



# Central Bedfordshire & Luton Green Belt Study

July 2017



## Central Bedfordshire and Luton Green Belt Study

### 1. Introduction

- 1.1 This is a joint study between Central Bedfordshire Council and Luton Borough Council which has been produced in support of Central Bedfordshire's Local Plan 2015-2035, and the future review of Luton's Local Plan. It is part of the evidence base required to underpin the statutory plan making process and provides an independent review of Green Belt in the study area.
- 1.2 At present around 40% of Central Bedfordshire is designated as Green Belt, a total of around 28,214ha.
- 1.3 The primary purpose of the Study, prepared by consultants LUC, was to test the performance of the Central Bedfordshire and Luton Borough Green Belt against the five purposes of Green Belt as identified within the NPPF, and to identify any areas which may be performing less well in Green Belt terms. The study also assessed the status of Central Bedfordshire's Green Belt villages to determine whether these settlements should remain inset or washed over by the designation.
- 1.4 This Study is a high level assessment which does not advise on suitability of land for development. It forms part of the evidence base for the the Central Bedfordshire Local Plan which will be used to help determine an appropriate strategy for growth across Central Bedfordshire as a whole and specifically within the Green Belt.
- 1.4 The key findings of the study and an executive study are provided below. The full technical study is at Appendix A.

### 2. Executive Summary and Key Findings

- 2.1 National policy with respect to the Green Belt is set out in National Planning Policy Framework (NPPF) paragraphs 79 – 92. Paragraph 83 states that Local Planning Authorities with Green Belt in their areas "should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period". The main aim of the Study is to provide a comprehensive, robust, transparent, and clear understanding of how the Green Belt land within the Central Bedfordshire and Luton Borough Council administrative areas performs against the purposes of Green Belt.
- 2.2 The Study concludes that the majority of the Green Belt in Central Bedfordshire is performing strongly, with less than 1% of the total Green Belt land in Central Bedfordshire making only a "weak" or "relatively weak" contribution to all Green Belt purposes. These "weak" parcels are all relatively small and lie adjacent to existing urban edges of inset settlements.

### 3. Assessment of Green Belt performance

3.1 The Study was undertaken in two stages. **Stage 1** was a desk-based assessment which divided the Central Bedfordshire Green Belt into parcels, and assessed these against the national purposes of Green Belt as set out in the NPPF paragraph 80, which are to:

- check the unrestricted sprawl of large built up areas;
- prevent neighbouring towns merging into one another;
- assist in safeguarding the countryside from encroachment;
- preserve the setting and special character of historic towns; and
- assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

3.2 Assessment parcels were defined using permanent and recognisable boundaries on the ground (e.g. watercourses and water bodies, roads and railway lines, established infrastructure and utilities such as sewage treatment works etc). As Green Belt is a strategic designation, the Stage 1 assessment parcels were defined at a scale which enabled the study to draw out the spatial differences in strategic contribution of land to the Green Belt purposes. This was achieved by defining smaller parcels adjacent to the main settlements where development pressures and therefore variations in contribution to the purpose of Green Belt, were likely to be greatest, and larger parcels away from the urban edges of the settlements. Each parcel was assessed to determine its contribution to the purposes of Green Belt, and any variations in the performance of land within the individual parcels were noted. The Stage 1 parcels are illustrated in Figure 3.1 on page 21 of the study.

3.3 With regards to Luton's Green Belt, a Stage 1 Study had previously been undertaken in 2013. The methodology of the Luton Stage 1 Study was reviewed to ensure consistency with this study.

3.4 **Stage 2** of the Study drew on the conclusions of Stage 1. All areas identified as making a relatively weak contribution to the Green Belt during Stage 1 (including those identified in the Stage 1 Luton Study) were visited for further, more detailed on-site assessment. In total 29 Stage 2 parcels were defined in Central Bedfordshire and Luton, and visited for further on-site assessment. The Stage 2 parcels comprised comparatively small portions of the original Stage 1 parcels and appropriate permanent and readily recognisable boundaries were highlighted as potential alternative Green Belt boundaries. The defined Stage 2 parcels were assessed and rated and the results summarised in Figure 5.2 on page 73 of the study .

### 4. Review of Green Belt Settlements

4.1 Guidance in relation to the status of Green Belt settlements is set out in paragraph 86 of the NPPF. It states that *"If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt"*

- 4.2 At present our larger Green Belt villages are inset from the Green Belt which means that Green Belt restrictions do not apply, whereas the smaller, more rural settlements are washed over by the designation which means the five purposes apply across the settlement as a whole.
- 4.3 Accordingly, settlements were evaluated in relation to the contribution which they make to the openness of the wider Green Belt using a combination of desk and field-based assessments. Lower density settlements with a more rural character were considered to contribute to the openness of the Green Belt and were recommended to be washed over by the designation. More densely developed, compact settlements, which contrasted with the openness of the surrounding Green Belt, were recommended to be inset within the Green Belt.

## **5. Conclusion**

### **5.1 Assessment of Green Belt performance**

The study states that the relatively poor performance of the land against Green Belt purpose is not, by itself, an ‘exceptional circumstance’ that would justify release of the land from the Green Belt, and does not indicate suitability for development. Such recommendations can only be made following consideration of other sustainability considerations through the plan-making process, and will need to be the subject of further work, drawing on the findings of the Green Belt Study alongside other evidence base studies including the settlement capacity study, transportation modelling, detailed site assessment work and the sustainability appraisal.

### **5.2 Green Belt Settlements**

Following desk-based analysis, three of Central Bedfordshire’s Green Belt settlements – Aspley Guise, Kensworth and Woburn – were found to contain urbanising features which it was considered may compromise their openness and therefore may undermine their status as washed over settlements in the Green Belt. However, following site visits, it was concluded that all three continued to contribute to the openness of the wider Green Belt, with only the estates centred on Ridgeway and Poplar Road in Kensworth which could be inset from the Green Belt subject to other relevant planning considerations.

## **6. Summary of implications**

- 6.1 The Council’s preferred spatial strategy is sustainable balanced growth across the area, and is exploring through the local plan process the potential for some limited Green Belt release in order to accommodate this and to meet exceptional needs. As less than 1% of Central Bedfordshire’s Green Belt was assessed as performing weakly, and may not necessarily be suitable for development for a variety of reasons, it will be necessary where exceptional circumstances apply, to release better performing areas of land in order to realise the strategy set out within the Local Plan. This will be considered alongside other technical evidence base studies and tested through the Examination process.

## Appendix A

### **Central Bedfordshire and Luton Green Belt Study**

**Final Report**

**November 2016**



LUC

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# Central Bedfordshire and Luton Green Belt Study

## Final Report

Prepared by LUC  
November 2016

**Project Title:** Central Bedfordshire and Luton Green Belt Study

**Client:** Central Bedfordshire Council and Luton Borough Council

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0.1	29/07/2016	Draft Final Report	Josh Allen Richard Swann Philip Smith	Philip Smith	Philip Smith
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# Central Bedfordshire and Luton Green Belt Study

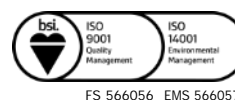
## Final Report

Prepared by LUC  
November 2016

Planning & EIA  
Design  
Landscape Planning  
Landscape Management  
Ecology  
Mapping & Visualisation

LUC LONDON  
43 Chalton Street  
London  
NW1 1JD  
T +44 (0)20 7383 5784  
[london@landuse.co.uk](mailto:london@landuse.co.uk)

Offices also in:  
Bristol  
Glasgow  
Edinburgh



Land Use Consultants Ltd  
Registered in England  
Registered number: 2549296  
Registered Office:  
43 Chalton Street  
London NW1 1JD  
LUC uses 100% recycled paper



# Contents

<b>1</b>	<b>Introduction</b>	<b>1</b>
	Study scope, aims and stages	1
	Report structure	2
<b>2</b>	<b>Study Context</b>	<b>3</b>
	National Green Belt policy	3
	Good practice learned from planning inspectors' reports	4
	Good practice from planning guidance	5
	The local context	6
<b>3</b>	<b>Study Methodology</b>	<b>8</b>
	Method statement consultation	8
	Defining and agreeing the assessment criteria	8
	Stage 1	19
	Stage 2	23
	Reporting and review	25
<b>4</b>	<b>Stage 1 Assessment Findings and Recommendations</b>	<b>26</b>
	Summary of findings	31
	Assessment of Central Bedfordshire's main Green Belt settlements	33
<b>5</b>	<b>Stage 2 Assessment Findings and Recommendations</b>	<b>63</b>
	Review of Luton Borough Council's Stage 1 Green Belt Study	64
	Findings of Stage 2 assessment	73
	Findings following site-based assessments of washed over settlements	73
<b>6</b>	<b>Conclusions and Next Steps</b>	<b>77</b>
	Overall performance of the Green Belt	77
	Making changes to the Green Belt	77
	Encouraging positive use of land in the Green Belt	79
<b>Appendix 1</b>		
	Stage 1 assessments	
<b>Appendix 2</b>		
	Stage 2 assessments	
<b>Appendix 3</b>		
	Record of duty to co-operate discussions, including method statement consultation	

# 1 Introduction

- 1.1 LUC was commissioned jointly by Central Bedfordshire Council and Luton Borough Council to undertake an assessment of the Green Belt within Central Bedfordshire and Luton.
- 1.2 The Study was overseen by a Steering Group comprising officers and Members from both local planning authorities.

## Study scope, aims and stages

- 1.3 The overall aim of the Study was to assess the extent to which the Green Belt land within the Study area contributes to the purposes of Green Belt, as set out in paragraph 80 of the National Planning Policy Framework (NPPF).
- 1.4 The NPPF attaches great importance to Green Belts and stresses that their essential characteristics are 'openness and permanence'. It also advises that, once established, Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of a Local Plan.
- 1.5 In determining the relative performance of different areas of Green Belt land against the Green Belt purposes it is possible to draw conclusions on the potential risk of harm to the Green Belt if different areas were released for development.
- 1.6 However, **the Study does not advise on the suitability or potential of land in the Green Belt for development**. Alongside other assessments, including the Luton Housing Market Area (HMA) Growth Options Study, the Study will assist the local authorities in considering the extent to which some existing Green Belt land could be used to accommodate sustainable forms, patterns and types of new development. Should the local authorities conclude that there are exceptional circumstances for making alterations to the existing Green Belt boundaries, these changes, including any allocations of land for development, will be taken forward through the Local Plan-making process.
- 1.7 The Study does not have regard to environmental, policy or land-use constraints and designations that exist within the Green Belt, such as landscape areas, SSSIs, and floodplains - except insofar that these are considered to be relevant to the purposes of Green Belts and the definition of permanent, readily recognisable Green Belt boundaries.

## Other Considerations

- 1.8 The brief indicated that the Study should assess the:
  - a) Performance of land that currently lies outside the Green Belt, isolating areas of non-Green Belt land that fulfil the purposes of Green Belt and advising on the exceptional circumstances for designating new areas of Green Belt.
  - b) Openness of existing settlements in the Green Belt, making recommendations on which settlements should be 'washed over' by Green Belt and which settlements should be 'inset' (i.e. fall outside the Green Belt, but surrounded by it).
- 1.9 At the beginning of the Study it was agreed that the former would be excluded from the Study. This conclusion was reached because of the strong 'tests' set out in paragraph 82 of the NPPF which require local planning authorities to demonstrate exceptional circumstances before establishing new Green Belt. To meet these exceptional circumstances, Central Bedfordshire and Luton must have a clear idea of their preferred spatial distribution of development, which will not be known for some time.

1.10 The Study was undertaken in two stages, as outlined below.

### Stage 1

1.11 Stage 1 was a desk-based assessment of the degree to which the Green Belt within Central Bedfordshire meets the purposes of the Green Belt designation, as set out in the NPPF. Defined parcels were assessed and rated. These ratings are supported by text that describes any spatial variation in the contribution of land to the purposes within each parcel.

1.12 In addition, Stage 1 assessed the openness of Central Bedfordshire's main settlements within the Green Belt, making recommendations on which settlements should be inset and which settlements should be washed over.

1.13 Luton Borough Council completed a Stage 1 strategic assessment of the six parcels of Green Belt within the Borough in 2014. These parcels were therefore not assessed again in Stage 1 of this Study.

### Stage 2

1.14 Stage 2 drew on the Stage 1 assessments, including Luton Borough Council's 2014 Stage 1 assessment, to isolate areas of the Central Bedfordshire and Luton Green Belt which perform relatively weakly against the Green Belt purposes and are therefore likely to cause less harm to the Green Belt if released for development.

1.15 All weakly performing areas of the Green Belt were visited for further on-site assessment. The field visits were used to verify and where necessary expand upon judgements made remotely. Where appropriate, permanent and readily recognisable boundaries defining relatively weak performing areas have been highlighted as potential alternative Green Belt boundaries.

1.16 In addition, three of Central Bedfordshire's washed over Green Belt settlements were visited at Stage 2 to verify whether urbanising influences identified remotely during Stage 1 sufficiently compromised their openness to recommend that they be inset in the Green Belt.

## Report structure

1.17 The remainder of the report is structured in the following Chapters:

- **Chapter 2** sets out the context to the Study, in terms of planning policy and the evolution and character of the South Bedfordshire Green Belt.
- **Chapter 3** describes the Study methodology, including the criteria used to assess the Green Belt.
- **Chapter 4** reports the findings of the Stage 1 assessment work.
- **Chapter 5** reports the findings of the Stage 2 assessment work.
- **Chapter 6** sets out the conclusions of the study and recommended next steps.

## 2 Study Context

### National Green Belt policy

- 2.1 The principle of maintaining a ring of open country around cities can be traced back to the 16<sup>th</sup> century when Elizabeth I forbade any building on new sites within three miles of the city gates of London. This was motivated by public health reasons, to prevent the spread of the plague, and to ensure a constant supply of food for the metropolis.
- 2.2 The importance of these considerations was later recognised by Ebenezer Howard, a pioneer of British town planning, in his book of 1898 *Tomorrow: a Peaceful Path to Real Reform* in which he referred to '*an attractive setting within the town could develop and which would maintain, close at hand, the fresh delights of the countryside- field, hedgerow and woodland*'.
- 2.3 The only mechanism available at the time to realise this vision, however, was the acquisition of land by public authorities. In 1935 the London County Council Regional Planning Committee therefore put forward a scheme '*to provide a reserve supply of public open spaces and of recreational areas and to establish a Green Belt or girdle of open space lands, not necessarily continuous, but as readily accessible from the completely urbanised area of London as practicable*'. This arrangement was formalised by the 1938 Green Belt (London and Home Counties) Act.
- 2.4 In 1955, Government Circular 42/55 codified Green Belt provisions and extended the principle beyond London. This was replaced by Planning Policy Guidance 2 in 1988 and in 2012, the Government replaced PPG2 with paragraphs 79–92 of a new National Planning Policy Framework (NPPF). This has since been supplemented by relevant National Planning Policy Guidance (NPPG).
- 2.5 Paragraph 79 of the NPPF states that 'the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence'. This is elaborated in NPPF paragraph 80, which states that Green Belts should serve five purposes, as set out below. The NPPF does not infer that any differential weighting should be applied to the five purposes. This is elaborated in NPPF paragraph 80, which states that Green Belts should serve five purposes, as set out below.

