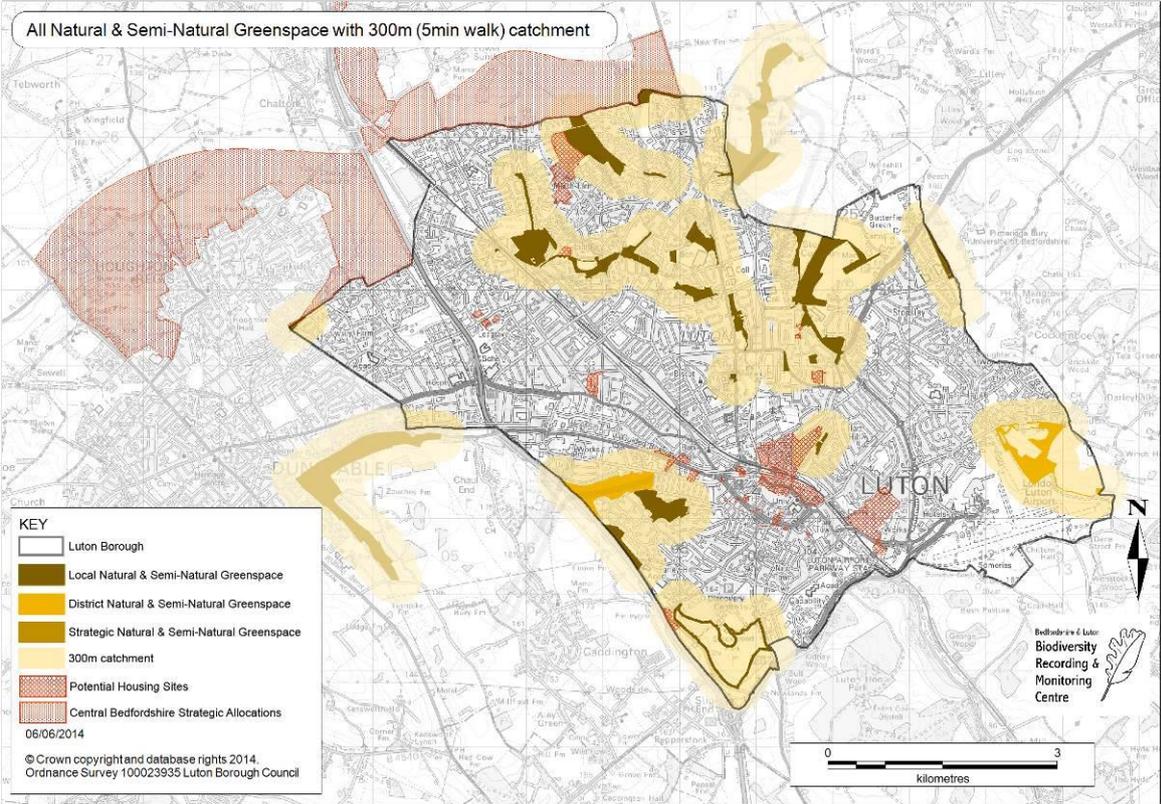


As **Figure 10** shows, coverage across the town is reasonable, although there is a large ‘doughnut’ of the Central Sub-Area, stretching into the South and West, with poor access. Various other areas of

deficit are scattered across the town. Wards experiencing high levels of social deprivation in areas of deficit include Biscot, Dallow and High Town. Strategic creation of new greenspaces could actually significantly reduce these areas of deficit.

