

1. Introduction

1.1 Background

- 1.1.1 Luton Borough Council (LBC) has restarted the process of developing a new Local Plan. At the Luton Local Access Forum (LAF) on 17 June 2026, 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 – Scoping Consultation (May 2026)." Please note that references and page numbers in this document correspond to the paper/pdf 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:
- It's been over a year since we responded to the initial consultation. In Section 2 we comment on what we've learned since then and highlight the areas that we feel need particular focus. The remaining sections are largely a repeat of our initial response and are included to ensure they are taken into account.
 - 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.

1.2 Requirement to Consult

- 1.2.1 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.
- 1.2.2 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".

2. LAF Focus Areas

Several things have changed since the initial consultation:

- The new LTP has been prepared.
- There have been changes to Planning Regulations.
- We have reviewed the plans for the “Open Space Strategy” and “Green & Blue Infrastructure” Studies.
- We can gain some insights from the response to the initial consultation.

As a result, we feel the Local Plan should focus on the following areas.

2.2 Active Travel

- 2.2.1 More Active Travel is critical in meeting the 2040 Vision (health, sustainability, equality...). It is vital that the Local Plan supports the proposals for Active Travel in LTP5.
- 2.2.2 Policies in the Local Plan should ensure that new developments are linked to Active Travel and support off-site enhancements if needed.
- 2.2.3 New paths should be included for all new large-scale developments. These should meet recognised quality standards and be created as Rights of Way, added to the definitive and signposted. Special care should be taken to link them up to the current path network, with particular emphasis on seeking to link urban areas to countryside and public transport routes to promote active lifestyles and access to the countryside for all.

2.3 Green and Bluespace

- 2.3.1 Access to greenspace in Luton is patchy. Opportunities for new space are extremely limited and what we have may be under threat. Residents are concerned because of what has happened with Wigmore and Wandon parks since the last local plan. The “Scoping Consultation” document includes several comments that underline the threat:
- 5.10: Luton has a range of parks and other green spaces, some which may not be 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.
 - 5.154: 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.
 - 5.164: We are carrying out evidence base work to review Luton’s local landscape areas and Green Belt, including to identify any areas of grey belt.
 - 5.215: There are gaps in the distribution of neighbourhood parks and some communities, such as Bury Park, do not have easy access. The moving of Luton Town Football Club away from Kenilworth Road could therefore present an opportunity for green space to be provided, as noted in the Inspectors Report (2017) for the adopted Luton Local Plan. This will need to be balanced with other needs such as the need for housing.

It is clear that our Greenspace is “under review”.

2.3.2 We believe that Luton should adopt Natural England’s green infrastructure framework standards and principles:

- Housing development should be restricted in areas that do not meet the national standards (not the Luton “tailored” version).
- Greenspace must not be developed where it will drive an area of town below the greenspace standard.

2.3.3 In addition, any review of Greenspace needs to respect current protections (SSSI, Fields in Trust, Common land) and nature designations (County and Local Wildlife sites).

2.3.4 Section 5.10 talks about Land Swaps and substitute spaces. These should only be considered if they are equally convenient to the current users. Land outside the borough is a poor substitute for space where people live.

2.4 Flood Resilience

2.4.1 Objective 17 talks about making developments resilient to “extreme weather events such as flooding”, but it is clear from the paper “Luton Resilient and Adaptive Communities, 2022” that the existing built and green environment faces an increased flooding risk due to climate change. The Local Plan needs to address this directly.

2.4.2 Objective 17 should be expanded to drive improved resilience across the whole town, not just new developments. There is more detail in the Annex under Question 32.

2.5 Consultation

2.5.1 There weren’t many responses to the initial consultation and almost none were from individual Luton residents (fewer than 10 in the data provided for this stage of the consultation).

2.5.2 It’s vital that more people are engaged in future rounds of consultation. Perhaps lessons can be learned from the recent LTP that gathered over 600 responses’.

2.5.3 We understand that there were no nominations for “Local Greenspace” in the initial consultation. We believe there should be a separate process for gaining nominations – see Section 5.

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: Needs to be expanded to cover the current environment as well as new developments. New developments can deliver a higher standard, but we must improve resilience particularly in “at-risk” areas and for key transport links. New 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

*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.*

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. *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?

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.

Addressing and adapting to climate change

Question 31 How can we adapt to and mitigate against the impacts of climate change? This includes flooding from rivers and rainfall and temperature extremes?

Encourage tree cover, especially near paths, to help cut the heat island effect. Planting a tree is just the start – they take at least 5-years to get established and this needs to be planned for.

Question 32 How can the Local Plan help Luton be more resilient and adaptive to flood risk?

For Luton the Local Plan requires major improvements to the planning aspects so:

(1) There needs to be an "Emergency Plan" to deal with flooding incidents, particularly for critical infrastructure: rail, motorways, A6, electrical and gas infrastructure, critical access routes re to hospitals, police. This needs close cooperation with the Fire brigade and NHS.

These plans should include a policy for mobile phone communications including alerts from the Environment Agency input. They also need to address informing those without access to latest technology (maybe by neighbours).

(2) Focus on different types of flooding:

A) Groundwater: Stopsley and the Crematorium

B) Surface water: housing on flood alleviation areas

C) Sequential: water cascades from one area to another. Can be caused by many factors but infill of housing is major part.

D) Flash floods: requires constant cleaning of gullies, drains.

(3) Communication directly with the public on a regular basis - requires a community engagement flood officer as part of planning team. Information boards at key sites in the Borough need instructions and contact numbers for who to contact should flooding be 'seen'

(4) Encouraging property "Owners" to work on resilience is key but hard to apply: the public rarely want to apply resilience to their properties because most methods are ugly.

Note that more serious flooding occurs between 1am and 4am in the Summer: the ground is hard (climate change bakes the top soil) and thunderstorms can be torrential.

(5) Our current path network needs to be evaluated to ensure it is resilient to periods of heavy rainfall. Paths may need to be raised and made of materials that can withstand be submerged in water for long periods of time (circa 3 months). In addition, we need surfaces that allow for heavy footfall and motorised wheelchairs to support the recognised need for access to green/ blue spaces – Active Travel, Park Runs and festivals are part of that footfall!

Green and Blue Infrastructure

Section 5.154 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 49 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 5.154 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. Maybe the remains of the former sports centre is seen as "Grey Belt".

(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 (SSSI, 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 5.212 "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.

*The “Accessible Greenspace Standard” recognises the need for different types of greenspace. 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 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.

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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