#### The purposes of Green Belt

- To check the unrestricted sprawl of large built-up areas.
- To prevent neighbouring towns merging into one another.
- To assist in safeguarding the countryside from encroachment.
- To preserve the setting and special character of historic towns.
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

- 2.6 The NPPF emphasises in paragraph 83 that local planning authorities should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. It goes on to state that '*once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period*'.
- 2.7 Paragraph 84 of the NPPF indicates that 'when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling

development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary'.<sup>1</sup>

- 2.8 Paragraph 85 of the NPPF suggests that Local Planning Authorities may wish to identify areas of 'safeguarded land' between the urban area and the Green Belt to accommodate long-term development needs well beyond the plan period. New boundaries must have regard for the permanence of the designation by redefining boundaries which endure beyond the Local Plan period. New boundaries should be defined clearly, using readily recognisable, permanent physical features.
- 2.9 Paragraph 82 of the NPPF indicates that, if proposing a new Green Belt, local planning authorities should:
- demonstrate why normal planning and development management policies would not be adequate;
  - set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
  - show what the consequences of the proposal would be for sustainable development;
  - demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas; and
  - show how the Green Belt would meet the other objectives of the Framework.
- 2.10 Current guidance therefore makes it clear that the Green Belt is a strategic planning tool designed primarily to prevent the spread of development and the coalescence of urban areas. To this end, land should be designated because of its position, rather than its landscape quality or recreational use. However, the NPPF states "*local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land*" (Paragraph 81).
- 2.11 It is important to note, that the lack of a positive role, or the poor condition of Green Belt land, does not necessarily undermine its fundamental role to prevent urban sprawl by being kept permanently open. Furthermore, openness is not synonymous with landscape character or quality.

## Good practice learned from planning inspectors' reports

- 2.12 Several recent planning inspector decisions have influenced current practice in Green Belt assessments. The main lessons reinforced by the Planning Inspectorate have been:
- Green Belt studies should be "*fair, comprehensive and consistent with the Core Strategy's aim of directing development to the most sustainable locations*". Green Belt reviews should be 'comprehensive' rather than 'selective'.<sup>2</sup>
  - Green Belt studies should be clear "*how the assessment of 'importance to Green Belt' has been derived*" from assessments against the individual purposes of Green Belt.<sup>3</sup> Such assessments against the purpose should form the basis of any justification for releasing land from the Green Belt.<sup>4</sup>
  - In reviewing land against the purposes, Green Belt studies should consider the reasons for a Green Belt's designation as they are related to the purposes.<sup>5</sup>

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<sup>1</sup> This NPPF requirement will be met as part of the wider Local Plan preparation process, although the findings of this review will form part of this.

<sup>2</sup> Inspector's report (A Thickett) to Leeds City Council (September 2014)

<sup>3</sup> Inspectors' Letter (L Graham) to Cambridge City and South Cambridgeshire Councils (May 2015)

<sup>4</sup> Inspector's interim findings (H Stephens) to Durham City Council (November 2014)

<sup>5</sup> Inspector's interim findings (H Stephens) to Durham City Council (November 2014)

- Green Belt studies should “take account of the need to promote sustainable patterns of development, as required by paragraph 85 of the NPPF [even if] such an exercise would be carried out through the SEA/SA process.”<sup>6</sup>

2.13 Meanwhile, case law has consistently confirmed that Green Belt alterations require ‘exceptional circumstances’ to be demonstrated by the local planning authority. For example the judgement in *Gallagher Homes Ltd v Solihull Borough Council* [2014] EWHC 1283 (Admin), Hickinbottom J cited the considerable amount of case law on the meaning ‘exceptional circumstances’ and concluded that “it is not arguable that the mere process of preparing a new Local Plan could itself be regarded as an exceptional circumstance justifying an alteration to a Green Belt boundary”. Case law also confirms that decision-makers should take into account the consequences for sustainable development of any review of Green Belt boundaries, including patterns of development and implications for additional travel.

## Good practice from planning guidance

2.14 There is no definitive guidance within National Planning Practice Guidance or elsewhere on how to undertake Green Belt reviews, although a few advice notes have been published, notably by Planning Officers Society (POS)<sup>7</sup> and the Planning Advisory Service (PAS)<sup>8</sup>. Both documents provide a useful discussion of some of the key issues associated with assessing Green Belt and subsequently reviewing/revising Green Belt boundaries, most notably:

### Green Belt assessments

- 2.15 Parcels of land around the inner edge of the Green Belt should be identified and delineated for assessment. To the greatest extent possible, each should have clearly defined boundaries using recognisable features.<sup>7</sup>
- 2.16 The assessment of the performance of Green Belt should be restricted to the Green Belt purposes and not consider other planning considerations, such as landscape, which should be considered in their own right as part of the appraisal and identification of sustainable patterns of development.<sup>8</sup>
- 2.17 Parcels which fully meet any one purpose make a considerable contribution to the Green Belt.<sup>7</sup>
- 2.18 Areas of land that make a relatively limited contribution to the overall Green Belt would be where new development would effectively be ‘infill’, with the land partially enclosed by development; new development would be well contained by the landscape, e.g. with rising land; new development would be of little harm to the qualities that contributed to the distinct identity of separate settlements in reality; and, a strong boundary could be created with a clear distinction between ‘town’ and ‘country’.<sup>8</sup>

### Green Belt reviews

- 2.19 Before undertaking a Green Belt review and making boundary revisions, Councils must be able to demonstrate exceptional circumstances.<sup>7</sup>
- 2.20 Revisions to a Green Belt should only be considered in the areas which are serious candidates for development, i.e. relatively large settlements which, as functioning population centres, are likely to be the most sustainable locations for growth.<sup>7</sup>
- 2.21 The purpose of a Green Belt review is not to identify the most appropriate locations for development<sup>7</sup> but to inform the identification of the most appropriate alterations to the designation’s boundary, alongside other planning considerations as part of an overall spatial strategy in the local plan-making process.<sup>8</sup>
- 2.22 The most sustainable locations for development may well be in Green Belts and these locations should be identified in plans unless the positive effects of the allocation would be outweighed by

<sup>6</sup> Inspectors’ Letter (L Graham) to Cambridge City and South Cambridgeshire Councils (May 2015)

<sup>7</sup> Approach to Review of the Green Belt, Planning Officers Society

<sup>8</sup> Planning on the Doorstep: The Big Issues – Green Belt, Planning Advisor Service (2015)

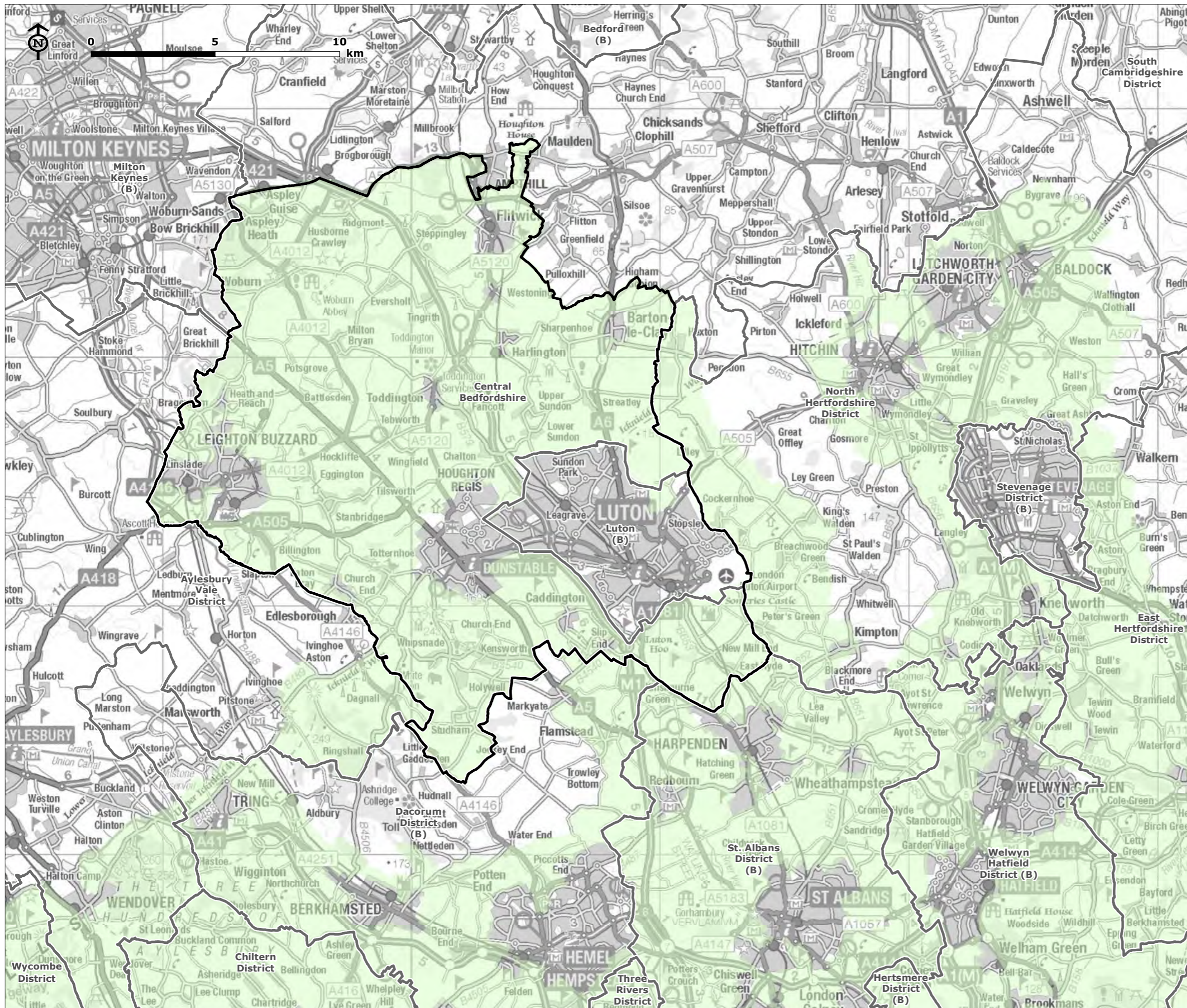
effects on the overall integrity of the Green Belt according to an assessment of the whole of the Green Belt according to the five purposes.<sup>8</sup>

## The local context

- 2.23 Understanding the origins and character of the South Bedfordshire Green Belt is an important first step in understanding its role and value and re-evaluating its performance. A summary of the local context is provided below.




### The South Bedfordshire Green Belt

- 2.24 Central Bedfordshire is a largely rural authority; conversely, Luton is predominantly urban. Approximately 40% of Central Bedfordshire (28,214ha) is Green Belt, whereas only 3% of Luton (136ha) is designated Green Belt.
- 2.25 The concept for the South Bedfordshire Green Belt was first introduced in 1944 as part of Abercrombie's Greater London Plan, but it was not until the early 1960s that the Green Belt was mapped and relevant policies were applied.
- 2.26 The main purposes of the South Bedfordshire Green Belt were to contain the outward sprawl of Luton, Dunstable, Houghton Regis, Leighton Linlade, Ampthill and Flitwick, and to prevent them merging with one another and other neighbouring settlements.
- 2.27 The adoption of the Bedfordshire County Structure Plan in 1980 gave the Green Belt statutory force. The extreme pressure for growth around the area's large built-up settlements was cited as the primary justification for the designation. Policy 8 of the Structure Plan stated: *'It is the policy of the County Council to maintain a Green Belt in the south of the County having a width of up to 12 miles measured from the south-western boundary of the County (but excluding that part of the County lying to the east of Hexton in Hertfordshire) for the purpose of containing the outward growth of Luton, Dunstable and Houghton Regis; Leighton-Linslade; and Ampthill and Flitwick and to prevent the coalescence of settlements within that area.'*
- 2.28 The South Bedfordshire Green Belt continues to play an important role in shaping the pattern of local development. The current extent of the South Bedfordshire Green Belt is shown in **Figure 2.1**.



**CENTRAL BEDFORDSHIRE AND LUTON JOINT GREEN BELT STUDY**

**Figure 2.1: South Bedfordshire Green Belt**

-  Study Area
-  Planning Authority boundary
-  Green Belt

Map Scale @ A3: 1:150,000





### Local Plan preparation within Central Bedfordshire and Luton

- 2.29 This Green Belt Study represents a key component of the evidence bases for plan-making in Central Bedfordshire, Luton and the wider Luton HMA.
- 2.30 Central Bedfordshire Council submitted its Development Strategy to the Secretary of State on 24<sup>th</sup> October 2014 for Examination. Following the initial hearings, the Inspector issued a letter indicating that his report would conclude that the Council had failed to meet the duty to co-operate. Central Bedfordshire Council subsequently withdrew from the Examination process and is now in the early stages of developing a new Local Plan.
- 2.31 Luton Borough Council consulted on its Pre-Submission Local Plan (Regulation 19) in November and December 2015. The plan covers the period up to 2031. Following consideration and approval by Full Council in March 2016 the Luton Local Plan was submitted to the Secretary of State in April 2016.
- 2.32 The Green Belt Study excluded Green Belt land earmarked for permitted strategic development sites from assessment, such as Houghton Regis North 1 and 2, East of Leighton Linlade and Chaul End north of Caddington. Parcels were drawn along the consented boundaries of these consented schemes.

### Local Green Belt assessments

- 2.33 In acknowledgement of the importance of consistency across the wider HMA, a review of the Green Belt assessment methodologies employed in Aylesbury Vale, North Hertfordshire and Luton was undertaken prior to assessment. While a number of differences were identified between the studies (e.g. in the specific criteria used for assessment), the overarching principles of these studies were found to be consistent with one another and the methodology outlined below. These are:
- Green Belt and non-Green Belt land is divided into parcels for broad strategic assessment against the Green Belt purposes;
  - The definition of assessment criteria is structured around the Green Belt purposes set out in the NPPF, with the exception of purpose 5 which is generally not assessed;
  - 'Large built-up areas', 'towns' and 'historic towns' are defined alongside other key terminology, such as sprawl, merging, encroachment and openness;
  - Ratings and supporting text are provided for each of the five purposes, with no weighting applied to any of the five (in accordance with the NPPF's lack of inference in this respect).

## 3 Study Methodology

- 3.1 In the absence of definitive national guidance on how to undertake Green Belt studies, a method statement was drawn-up based on LUC's extensive experience of undertaking Green Belt assessments, information collated on the context and background of the South Bedfordshire Green Belt and good practice elsewhere (see **Chapter 2**).

### Method statement consultation

- 3.2 The first draft of the method statement was prepared by LUC and circulated to the Steering Group for review and feedback. The methodology was subsequently refined in conjunction with planning officers from Central Bedfordshire Council and Luton Borough Council and in consultation with their wider duty to co-operate partners (i.e. adjoining authorities in surrounding Housing Market Areas (HMAs)).
- 3.3 A final draft of the method statement was circulated to Aylesbury Vale District, Bedford Borough Council, Buckinghamshire County Council, Dacorum Borough Council, Huntingdonshire District Council, Milton Keynes Council, North Hertfordshire District Council, South Cambridgeshire District Council, St Albans City and District Council and Stevenage Borough Council. The neighbouring authorities were asked to review and comment on the method statement prior to and during a Stakeholder Workshop which took place on 26<sup>th</sup> May 2016.
- 3.4 Bedford Borough Council and Milton Keynes Council provided comments on the Method Statement in advance of the Stakeholder Workshop and North Hertfordshire District Council attended the Stakeholder Workshop. A record of the duty to co-operate discussions around the method is available in **Appendix 3**.
- 3.5 A key part of the methodology was the development of an assessment framework that appropriately reflected the context and priorities of both Central Bedfordshire and Luton, whilst remaining true to the five purposes of the Green Belt set out in the NPPF. Following the **definition of an agreed set of assessment criteria**, the assessment of the Green Belt within the Study area was undertaken in two stages – **Stage 1** and **Stage 2** – as set out below.