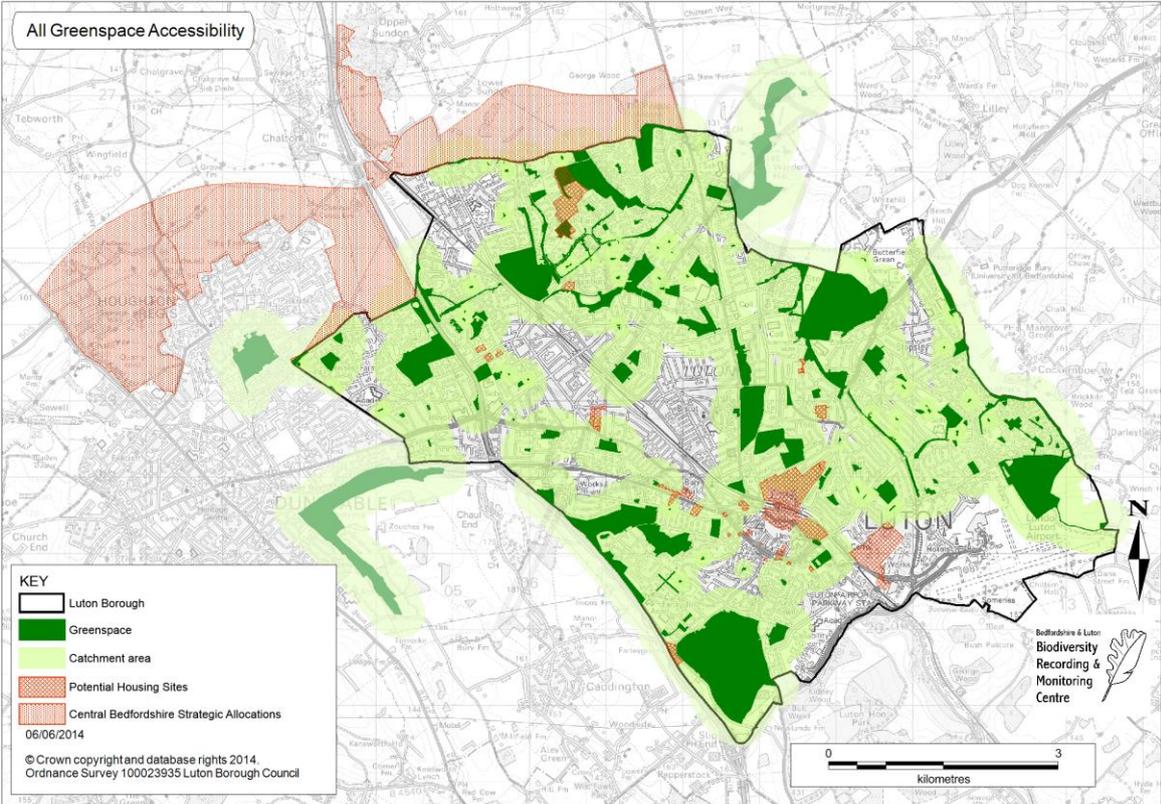
There is one significant area of proposed housing, to the south, that currently sits within a wider area of access deficit, as does part of one in the town centre. There is an area of deficit in the North Sub-Area which is close to the Central Bedfordshire Strategic Allocation.

Figure 11 illustrates all Natural and Semi-Natural Greenspace across the three levels of the hierarchy, again with a 300m catchment.



Even when taking all levels of the hierarchy into consideration at the same time, distribution of Natural and Semi-Natural Greenspaces is poor, with large parts of the town a significant distance from the nearest site of this type, particularly in the Central, West, East and South Sub-Areas. As outlined above, in a densely populated town like Luton this is perhaps not surprising. However, the issue is further exacerbated by obstructions such as the M1, the rail line and adjacent built up areas. As **Figure 11** illustrates, the least well served area is a large swathe right through the southern and central part of the town, from east to west. Within this there are significant areas of proposed housing development, and again a significant part of the northern edge, adjacent to the Central Bedfordshire Strategic Allocation, is an area of deficit.

Finally, **Figure 12** includes all greenspaces with a 300m catchment, plus the smaller Amenity Greenspaces (<0.2ha) with a 100m catchment (the smaller catchment has been used to reflect the accessibility standard in **Table 7** above. This illustrates where people are considered to have access to a greenspace of some sort, regardless of typology, and obviously the areas where people do not have access to a greenspace of *any* sort.



As **Figure 12** illustrates, there is a reasonable distribution of greenspaces across the town, but there are still significant areas that do not have access to a greenspace of some sort within walking distance. Parts of the Central, North and South Sub-Areas have significant residential areas without access to any greenspace. Socially deprived wards such as Biscot and to a degree Saints are particularly affected. Much of the deficit area in the South and East Sub-Areas is taken up by the airport, major road infrastructure, retail and business parks, rather than residential areas. However, a significant area of proposed housing development is within this zone.

The northern edge of the town is a particular area of concern, compounded by the Central Bedfordshire Strategic Allocation. This is most significant westwards from Bramingham Wood. This includes an area of significant access deficit, but even where there is not a deficit this is only because coverage is provided by a small number of well-spaced, small sites.

The accessibility mapping in this Review has also been used to update the 'Green Infrastructure' network map for the town by using the areas of access deficit illustrated in **Figure 12**, alongside other new and updated information on landscape.

Recommendations:

- 1. That the suggested accessibility thresholds are adopted within the 2011-2031 Local Plan Review**
- 2. That areas with poor accessibility identified through the mapping are used to help Identify and prioritise future projects, in combination with socio-economic information.**
- 3. That Accession Modelling is used in any future analysis of greenspace accessibility.**
- 4. That any future Greenspace Strategy is based upon comprehensive local consultation that takes into account the typology being used.**

4.3 Quality Standards

Quality standards are important as they provide the benchmark for developers to achieve with regard to new green spaces, and help shape policies and priorities for spending limited resources on existing ones. The NPPF (Para 73) advocates assessments to identify specific needs and quantitative or qualitative deficits or surpluses.

The draft GSS 2008 includes qualitative criteria for each element of the typology, largely derived from examples of good practice such as the Green Flag Award (the sub-divisions of character, accessibility, planting & biodiversity, facilities & features and management & maintenance are identical to those used in Green Flag assessments).

As criteria, these are very similar to those used by other authorities and are considered appropriate. The suggested 60% score is realistic, and consistent with the approach used elsewhere. However, a stronger link with quality audits should be made to demonstrate how the standards have been developed.

