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Luton Local Access Forum (LLAF) Feedback on Luton Local Plan

Presented to Luton Borough Council at the LAF meeting on 12 March 2025.

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1. Introduction

- 1.1.1 Luton Borough Council (LBC) has initiated the process of developing a new Local Plan. At the Luton Local Access Forum (LAF) on 11 December 2024, Chris Thom presented the framework for this Local Plan, marking the beginning of a public consultation phase based on the Community Involvement Paper..
- 1.1.2 The LAF comments in this paper are based on the document: "Community Involvement Paper – Issues and Options (Regulation 18) (December 2024)." Please note that references and page numbers in this document correspond to the paper version (some variations exist in the online feedback portal). Our comments are strictly on matters within the LAF's scope.
- 1.1.3 Our response is structured as follows:
 - Section 2: explains the necessity of LAF's consultation in the new Local Plan process.
 - In section 3: We have picked out the key "Objectives" relevant to the LAF.
 - In section 4: Rather than analysing all of the options in Chapter 5, we have selected several key themes.
 - Section 5: Our response on "Local Green Spaces"
 - Annex: Detailed comments on specific options/ideas in Chapter 5.

2. Requirement to Consult

- 2.1.1 Local Access Forums serve an essential advisory function. Section 94 of the Countryside and Rights of Way (CROW) Act mandates their role in advising on improving public access to land for recreation, enjoyment, and any other lawful purpose.
- 2.1.2 According to DEFRA's "Guidance On Local Access Forums in England," (section 6.1.3) LBC must not only regard the LAF's advice but should actively consult the forum on relevant matters, including those without a statutory consultation requirement. Given that the Local Plan will significantly impact access, LBC is obliged to consult the LAF at an early stage. "...Appointing authorities must have regard to any relevant advice from the forum, and should aim to consult the forum on relevant matters (not just matters where there is a statutory duty to consult), preferably at an early stage in the decision-making process".

3. Chapter 4: Vision and Objectives

- 3.1.1 Page 14 & 15 of the paper provides a list of 26 Objectives. We have picked out the objectives which are most relevant to the LAF. Where we have a comment on the objective it is shown below in italics.

5. Create sustainable, well-designed, safe, inclusive, mixed communities, with access to services and facilities in order to help address poverty, including child poverty and improve health outcomes

6. Create an inclusive and accessible urban environment in order to help tackle crime and antisocial behaviour and encourage social interaction and activity

*Objective 5 & 6: Addressing crime and antisocial behaviour is **crucial** for fostering active travel. Good design and enforcement will encourage walking and cycling.*

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.*

17. Deliver developments that minimise and are resilient to the impacts of climate change, including extreme weather events such as flooding, increased rainfall, drought and heatwaves and improve air quality.

Objective 17: Developments must not only be resilient to climate change but must not exacerbate environmental risks for surrounding areas. 18. Protect and maximise opportunities for biodiversity net gain and the enhancement of Luton's natural assets

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*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.*

20. Provide sufficient accessible, well maintained good quality services, facilities and infrastructure, to meet health, education, transport, open space, sport, recreation, cultural, social and other community needs

24. Prioritise active travel and increase the attraction of, and opportunities for public transport, ensuring high standards of connectivity and accessibility to services for all

25. Reduce dependency on the private car as a mode of travel, facilitating the creation of a net-zero carbon transport network and secure improvements to transport infrastructure

*Objective 24 & 25: Active travel requires more focus. We must shift from vague aspirations to **tangible commitments**, such as ensuring pedestrian and cycling infrastructure is safe, connected, and prioritised in new developments.*

4. Chapter 5 - Issues and Options for Luton – Key Themes

4.1 Active Travel

4.1.1 Active Travel is fundamental to multiple objectives. The Local Plan must implement policies that enforce and accelerate changes outlined in LTP5.

4.2 Protect and enhance the network of “traffic free” routes

4.2.1 For active travel to succeed, it must be both practical and enjoyable. A robust network of Rights of Way and shared-use paths is indispensable.

