

This note constitutes formal advice from the Luton Local Access Forum. Luton Borough Council is required, in accordance with section 94(5) of the Countryside and Rights of Way Act 2000, to have regard to relevant advice from this forum in carrying out its functions.

Luton Local Access Forum (LLAF) Letter of Advice to LBC re. Bury Park Traffic Improvements

Date: 9 November 2025

Signatories at LLAF:

Mamnun Khan (Chair), Louis Upton (Vice Chair), John Mardle, Russell Cartwright, Graham Simpson, Raheed Salam, Roy McCrudden, Cherry Newbery, David Oakley-hill

The Luton LAF overall welcome Luton Borough Council's (LBC's) proposal on improving the traffic in the Bury Park area. We believe it will improve the traffic flow not only for cars but significantly for buses as well. Pedestrians will also benefit from additional space to walk, making the area safer and less congested. We further recognise that reducing illegal parking and stopping on main roads (through the introduction of a red route) will help keep carriageways clearer and more predictable. This may, in turn, offer some improvement for cyclists by reducing obstructions and the need to navigate around parked vehicles.

We note that in the 12 months to 30 September 2025 there were 11,037 penalty charge notices (PCNs) issued in Bury Park for parking/traffic enforcement, which bolsters the case that enforcement alone has not solved the problem and more structural change is required.¹

However, while we support LBC's proposal, we believe there are more considerations that should be taken into account to ensure that traffic improvements will not only enhance vehicle flow but also create a safer, more inclusive environment for cyclists and disabled users accessing shops, community centres, mosques and churches. We set these out below.

1. Cycling improvements not fully addressed. We recognise that if illegal parking/stopping is reduced on main roads (via red route) then

¹ Luton Today, *Consultation over 'red route' plan in Luton after more than 11,000 parking fines issued in a year*, 21 October 2025, <https://www.lutontoday.co.uk/news/transport/consultation-over-red-route-plan-in-luton-after-more-than-11000-parking-fines-issued-in-a-year-5368076>.

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carriageways may be clearer and more predictable. That could marginally improve conditions for cyclists (less car obstruction, fewer parked cars to avoid).

However, the plan does not appear to include dedicated/protected cycle lanes or explicit cycle route enhancements. This will be a missed opportunity, despite in the council's own documents for the Local Cycling & Walking Infrastructure Plan (LCWIP) for Luton, it is acknowledged that the active-travel network (walking & cycling) currently has gaps and barriers, especially in more deprived wards such as Bury Park.² Without explicit cycle route continuity work, cyclists may still face barriers when moving through Bury Park or connecting to wider networks: the “barrier” problem noted in the LCWIP remains unaddressed explicitly.

Moreover, if parking/loading is shifted into side streets to compensate, cyclists in those streets may experience increased vehicular traffic/deliveries, reversing localised benefits. The plan focuses on main roads (Leagrave Road, Dunstable Road, Bury Park Road) but many cyclists use smaller streets or cut-throughs that may not be covered or improved. Furthermore, loading bays, one-way changes, and enforcement may indirectly prioritise car/delivery access rather than cyclists, unless explicitly balanced.

- 2. Impacts to accessibility and inclusion.** Stopping on-street parking near key destinations may affect those with mobility challenges or older visitors who rely on being dropped off close to amenities in the Bury Park area such as shops, community centres, mosques and churches. Although the proposal identifies three additional disabled bays in the main area, in the view of Luton LAF, this may not be adequate for such a large community area like Bury Park, and the overall accessibility impact is not yet clear.

² *Local Cycling and Walking Infrastructure Plan 2023-2033*, Luton Borough Council, https://www.luton.gov.uk/Transport_and_streets/Lists/LutonDocuments/PDF/Responsible%20travel/lcwip.pdf?

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LLAF would remind LBC that under the Equality Act 2010, LBC as a public body has a *Public Sector Equality Duty (PSED)* (Section 149) that requires it to: eliminate discrimination and advance equality of opportunity for people with protected characteristics (including disability); and make reasonable adjustments so that disabled people are not placed at a substantial disadvantage compared with non-disabled people.

We also believe the proposal does not set out how it will ensure that restrictions (such as red routes) do not unreasonably hinder Blue Badge holders' ability to park. We believe this may not sufficiently meet the Disabled Persons (Badges for Motor Vehicles) (England) Regulations 2000, as amended, and associated DfT Blue Badge Guidance (2014).

In the consultation FAQ, there is a provision for exempting "Blue Badge holders / Taxi drivers for drop-off/pick-up, with badge displayed and prompt departure."³ However, there is insufficient clarity on:

- What constitutes "prompt departure" – e.g., 5 minutes, 10 minutes, or another threshold?
- How "drop-off/pick-up" is defined operationally – does it include delivery of shopping or assistance to passengers?

Comparatively, on red routes in Transport for London (TfL) areas, Blue Badge holders may stop for up to three hours in designated zones, provided it is safe to do so. LBC's proposals do not appear to replicate this flexibility, potentially creating unintentional barriers for disabled users.

A further complication arises with monitoring and enforcement via ANPR cameras. The proposals do not specify how exemptions will be verified, raising several practical concerns:

- **Blue Badge visibility:** badges are typically displayed on the front windscreen. In practice, this may not always be possible or consistent, particularly in vehicles where the badge cannot be clearly seen by overhead cameras, or for quick drop-offs.