There needs to be a link to public consultation. PPG 17 advocates that quality assessments use a combination of site assessments and public consultation. This is not necessarily clear in the Draft GSS 2008 and again should be demonstrated in any future Greenspace Strategy. The consultation used in the production of the Draft GSS 2008 is largely derived from GreenStat data, and while this system is not currently operating, the GreenStat analysis carried out (see **Appendix 5**) shows there is a much larger body of information and analysis now available. This analysis is summarised in brief below.

GreenStat was a national greenspace monitoring system managed by the now defunct Greenspace. It provided feedback to park managers from users in a systematic fashion that facilitated comparison across an authority's area and between different authorities.

The analysis of Luton's GreenStat information shows that the overall picture is an improving situation in terms of levels of user satisfaction, but the number of people showing dissatisfaction are not insignificant.

People seem to be generally satisfied with park design, appearance, maintenance and internal accessibility. However, while there is a good level of satisfaction with facilities for children and parents (an improving trend due to the injection of funding through Playbuilder and other schemes), there are much lower levels of satisfaction with the wider range of facilities provided.

This shows potential for the PPG17 suggested approach of enhancing the range and quality of existing provision (as well as improving access to sites) as a way of coping with future demand. Analysis of the individual site data provided by GreenStat would be very useful in targeting improvements.

4.4 Assessment of other qualitative data: Integrated Environmental Visions/Ward-level GI Planning work:

During 2011 and 2012 two ward-level environmental planning exercises were carried out, and these were reviewed in 2012/13. They are summarised below and the information contained within them (and any similar future exercises) should be integrated into any future Greenspace Strategy.

a. Dallow Green Space Community Consultation (BRCC, 2012)

- Builds on 2011 report – aspirations around ecological enhancements (create wildflower meadows, more trees), site and facilities improvements (enhance entrances and boundaries, restore gardens, create picnic area, waymarking, surfacing, seating etc)
- 2012 report identifies similar issues. Notes how unwelcoming entrances are, and issues around drunks/drug users
- Includes full list of survey responses, divided by location and issues.
- Action Plan with recommendations for how to take forward.

b. High Town Integrated Environmental Vision (Groundwork Luton and South Bedfordshire, 2012)

- Environmental assets are identified and evaluated
- Suggested improvements are identified – with a separate sheet for each site
- Improvements are around wildlife, physical infrastructure, provision of information
- Smaller assets considered just as valuable as larger.

Recommendation: Information provided by these ward-level GI planning exercises should be integrated into any future Greenspace Strategy, in particular any assessment of Qualitative Standards.

5. Outstanding issues raised in the consultation response

Any issues raised in the Stakeholder Consultation for the Draft GSS 2008 and summarised in **Appendix 1** are noted below, with a response to the issue suggested:

- *Developers felt high figure could cause non-viability. Suggested a flexible approach.*

A flexible approach would ultimately result in lower provision, which would not be satisfactory given the consensus around the deficit of greenspace in Luton. The standards recommended within this Review are generally lower (but more suitable to the 'Luton only' context). A more flexible approach would create inconsistencies and would set potentially dangerous precedence, so should not be permitted.

- *Spatial analysis should be provided*

Spatial analysis is provided with the accessibility thresholds (and was provided with the Draft GSS 2008, but buried in the appendices.

- *Weak on cultural/historic heritage*
- *Importance of many greenspaces for biodiversity is not recognised.*

These are considered valid criticisms.

Recommendation: Any future Greenspace Strategy should take into account all other relevant strategies and sources of information to ensure the full value of greenspaces is considered.

- *Management & maintenance not adequately covered*

This is considered a valid criticism.

Recommendation: Any future Greenspace Strategy should include consideration of management and maintenance, look at different models for managing greenspaces and mechanisms for funding them. Any greenspaces secured through the planning system or external funding should include provision for management and maintenance over a minimum of 10 years (where permitted with external funding schemes).

- *Sites with a Primary Purpose of 'Biodiversity' won't have the capacity/resilience to deal with large numbers of people.*

It is considered that the process of mapping greenspaces and allocating them to the typology, carried out by a sub-group of Luton Borough Council officers, including the Planning Ecologist, in 2013 has resulted in the clear identification of sites of biodiversity value. The concurrent process of identifying a new tier of wildlife sites (District Wildlife Sites) has also added to the level of knowledge.

Recommendation: Any future Greenspace Strategy should include an analysis of Site Sensitivity, which should then result in reduced accessibility catchments for sites which are highly sensitive (and therefore illustrating an increased need for alternatives). Any such analysis should use the

methodology developed by the Bedfordshire and Luton Biodiversity Partnership (2010) and also take into account visitor numbers and carrying capacity.