4.3 Accessible Green & Blue Infrastructure Network

4.3.1 Existing parks and wildlife sites must be protected.

4.3.2 Every resident must have access to green space. Areas currently underserved (e.g. Bury Park) require immediate attention. Several of our wildlife sites are in a poor state and **must be actively restored** to halt and reverse their decline and turn it into a Biodiversity Net Gain.

5. Local Green Space

5.1.1 Question 41 asks “Are there any sites that you consider to meet the criteria for Local Green Space designation?” This is not the right place to ask this question.

5.1.2 LBC's approach to Local Green Space (LGS) designation is flawed. Instead of embedding it in a broader consultation, LBC must:

- Publish a clear LGS policy.
- List sites with existing protection to avoid redundancy.
- Create a formal nomination process.
- Promote LGS applications through local media and the council website.

Annex

Chapter 5 - Issues and Options for Luton Detailed Comments

Introduction: Chapter 5 cover 63 pages, asks 58 questions and suggests 100s of options. In this Annex we have picked out sections, questions and options that we feel are within the LAF scope and need a response. As before, our comments are in italics.

Providing Suitable and Sustainable homes

Section 5.10 Luton has a range of parks and other green spaces, some which may not be *being used to their full potential*. Planning policy requires that these areas are protected, however there could be an opportunity to provide new homes in some limited circumstances, for example through land swaps and providing improved open space and recreation facilities elsewhere.

Luton's parks and open spaces must not be sacrificed for development.. Where open space is not being used to its full potential, it is often because LBC have removed facilities like sports etc. "land swaps" can only work if they are within a few minutes walk - they should not be out of town.

Question 6 How should we establish the number of homes we need to plan for and where should new homes be located?

Option 7 Should the new Local Plan seek to increase densities and/or build upwards, including more taller buildings? If so, where?

7: There has already been an increase in housing density in the Town Centre and current applications will increase that. The problem is where do the thousands of people living in houses and flats with no outdoor space go to relax. Where do children go to play etc.

Supporting Economic Development

Question 17 What do you think the future role of the airport should be in terms of contributing to economic growth?

Option 1. How can the Local Plan help ensure that the airport continues to provide employment and contributes towards growth and should there be more flexibility on how land associated with the airport can be used?

Any flexibility in airport land use must be rigorously scrutinised by local residents. Expanding into greenbelt areas must not become a backdoor mechanism for industrial or residential development. This is particularly the case as the airport is expanding onto one of our parks and into the green belt. It would not be acceptable if this was a back-door route to non-airport industry or housing.

Health and Wellbeing

Question 27: What should we do to address deprivation and improve life outcomes in Luton and what health facilities are required?

The Town Centre should become a hub for health facilities (GPs, diagnostics and selected outpatient facilities). As Luton's population grows, the Town Centre should serve as a health hub, incorporating GP services, diagnostics, and outpatient facilities for easy access.

Green and Blue Infrastructure

Section 5.155 Our intention is that policies in a new Local Plan:

- Follow Natural England's green infrastructure framework standards and principles, although standards may be tailored to reflect Luton's circumstances if our evidence base shows that that is what we need to do. Standards could include the urban greening factor, tree canopy cover, and accessible green space standards
- Promote new green infrastructure, including linkages between current green spaces in the borough, and considering links to adjoining areas
- Enhance, maintain and protect existing green and blue infrastructure, including the River Lea and Public Rights of Way
- Recognise and promote the multi-functional benefits that green and blue infrastructure provides, including access to nature to support health and wellbeing outcomes
- Support the de-culverting and naturalisation of the River Lea, along with riverside improvements which achieve multiple benefits.

Section 5.155 provides a good summary of what the Local Plan needs to include. It is important that LBC study how Luton can meet Natural England's green infrastructure framework standards, so that any exceptions can be built into the plan.

Question 36 How can green and blue infrastructure in Luton be improved and enhanced?

Option 1 Should we incorporate Natural England's green infrastructure framework principles and standards in a new Local Plan?

(1) Yes - incorporate NE's Green Infrastructure Framework.

Option 2 Should a new Local Plan have a policy dedicated to the River Lea, including the promotion of the de-culverting and naturalisation of the river, along with the creation of a River Lea Linear Park?