³ *Have Your Say Today - FAQs - Bury Park Traffic Improvements:* <https://burypark.commonplace.is/en-GB/proposals/v3/sample-media-content?step=step1>

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- **Detection limitations:** current ANPR systems can identify vehicle registration plates but cannot reliably detect whether a Blue Badge is displayed or valid.
- **Inadequate information on ANPR:** we note there is lack of detail on the planned use of ANPR, including where the cameras will be installed, how they will be managed, and how frequently their operation will be reviewed. These must be in the scope of the trial.

Administrative burden: if LBC requires pre-registration of vehicles to allow Blue Badge exemptions, this adds complexity for residents and visitors and may lead to inadvertent penalties.

Enforcement accuracy: without a clear protocol, there is a risk that disabled users could be incorrectly fined, undermining accessibility objectives and exposing the Council to complaints or legal challenge.

3. **Unintended consequences to cyclists, pedestrians.** Loss of on-street an loading bays may displace parking to other roads impacting pedestrians and cyclist elsewhere, as well drastically make road usage unsafe as goods are transported from longer distance.

a) Displacement of parking and loading activity

- The removal of on-street parking and loading bays along key corridors (Dunstable Road, Leagrave Road, Bury Park Road) may push vehicles, delivery vans, and service traffic into adjacent residential streets or minor roads.
- These side streets are often narrower, with mixed traffic including pedestrians and cyclists. Increased parking, loading, or through-traffic could create conflict points, reduce visibility, and increase the likelihood of collisions or near-misses.
- Pedestrians may be forced to navigate between parked or moving vehicles, particularly where footways are narrow, potentially reducing accessibility for older or disabled users.

b) Longer delivery routes and risk to cyclists

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- Businesses that previously had short-term on-street access will need to deliver goods from more distant loading zones or off-street car parks. This may lead to larger vehicles traversing residential streets and cycling routes, creating new hazards.
- Cyclists may be exposed to higher-speed vehicles and obstructed sight-lines when navigating around delivery vans, especially at junctions and on narrow streets. The absence of dedicated cycle lanes compounds this risk.

c) Impact on pedestrian movement

- Displaced parking can block informal pedestrian routes or force crossings in unsafe locations, especially where pavements are narrow or poorly maintained.
- Congregations of vehicles (for deliveries, pick-ups, or illegal parking due to displacement) near community hubs such as mosques, shops, and schools could increase pedestrian–vehicle interactions, heightening the risk of accidents.

d) Compounding cumulative risks

- Individually, each measure (red routes, removal of loading bays, one-way streets) may appear to improve traffic flow. Collectively, however, the scheme risks shifting hazards rather than eliminating them, particularly for vulnerable road users.
- Cyclists may experience longer detours, reduced predictability of traffic flow, and increased exposure to vehicles performing last-minute manoeuvres to access side-street parking.
- Pedestrians, especially those with mobility impairments, may face longer walking distances from accessible parking or increased conflicts with vehicles on footways and crossings.

4. Success criteria and trial concerns

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We would welcome clarity on how issues raised during the 18-month trial will be monitored and addressed. In particular, we seek a clear framework for assessing the trial, including:

- The Council should clearly define the success criteria for the trial and ensure that baseline data covers a sufficiently long period before implementation, including festival and peak periods, so that results are genuinely representative and comparable.
- How local residents' views, safety considerations, traffic-flow effectiveness, and active-travel measures will be evaluated?
- What quarterly reporting and regular publication of monitoring data will be made available?
- We recognise that the scheme may not be perfect at launch, and that unintended consequences (such as increased pressure on surrounding streets) may emerge. For this reason, regular reviews are essential, and Luton Borough Council must be prepared to take further action where needed.

Finally, we hope that the police and all relevant organisations are fully briefed on the objectives of the trial and appropriately resourced to support it throughout the trial period and, if necessary, beyond.

Conclusion

Luton LAF welcomes LBC's proposals to improve traffic flow in Bury Park, recognising potential benefits for buses, general vehicle movement, and pedestrian space. However, to ensure the scheme delivers a genuinely safe, inclusive, and sustainable environment, further measures are needed.

In particular:

1. **Cycling provisions** must be strengthened, with dedicated or protected cycle lanes, continuity of routes, and mitigation of risks from displaced traffic.
2. **Accessibility for disabled and older users** requires more comprehensive planning, including additional disabled bays, clear Blue Badge

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exemptions, and robust ANPR enforcement protocols to avoid inadvertent penalties.

3. **Pedestrian and cyclist safety** must be safeguarded against unintended consequences of displaced parking and loading activity, with traffic-calming, safe delivery routes, and protected crossings.
4. **Overall, transparent monitoring, clear success criteria, evaluation timings and baselining, and a commitment to adapt throughout the trial period** will be essential to ensuring the scheme delivers meaningful, safe, and sustainable improvements for the Bury Park community.

LLAF urges LBC to integrate these considerations into the final trial design to ensure that traffic improvements benefit all users, vehicles, pedestrians, cyclists, and disabled people alike, and to uphold statutory equality and accessibility obligations.