- *Green Corridors can play a much wider role.*

Green Corridors have been taken into account. They are also being considered for the contribution they make to landscape and biodiversity through the Nature Conservation Strategy (2013) and Landscape Character Assessment (2013)

Bibliography

- Draft Greenspace Strategy 2008 (Halcrow)
- A Parks, Playing Pitch and Open Spaces Strategy for Luton Borough – Torkildsen Barclay in association with Clive Payne (2002)

APPENDICES

Appendix 1: Consultation Response Summary – Draft GSS 2008 Consultation

Key Issues

The key issues from the analysis of the GSS consultation responses are below, with interpretation of these issues or actions required in *italics*.

Mapping & Data:

- Many picked up on mapping errors (and large volume of errors), and this led them to question the soundness data behind them, and of the document.
- Presentation was also considered to be poor.
- Question over inclusion of non-accessible greenspace raised – *more for GI plan than GSS (need to be clear on what GI is, how GSS relates to GI Plans)*.
- Lack of clarity in how conclusions drawn

Format

- Length and readability were key issues, for consultation purposes and later use
- GSS should be evidence base for SPD, not SPD itself – latter needs to be shorter and more concise. *However, any future strategy/review is not necessarily going to be put forward as an SPD – it is more likely that it will be a Technical Document/s supporting the Local Plan, and therefore length of document is not critical.*
- An Exec Summary is required

Standards

- Application of standards across Luton and South Beds area questioned – a limited, broad-brush approach covering urban and rural is considered limited. *Would not be such an issue for Luton-only context*
- Use of ‘Best Current Position’ to form basis of quantitative standards (rather than an ideal) questioned – *very difficult in Luton scenario. The approach being suggested is that standards need to reflect the vision in an ideal world, which is then qualified by the fact it will be very difficult to achieve in the Luton scenario.*
- Developers felt high figure could make developments unviable
- Developers suggested a more flexible approach – *valid point as area varied, but not so relevant for Luton. However, still need a minimum standard.*
- It was felt spatial analysis should also be provided

Typology

- Needs to be clearer, with more rigorous application of sites to typologies
- Issue of Primary Purpose needs to be addressed – needs to be defined – will affect typology – *See John Comont suggestion of 3 sub-categories within N&S-N GS depending on Primary Purpose – Nature Conservation, Informal Recreation and Country Park. CP is not relevant as*

Luton does not have any. The key question is therefore whether any of the sites considered to be N & S-N GS would fit a primary purpose of 'Informal Recreation' better, but would not fit into the amenity greenspace typology.

Biodiversity

- Many raised issue of fact many GS are important for BD, and this not acknowledged
- Those sites whose primary purpose is BD won't have the capacity/resilience to deal with large numbers of visitors
- Recognising ecological sensitivity supports case for further provision
- Green corridors can play a much wider role

Accessibility

- Better integration with RoW network required. *In Luton context pavements, alleys etc also relevant. Key area is connectivity to spaces outside Luton - see RoWIP*

Green corridors

- Principle generally supported but requires better, more concise definition
- Developers queried size

Masterplanning

- Masterplans can be used at a more detailed level – but generally only apply to larger developments, and GSS should still set out parameters.

Action Plans

- Need to be more specific and include resources required

Resourcing

- More detail is required
- Seems to be an over-reliance on developer funding

Opportunity Areas

- Broadly supported (though some dissent from development industry)

Consultation Issues

- Felt consultation not wide enough
- Children/young people highlighted as key omission
- BME groups felt to be under-represented

Other

- Weak on cultural/historic heritage
- Need to tie in with public transport provision
- Management and maintenance not adequately covered.

Appendix 2: Draft GSS 2008 Consultation – Full Response Matrix (electronic only)

See spreadsheet “Draft GSS 2008 Consultation - Full Response Matrix”

Appendix 3a: All Greenspace Map (Figure 1) (electronic only)

Appendix 3b: All Greenspace Spreadsheet (electronic only)

See Spreadsheet titled “GSS Review 2014 - All Greenspace Spreadsheet”

Appendix 4: PPG17 Typology Summary

Parks and gardens – including urban parks, country parks and formal gardens.

Natural and semi-natural urban green spaces - including woodlands, urban forestry, scrub, grasslands (for example, downlands, commons and meadows), wetlands, open and running water, wastelands, and derelict open land and rock areas (for example, cliffs, quarries and pits).

Green corridors – including river and canal banks, cycleways and rights of way.

Outdoor sports facilities (with natural or artificial surfaces and either publicly or privately owned) – including tennis courts, bowling greens, sports pitches, golf courses, athletics tracks and school and other institutional playing fields.

Amenity green space – (most commonly but not exclusively in housing areas) including informal recreation spaces, green spaces in and around housing, domestic gardens and village greens.

Provision for children and teenagers – including play areas, skateboard parks and outdoor basketball hoops, and other more informal areas (for example, hanging out areas, teenage shelters).

Allotments, community gardens and city (urban) farms

Cemeteries and churchyards

Accessible countryside in urban fringe areas

Civic spaces – including civic and market squares, and other hard-surfaced areas designed for pedestrians.

Appendix 5: GreenStat Summary

Note – full data not currently available as GreenSpace went into receivership.