### Defining and agreeing the assessment criteria

- 3.6 **Table 3.1** below sets out the agreed assessment framework for assessing the relative performance of Green Belt parcels and broad areas against each Green Belt purpose. This is followed by a description of the rationale for the assessment criteria adopted.
- 3.7 For Green Belt purposes 1-4, Table 3.1 sets out:
- The **settlements** considered relevant for the assessment of the purposes (not all settlements are considered large built-up areas (Purpose 1), towns (Purpose 2) or historic towns (Purpose 4)).
  - The **key assessment factors** affecting a parcel's rating against each of the purposes.
  - A **range of scenarios** likely to result in specific contributions to each Green Belt purpose to ensure consistency and clarity in assessment judgements/ratings.
  - Further **comments and definitions** to aid assessment.
- 3.8 A 5-point scale was used to rate each parcel and broad area as making either a strong, relatively strong, moderate, relatively weak contribution, or weak/no contribution to the Green Belt purposes.

<b>Strong Contribution</b>	Parcel performs well against the purpose.
<b>Relatively Strong Contribution</b>	Parcel performs relatively well against the purpose.
<b>Moderate Contribution</b>	Parcel performs moderately well against the purpose.
<b>Relatively Weak Contribution</b>	Parcel performs relatively weakly against the purpose.
<b>Weak/No Contribution</b>	Parcel makes a weak or no contribution to the purpose.

3.9 **Table 3.1** also explains why the Study does not include a parcel by parcel assessment of the fifth purpose of Green Belts, which assists urban regeneration through the recycling of derelict and other urban land. This is based on the reasoning that the contribution of individual parcels of land to encouraging the recycling of derelict and other urban land does not vary spatially across the Study area, and that it is the collective contribution of the Green Belt designation as a whole which achieves this purpose.

**Table 3.1: Assessment Framework**

<b>Purpose 1: Check the unrestricted sprawl of large built-up areas</b>	
<b>Settlements considered to be 'large built-up areas':</b> Luton/Dunstable/Houghton Regis and Leighton Linlade.	
<b>Key assessment factors:</b> Development/land-use: less development = stronger contribution Location: closer to settlement = stronger contribution Separating features: stronger relationship with countryside than settlement = stronger contribution Connecting features: weaker relationship between settlement and countryside = stronger contribution	
<b>Strong Contribution</b>	The parcel is adjacent to the large built-up area but has some separation from it and relates strongly to the wider countryside – development would represent significant expansion of the large built-up area into countryside
<b>Relatively Strong Contribution</b>	The parcel is adjacent to the large built-up area but relates more strongly to the wider countryside
<b>Moderate Contribution</b>	The parcel is adjacent to the large built-up area and either relates to both the settlement and the wider countryside or has a degree of separation from both
<b>Relatively Weak Contribution</b>	The parcel is adjacent to the large built-up area and relates more strongly to this than to the wider countryside; or The parcel is not adjacent to the large built-up area, but has sufficient connection for development here to have some association with it
<b>Weak/No Contribution</b>	The parcel is not adjacent to the large built-up area and development here would be associated with a different settlement
<b>Further Notes/Definitions:</b> Urban sprawl is the spread of urban areas into the neighbouring countryside. This could be in the form of ribbon development or non-compact development which doesn't relate well to the existing urban area. Development means any built structure.	

## Purpose 2: Prevent neighbouring towns from merging

**Settlements considered to be 'towns':** Luton/Dunstable/Houghton Regis, Leighton Linlade, Ampthill and Flitwick.

### Key assessment factors:

Development/land-use: less development = stronger contribution

Location: juxtaposed between towns = stronger contribution

Separating features: lack of features to increased perceived separation between towns = stronger contribution

Connecting features: stronger relationship between towns = stronger contribution

<b>Strong</b> Contribution	Development of this parcel would result in physical or visual coalescence of towns, or a significant narrowing of the physical gap with no landscape elements to preserve separation
<b>Relatively Strong</b> Contribution	Development of this parcel would result in physical or visual coalescence of settlements which form a significant proportion of the land between towns
<b>Moderate</b> Contribution	Development of this parcel would result in significant narrowing of the physical gap, but landscape feature(s) would preserve a sense of separation; or Development of this parcel would result in a moderate narrowing of the physical gap, but with no landscape feature(s) to preserve separation
<b>Relatively Weak</b> Contribution	Development of this parcel would result in a moderate narrowing of the physical or perceived gap, but with landscape feature(s) to preserve separation
<b>Weak/No</b> Contribution	Development of this parcel would result in little or no perception of the narrowing of the gap between towns

### Further Notes/Definitions:

This purpose seeks to prevent settlements from merging to form larger settlements. The PAS guidance states that distance alone should not be used to assess the extent to which the Green Belt prevents neighbouring towns from merging into one another. Two key elements have therefore been used – the extent of the actual or perceived visual and physical gap.

## Purpose 3: Assist in safeguarding the countryside from encroachment

**Applies to the countryside around all settlements** – i.e. all Green Belt parcels.

### Key assessment factors:

Development/land-use: less urbanising land use and more openness = stronger contribution

Location: further from settlement = stronger contribution

Size: larger parcel = stronger contribution

Separating features: stronger relationship with countryside than settlement = stronger contribution

Connecting features: weaker relationship between settlement and countryside = stronger contribution

<b>Strong</b> Contribution	The parcel relates strongly to the wider countryside, has a sense of separation from the settlement and lacks urbanising development – development would represent encroachment into the countryside
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<b>Relatively Strong Contribution</b>	The parcel relates more strongly to the wider countryside than the settlement and lacks urbanising development
<b>Moderate Contribution</b>	The parcel relates to both the settlement and the wider countryside or has a degree of separation from both; or The parcel relates more strongly to the wider countryside than to the settlement, but openness is compromised by urbanising development within it
<b>Relatively Weak Contribution</b>	The parcel relates more strongly to the settlement than to the wider countryside; or The parcel relates to both the settlement and the wider countryside, or has a degree of separation from both, but openness is compromised by urbanising development within it
<b>Weak/No Contribution</b>	The parcel is too lacking in openness to be considered countryside, or has little countryside within it and lacks relationship with the wider Green Belt countryside

**Further Notes/Definitions:**

Encroachment from urbanising influences is the intrusion / gradual advance of buildings and urbanised land beyond an acceptable or established limit.

Urbanising influences include any features that compromise 'openness', such as roads lined with street lighting and pavements, large areas of hard standing, floodlit sports fields, roads, pylons etc. They do not include development which is commonly found within the countryside, e.g. agricultural or forestry related development, isolated dwellings, historic schools and churches.

Countryside is land/scenery which is rural in character, i.e. a relatively open natural, semi-natural or farmed landscape.

**Purpose 4: Preserve the setting and special character of historic towns**

**Settlements considered to be 'historic towns':** Ampthill, Leighton Buzzard, Linslade and Luton.

**Key assessment factors:**

Development/land-use: less development = stronger contribution

Location: contains key characteristics, or important in views to or from them = stronger contribution

Separating features: lack of features to increase perceived separation from historic town = stronger contribution

Connecting features: stronger relationship between historic town and countryside = stronger contribution

<b>Strong Contribution</b>	The parcel's openness is a key element in the relationship between the settlement and key characteristics identified as contributing to special character or historic setting – development would detract significantly from the town's historic character
<b>Relatively Strong Contribution</b>	The parcel's openness contributes to the relationship between the settlement and characteristics identified as contributing to special character or historic setting – development would detract from the town's historic character
<b>Moderate Contribution</b>	The parcel's openness contributes to the relationship between the settlement and characteristics identified as contributing to special character or historic setting, but development would have only a moderate impact on historic character

<b>Relatively Weak Contribution</b>	The parcel forms a minor element in the setting of an historic town; or forms a more major element but has limited openness
<b>Weak/No Contribution</b>	The parcel does not form part of the setting of an historic town
<b>Further Notes/Definitions:</b>	
To inform assessments against purpose 4, relevant evidence bases were used to define the setting and special character, i.e. the 'historic character' of each historic town. These historic characteristics are outlined below in paragraphs <b>3.45</b> to <b>3.56</b> below.	
At Stage 1, topographic OS base mapping and aerial and road-side imagery were used to establish the role of Green Belt parcels and broad areas in contributing to the setting and special character of historic towns. Stage 1 parcels considered remotely to be making a contribution (strong – relatively weak) to purpose 4 were visited during site-based assessments in Stage 2 to verify desk-based judgements in the field.	
<b>Purpose 5: To assist in urban regeneration by encouraging the recycling of derelict and other urban land</b>	
Green Belt has the potential to make a strategic contribution to urban regeneration by restricting the land available for development and encouraging developers to seek out and recycle derelict / urban sites. It is considered that it is not possible to distinguish the extent to which each Green Belt parcels delivers against this purpose and therefore the parcels have not been individually assessed against Purpose 5.	

### Rationale behind the assessment criteria

- 3.10 National planning policy and guidance provides limited material on how the five purposes of the Green Belt should be interpreted. Based on the review of relevant guidance, recently adopted Local Plans, and detailed discussions with the Steering Group, this section sets out LUC's rationale and local interpretation of the Green Belt essential characteristics and purposes for the Central Bedfordshire and Luton Green Belt Study.

#### *The 'essential characteristic' of Green Belt*

- 3.11 The NPPF refers to two essential characteristics of Green Belt: '*openness*' and '*permanence*'.
- 3.12 **Openness** in a Green Belt sense relates to lack of built development more than visual openness, although the two often go hand in hand. The key distinction is that where vegetation provides visual enclosure this does not reduce Green Belt openness, even though it might in practice mean that development would have less visual impact<sup>9</sup>. Openness should therefore be judged based on the scale and density of existing development. The extent and form of existing development affects the degree to which a parcel can be considered to be part of the countryside rather than an extension of the urban/settled area, or a built-up area in its own right.
- 3.13 The concept of **permanence** is a planning consideration rather than a physical characteristic, so it cannot be assessed in the same way that openness can. However, when redefining a Green Belt boundary, new boundaries should be drawn along features which are clearly defined and which also play a physical and/or visual role in separating town, i.e. the urban, and countryside, i.e. the rural.

#### *Assessing land parcels' contribution to the Green Belt purposes*

- 3.14 Assessments of land against the Green Belt purposes are routed in the relationship between individual land parcels, settlements and the wider countryside as influenced by the following common factors<sup>10</sup>:

<sup>9</sup> This point is made in paragraph 22 of the judgement in *Heath & Hampsted Society v London Borough of Camden* [2007] EWHC 977 (Admin) (3rd April 2007)

<sup>10</sup> These factors can be addressed without allowing landscape quality to influence the assessment.

- **Development and land use** – the extent and form of existing development, and land use characteristics, affect the degree to which parcels of land are considered to be part of the countryside rather than an extensions of the urban/settled area;
- **Location** – the position of land parcels in relation to settlements affects the significance of their role in influencing the potential expansion of those settlements;
- **Separating features** – landscape elements such as woodland blocks, rivers and ridges, motorways and railways, have a physical and visual impact on the relationships between settlements and the countryside;
- **Connecting features** – roads or rail links and landforms like valleys can draw areas together.

3.15 All these factors have the potential to influence a parcel of land's contribution to any one of the Green Belt purposes.

*Purpose 1: to check the unrestricted sprawl of large built up areas*

- 3.16 It is possible to argue that all Green Belt prevents the unrestricted sprawl of large built up urban areas, because that is its principal purpose as a strategic planning designation. However, the study requires us to distinguish one area (or parcel) from another in terms of the extent to which they perform this purpose. This requires a detailed, site specific assessment against this strategic purpose.
- 3.17 There is no definition provided in the NPPF or a standard definition for a 'large built up area.' The Office for National Statistics defines a 'large' built up area as a settlement with between 0.5-1 million people; much larger than the settlements within the Study area. It was therefore necessary to decide on what constitutes a 'large built up area' for the purposes of the Study.
- 3.18 Following discussions with the Steering Group the following conurbations were defined as large built-up areas:
1. Luton, Dunstable and Houghton Regis
  2. Leighton Buzzard and Linslade
  3. Milton Keynes
- 3.19 These merged urban conurbations are significantly larger than any of the other settlements within or directly adjacent to the Study area. Milton Keynes does not lie within or directly adjacent to the South Bedfordshire Green Belt; however, the settlement of Woburn Sands, which has a strong connection with the large built-up area of Milton Keynes, does. As there is no Green Belt in between Milton Keynes and Woburn Sands forming a barrier to sprawl of the large built-up area, the Green Belt to the south and east of Woburn Sands plays a role in checking the sprawl of Milton Keynes.
- 3.20 The permitted mixed-use urban extensions north of Houghton Regis and east of Leighton Linslade were mapped and used to define the new urban edges of these large built-up areas. Assumptions about the extent and form of future development which have not been permitted cannot be made.
- 3.21 There is no clear definition of what constitutes urban sprawl. The PAS guidance<sup>11</sup> states in relation to Purpose 1:
- "The terminology of 'sprawl' comes from the 1930s when Green Belt was conceived. Has this term changed in meaning since then? For example, is development that is planned positively through a local plan, and well designed with good masterplanning, sprawl?"*
- 3.22 The guidance emphasises the variable nature of the term 'sprawl' and questions whether positively planned development constitutes 'sprawl'. The RTPI Research Briefing No. 9 (2015) on Urban Form and Sustainability is also not definitive on the meaning of sprawl:
- "As an urban form, sprawl has been described as the opposite of the desirable compact city, with high density, centralised development and a mixture of functions. However, what is considered to be sprawl ranges along a continuum of more compact to completely dispersed development. A*

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<sup>11</sup> Planning on the Doorstep: The Big Issues – Green Belt, Planning Advisor Service (2015).

*variety of urban forms have been covered by the term 'urban sprawl', ranging from contiguous suburban growth, linear patterns of strip development, leapfrog and scattered development."*

- 3.23 Therefore, sufficiently well-located and planned urban extensions may not constitute 'urban sprawl'. For the purpose of this study, urban sprawl is defined as uncompact and/or ribbon development which does not relate well to the existing urban form of the 'large built-up areas' as defined above.
- 3.24 Given this definition, land parcels adjacent to the large built up areas are likely to contribute to checking sprawl, unless it is separated from the wider countryside by landscape features significant enough to prevent any subsequent development beyond the parcel being directly relatable to a large built-up area.
- 3.25 The smaller the area of land the greater the potential for a stronger relationship with a large built-up area than with the wider countryside, whether due to the extent of existing urban influence within the parcel or to the presence of landscape elements which separate it from the wider countryside.

*Purpose 2: to prevent neighbouring towns from merging into one another*

- 3.26 The NPPF specifically refers to preventing the merging of neighbouring towns, not the merging of towns with smaller satellite settlements, or the merger of smaller settlements with each other. It is, however, acknowledged that smaller intervening settlements can affect the nature and size of the perceived gaps between neighbouring towns.
- 3.27 Central Bedfordshire's latest settlement hierarchy<sup>12</sup> was used to identify the settlements within the Study area which broadly fall under the term 'neighbouring towns'. All Green Belt settlements defined as 'Major Service Centres' in the hierarchy were considered large enough to be defined as 'towns':
- Ampthill
  - Dunstable
  - Flitwick
  - Houghton Regis
  - Leighton Linsalde
- 3.28 Luton was considered as a 'town'. In addition, Milton Keynes to the north west and Harpenden to the south east – both outside but in close proximity to the study area – were considered to be of an equivalent size to Central Bedfordshire's 'Major Service Centres' and Luton to also be considered as 'towns'.
- 3.29 There are a number of factors which are relevant to a land parcel's contribution to purpose 2:
- A land parcel's location and size. For example, a parcel that represents all or most of the physical gap between neighbouring towns is likely to make a significant contribution to preventing the coalescence of towns.
  - The role of landform and land cover within a land parcel in connecting or separating neighbouring towns visually or in terms of the character of their settings.
  - The character of the towns themselves, i.e. the strength of the relationship between the towns and the land parcels that form the gaps that separate them.

