

Luton LAF Comments on “Open Space Strategy” and “Green & Blue Infrastructure” Studies

1. Introduction

Luton’s Planning Policy team has begun work on the new Local Plan. They have commissioned evidence base studies as input to the plan. Luton LAF have been asked to comment on two of these studies.

1.1 The Studies

Knight Kavanagh & Page (KKP) have been commissioned to create a new Open Space Strategy (OSS). This involves a comprehensive audit and assessment of all open spaces (e.g., parks, play spaces, nature reserves and allotments).

The Environment Partnership (TEP) has been appointed to undertake a Green & Blue Infrastructure Study (GBI), to provide the evidence required for the development of GBI-related policies within a new Luton Local Plan. This will involve undertaking a baseline assessment of green and blue infrastructure in the town, an analysis of current provision, and testing of Natural England’s Green Infrastructure Framework within the Luton context.

1.2 The LAF View

The documents we currently have access to on these two areas are over 10 years old, so it’s important they’re updated.

At this stage, both studies are collecting data. There is little for the LAF to say about the data collection process. We have provided some comments on priority areas and pitfalls below.

It’s more important that the LAF is consulted once draft reports are available to review the interpretation of the data and conclusions before the reports are finalised.

2. Background

2.1 What Luton Local Plan 2011-2031 said about Open Space

In Section 2: Setting the Scene:

- 2.10: Luton is for the most part built up to its boundary and is surrounded by the Green Belt.
- 2.17: The distribution of greenspaces across the Borough is unequal with the western and central areas of the Borough having significantly less overall greenspace. This is compounded by their location, being separated from open countryside and surrounded by built up areas. The overall current provision of greenspaces is below the standards (for each typology) devised by the Greenspace Strategy Review 2014.
- 2.28 The town's green spaces and green infrastructure network, including the River Lea and other open areas, need to be protected and enhanced for wildlife and accessibility for formal and informal

recreation that bring important benefits in terms of health and wellbeing.

In Section 10: Natural & Historic Environment:

- 10.6: A need to protect the most important green space (including District and Neighbourhood Parks) and future designations from the community of Local Green Space (as defined in the NPPF) and only in exceptional circumstances allow losses arising from development..... It is not realistic to expect significant net additional provision of open space and green infrastructure, given the constrained land available within a built up area such as Luton. Protection and enhancement of existing open space and green infrastructure, including for multi-functional purposes, is therefore a significant requirement and reflected in the policy LLP27.

Appendix 11 Greenspace Standards

- This section shows the analysis from the Greenspace Strategy report. In every Greenspace category, Luton’s provision is below the recommended standard. In most categories by a significant margin.

2.2 What has happened:

It is worth looking at what has happened to Open Space in Luton since the last Local Plan was created.

Things that have improved:

- Two new SSSIs – Cowslip Meadow and Dallow Downs.
- Improvements to Bradgers Hill – environmental quality and access.
- A new “pocket park” in town: Hat Gardens
- Barnfield Linear Park
- Nature improvements at several parks led by Friends of Luton Parks
- River Lea reprofiling at the Moor and Manor Park

Things that have got worse:

- Developments on green belt to the North and East of Luton will create a barrier to open country.
- Cemetery extension built on green belt near Stopsley Common.
- Wandon Park to be built over. New Wandon Park created on former playing fields outside the Borough.
- Airport development means that much of Wigmore Park will be closed. Substitute space will be provided outside the Borough.

The reduction in open country around the town makes the quantity and quality of greenspace within the borough even more important.

The net loss of Greenspace **within** the town suggests that Luton has failed to respect section 2.28 of the current local plan: “The town's green spaces and green infrastructure network....need to be protected and enhanced”.

The loss of two well-loved parks has created ill-feeling with those affected and a wider concern in the town that none of our greenspace is safe. In addition, in the initial documents for the new plan, Objective 7 is “Explore the opportunity to utilise public sector land... to help unlock sites, particularly for new affordable homes”.

To regain trust and engagement with the Local Plan development process LBC need to:

- Be open about whether there are plans to develop any of our current greenspace.
- Commit to provide stronger protection than that given in Policy LLP27 of the current plan.

3. General Comment on the Studies

3.1 LAF priorities

The Luton LAF provided feedback on the initial Local Plan documents in March 2025. At that time we indicated the Objectives that we thought were critical. Here we have picked out objectives relevant for these two studies (LAF comments on the objectives are shown in *blue italics*):

7. Explore the opportunity to utilise public sector land, assets and delivery mechanisms to help unlock sites, particularly for new affordable homes

Objective 7: The lack of transparency regarding public sector land in Luton is concerning. A detailed map of LBC-owned land is necessary to assess this objective's viability.