(2) Only if LBC are prepared to take active steps to make this happen. For example, they will need to devote money and resources to the project and reject planning applications adjacent to the Lea that do not enhance the river.

Option 3 Given the competing uses for land, should we encourage the multi-functional uses of green infrastructure?

(3) Yes. A lot of this has been done successfully along the Lea already.

Option 4 Should a new Local Plan do more to protect green roadside verges?

(4) Yes, but LBC will need to enforce the protection.

Question 37 Are there any local Green Belt or Chilterns National Landscape matters that we need to consider?

Option 1: Are there any areas of the Green Belt that you consider to be of lower quality which could be used for new homes or employment uses, or could be enhanced or improved for environmental benefits?

(1) You can basically divide Luton's Green Belt into 3 groups: (a) Adjacent to the Airport, (b) Stopsley Common and (c) Patches around Stopsley Common.

(a) the areas south of the Airport were said to be of "Local Landscape Value". Given the expansion of the airport their main value is as a buffer to the residents south of the airport.

(b) Stopsley Common is "Protected" as a QE2 Field

(c) In the last plan, the other patches were all either in the Chilterns National Landscape or deemed to be Areas of Great Landscape Value. Much of the area is also wildlife sites (SSI, CWS). There is a field next to the cemetery extension. That's about it.

Option 2: How can we seek to enhance the purpose of conserving and enhancing the natural beauty and special qualities of the Chilterns National Landscape?

(2) Maintain a green nature corridor alongside the current town-edge housing developments - as we have now - this softens the view of town from the Chilterns National Landscape.

Option 3: Should we continue to designate Local Landscape Areas - important sites and green corridors adjacent to the Chilterns National Landscape, and other areas of more limited landscape value?

(3) Designating Landscape Areas helps to protect them and in turn they improve the setting of the town. Green corridors are a vital resource in connecting communities to the countryside, without the need to get in a car.

Section 5.216 "Green spaces also need to be accessible. Some of Luton's green spaces (such as Dallow Downs and Warden and Galley Hills) are not particularly accessible due to their terrain."

Not all Green Spaces need to be accessible - the two examples you provide (Dallow Downs and Warden and Galley) are special because of the steep hillsides. There are also wildlife areas like Cowslip Meadow that can be flooded for much of the year. The key thing is that we have a network of spaces so that everyone has an accessible Green Space nearby.

Question 42 How can the Local Plan help to ensure access to a network of high quality open spaces?

Option 1 Should we adopt open space standards, requiring provision of new open space in identified areas of need?

(1) Adopt a standard - that will make it easier to enforce for new planning applications

Connectivity and Transport

Question 51 How do you think we can encourage more walking and cycling in Luton?

This question should come before the question about bus travel. If you want to improve the environment, health etc, then Active Travel comes first, public transport second and electric cars third.

If you want to increase Active Travel, walkers and cyclists need to feel that they are the priority at road junctions and in street design

Option 1 Should the Local Plan include policies on the integration of cycling and walking infrastructure with strategic developments whilst also building on the provisions of existing networks and how?

(1) Yes, include policies on integration and for large developments, this needs to go beyond the boundary of the development. Large developments, particularly at the edge of town (Airport, Newlands) need to contribute to improving the wider network.

Option 2 How should walking and cycling infrastructure be provided within new sites, for example the provision of cycle storage?

(2) Cycle storage is important at new sites but bikes need a safe place at both ends of the journey. Developments without car-parking should contribute to cycle infrastructure around the town - for example at the Station – not just on-site cycle parking.

Option 3 Where and how should cycling and walking infrastructure be provided and improved, and are there any areas/routes where it should be focused?

(3) We need to expand safe cycle parking close to the station and bus hub. The LCWIP provided a lot of ideas about routes, but the key thing is to improve routes across the "ring-road" into the Town Centre.

Question 58 Is there any other evidence or information we should be collecting to inform the Local Plan? Do you have any suggestions on the scope of the evidence outlined and what it should include?

Review Luton against Natural England's green infrastructure framework standards and principles (see section 5.150 - <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx>) and add the results to the "Evidence Base".