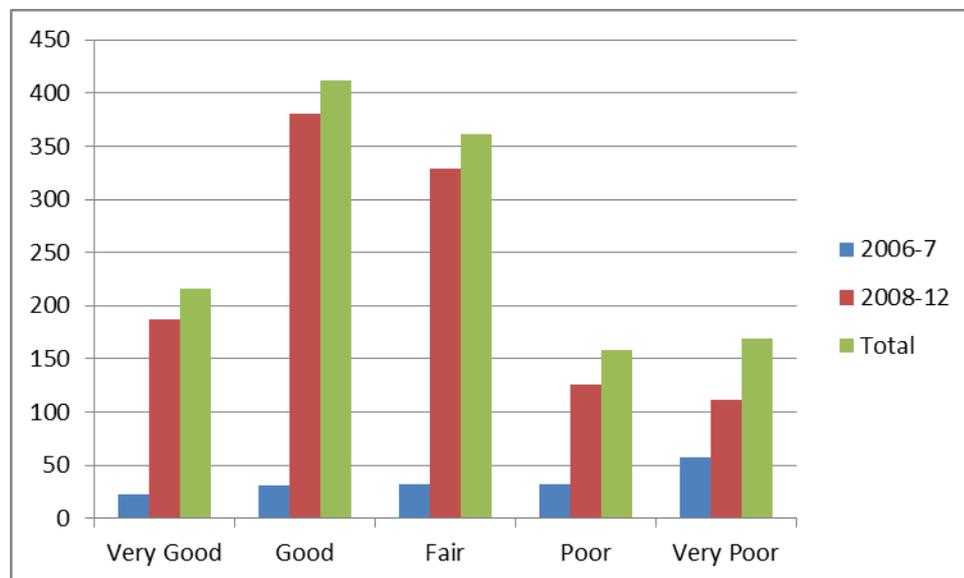
2006-7 data – up to 175 entries (not every entry completed every question)

2008-12 data – up to 1310 entries

Total – up to 1485 entries

While this represents a good number of responses which means a good level of robustness, some caution should be applied when comparing 2006-7 and 2008-12. The first set of data covers a period of 1 year, the second set 4 years (and over 7 times the volume of responses). The gap (2007-8) will remain a gap because the data is now unavailable.

Figure(a) – Park Design & Appearance

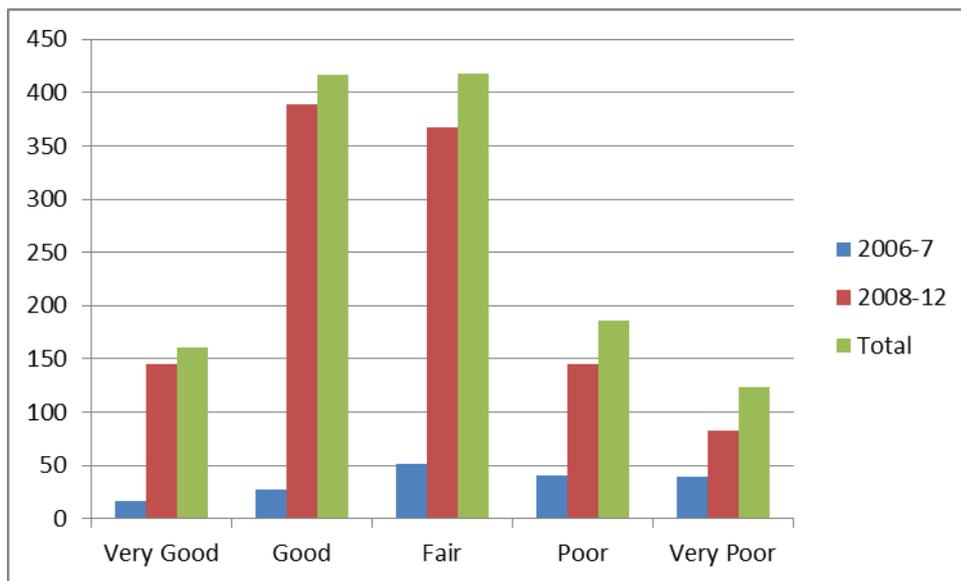


2006-7 = spread from good to very poor, 2008-12 good and fair have increased significantly, and very good to a lesser degree.

This represents an overall improving situation. However, 327/1310 (25%) still think park design and appearance are poor or very poor, which is a significant number. The data relates to a range of sites, so it's likely that there are some very good sites and some poor ones (design and appearance don't change over relatively short timescales, though note this is over 6 years).

It should also be noted that where a site is more natural in character, but is used as a recreational greenspace, user aspirations may be for a "neat and tidy" space, which could result in poor perceptions.