13. Ensure that new developments enable improvements in health and wellbeing and life outcomes, including through the provision of new open space, improvements to the built environment and opportunities for active travel

Objective 13: With an increasing number of high-density residential developments, new open spaces are critical to avoid overwhelming existing green spaces.

18. Protect and maximise opportunities for biodiversity net gain and the enhancement of Luton's natural assets

Objective 18: Biodiversity Net Gain (BNG) should be achieved within Luton first, ensuring benefits are accessible.

19. Protect and enhance the natural environment, including open spaces, landscapes, green infrastructure and waterways, provide a linear park for the town, and minimise pollution

Objective 19: Protecting and enhancing green spaces must be prioritised, not treated as a secondary concern.

3.2 Quality information is key

There is no easy way to find out where the green and blue space in Luton is. Several lists are available, but it's hard to find out where places are, how big the space is and whether it's accessible (several of the County and Local Wildlife sites are not).

It would be great if, out of these studies, Luton could publish a list of all the **accessible** plots of greenspace in Luton, showing:

- Name
- Type (Park (District, Neighbourhood, play etc), Nature Reserve, Other Openspace etc)
- Size (Ha)
- Entry point(s) – street name and gridref
- Ownership
- What's allowed (Dogs, cycling?)
- Do they have any protection (Fields in Trust, Heritage Register, SSSI etc).

Natural England provides some online maps for the [Green Infrastructure Framework](#). If you look at Luton and select “All GI Assets that are thought to be Publicly Accessible” you will see that Stopsley Common is excluded as is much of the River Lea corridor. On the other hand there are examples of School Playing fields marked as publicly accessible when they are fenced off. Without accurate data, the “Access to Greenspace Standards Assessment” will be unreliable.

4. Open Space Strategy

4.1 Accessibility and Facilities

It's good that the study is considering a range of things that may constrain access: for example: whether women and girls feel comfortable using particular parks.

Toilets are an important facility. They are rare in Luton Parks which constrains visits for a significant proportion of people.

4.2 Nature Reserves

There are about 38 Nature Reserves in Luton. Finding where they are is not straightforward but, more importantly, several of them are not accessible. For example:

- Slaughters Wood is completely fenced off (for Girl Guides).
- Croda Colloids has “No Public Access” signs.
- Oaket Wood: there's no “legal” way to get to it.

Around 7 are not accessible and others are not completely open. There may be good reasons for this (conservation, safety). The important thing is that information should be easily available which, right now, it isn't.

Obviously, if a nature area is not accessible, it should not be included in the “Accessible Greenspace” calculation.

5. Green & Blue Infrastructure Study

5.1 Green Infrastructure Principles

We support the principles and standards outlined in “Green Infrastructure Standards for England”.

Appendix 2 - Accessible Greenspace Standards underlines the importance of having some facilities close to home: “A **doorstep greenspace** of at least 0.5ha within 200 metres, or a **local natural greenspace** of at least 2ha within 300 metres walk from home” as well as access to “A medium sized **neighbourhood natural greenspace** (10ha) within 1km”.

It will be interesting to see how Luton measures up to these standards. *Note the comment in Section 3.2 about questionable data in the Natural England maps.*

5.2 Population Density is also important

Growth in Luton housing (recent and planned) has been focussed close to the Town Centre and Station. The biggest green space within the central area is St. Mary’s churchyard (not really appropriate to use as a park). There are 3 parks just outside the “ring-road”: Manor Road Park, the Moor and Brantwood. These are all smaller than a “local natural greenspace” (ie. <2ha).

Once the currently planned housing (The Stage, Power Court, Hayward Tyler and many more) is built out, these small areas of greenspace could be overwhelmed by the increased population.

It is important that, as well as checking everyone has access to greenspace withing a reasonable distance, you check that available greenspace is large enough to support the surrounding population.

What is the Luton Local Access Forum (LAF)?

The Countryside and Rights of Way Act 2000 places a duty on Highway Authorities for any area to establish a LAF for that area.

The main purpose of Luton LAF is to give advice on the improvement of public access in Luton for open-air recreation, responsible enjoyment and other related matters. The Luton LAF provides advice on access within the Luton Borough boundary and land outside Luton that is owned, managed or controlled by Luton.

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