

1. Introduction

1.1 Background

1.1.1 Luton Borough Council (LBC) has restarted the process of developing a new Local Plan.

1.1.2 Be Active's comments below are based on the document: "Community Involvement Paper – Scoping Consultation (May 2026). Our comments are strictly on matters of relevance to the work of the Active Partnership. Please see 1.2 below which provides an overview of our works mission and vision for Luton and Bedfordshire.

1.2 Be Active are the Active Partnership for Bedfordshire, covering the unitary authority areas of Luton, Central Bedfordshire and Bedford. Established in 2005, our mission is to address inequalities in access to physical activity across Bedford, Central Bedfordshire, and Luton. We are dedicated to inspiring the community and encouraging Bedfordshire to move more.

As one of 42 Active Partnerships across England, we collaborate with community organisations, governing bodies, coaches, clubs and volunteers to support, develop, and promote physical activity. Our goal is to make a positive impact on lives and build community resilience throughout Bedfordshire.

1.3 This paper is submitted alongside the Community Involvement Paper Scoping response issued by LBC. This paper provides narrative that was difficult to format within the referenced document.

2.0 Response to Chapter 4 – Local Plan – Vision & Objectives

Question 3 – We support the draft objectives, particularly those within sections M,S,T,V,X&Y. We would encourage the use of Sport England's Active Design guidance (2023 version).

The guidance emphasizes the importance of designing spaces that are accessible and appealing to all users, thereby promoting active lifestyles across communities.

The latest iteration of the guidance was published in May 2023 and includes updated best practices and case studies. The Active Design Guidance is built around Ten Principles, which focus on integrating physical activity into everyday life through urban design.

These principles include:

1. Activity for All: Ensuring that neighbourhoods and facilities are accessible to everyone, supporting physical activity for all ages and abilities.
2. Supporting Active Travel: Designing environments that encourage walking, cycling, and other forms of active transportation.
3. Active, High-Quality Places and Spaces: Creating attractive and safe

public spaces that invite people to engage in physical activities.

Question 5 - The future strategy should fully encapsulate and embrace the wider strategic priorities of Luton 2040 and be able to demonstrate how it is impacting across all priority areas. There should be a marrying up of the period covered at some point with Luton 2040. We appreciate that this is not currently the plan but it would be logical for the local plan to align with the council's key strategic priorities in every way, including the timeline covered.

3.0 Response to Chapter 5 Issues and Options for Luton

Comment - section 5.10 - we are concerned by this section in relation to the protection of parks and green spaces. We would request that the policy is that all existing parkland and green spaces are protected with the only exception being situations where Sport England planning team approve development that enhances access to sport and physical activity.

Question 15 - We would advocate for the use of Sport England's Active Design in supporting the design process and that this is built into design codes. This guidance emphasizes the importance of designing spaces that are accessible and appealing to all users, thereby promoting active lifestyles across communities. The latest iteration of the guidance was published in May 2023 and includes updated best practices and case studies.

Question 18 - We would encourage the prioritising of job opportunities for Luton residents alongside committed investment into developing skills required for the relevant employment opportunity sector coming into Luton.

Question 24 - Policies should prioritise active travel and particularly walking and cycling. Planning should consider designs that prioritise cycling and walking that should include Safety; Accessibility; Comfort; Attractiveness; directness and cohesion/connectivity.

Sport England's Active Design guidance, referenced elsewhere within this submission, provides helpful guidance and practical examples.

Question 29 - We would strongly encourage the prioritising of investment into the active travel infrastructure alongside a masterplan developed in partnership with communities and wider stakeholders that provides support for communities to learn to cycle and have access to an affordable bike and maintenance regime. Schemes and programmes are available but need to be effectively co-ordinated and funded.

Comment – section 5.191 – We support the use of the Indoor Built Facilities Strategy and its updating. This should include facilities on educational sites and actively promote access and accessibility to these facilities that is affordable to residents and communities.

Comment - section 5.212 –

The “Accessible Greenspace Standard” recognises the need for different types of greenspaces. For example, the “Dallow Downs and Winsdon Hill SSSI” provides access to a wilder, nature rich landscape as well as more accessible areas close to Dallow and Farley.

Question 40 – The Indoor Built Facility Strategy and Outdoor Playing Pitch Strategy are prepared in consultation with Be Active, National Governing Bodies of Sport, Active Luton, clubs, community groups and educational establishments. The wider public also can feed into the consultation work and evidence gathering. These are valuable resources that provide the evidence base for investment into these facilities and spaces and should be updated regularly and used to secure developer investment for the protection, enhancement and development of new facilities. Such investment should be used to leverage in additional investment from other sources. Developer investment should also be considered and requested on developments adjoining Luton (for example the East of Luton development).

Question 41 – Is there a register of spaces that could be converted into green spaces? If not, then this should be prioritised.

Comment re section 5.214 – Please see response to question 40 above as the commentary also applies here.

Question 42 – We would encourage the use of design codes that include Sport England’s Active Design guidance (2023) referenced above and that all elements of this are prioritised when considering applications for development. We would also ask that Outdoor Playing Pitch Strategy and Indoor Built Facilities Strategy are prioritised when considering the use of available spaces and existing facilities and spaces. We would also ask that appropriate developer contributions are secured, with the help and support of Sport England’s Planning team, to provide essential funding to support such sport and physical activity and travel infrastructure developments.

Question 51 - We would strongly encourage the prioritising of investment into the active travel infrastructure alongside a masterplan developed in partnership with communities and wider stakeholders that provides support for communities to learn to cycle and have access to an affordable bike and maintenance regime. Schemes and programmes are available but need to be effectively co-ordinated and funded to particularly support those communities that will otherwise struggle to gain access to a cycle and know how to ride it safely.

Be Active – Response to the Luton Council Local Plan Consultation
Questionnaire – 23 July 2026
Responder on behalf of the organisation – Graham Simpson, Strategic Lead,
Active Environments

We would also advocate for prioritised use of Sport England's Active Design guidance (2023) in the design of new schemes and places in relation to developing an attractive active travel offer.