Figure (b) – Cleanliness & Maintenance

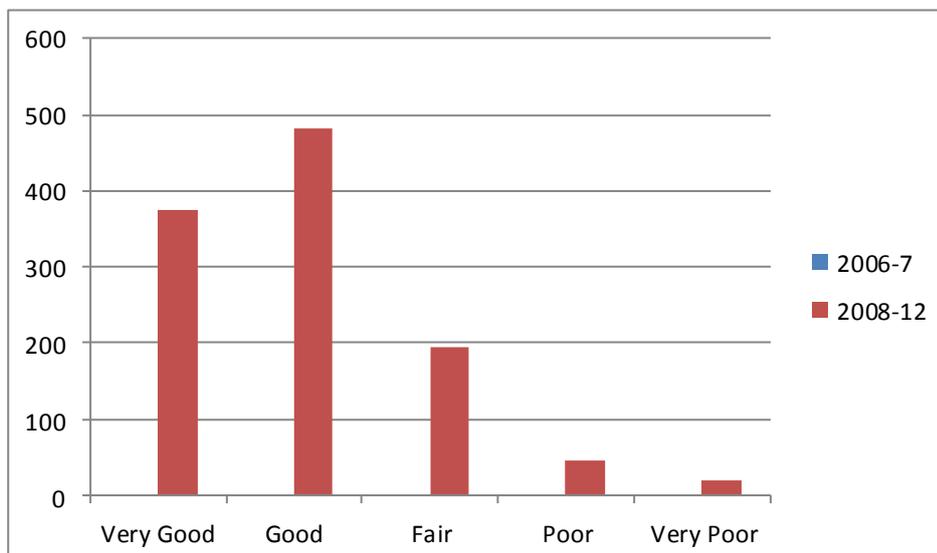


2006-7 = Fair to very poor, 2008-12 = good to fair, so improved situation

Cleanliness and maintenance are more likely to change over shorter timescales – so variability in opinion could relate to changes in sites as well as different sites.

309/1304 (24%) either poor or very poor. Again this is a significant percentage. The point made above about ‘natural’ greenspaces and perceptions around these being ‘untidy’ is equally relevant here.

Figure (c) – Internal Accessibility

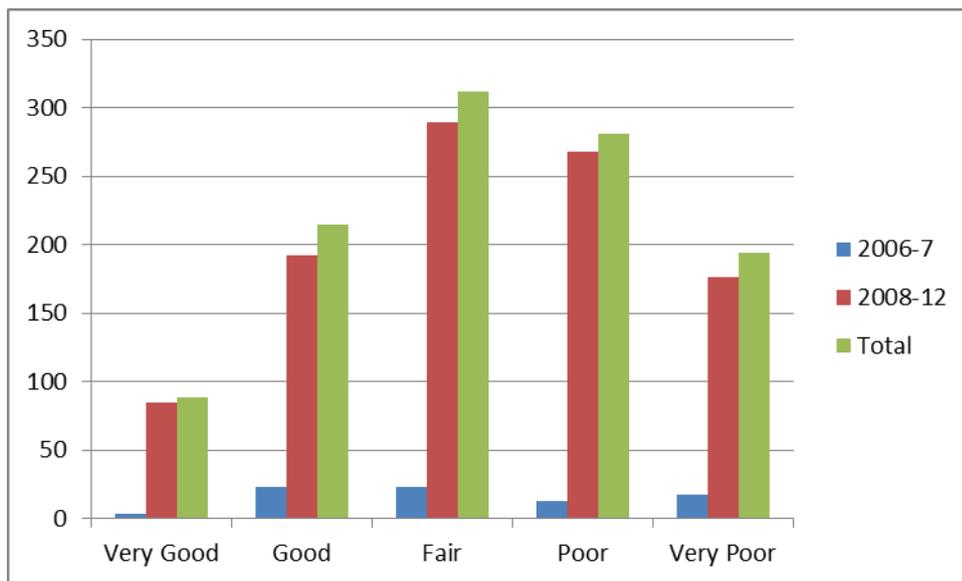


No 2006-7 data as question not asked.

People satisfied/happy – overall very good or good.

Only 66/1120 (6%) felt poor/very poor – a much less significant percentage.

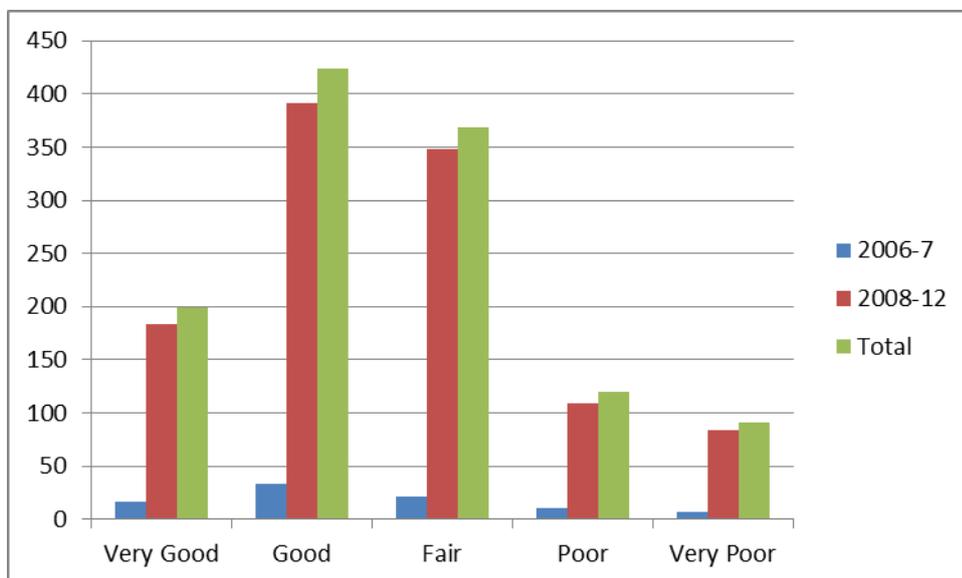
Figure (d) – Range of Visitor Facilities



