

FAO Mr C Thom  
Luton Borough Council

**By Email only**

7<sup>th</sup> February 2025

Dear Chris,

**Bedfordshire LNP response to the Luton Local Plan Duty to Co-operate Consultation**

The Bedfordshire Local Nature Partnership was formally established in October 2013. Local Nature Partnerships (LNPs) have been established across England. The purpose of the Bedfordshire Local Nature Partnership is to ensure the natural environment is valued and integral to local decision making to deliver benefits for wildlife, people, landscape, heritage, and the local economy. The Bedfordshire LNP covers the geographical area of Bedfordshire, including the Luton, Bedford and Central Bedfordshire unitary councils.

Our vision is to be an independent, challenging, ambitious and outward-reaching partnership, leading the way to the creation of a vibrant, biodiversity-rich and sustainable natural environment valued by all, enhancing health and well-being, culture and the local economy. The aims of the LNP are as follows:

- To champion the importance of the natural environment and the benefits it brings with key decision-makers and influencers locally, resulting in the protection, enhancement and positive use of a diverse, high quality natural environment;
  - To act as a natural environment advocate and critical friend to local and national government, Local Enterprise Partnerships, businesses, developers and infrastructure providers;
  - To encourage opportunities for people across Bedfordshire to engage with the natural environment;
  - To ensure the natural environment is prioritised, planned for and delivered in an inclusive way to benefit existing and new communities;
  - To ensure that the natural environment is valued and central to decision making and local economic plans;
  - To promote the natural environment as a critical factor in underpinning the local economy through a natural capital-led approach;
  - To achieve a net gain in natural capital, with net biodiversity gain at its core, as part of housing, infrastructure and other development including within the Ox Cam Arc;
  - To promote the natural environment as a means of improving health and well-being within local communities;
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- To champion sustainable practices which protect the natural environment and support a water catchment approach to ensure a high quality water environment;
- To support cross boundary working within SEMLEP and neighbouring LEPS and LNPs;
- To develop knowledge and understanding of adaptation to future climate extremes and the changing needs of the environment, society and the local economy.

Our membership includes a range of organisations with an interest in the natural environment of Bedfordshire, including government agencies, local councils, charitable trusts and other organisations.

We thank you for the opportunity to engage with this consultation, including the recent opportunity to discuss this with you, and I have been authorised to make this representation by the Board of the LNP. The views expressed here represent the position of the LNP and are not intended to replace those of our members.

We wish to be considered as consultees under the Duty to Co-operate under all of the headings below, and as previously indicated. Our comments are as follows, separated out under the specific headings:

#### Green Belt

- We understand that review of the Green Belt is required.
- We request that LBC (and CBC as this is joint review) consult with the LNP as part of this process.
- It is important that those areas of Green Belt that are not designated in any way, but are adjacent to Areas of Particular Importance for Biodiversity within the Bedfordshire Local Nature Recovery Strategy (LNRS) / are identified within LNRS opportunity / priority mapping are not subject to development as a result of any Green Belt review.

#### Chilterns SAC

- We note that LBC is not required to provide specific SANGs. It is important that any policy around SANGs seeks to ensure that additional pressure is not put on ecologically fragile sites or doesn't add to pressure on sites already at capacity.

#### Historic Environment and Landscape

- The LNP is supportive of the continued use of local landscape designations (developed for the current Local Plan) to help identify what is locally valued and protected through the Local Plan.

#### Blue and Green Infrastructure

- The LNP recognises importance of the development of a Green and Blue Infrastructure Strategy, and would wish to be closely involved.
  - In the context of Luton, we are particularly interested in how any Strategy can help identify where new accessible green space can be created within the
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urban area, providing access to those communities impacted by deprivation and a lack of access to greenspace.

- The LNP is very supportive of initiatives such as the Lea Valley Park and 'daylighting' the River Lea, and would want to be involved in any future discussions. There is significant potential in terms of LNRS and accessible greenspace creation and connectivity. The LNP would support development of policy to make this possible.

#### Climate Change

- The LNP wishes to be involved in discussions/development of policy around adapting to and mitigating climate change.
- We would wish to see principle of Environmental Net Gain adopted in Luton, above and beyond BNG. In Bedford Borough, the ENG policy developed has its foundations in the county-wide Natural Capital assessment commissioned by the LNP working with all three Bedfordshire authorities, and we are keen to see this valuable evidence base utilised fully. Several of the Ecosystem Services identified are those that help mitigate the impacts of climate change, including those relating to water.

#### Luton Airport

- LNP has an interest in Airport expansion due to the significant impacts on the global and local environment.

#### General

- The LNP is keen to be engaged / involved in the wider development of the Local Plan, including water-related matters (both the Luton Lea and Upper and Bedford Ouse Catchment Partnerships are now represented on the LNP Board). The LNP will also have a significant role to play in guiding LNRS delivery.

Yours sincerely,

Jon Balaam  
**Secretariat to the Bedfordshire Local Nature Partnership**

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