*Purpose 3: to assist in safeguarding the countryside from encroachment*

- 3.30 All Green Belt land adjacent to settlements inset within or directly adjacent to the Green Belt within the Study Area was considered as having potential to be vulnerable to encroachment and was therefore parcelled and assessed against purpose 3.
- 3.31 The contribution a parcel makes to safeguarding the countryside from encroachment can be directly related to the extent to which it:

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<sup>12</sup> Central Bedfordshire's latest settlement hierarchy is outlined in its withdrawn Development Strategy for Central Bedfordshire, Central Bedfordshire Council, 2014



- Displays the characteristics of countryside.
  - Relates to the adjacent settlement and to the wider countryside, regardless of administrative boundaries.
- 3.32 The word 'countryside', is typically defined as land/scenery which is rural in character, i.e. a relatively open natural, semi-natural or farmed landscape that falls outside of, or inset into, the defined boundaries of settlements. Countryside lacks dense, urbanising development. Urbanising influences were considered to include any features that compromise the rural character and openness of the countryside. Development commonly found within the countryside, such as agricultural or forestry related development, isolated dwellings, historic schools and churches were not considered to have an urbanising influence.
- 3.33 PAS guidance states that:
- "The most useful approach is to look at the difference between urban fringe – land under the influence of the urban area - and open countryside, and to favour the latter in determining which land to try and keep open, taking into account the types of edges and boundaries that can be achieved."*
- 3.34 It is important to recognise that Green Belt does not function as a series of isolated parcels: the assessment of a defined parcel will reflect the nature of landscape elements or characteristics within that parcel but must also reflect its relationship with the wider Green Belt.
- Purpose 4: to preserve the setting and special character of historic towns*
- 3.35 Whilst many settlements have historic elements, this Green Belt purpose is only relevant to settlements of a certain size – towns – which retain a historic character connected to surrounding landscape elements, and which it is impractical to protect solely through Conservation Area designations. This connection between a historic town's historic character and the wider countryside does not have to be physical, indeed successions of development often isolate core historic areas from the surrounding countryside; it is often a visual connection. This visual connection can be defined through movement through the area or views into or out of the settlement.
- 3.36 A desk-based review of relevant local planning documents and evidence bases was undertaken by LUC, Central Bedfordshire and Luton to identify towns within the study area which could be appropriately defined as historic towns.
- 3.37 The South Bedfordshire Local Plan Review<sup>13</sup> stated:
- "...the South Bedfordshire Green Belt serves the purpose of preserving the setting and special character of the historic town of Leighton Buzzard. The town has its origins as a crossing point on the River Ouzel and although 19th and 20th century development has masked this relationship to some extent, the application of Green Belt policies has ensured that the riverside landscapes of the Ouzel Valley still extend into the heart of the urban area and that the setting of All Saints Church and the adjoining historic town centre and views to it from the meadowland to the south of the town, have been retained."*
- 3.38 The Luton/South Bedfordshire Local Development Framework Issues Paper 1<sup>14</sup> stated that purpose 4 "is only applicable, in southern Bedfordshire, to Leighton-Linslade where Green Belt boundaries have been carefully drawn so as to retain the open land of the Ouzel Valley which is important in the context of the setting and character of the historic core of Leighton Buzzard."
- 3.39 Therefore, Leighton Linslade was identified as a historic town.
- 3.40 Luton Borough Council's Stage 1 Green Belt Study<sup>15</sup> assessed the pockets of Green Belt within the Borough to determine their contribution to the Green Belt purposes, including contribution to the setting of the historic town of Luton for purpose 4. Therefore, for consistency, Luton has been defined as a historic town.

<sup>13</sup> South Bedfordshire Local Plan Review, South Bedfordshire Council, 2004 Viewed at:

<http://www.centralbedfordshire.gov.uk/planning/policy/ldf-south/plan.aspx>

<sup>14</sup> Luton/South Bedfordshire Local Development Framework Issues Paper 1, Luton Borough Council and South Bedfordshire Council, 2006

<sup>15</sup> Luton Green Belt Study, Luton Borough Council, 2014.

- 3.41 Finally, at the Stakeholder Workshop on 26<sup>th</sup> May 2016, it was agreed by the cooperating authorities and present neighbouring authorities that Ampthill should be defined as a historic town. The town's Conservation Area Character Appraisal was adopted in April 2005 but updated by Central Bedfordshire officers and external consultants in June 2013<sup>16</sup>. However, the updated appraisal was not published. Although still in draft form, the 2013 update clearly describes the town's large Conservation Area including Ampthill Park and its historic core whose historic character is intrinsically linked to the surrounding landscape, including the landscaped parks and the Bedford Plain beyond. It is these features, which form a green backdrop to much of the town, which were considered justify the definition of Ampthill as a historic town in Green Belt terms.
- 3.42 To assess the contribution of parcels of land to the setting and special character of specific historic towns (Green Belt purpose 4) requires an appreciation of each historic town's distinctive qualities or historic characteristics – more specifically the landscape elements and relationships which contribute to the setting or special character of each historic town.
- 3.43 Relevant landscape elements tend to be distinct from historic towns, forming part of their open surroundings, open surroundings which, more often than not, also contribute to the prevention of encroachment on the countryside (Green Belt purpose 3).<sup>17</sup> These landscape elements do not have to form part of the visual setting of a historic town to preserve its setting and special character. Where successive settlement expansion around a historic town's historic core might screen it from the wider landscape, the open countryside can still play an important role in preserving the approach to and arrival in to a town, as to views out from it.
- 3.44 The relevant historic characteristics of Ampthill, Leighton Linlade and Luton used in the assessment of Green Belt land parcels against purpose 4 are outlined below.

#### *Ampthill*

- 3.45 The Ampthill Conservation Area Appraisal<sup>16</sup> provides information regarding the key elements of Ampthill's setting. The principal elements are the elevated medieval parklands on the greensand ridge to the north and west which create a sheltered setting. A list of factors creating "*the special interest that justifies designation of the Ampthill Conservation Area*" includes "*landscaped parks to the north and west which form a green tree lined backdrop to much of the town*" and which provide a "*rural setting which sits very close to the core of the Conservation Area in places*". The Conservation Area incorporates Ampthill Park to the north and north-west, and the avenue of the trees known as the Alameda (which runs from the town westwards up to Cooper's Hill). The appraisal notes that "*the compact and enclosed nature of the town is often seen in stark contrast to the open landscape beyond viewed between and above buildings. The wider landscape particularly in relation to Ampthill Park is constantly forming a dynamic and interesting backdrop to the traditional built form of the town. The treed backdrop of the town and the richness and diversity of the park landscaping are crucial elements of its character.*"
- 3.46 The Conservation Area appraisal also notes the importance of the parish church: "There are excellent open views to the church from Church Street as the traveller approaches the town from the east. The varied species of trees of Church Hill and Rectory Lane make a significant contribution to long views into the town from this approach. The topography is such that the Church of St Andrew sits as part of a very high quality group of historic buildings somewhat detached from the town centre but no less important. The church remains the dominant building in these important and highly sensitive views." However, fieldwork undertaken as part of the study revealed that there were no significant views of the church from beyond the inset settlement edge, particularly since the recent construction of a residential development to the north of Church Street.
- 3.47 There is little reference in the Conservation Area appraisal to the southern side of Ampthill, but tree cover here does play a role in containing the settlement, maintaining separation from Flitwick.

<sup>16</sup> Ampthill Conservation Area Character Appraisal Update (unpublished), Mid Bedfordshire District Council, June 2013.

<sup>17</sup> It should be noted that settlements which have not been defined as 'historic towns' can have equally distinctive landscape settings which make equally important contributions to purpose 3.

### Leighton Linlade

- 3.48 The South Bedfordshire Local Plan Review<sup>18</sup> stated that “the application of Green Belt policies has ensured that the riverside landscapes of the Ouzel Valley still extend into the heart of the urban area and that the setting of All Saints Church and the adjoining historic town centre and views to it from the meadowland to the south of the town, have been retained.”
- 3.49 The Luton/South Bedfordshire Local Development Framework Issues Paper 1<sup>19</sup> stated that the Green Belt boundary around Leighton Linlade “*have been carefully drawn so as to retain the open land of the Ouzel Valley which is important in the context of the setting and character of the historic core of Leighton Buzzard.*”
- 3.50 The Central Bedfordshire Landscape Character Assessment<sup>20</sup> makes reference in the Ouzel Greensand Valley character area analysis to “*extensive areas of historic meadowland, with watercourses and cross-ditches deriving from the management of meadows and water supply for Grange Mill*” (7B1.21), and there is also reference to the “*Grand Union Canal and towpath, Sandhole Bridge and remains of other canal structures of industrial heritage interest and now providing significant opportunities for recreation*” (7B1.24). Views to All Saints Church are noted in The Toddington – Hockcliffe Clay Hills character area assessment when considering “*local views to historic features including churches (e.g. All Saints Church) which would be vulnerable to unsympathetic development within their setting*” (8A1.28).
- 3.51 Leighton Linlade also has prominent surrounding hills, with associated woodland to the north in particular, for example the “*wooded context provided by the surrounding Woburn Greensand Ridge (6a) to the north of Leighton Buzzard*” (7B1.25), and to the south the Billington Clay Hills character area: “*largely undeveloped hill sides which are visible in distant views through gaps in vegetation or in channelled views along road corridors from the surrounding clay vale, the edge of Leighton Buzzard and east to Totternhoe Knolls located on the nearby Chalk Escarpment (9b)*” (8B.10).
- 3.52 Although the 2004 Local Plan Review only makes reference to the meadow to the south of the town centre, the river valley to the north is also noted in the Central Bedfordshire Landscape Character Assessment as having an “*intimate, rural character including picturesque qualities such as the setting of Old Linlade Church.*” (7B1.18).

### Luton

- 3.53 Luton Borough Council provided the following text on 10/06/2016 to inform the consideration of setting characteristics for the town:
- “Luton became an established settlement during the Medieval period formed around the River Lea within the Chiltern Hills chalk spring line which played an important role in the early development of the town and its setting within historic landscapes including Scheduled Ancient Monuments (Dreys Ditches and Strip Lynchetts at Stopsely Common) and more recently, Luton Hoo and Putteridge Bury. Its original Medieval layout can be understood through many of the road names within the town centre such as Bridge Street, Castle Street and Mill Street. The town centre saw large expansion from its historic core, including Victorian and Edwardian buildings and frontages (e.g. High Town), the River Lea and Wardown Park (Registered Park and Garden) during the 19th and 20th century in which Luton grew into a successful market town. The straw hat industry also saw great success within the town and by the end of the 19th century was established and largely influenced the built form of the town centre such that the town sustains five Conservation Areas, notably the predominantly commercial Conservation Areas of the Town Centre; High Town (Luton’s earliest suburb); and Plaiters Lea and the primarily residential Conservation Areas of Rothsay; and Luton South.”*
- 3.54 The key elements of this description with regard to settlement setting are the references to its relationship with the River Lea and the surrounding hills and historic landscape features: Scheduled Ancient Monuments (SAMs) and estate parklands. The SAM and Registered Park and

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<sup>18</sup> South Bedfordshire Local Plan Review, South Bedfordshire Council, 2004 Viewed at:

<http://www.centralbedfordshire.gov.uk/planning/policy/ldf-south/plan.aspx>

<sup>19</sup> Luton/South Bedfordshire Local Development Framework Issues Paper 1, Luton Borough Council and South Bedfordshire Council, 2006

<sup>20</sup> Central Bedfordshire Landscape Character Assessment, LUC, 2015.

Garden designations provide a degree of protection to their settings in the same way that Conservation Areas do, but it is the relationship between these features and the inset settlement which is important for Green Belt assessment purposes. There are no Green Belt landscape elements which have particular relationships with Conservation Areas that increase their contribution.

- 3.55 The Central Bedfordshire Landscape Character Assessment<sup>20</sup> makes reference to landscape elements which are relevant to the setting of Luton, and the distinctive chalk hills and escarpments, which provide viewpoints from which the landscape setting can be appreciated, are key elements in this. For example, the assessment for the Warden Hill - Stopsley Common Chalk Escarpment character area notes that it provides an *"important rural setting and backdrop to the suburban and urban context of Luton"* (9D1.13). With regard to visual sensitivity it identifies the *"open, exposed skyline forming a backdrop in views from the urban area"* (9D1.21). To the south of Luton there is reference in the South Dunstable Chalk Escarpment character area assessment to the *"glimpsed views of the scarp"* which *"provide a dramatic backdrop from retail and housing estates at the foot of the scarp"* (9), and the Caddington – Slip End Chalk Dipslope character area assessment notes the *"value of the area in providing a buffer or rural setting to the Luton-Dunstable conurbation; the scarp acting as a natural containment to growth"* (11B1.21). To the north, the Houghton Regis – North Luton Rolling Chalk Farmland character area assessment notes small pockets of ancient woodlands and makes reference to an ancient routeway: *"Thiodweg, including a section of Dray's Ditches – is a historic landscape feature of major importance, but vulnerable to being breached by any northward extension of Luton's urban area"* (10B1.19).
- 3.56 With regard to historic parklands and to the River Lea, the Luton Hoo Chalk Dipslope character area assessment states that *"the designed landscapes of Luton Hoo Manor House and Stockwood Country Park impart a designed, managed character on the landscape, sensitive to changes in management or views to modern development"* (11C1.15), and notes the *"strong perception of an elevated landform with clear visual relationship with the adjacent Lea River Valley"* (11C1.17).
- Purpose 5: to assist in urban regeneration by encouraging the recycling of derelict and other urban land*
- 3.57 Green Belt assessments tend not to assess individual parcels against purpose 5, rating all parcels equally or not at all. This is based on the reasoning that the contribution of individual parcels of land to encouraging the recycling of derelict and other urban land rarely varies spatially; rather it is the contribution of the Green Belt designation as a whole which achieves this purpose.
- 3.58 The view of the PAS guidance (see 2.6 above) is that:
- "...it must be the case that the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land. If Green Belt achieves this purpose, all Green Belt does to the same extent and hence the value of various land parcels is unlikely to be distinguished by the application of this purpose."*
- Rating the contribution of land parcels to the Green Belt purposes*
- 3.59 There is no accepted standard on how to rate the contribution of land to the Green Belt purposes. It is, however, important to use a scale of ratings that clearly draws out variations in the contributions of individual parcels across the Study Area.
- 3.60 The NPPF does not weight the purposes; however, in practice, purpose 3 is relevant to all parcels of land and only parcels that lack the 'essential characteristic' of openness will make no contribution to it. Purposes 1, 2 and 4, on the other hand, are only relevant to parcels in the vicinity of large built-up areas, juxtaposed between neighbouring towns or within the settings of historic towns.
- 3.61 The significance of this in terms of the results of assessments is that many parcels which might be considered 'core' Green Belt rate highly against purpose 3 but make lower contributions to the other purposes. Assessments which aggregate ratings to provide an overall assessment may as a result rate parcels that make a low or moderate contribution to a number of purposes higher than those which make a strong contribution to purpose 3 only. The NPPF does not require all the purposes to be met simultaneously. Therefore, parcels of land can make a significant contribution without performing all the purposes at the same time. However, it would not be unreasonable to

assume that a parcel that rates highly against a number of different purposes potentially has more value in Green Belt terms than one which rates highly against only one purpose.