2006-7 was good to fair, now 2008-12 good to very poor. Given generally small size of 2006-7 sample could really be similar, but shows an overall decline

475/1091 (43.5%) either poor or very poor – large and significant proportion. Good guide for potential to improve – while access and appearance are generally good, range of facilities isn't. Need to look at on individual site basis.

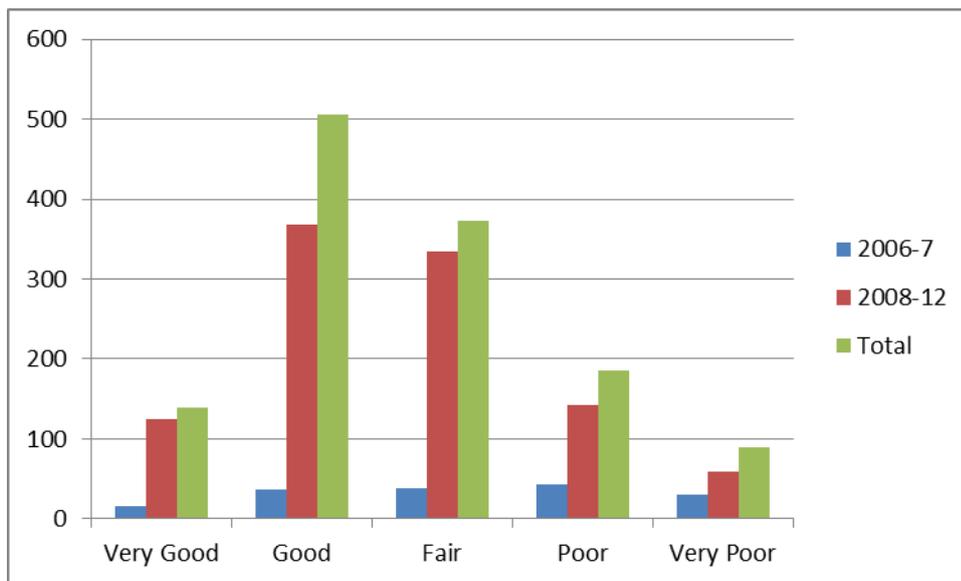
Figure (e) – Standard & Maintenance of trees, shrubs, planted areas etc.



2006-7 and 2008-12 people felt good or fair, so reasonably high and consistent.

211/1203 (17.5%) either poor or very poor – still a significant percentage, but not as high as others.

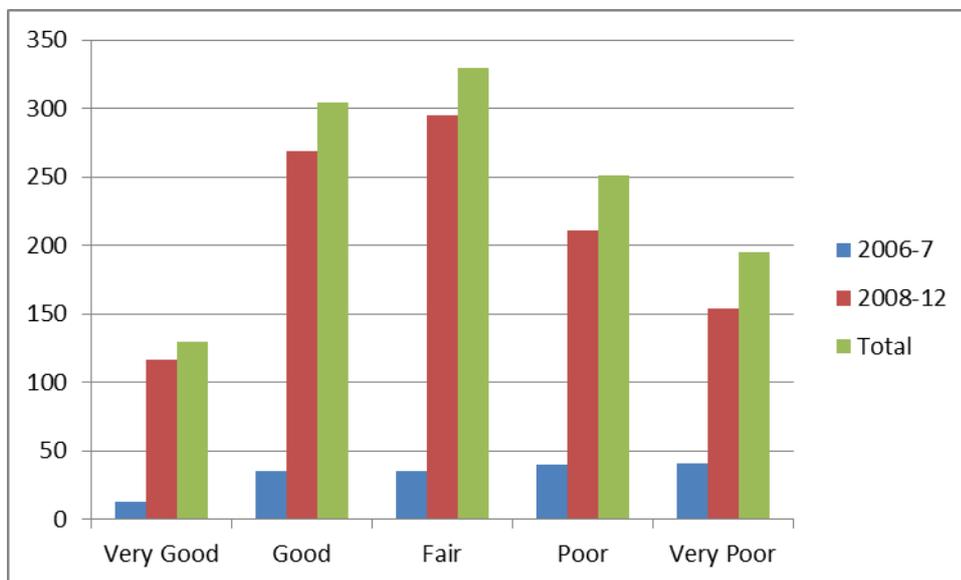
Figure (f) – Care & protection of nature & wildlife



2006-7 good to poor, but smaller proportion felt poor during 2008-12 so slight improvement and overall good.

