



Chilterns
National
Landscape

Contact: Matt Thomson

Email: [REDACTED]

By email only to localplan@luton.gov.uk

My Ref.: Planning\PPC\Local\Beds\Luton



Dear Sir/Madam,

Luton Local Plan Review – Scoping Consultation

Thank you for the opportunity to comment at this stage of the preparation of the local plan. As the nature and extent of our comments would require the completion of multiple online responses, we have instead collated them in this single written response, and trust that that is acceptable: if it is not, please do advise accordingly. For now, thank you for accommodating the alternative format. You have our consent to upload and process this response as needed.

The Chilterns Conservation Board (CCB) is a statutory public body established by Parliamentary Order in 2004 under the Countryside and Rights of Way Act 2000 (the CROW Act), at the request of the area's local authorities, to further the purpose of conserving and enhancing the natural beauty of the Chilterns AONB (now known as the Chilterns National Landscape, or CNL), and to promote the understanding and enjoyment of its special qualities.

Our role includes that of advising policy- and decision-makers on how they can meet their duty under section 85 of the CROW Act (the Protected Landscapes Duty) to seek to further the purpose of conserving and enhancing the natural beauty of the area. This response may be taken as comprising such advice.

A key way in which compliance with the Protected Landscapes Duty can be demonstrated is through constructive reference to the statutory AONB Management Plan for the Chilterns National Landscape 2025-2030 within the local plan and as a key part of the plan's evidence base. This approach will be explicitly supported by emerging policy N1 in the draft NPPF (2025). Referring to other guidance published by the CCB, including the Chilterns Buildings Design Guide, would also be valuable.

With regard to the various consultation documents issued, we have the following comments at this stage:

Community Involvement Paper – Scoping Consultation

Chapter 3 – Luton Context

- The reference to the Chilterns is welcomed.

Issues and Options for Luton

- Green Belt and Protected Landscapes:
 - The references to the Chilterns and the Protected Landscapes Duty are welcomed.



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- The reference at paragraph 5.167 to ‘policies’ suggests that Green Belt and the National Landscape will be addressed in separate policies, but that is not entirely clear from the remainder of the text, and we would appreciate confirmation that National Landscape policy will not be conflated with Green Belt, general countryside or locally-valued landscapes policies.
- The intentions outlined with regard to National Landscape policy are supported.
- With regard to the boundary review process, it should be noted that Defra was not able to continue to fund Natural England for the National Landscapes designations programme, and so Natural England ‘made the difficult decision to stop work the Chilterns boundary review’: there have been no boundary changes. The evidence gathered in support of the boundary review has now been shared, however, with a view to supporting local planning authorities, and others, in ‘their own projects and plans’. The draft Natural Beauty Assessment for the Chilterns resulted in the identification of a proposed ‘candidate area’ comprising land that demonstrates high levels of outstanding natural beauty in areas adjacent to, but outside, the existing Chilterns National Landscape, and will be of use to you in your review of Luton’s landscapes.
- In response to Question 37 (‘are there any local Green Belt or Chilterns National Landscape matters that we need to consider?’):
 - Option 2: including a dedicated Chilterns National Landscape policy within the plan will support the conservation and enhancement of its natural beauty and special qualities. This should of course reflect the NPPF in force at the time, the Protected Landscapes Duty, and the CNL Management Plan. We are currently reviewing our ‘model development plan policy’, and would welcome the opportunity to work with Luton BC in developing both our policy and yours in light of (existing and emerging) changes to the NPPF and the Protected Landscapes Duty.
 - Option 3: the Natural Beauty Assessment for the Chilterns may help in determining whether or not to designate Local Landscape Areas adjacent to the Chilterns National Landscape, but, whether you decide to designate such areas or not, we would wish to see suitable consideration of the setting to the National Landscape, in line with national planning policy (the current NPPF states at paragraph 189 that which is ‘development within [the CNL] setting should be sensitively located and designed to avoid or minimise adverse impacts’).
- Natural Capital:
 - The references to the Chilterns Beechwoods Special Area of Conservation (SAC) are welcomed, including to the potential mitigation required for developments of a net increase of more than 100 dwellings in certain parts of Luton. We would be happy to provide assistance with your proposed work on recreational pressures (note that the provision of strategic alternative natural green space (SANGs) is supported by the Management Plan 2025-30, and we expect to produce guidance on SANGs to assist with their design and location when proposed in the CNL).