- 3.62 Short of defining Green Belt parcels around individual agricultural fields and carrying out thousands of assessments, a scale of assessment which is both impractical and inappropriate for a strategic assessment of the Green Belt, variations in the contribution of land within parcels to individual purposes is inevitable. This variation is an added source of complication when providing assessment ratings: should a rating reflect the strongest level of contribution, or should it represent an average within the parcel?
- 3.63 At Stage 1, parcels ratings reflect the highest contribution portions of land within the parcel make to each purpose; however, each rating is supported by detailed text which describes how a judgement has been reached, i.e. which factors have influenced the rating given. This text also draws out the variations in contribution of land across a parcel. These textual judgements recorded at Stage 1 of the Study were invaluable for the first task of Stage 2 of the Study, isolating the portions of the Green Belt which make relatively weak contributions to all the Green Belt purposes and are therefore likely to pose less risk of harm to the wider Green Belt if released for development.

## Stage 1

- 3.64 Stage 1 was a desk-based assessment to establish the degree to which the Green Belt within Central Bedfordshire meets the purposes of the Green Belt designation, as set out in the NPPF. Defined parcels were assessed and rated. These ratings are supported by text that describes the spatial variations in the contribution of land to the purposes within each parcel.
- 3.65 In addition, Stage 1 involved remotely assessing the openness of Central Bedfordshire's main settlements within the Green Belt, making recommendations on which settlements should be inset and which settlements should be washed over.
- 3.66 Luton Borough Council completed a Stage 1 strategic assessment of the six parcels of Green Belt within the Borough in 2014. These pockets of Green Belt were not assessed again.

### Definition of Stage 1 land parcels

- 3.67 The 'Examination in Public' (EIP) of the Leeds Core Strategy highlighted the importance of assessing the performance of all Green Belt within a Plan area, particularly where the scale of planned growth is likely to lead to pressure to release Green Belt land for development. Therefore, all Green Belt land within Central Bedfordshire was parcelled for assessment at Stage 1.
- 3.68 Green Belt is a strategic designation designated at a landscape scale. It is therefore important that strategic assessments of Green Belt, designed to inform the definition of sustainable patterns of development, are undertaken at an appropriate scale, i.e. assessment parcels are defined at a scale which enables the study to draw out the spatial differences in strategic contribution of land to the Green Belt purposes. In Central Bedfordshire, this was achieved by defining smaller assessment parcels adjacent to the main inset settlements where development pressures, and therefore variations in contribution to the purposes of Green Belt, are likely to be greatest:
- Ampthill
  - Barton-le-Clay
  - Caddington
  - Dunstable
  - Eaton Bray
  - Flitwick
  - Harlington
  - Heath and Reach

- Hockliffe
- Houghton Regis
- Leighton Linlade
- Luton
- Slip End
- Toddington
- Westoning
- Woburn Sands

- 3.69 Parcels were defined by taking the built-up area boundaries of Central Bedfordshire's inset settlements as the 'inner edges' and working outwards to consistent and significant landscape features, which were defined as the 'outer edges' of each parcel. In an effort to try and isolate variations in the strategic contributions of Green Belt land to the purposes of Green Belt before any assessment work, consideration was also given to marking out visual changes in the relationship between inset settlements and countryside.
- 3.70 GIS maps (based on Ordnance Survey and Mastermap mapping), local proposals maps and aerial images were used to identify notable permanent and readily recognisable boundaries on the ground (as referenced in paragraph 85 of the NPPF) – physical features such as substantial watercourses and water bodies, motorways, A roads and railway lines, and established infrastructure and utilities such as sewage treatment works. Woodland, hedgerows, tree lines, streams and ditches were also considered to be recognisable but less permanent boundaries. Where appropriate, these were also used to define land parcel boundaries.
- 3.71 Land with planning permission for large strategic developments was excluded from defined parcels and therefore the assessment. Permitted developments included the major mixed-use urban extensions north of Houghton Regis and east of Leighton Linlade and the Chaul End north of Caddington. Parcels were drawn along the consented boundaries of these consented schemes, with the large urban extensions at Houghton Regis and Leighton Linlade becoming the new urban edges of their respective Green Belt settlements. The final Green Belt boundaries around these permitted developments will be defined as part of their detailed design and construction stages.
- 3.72 The Stage 1 parcels for assessment are illustrated in **Figure 3.1**.

#### Definition of Stage 1 broad areas

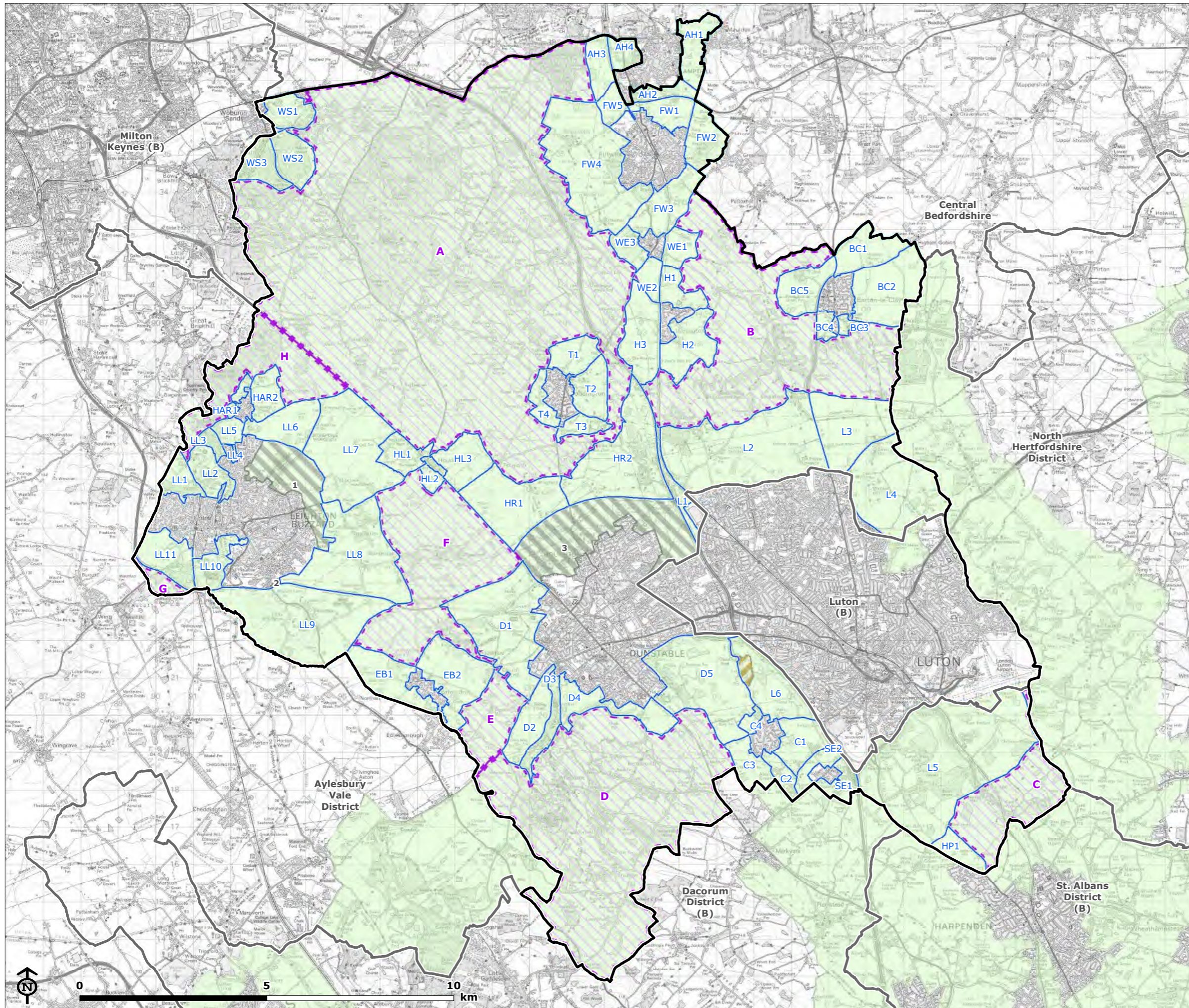
- 3.73 Given the strategic nature of the Study, it was considered inappropriate and impractical to define and assess small parcels of Green Belt across the large areas of Green Belt that lie away from the urban edges of the main inset settlements. Therefore, having parcelled the land around all the inset settlements within and directly adjacent to the Central Bedfordshire Green Belt, the remaining areas of Green Belt were subdivided into larger 'broad areas' for assessment.
- 3.74 The same criteria for assessment were used for the broad areas as for the smaller parcels.
- 3.75 The Stage 1 broad areas for assessment are defined in **Figure 3.1**.

#### Assessment of Non-Green Belt parcels

- 3.76 The brief indicated that the Study should assess the performance of land that currently lies outside the Green Belt, isolating areas of non-Green Belt land that fulfil the purposes of Green Belt and advising on the exceptional circumstances for designating these areas as Green Belt.
- 3.77 At the beginning of the Study it was agreed that this assessment would be excluded from the Study because of the strong 'tests' set out in paragraph 82 of the NPPF which require local planning authorities to demonstrate exceptional circumstances before establishing new Green Belt. To meet these exceptional circumstances, Central Bedfordshire and Luton must have a clear idea of their preferred spatial distribution of development, which will not be known for some time.

**CENTRAL BEDFORDSHIRE  
AND LUTON  
JOINT GREEN BELT STUDY**

**Figure 3.1: Stage 1 Assessment of Central Bedfordshire Green Belt – Parcels and Broad Areas**



- Study area
- Planning Authority boundary
- Green Belt
- Parcel
- Broad Area
- Permitted urban extensions in Green Belt
  - 1: East of Leighton Linlade
  - 2: Pulford Corner
  - 3: Houghton Regis North 1&2
- Permitted strategic development in Green Belt - Chaul End

Map Scale @ A3: 1:100,000



### Desk-based assessment of Stage 1 parcels and broad areas

- 3.78 Each land parcel and broad area was assessed using the agreed assessment criteria, OS maps, aerial images and relevant GIS data to gain a clear understanding of how they performed against the Green Belt purposes. Ratings and detailed notes on the judgements for each land parcel and broad area were input into an Access database. All ratings were rigorously cross-checked and reviewed to ensure consistency, clarity and transparency in all judgements.
- 3.79 Clear, colour-coded GIS maps linked to the Access database were prepared illustrating the defined land parcels and broad areas and the overall assessed contribution of each land parcel and broad area to each of the purposes of Green Belt.

### Assessment of Central Bedfordshire's main Green Belt settlements

- 3.80 The brief indicated that the Study should assess the Study area's main settlements inset within and washed-over by Green Belt to determine whether they should remain inset or washed over by the designation.
- 3.81 All Major and Minor Service Centres, Large and Small Villages listed in Central Bedfordshire's latest settlement hierarchy<sup>21</sup> were assessed. Despite being in the Study area, Luton was not assessed because the town cannot be regarded as 'inset'; rather it forms part of the built up area which justified the Green Belt. Other settlements which are not included in Central Bedfordshire's settlement hierarchy are small and have a rural character. As such it was considered that they should not be assessed.

**Table 3.2: List of settlements assessed within the Green Belt**

Green Belt Settlements	Status
<b>Major Service Centres</b>	
Amphill	Inset
Dunstable	Inset
Flitwick	Inset
Houghton Regis	Inset
Leighton Linlade	Inset
<b>Minor Service Centres</b>	
Barton-Le-Clay	Inset
Caddington	Inset
Toddington	Inset
<b>Large Villages</b>	
Aspley Guise	Washed Over
Eaton Bray	Inset
Harlington	Inset

<sup>21</sup> Central Bedfordshire's latest settlement hierarchy is outlined in its withdrawn Development Strategy for Central Bedfordshire, Central Bedfordshire Council, 2014



Green Belt Settlements	Status
Heath and Reach	Inset
Hockliffe	Inset
Slip End	Inset
Westoning	Inset
Woburn	Washed Over
Small Villages	
Aspley Heath	Washed Over
Chalton	Washed Over
Eversholt	Washed Over
Husborne Crawley	Washed Over
Kensworth	Washed Over
Ridgmont	Washed Over
Stanbridge	Washed Over
Steppingley	Washed Over
Streatley	Washed Over
Studham	Washed Over
Tilsworth	Washed Over
Totternhoe	Washed Over
Upper Sundon	Washed Over

3.82 The methodology for assessing inset and washed over settlements within the Green Belt was based on guidance outlined in paragraph 86 of the NPPF:

*"If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt"<sup>22</sup>.*

3.83 Based on this guidance, each Green Belt settlement's contribution to the openness of the Green Belt was assessed through an evaluation of its character. Green Belt settlements were not assessed against the Green Belt purposes.

3.84 At Stage 1, topographic OS base mapping and aerial and road-side imagery were used to remotely evaluate the character of each settlement. Lower density settlements with a more rural character were considered to contribute to the openness of the Green Belt and were

<sup>22</sup> <http://planningguidance.planningportal.gov.uk/blog/policy/achieving-sustainable-development/delivering-sustainabledevelopment/9-protecting-green-belt-land/>

recommended to be washed over by the designation. More densely developed, compact settlements, which contrasted with the openness of the surrounding Green Belt, were recommended to be inset within the Green Belt.

- 3.85 Settlements that contained strong characteristics that contradicted their status as either inset or washed over settlements were highlighted in the Stage 1 desk-based assessment and visited at Stage 2 to verify the desk-based judgments made in Stage 1. These verified judgements were used to inform the recommendations made in **Chapter 5**.

## Stage 2

- 3.86 The first task conducted at Stage 2 of the Study was to draw on the Stage 1 assessment of Central Bedfordshire's Green Belt and Luton Borough Council's 2014 Stage 1 assessment to isolate areas of the Green Belt judged to make no more than a 'relatively weak' contribution to all of the Green Belt purposes.
- 3.87 Land achieving higher ratings (i.e. 'moderate', 'relatively strong' or 'strong' contributions) was not isolated at Stage 2 on the grounds that releasing land making higher contributions to just one Green Belt purpose posed a greater risk of harm to the fulfilment of that Green Belt purpose and thus the integrity of the Green Belt. The framework shown in **Table 3.3** fully translates the ratings recorded at Stage 1 of the Study into a forecast for harm to the Green Belt purposes if land within a parcel were released for development.

**Table 3.3: Framework for assessing harm**

Stage 1 assessment ratings	Risk of harm from release	Stage 2
Makes a STRONG contribution to at least one Green Belt purpose.	Very high	Not taken forward to Stage 2
Makes a RELATIVELY STRONG contribution to at least one Green Belt purpose. No strong contribution to any purpose.	High	
Makes a MODERATE contribution to at least one Green Belt purpose. No strong or relatively strong contribution to any purpose.	Moderate	
Areas considered to be borderline, i.e. making a moderate to weak contribution to all Green Belt purposes, were taken forward for site-based assessment to minimise the chance of missing weakly performing areas.		
Makes a RELATIVELY WEAK contribution to Green Belt purposes. No strong, relatively strong or moderate contribution to any purpose.	Low	Taken forward to Stage 2
Makes a WEAK contribution to Green Belt purposes. No strong, relatively strong, moderate or relatively weak contribution to any purpose.	Very low	
Makes NO contribution to any GB purposes. No strong, relatively strong, moderate, relatively weak or weak contribution to any purpose.	None	

- 3.88 As outlined above, variations in the performance of land within individual parcels and broad areas were noted in the assessment text (**Appendix 1**). It was these textual judgements drawing out spatial variations in the contribution of parcels to the Green Belt purposes which were used to isolate the portions of parcels and broad areas which performed relatively weakly across all the Green Belt purposes and not the individual purpose ratings for each parcel, which prudently reflect the portions of land within each parcel which make the greatest contribution to each purpose.