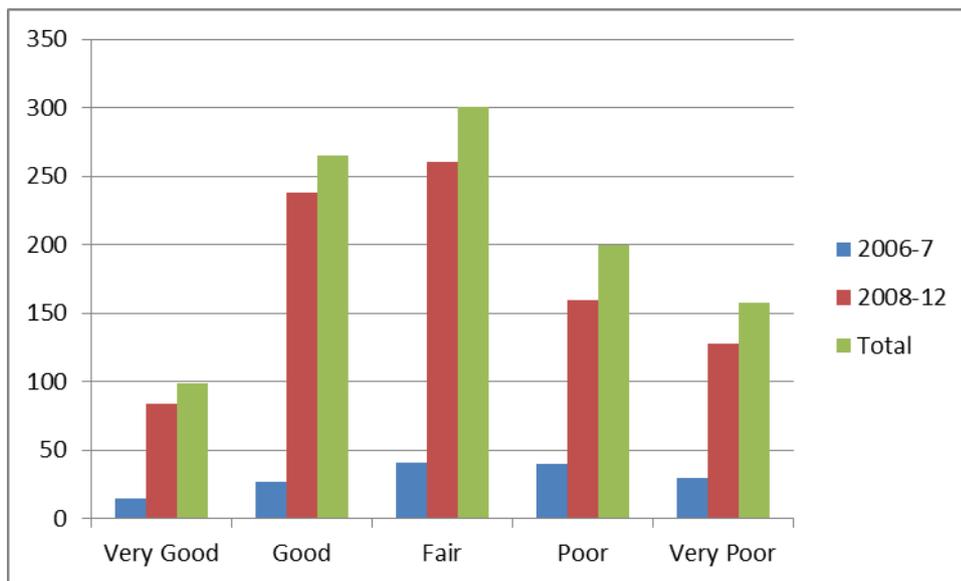
275/1192 (23%) either poor or very poor – again opportunities for improvement.

Figure (g) – Facilities for children & parents



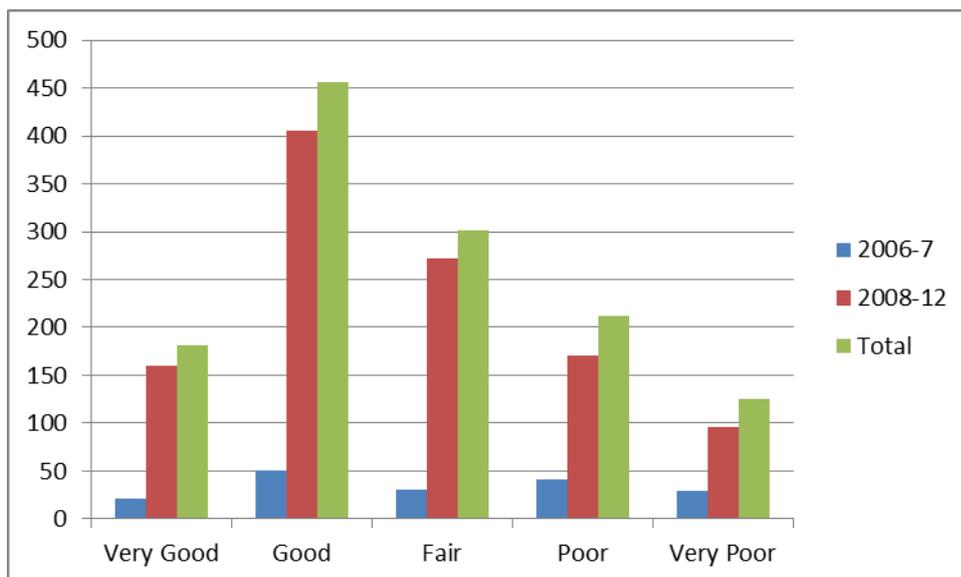
2006-7 was good to very poor, but Playbuilder etc over intervening period meant that it was an improving situation, although a significant proportion still felt it was poor or very poor – 446/1210 (37%) – like general facilities large proportion – helps direct improvements/resources.

Figure (h) – Sports Facilities



In 2006-7 generally fair to poor, 2008-12 good to fair, so a slight improvement overall. 358/1023 (35%) poor or very poor – another significant area for potential improvement.

Figure (i) - Overall



2006-7 = good to poor, so wide spread. 2008-12 larger emphasis on good to fair, so an improvement here. 337/1276 (26%) either poor or very poor.

Likely to be some poor sites, others better – will help target improvements.

While condition/maintenance etc has room for improvement, main area for improvement is in the range and type of facilities provided.

This shows potential for the PPG17 suggested approach, particularly useful in urban areas where opportunities for new greenspace are limited, in enhancing quality of existing provision (as well as improving access to sites) as a way of coping with future demand.