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- The references to the Local Nature Recovery Strategy are also welcomed, and a reference to the Chilterns Nature Recovery Plan would also be appreciated.
- There is passing reference to chalk streams in the consultation document, including in the ‘Water Quality and Water Efficiency’ section, and the Glossary, but the topic is not developed, and does need more attention. Our response to Question 38 (‘how can the Local Plan help to conserve and enhance Luton’s natural environment?’)/Option 2 (‘how can the Local Plan help to conserve and enhance Luton’s natural environment, and achieve wider environmental gains?’) is to request that the emerging plan includes a policy on the protection and enhancement of chalk streams. The Luton area includes the River Lea and its source, and Luton Borough Council has been instrumental in recognising and enhancing the river environment. A policy helping to support future conservation and enhancement of this globally rare habitat would be a valuable addition to the Plan. Our Chilterns Chalk Streams planning guidance (also available on the published guidance page) will be of use in that regard, and, again, we can provide further assistance.
- The Public Realm and Inclusive Design:
 - The commitment to quality design is supported, but reference to the specific design needs of the Chilterns is sought, including a cross-reference to the Chilterns Buildings Design Guide.

Strategic Environmental Assessment Scoping Report

Introduction

- The reference to the Chilterns is welcomed.

Relevant Plans and Programmes

- Policy N1 of the draft NPPF (December 2025) states that ‘development plans should safeguard and enhance the natural environment, and reflect the wider benefits from natural capital and ecosystem services, by using... Protected Landscape Management Plans...’. Accordingly, The Management Plan for the Chilterns National Landscape should be clearly identified as a relevant plan or programme within the Strategic Environmental Assessment Scoping Report.
- Passing reference is made to the Management Plan in relation to the Chilterns Nature Recovery Plan (the inclusion of which is welcomed), and in the references (where it currently appears twice, under 119 and 193), but this is not sufficient.
- Inclusion of the Management Plan would also help to support and demonstrate the Council’s compliance with the Protected Landscapes duty, set out in section 85 of the Countryside and Rights of Way Act 2000: ‘in exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England, a relevant authority... must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty’ (see also Defra’s guidance on this Duty.)
- The Countryside and Rights of Way Act is referred to in the Strategic Environmental Assessment Scoping Report (albeit incorrectly dated in paragraph A. 82), but only regarding its provisions in respect of public access to the countryside: reference should also be made to the Protected Landscapes Duty.



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- Reference is made to The National Parks and Access to the Countryside Act 1949, but the text explaining its relevance omits reference to the fact that the Chilterns National Landscape was designated under this legislation.
- The reference to the Protected Landscapes Targets and Outcomes Framework (2024) is welcomed, as is the reference to the National Chalk Streams Strategy (2021).
- As noted above, referring to other guidance published by the CCB, including the Chilterns Buildings Design Guide, would also be valuable.

Baseline Information

- The references to the Chilterns, Chiltern Beechwoods SAC, and the Chilterns National Character Area are welcomed, as is the reference to the production of an updated Landscape Character Assessment.
- The National Landscape's chalk streams are mentioned only in passing, or in relation to habitats: more targeted coverage of this important topic is needed given the significance of the River Lea.

Sustainability Framework

- We welcome the inclusion of SEA Objectives 2 ('protect and enhance biodiversity assets') and 3 ('maintain and enhance the character and quality of the landscape including the natural beauty of the Chilterns National Landscape').
- We particularly welcome the inclusion of the appraisal questions relating to:
 - Woodland/hedgerow cover and management
 - Delivery of Local Nature Recovery Strategies
 - Furthering the purpose of conserving and enhancing the natural beauty of the Chilterns National Landscape
 - Raising the profile of geographically rare chalk streams.

Engagement Strategy – Scoping Consultation

Partnerships, Boards and Forums

- We welcome the recognition of the Chilterns Conservation Board (which is how we prefer to style our organisation, rather than 'Chilterns National Landscape Conservation Board').
- We further welcome the Council's commitment to active and ongoing involvement with the CCB in the preparation of the new local plan.

Local Green Space Nomination

- We do not have any sites to nominate. We would, however, be generally supportive of the identification of Local Green Spaces (and other types of open space, including SANGs) within the CNL and its setting, where any built infrastructure is kept to a minimum, and design is consistent with the designation, including the Management Plan and Nature Recovery Plan.



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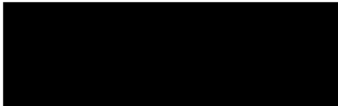
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Call for Sites

- We do not have any sites to nominate, but would be happy to assist with the assessment of any sites within or otherwise affecting the Chilterns National Landscape, if that would be of interest.

Please do let us know how we can assist in supporting appropriate reference to and consideration of the Chilterns National Landscape in the emerging plan.

Yours faithfully,



Dr Matt Thomson MRTPI

Head of Planning, Chilterns Conservation Board

cc.:

Cllr Robert Roche (Luton Borough Council's appointee to the CCB)

Chris Thom & Carol Quinn (LBC's identified officer contacts for the CCB & CNL)



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