3.89 At this stage of the Study it was acknowledged that the desk-based judgements had been made remotely and had yet to be verified in the field. Therefore, when identifying the Stage 2 areas of relatively weak contribution, LUC erred on the side of caution by deliberately defining Stage 2 areas which were considered to be borderline moderate to weak contribution, minimising the chance of missing weakly performing areas.

#### *Interpreting Luton Borough Council's Stage 1 Green Belt Study<sup>23</sup>*

3.90 The conclusions of Luton Borough Council's Stage 1 assessment of Green Belt were reviewed alongside and in the same way as the textual judgements of the Central Bedfordshire Stage 1 Study to determine whether there were any pockets of Green Belt within Luton which were relatively weak performing for all purposes.

3.91 The Luton Stage 1 Study identified six existing Green Belt areas and five non-Green Belt areas for assessment against detailed criteria based primarily on the five Green Belt purposes. It was agreed that it was *'almost impossible and impractical'* to appraise each parcel against purpose 5. Therefore all parcels identified for assessment within the Borough were considered to perform equally well against purpose 5.

3.92 Using the criteria, professional judgement was used to assess the level of contribution of each parcel to each purpose. A traffic light system was used to communicate the high, medium or low contribution of parcels against each purpose. An overall score was then determined based on these separate levels of contribution and other recorded considerations such as use, function, openness, sustainability and permanence to assess the overall importance of Green Belt areas and whether boundary changes are recommended. Assessments were recorded using a standard pro-forma. Boundaries of the Green Belt designation were checked to ensure that they followed discernible physical features and other relevant Local Plan designations were recorded.

3.93 Overall, all six existing Green Belt areas (a total of 136ha) were found to still meet Green Belt purposes; the non-Green Belt areas were not considered to meet the purposes. **Table 5.1** in **Chapter 5** records the evaluation of the conclusions of Luton Borough Council's Stage 1 assessment.

#### **Site-based assessments of weakly performing areas of Green Belt**

3.94 Following the identification of the weakly performing areas of Green Belt based on the Stage 1 desk-based assessment, all weakly performing areas were visited in the field. The field visits were used to:

- Verify and where necessary expand upon judgements made about the weak performing areas remotely.
- Identify alternative permanent and readily recognisable boundaries around the weakly performing areas of the Green Belt to minimise harm to the Green Belt.

3.95 Three of Central Bedfordshire's washed over Green Belt settlements were visited at Stage 2 to verify whether urbanising influences identified remotely during Stage 1 sufficiently compromised their openness to recommend that they be inset in the Green Belt.

3.96 The Stage 1 parcels considered remotely to be make a contribution (strong – relatively weak) to purpose 4 were visited during the site-based assessments undertaken at Stage 2 to verify the Stage 1 desk-based judgements in the field.

3.97 Upon completion of the site-based assessment work, final ratings and detailed notes on the judgements for each land parcel and broad area were input into an Access database and exported in to individual parcel reports (see **Appendix 2**). Each parcel report contains a detailed map centred on the parcel and a record of the ratings and judgements associated with each parcel. Environmental constraints able to render any significant development proposal within the Green Belt inappropriate were also mapped within the reports:

- Internationally and Nationally protected biodiversity sites: Special Areas of Conservation, Special Protection Areas, RAMSAR Sites, Sites of Special Scientific Interest, National Nature Reserves;

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<sup>23</sup> Luton Green Belt Study, Luton Borough Council, 2014

- Ancient woodland;
- Areas of Outstanding Natural Beauty;
- Scheduled Monuments;
- Registered Parks and Gardens; and
- Flood Zone 3.

- 3.98 These environmental constraints provided valuable context; however, their presence did not influence any ratings or judgements – except insofar that they were considered to be relevant to the purposes of Green Belts and the definition of permanent, readily recognisable Green Belt boundaries. For example, while landscape quality is not directly included in the purposes of Green Belt, there are aspects of landscape quality and character that are indirectly incorporated – i.e. in relation to safeguarding the countryside. Furthermore, the boundaries Ancient Woodlands, Scheduled Monuments and Registered Parks and Gardens may represent appropriate permanent, readily recognisable boundaries.
- 3.99 Clear, colour-coded overview maps of the Study area were prepared illustrating the weakly performing areas contribution to the purposes alongside the Stage 1 parcel and broad areas contribution to the purposes.

## Reporting and review

- 3.100 Following the completion of the Stage 2 assessment work, the Study was written-up into a report for publication. This report draws together the findings of the Stage 1 desk-based assessments and Stage 2 site-based assessments and makes general recommendations on how the Councils might take forward the findings of the Study through the plan-making process (see Chapters 4, 5 and 6).
- 3.101 Drafts of the final report were prepared, each responding to the Steering Group's comments received. Whilst not all members of the Steering Group agreed with the ratings of individual parcels, following the final changes to the report, Central Bedfordshire Council and Luton Borough Council agreed to accept the report as an important piece of independent/objective evidence for the Steering Group's Growth Options Study and for their respective Local Plans. This report represents the final version, responding to all outstanding comments.

## 4 Stage 1 Assessment Findings and Recommendations

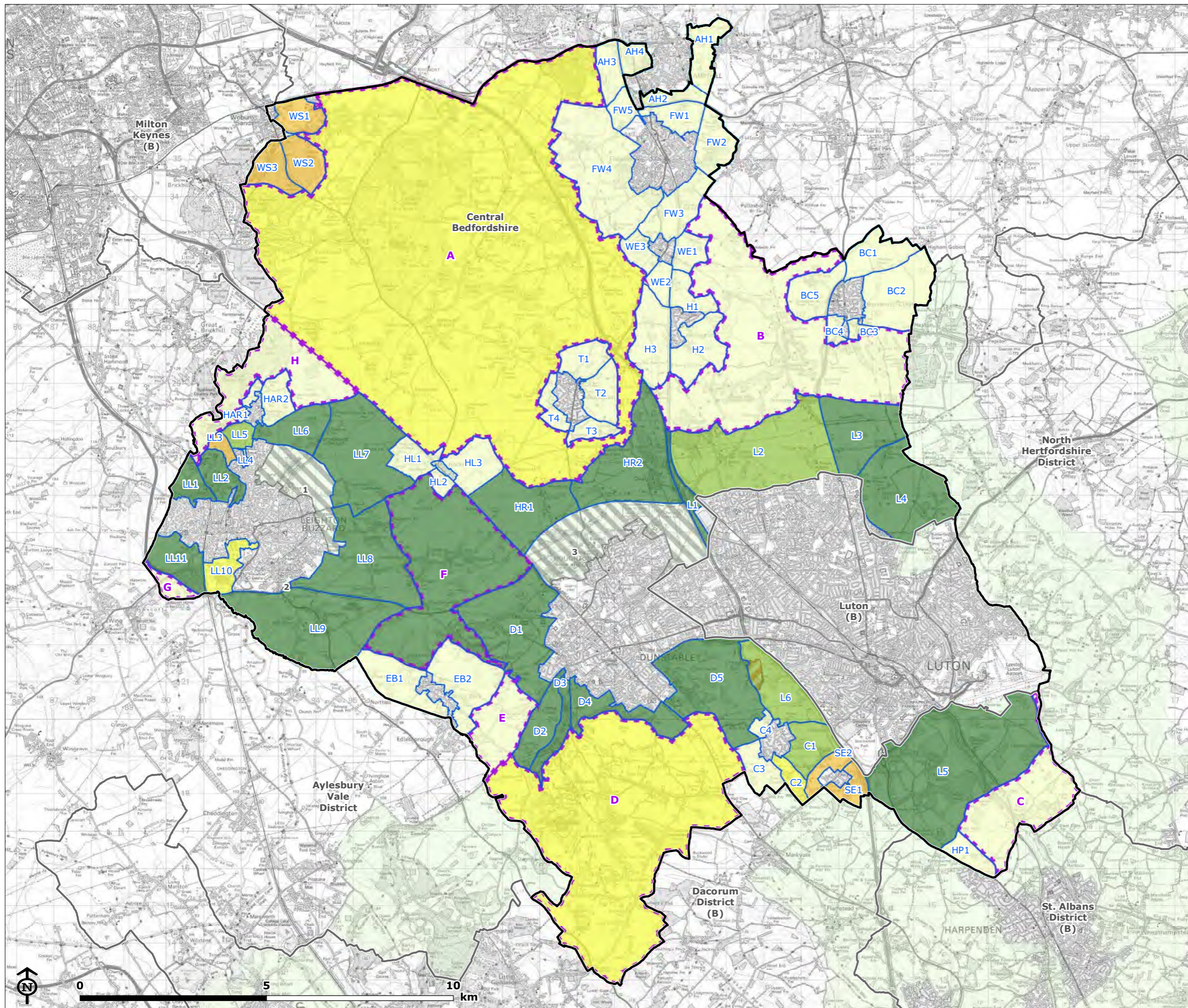
- 4.1 The main aim of Stage 1 of the Study is to provide a comprehensive, robust, transparent and clear understanding of how the Green Belt land within Central Bedfordshire performs against the purposes of Green Belt. In this Chapter, the application of the agreed methodology outlined in Chapter 3 results in a helpful and informative strategic overview of the performance of Green Belt within Central Bedfordshire.
- 4.2 A total of 65 parcels and 8 broad areas of Green Belt land were defined in Central Bedfordshire at Stage 1 and assessed against the Green Belt purposes (i.e. purposes 1-4) defined in the NPPF. A series of maps present the ratings given to each parcel and broad area against each purpose (**Figures 4.1 to 4.4**). **Appendix 1** contains all the assessment sheets for all broad areas and parcels assessed at Stage 1. The assessment sheets contain the detailed judgements behind the ratings against each Green Belt purpose including any variations<sup>24</sup> in the performance of land within each parcel. **It is therefore essential that the detailed commentaries on the parcels (as set out in Appendix 1) are read alongside Figures 4.1 to 4.4 and/or Table 4.1 and Table 4.2 below.**
- 4.3 The information in these Figures and **Appendix 1** essentially fulfils the Stage 1 Study's overall aim. However, the Steering Group requested that the findings should be brought together to show how parcels and broad areas rate against each purpose and overall against the all Green Belt purposes. **Table 4.1** and **Table 4.2** show the ratings of each parcel and broad area against each purpose, respectively.
- 4.4 **Table 4.1** and **Table 4.2** do not present an aggregation of the parcels' and broad areas' ratings against all the purposes. As noted earlier, the NPPF does not require all the purposes of Green Belt to be met simultaneously and a Strong or Relatively Strong, even a Moderate, rating against any Green Belt purpose could be sufficient, on its own, to indicate an important contribution. Equally, even if an area of Green Belt scores highly against one or more purposes, the NPPF does not suggest that a review of its boundaries would not be appropriate, if exceptional circumstances were demonstrated.
- 4.5 **Figure 4.5** illustrates the overall contribution of each broad area and parcel to the Green Belt purposes not by aggregating ratings against the purposes, but by only showing the highest contribution each made to any one of the Green Belt purposes.

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<sup>24</sup> At this strategic stage, no methodology was defined for precisely mapping variations. Therefore, references in the detailed assessments to variations of performance within a parcel/broad area are informative rather than rigorous. More detailed analysis will be required if the local authorities intend to remove areas of land from the Green Belt.

**CENTRAL BEDFORDSHIRE  
AND LUTON  
JOINT GREEN BELT STUDY**

**Figure 4.1: Stage 1 Parcel and Broad Area Contribution to Purpose 1 – To Check the Unrestricted Sprawl of Large Built-up Areas**



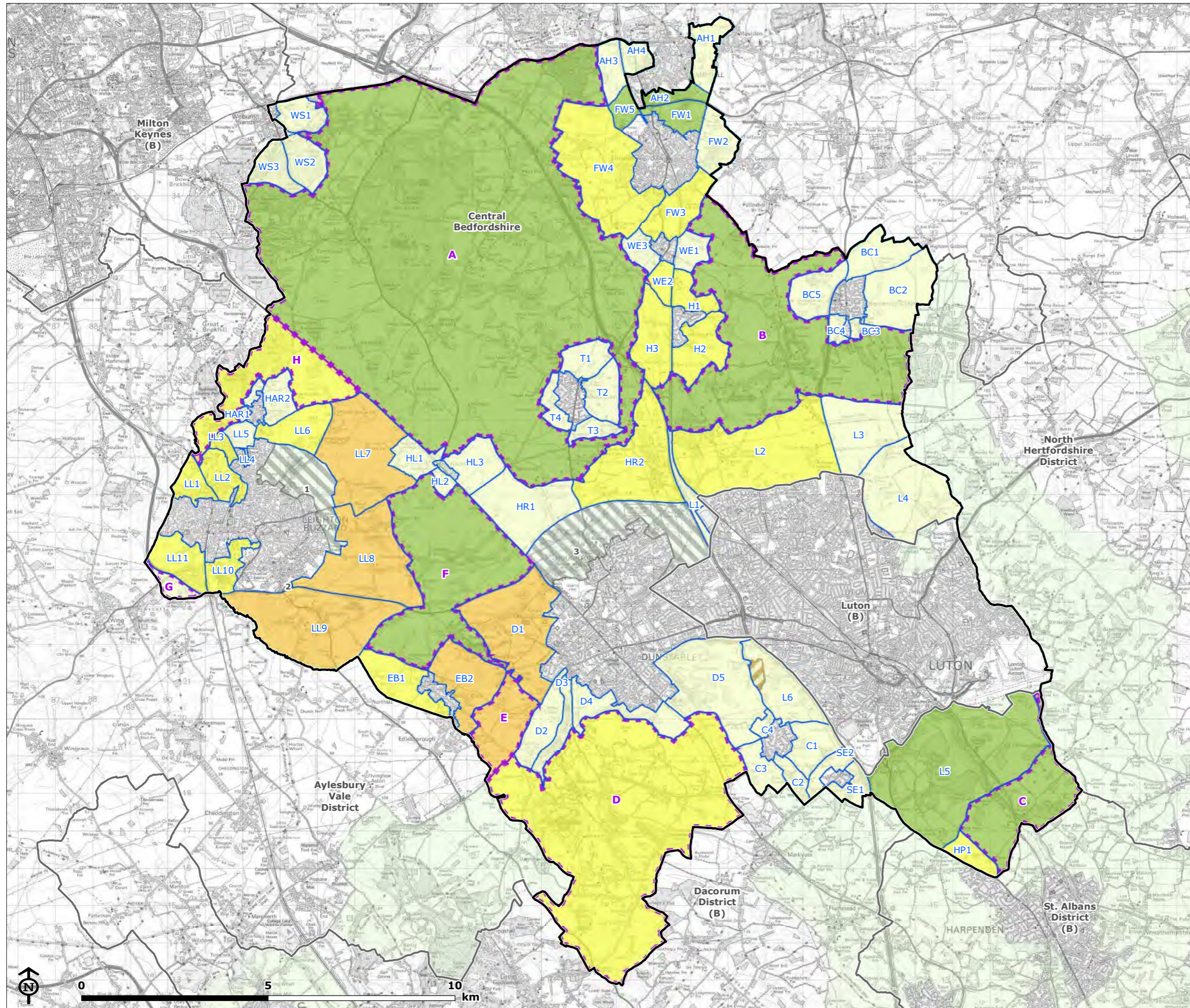
- Study area
  - Planning Authority boundary
  - Parcel
  - Broad Area
  - Green Belt
  - Permitted urban extensions in Green Belt
    - 1: East of Leighton Linlade
    - 2: Pulford Corner
    - 3: Houghton Regis North 1&2
  - Permitted strategic development in Green Belt - Chaul End
- Purpose 1 contribution**
- Strong contribution
  - Relatively strong contribution
  - Moderate contribution
  - Relatively weak contribution
  - Weak/No contribution

Map Scale @ A3: 1:100,000



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AND LUTON  
JOINT GREEN BELT STUDY**

**Figure 4.2: Stage 1 Parcel and Broad Area Contribution to Purpose 2 – To Prevent Neighbouring Towns Merging into One Another**



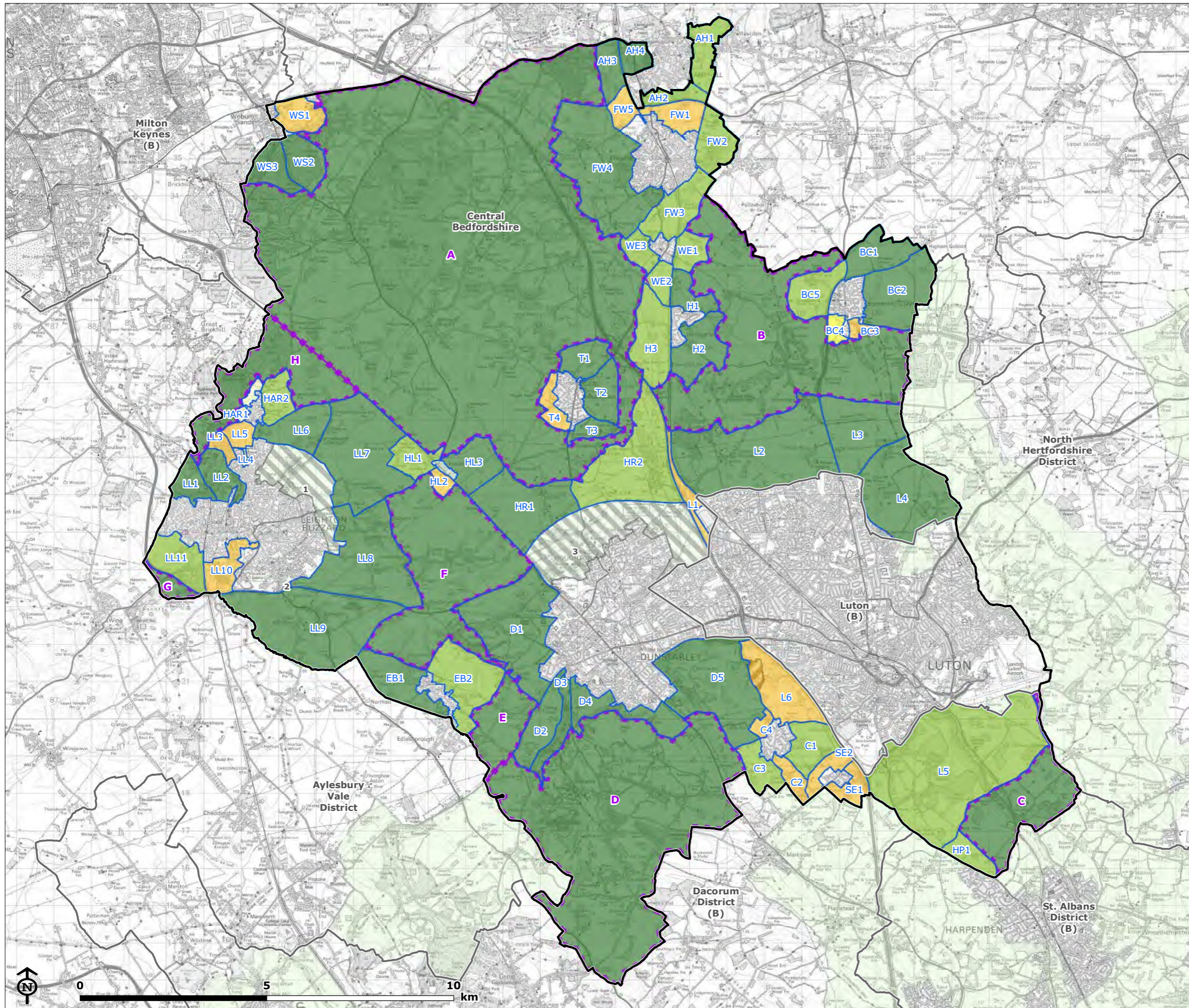
- Study area
  - Planning Authority boundary
  - Parcel
  - Broad Area
  - Green Belt
  - Permitted urban extensions in Green Belt
    - 1: East of Leighton Linslade
    - 2: Pulford Corner
    - 3: Houghton Regis North 1&2
  - Permitted strategic development in Green Belt - Chaul End
- Purpose 2 contribution**
- Relatively strong contribution
  - Moderate contribution
  - Relatively weak contribution
  - Weak/No contribution

Map Scale @ A3: 1:100,000



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AND LUTON  
JOINT GREEN BELT STUDY**

**Figure 4.3: Stage 1 Parcel and Broad Area Contribution to Purpose 3 – To Assist in Safeguarding the Countryside from Encroachment**



- Study area
  - Planning Authority boundary
  - Parcel
  - Broad Area
  - Green Belt
  - Permitted urban extensions in Green Belt
    - 1: East of Leighton Linlade
    - 2: Pulford Corner
    - 3: Houghton Regis North 1&2
  - Permitted strategic development in Green Belt - Chaul End
- Purpose 3 contribution**
- Strong contribution
  - Relatively strong contribution
  - Moderate contribution
  - Relatively weak contribution
  - Weak/No contribution

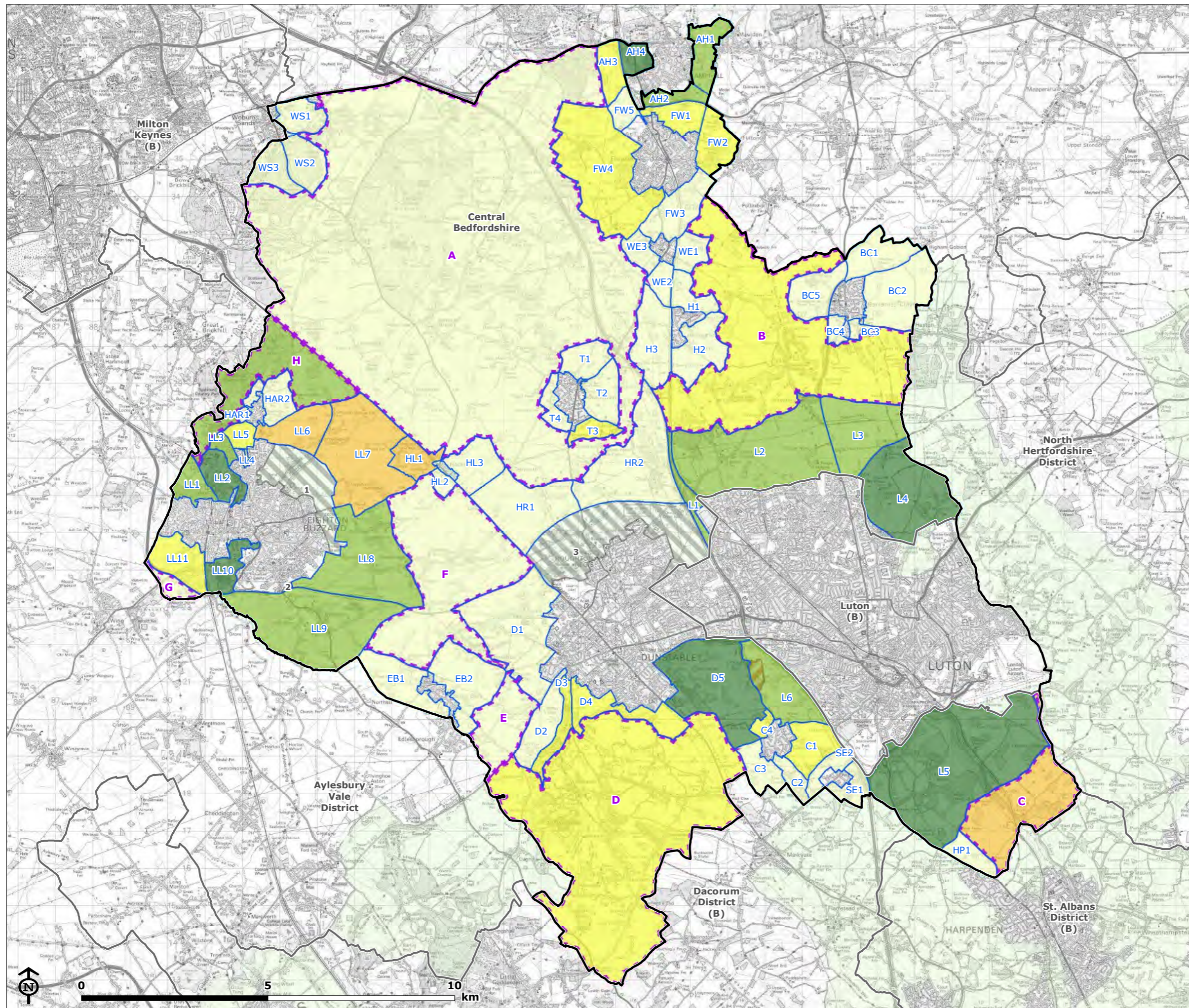
Map Scale @ A3: 1:100,000





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AND LUTON  
JOINT GREEN BELT STUDY**

**Figure 4.4: Stage 1 Parcel and Broad Area Contribution to Purpose 4 – To Preserve the Setting and Special Character of Historic Towns**



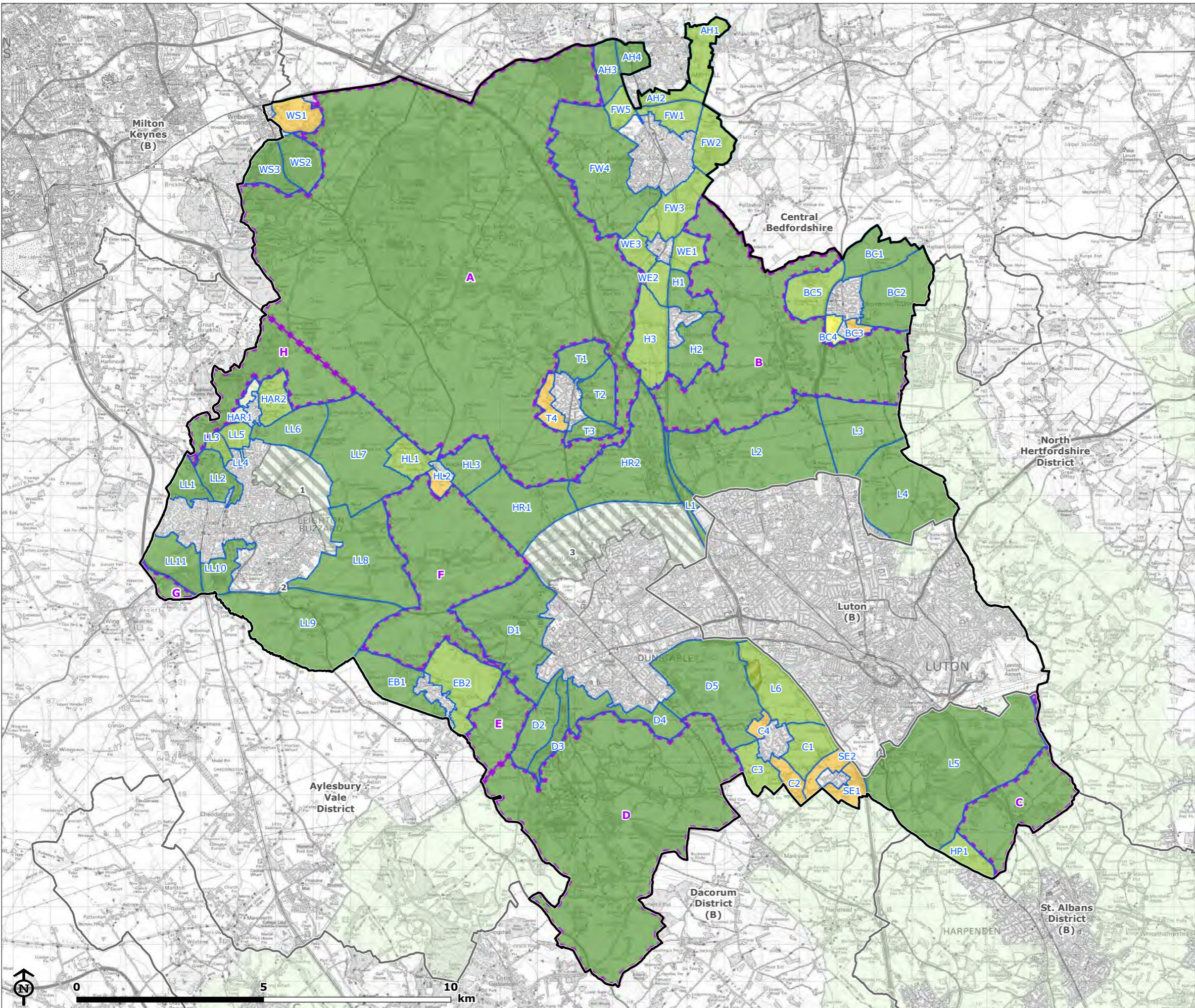
- Study area
  - Planning Authority boundary
  - Parcel
  - Broad Area
  - Green Belt
  - Permitted urban extensions in Green Belt
    - 1: East of Leighton Linlade
    - 2: Pulford Corner
    - 3: Houghton Regis North 1&2
  - Permitted strategic development in Green Belt - Chaul End
- Purpose 4 contribution**
- Strong contribution
  - Relatively strong contribution
  - Moderate contribution
  - Relatively weak contribution
  - Weak/No contribution

Map Scale @ A3: 1:100,000



**CENTRAL BEDFORDSHIRE AND LUTON JOINT GREEN BELT STUDY**

**Figure 4.5: Highest Contribution each Stage 1 Parcel and Broad Area makes to a Green Belt Purpose**



- Study area
  - Planning Authority boundary
  - Parcel
  - Broad Area
  - Green Belt
  - Permitted urban extensions in Green Belt
    - 1: East of Leighton Linslade
    - 2: Pulford Corner
    - 3: Houghton Regis North 1&2
  - Permitted strategic development in Green Belt - Chaul End
- Highest contribution**
- Strong contribution
  - Relatively strong contribution
  - Moderate contribution
  - Relatively weak contribution
  - Weak/No contribution

Map Scale @ A3: 1:100,000



**Table 4.1: Assessment ratings for Stage 1 parcels**

Parcel	Contribution			
	Purpose 1	Purpose 2	Purpose 3	Purpose 4
<b>Ampt Hill</b>				
AH1	Weak/No contribution	Weak/No contribution	Relatively strong contribution	Relatively strong contribution
AH2	Weak/No contribution	Relatively strong contribution	Relatively strong contribution	Relatively strong contribution
AH3	Weak/No contribution	Weak/No contribution	Strong contribution	Relatively weak contribution
AH4	Weak/No contribution	Weak/No contribution	Strong contribution	Strong contribution
<b>Barton-le-Clay</b>				
BC1	Weak/No contribution	Weak/No contribution	Strong contribution	Weak/No contribution
BC2	Weak/No contribution	Weak/No contribution	Strong contribution	Weak/No contribution
BC3	Weak/No contribution	Weak/No contribution	Moderate contribution	Weak/No contribution
BC4	Weak/No contribution	Weak/No contribution	Relatively weak contribution	Weak/No contribution
BC5	Weak/No contribution	Weak/No contribution	Relatively strong contribution	Weak/No contribution
<b>Caddington</b>				
C1	Relatively strong contribution	Weak/No contribution	Relatively strong contribution	Relatively weak contribution
C2	Relatively weak contribution	Weak/No contribution	Moderate contribution	Weak/No contribution
C3	Weak/No contribution	Weak/No contribution	Relatively strong contribution	Weak/No contribution
C4	Weak/No contribution	Weak/No contribution	Moderate contribution	Relatively weak contribution
<b>Dunstable</b>				
D1	Strong contribution	Moderate contribution	Strong contribution	Weak/No contribution
D2	Strong contribution	Weak/No contribution	Strong contribution	Weak/No contribution
D3	Strong contribution	Weak/No contribution	Strong contribution	Relatively weak contribution
D4	Strong contribution	Weak/No contribution	Strong contribution	Relatively weak contribution

Parcel	Contribution			
D5	Strong contribution	Weak/No contribution	Strong contribution	Strong contribution
<b>Eaton Bray</b>				
EB1	Weak/No contribution	Relatively weak contribution	Strong contribution	Weak/No contribution
EB2	Weak/No contribution	Moderate contribution	Relatively strong contribution	Weak/No contribution
<b>Flitwick</b>				
FW1	Weak/No contribution	Relatively strong contribution	Moderate contribution	Relatively weak contribution
FW2	Weak/No contribution	Weak/No contribution	Relatively strong contribution	Relatively weak contribution
FW3	Weak/No contribution	Relatively weak contribution	Relatively strong contribution	Weak/No contribution
FW4	Weak/No contribution	Relatively weak contribution	Strong contribution	Relatively weak contribution
FW5	Weak/No contribution	Relatively strong contribution	Moderate contribution	Weak/No contribution
<b>Harlington</b>				
H1	Weak/No contribution	Relatively weak contribution	Strong contribution	Weak/No contribution
H2	Weak/No contribution	Relatively weak contribution	Strong contribution	Weak/No contribution
H3	Weak/No contribution	Relatively weak contribution	Relatively strong contribution	Weak/No contribution
<b>Heath and Reach</b>				
HAR1	Weak/No contribution	Weak/No contribution	Weak/No contribution	Weak/No contribution
HAR2	Weak/No contribution	Weak/No contribution	Relatively strong contribution	Weak/No contribution
<b>Hockliffe</b>				
HL1	Weak/No contribution	Weak/No contribution	Relatively strong contribution	Moderate contribution
HL2	Weak/No contribution	Weak/No contribution	Moderate contribution	Weak/No contribution
HL3	Weak/No contribution	Weak/No contribution	Strong contribution	Weak/No contribution
<b>Harpenden</b>				

Parcel	Contribution			
HP1	Weak/No contribution	Relatively weak contribution	Relatively strong contribution	Weak/No contribution
<b>Houghton Regis</b>				
HR1	Strong contribution	Weak/No contribution	Strong contribution	Weak/No contribution
HR2	Strong contribution	Relatively weak contribution	Relatively strong contribution	Weak/No contribution
<b>Luton</b>				
L1	Strong contribution	Weak/No contribution	Moderate contribution	Relatively strong contribution
L2	Relatively strong contribution	Relatively weak contribution	Strong contribution	Relatively strong contribution
L3	Strong contribution	Weak/No contribution	Strong contribution	Relatively strong contribution
L4	Strong contribution	Weak/No contribution	Strong contribution	Strong contribution
L5	Strong contribution	Relatively strong contribution	Relatively strong contribution	Strong contribution
L6	Relatively strong contribution	Weak/No contribution	Moderate contribution	Relatively strong contribution
<b>Leighton Linlade</b>				
LL1	Strong contribution	Relatively weak contribution	Strong contribution	Relatively strong contribution
LL2	Strong contribution	Relatively weak contribution	Strong contribution	Strong contribution
LL3	Moderate contribution	Relatively weak contribution	Moderate contribution	Relatively strong contribution
LL4	Weak/No contribution	Weak/No contribution	Relatively weak contribution	Relatively weak contribution
LL5	Relatively strong contribution	Weak/No contribution	Moderate contribution	Relatively weak contribution
LL6	Strong contribution	Relatively weak contribution	Strong contribution	Moderate contribution
LL7	Strong contribution	Moderate contribution	Strong contribution	Moderate contribution
LL8	Strong contribution	Moderate contribution	Strong contribution	Relatively strong contribution
LL9	Strong contribution	Moderate contribution	Strong contribution	Relatively strong

Parcel	Contribution			
				contribution
LL10	Relatively weak contribution	Relatively weak contribution	Moderate contribution	Strong contribution
LL11	Strong contribution	Relatively weak contribution	Relatively strong contribution	Relatively weak contribution
<b>Slip End</b>				
SE1	Moderate contribution	Weak/No contribution	Moderate contribution	Weak/No contribution
SE2	Moderate contribution	Weak/No contribution	Moderate contribution	Weak/No contribution
<b>Toddington</b>				
T1	Weak/No contribution	Weak/No contribution	Strong contribution	Weak/No contribution
T2	Weak/No contribution	Weak/No contribution	Strong contribution	Weak/No contribution
T3	Weak/No contribution	Weak/No contribution	Strong contribution	Relatively weak contribution
T4	Weak/No contribution	Weak/No contribution	Moderate contribution	Weak/No contribution
<b>Westoning</b>				
WE1	Weak/No contribution	Weak/No contribution	Relatively strong contribution	Weak/No contribution
WE2	Weak/No contribution	Relatively weak contribution	Relatively strong contribution	Weak/No contribution
WE3	Weak/No contribution	Weak/No contribution	Relatively strong contribution	Weak/No contribution
<b>Woburn Sands</b>				
WS1	Moderate contribution	Weak/No contribution	Moderate contribution	Weak/No contribution
WS2	Moderate contribution	Weak/No contribution	Strong contribution	Weak/No contribution
WS3	Moderate contribution	Weak/No contribution	Strong contribution	Weak/No contribution

**Table 4.2: Assessment ratings for Stage 1 broad areas**

Broad Area	Contribution			
	Purpose 1	Purpose 2	Purpose 3	Purpose 4
A	Relatively weak contribution	Relatively strong contribution	Strong contribution	Weak/No contribution
B	Weak/No contribution	Relatively strong contribution	Strong contribution	Relatively weak contribution

Broad Area	Contribution			
C	Weak/No contribution	Relatively strong contribution	Strong contribution	Moderate contribution
D	Relatively weak contribution	Relatively weak contribution	Strong contribution	Relatively weak contribution
E	Weak/No contribution	Moderate contribution	Strong contribution	Weak/No contribution
F	Strong contribution	Relatively strong contribution	Strong contribution	Weak/No contribution
G	Weak/No contribution	Weak/No contribution	Strong contribution	Weak/No contribution
H	Weak/No contribution	Relatively weak contribution	Strong contribution	Relatively strong contribution

## Summary of findings

4.6 **Table 4.3** summarises the assessment findings of the Stage 1 assessments, drawing attention to the spatial pattern of the performance of the parcel against the Green Belt purposes.

**Table 4.3: Summary of assessment findings**

Green Belt Purposes	Summary of Findings
1 To check the unrestricted sprawl of large built-up areas	<ul style="list-style-type: none"> <li>Only parcels and broad areas immediately adjacent or within close proximity to the large built-up areas of Luton/Dunstable and Houghton Regis, Leighton Linlade and Milton Keynes are considered to make a contribution to this purpose.</li> <li>Higher rated parcels tend to be those which represent open areas of countryside directly adjacent to large built-up areas, e.g. LL7, HR1 and L4, or containing features which, if unchecked by Green Belt, have the potential to facilitate the sprawl of large built-up areas in the long term, e.g. Broad Areas A and F.</li> <li>Lower rated parcels are generally found to the north and south of the large built-up areas, or where urban sprawl has already occurred to some degree and/or a parcel's relationship with the wider countryside is more limited. The presence of sprawling development within parcels does not imply that these areas are less valuable as Green Belt as the remaining open land in a parcel significantly affected by urban sprawl could be considered more valuable in preventing further development.</li> </ul>
2 To prevent neighbouring towns from merging into one another	<ul style="list-style-type: none"> <li>Higher rated parcels are found between the settlements defined as 'towns'.</li> <li>The highest rated parcels contain open land which represents a significant proportion of the gap between neighbouring towns.</li> <li>Parcels which make a less significant contribution tend to represent smaller proportions of the gap between settlements and or contain landforms or land cover which play a role in separating/containing towns and therefore limit the perception</li> </ul>

Green Belt Purposes		Summary of Findings
		<p>of narrowing.</p> <ul style="list-style-type: none"> <li>The large villages of Harlington and Westoning sit in between the towns of Flitwick and Luton, breaking-up the open countryside between them. Therefore, the parcels to the north and south of Harlington and Westoning make a relatively weak contribution to maintaining the long term separation of Flitwick and Luton.</li> <li>Parcels on the 'outer side' of the neighbouring towns tend to have a lower rating.</li> </ul>
3	To assist in safeguarding the countryside from encroachment	<ul style="list-style-type: none"> <li>Almost all parcels contribute to this purpose to a greater or lesser extent.</li> <li>Higher rated parcels and broad areas are generally further away from the larger settlements, where there is a stronger sense of openness and countryside character.</li> <li>Lower rated parcels are less open either as a result of being more contained or developed/urbanised.</li> </ul>
4	To preserve the setting and special character of historic towns	<ul style="list-style-type: none"> <li>Green Belt contributing strongly to the setting and special character of the historic towns of Ampthill, Leighton Linlade and Luton are generally confined to those parcels which lie in close proximity to the towns' key historic characteristics.</li> <li>Parcels and broad areas that form part of the wider setting of the historic towns make less significant (moderate and relatively weak) contributions to this purpose.</li> <li>The parcels which lie furthest away from the historic towns tend to make the weakest or no contribution to preserving their setting and special character. This is generally because they're the least visible in views into or out of the historic towns, or from the main highways that surround them.</li> </ul>

4.7 The broad areas represent the largely open and undeveloped countryside away from the urban edges of the inset urban settlements. As such they can often be described as the 'main body' of the Green Belt, considered to make a strong contribution to the Green Belt purposes.

4.8 Broad Area G is an exception in so far as it sits in isolation on the outer edge of the Green Belt. This rural area does not relate strongly to Leighton Linlade to the north due to the presence of the A4146 dual-carriageway at its northern edge. Built development here would constitute significant encroachment on the countryside; however, the parcel's outer edge location could be considered to reduce its role, with the area to the south of the A4146 adding little to the function already performed by adjacent Green Belt land to the north. However, whilst the A4146 could constitute a strong alternative boundary feature to the existing tree belts and hedgerows along the southern and western edges of the area, the existing Green Belt edge abuts the Registered Park and Garden at Ascott.

4.9 As well as the above 'purpose and parcel specific' findings, it was noted that the South Bedfordshire Green Belt has helped to maintain the sense of openness and rural character of the washed over, rural settlements the majority of which lie within the broad areas. This is broadly related to, and supports, Purpose 3 'To assist in safeguarding the countryside from encroachment'.

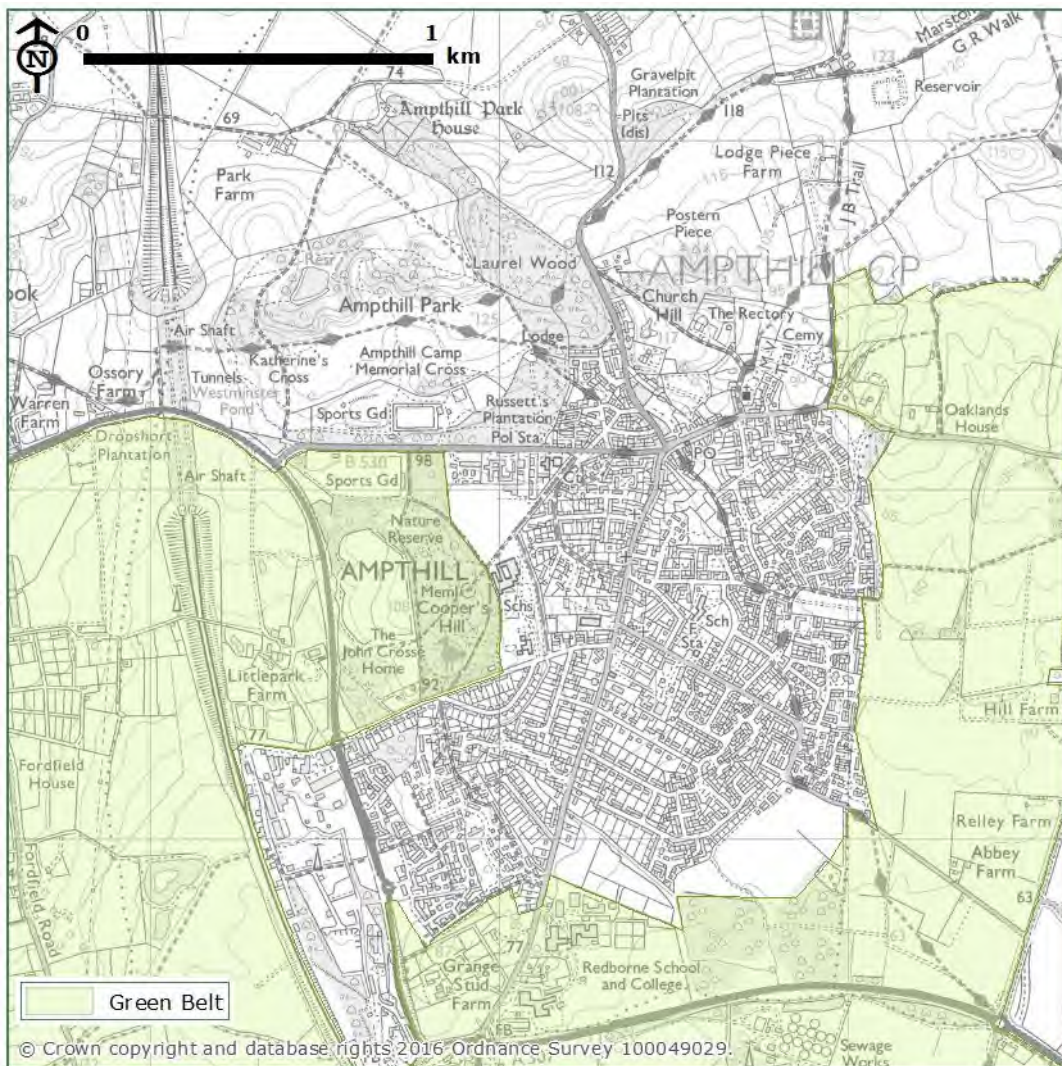


## Assessment of Central Bedfordshire's main Green Belt settlements

- 4.10 This section summarises the findings of the desk-based assessment of Central Bedfordshire's main Green Belt settlements, including Major Service Centres, Minor Service Centres, Large Villages and Small Villages, carried out at Stage 1 of the Study.
- 4.11 Recommendations are made where settlements should remain inset or washed over by the Green Belt. Settlements that contained strong characteristics that contradicted their status as either inset or washed over settlements were recommended for on-site assessment at Stage 2. These contradictory characteristics were then visited in the field at Stage 2 to verify the desk-based judgements made at Stage 1 and inform the final recommendations made in **Chapter 5**.

### Amphill

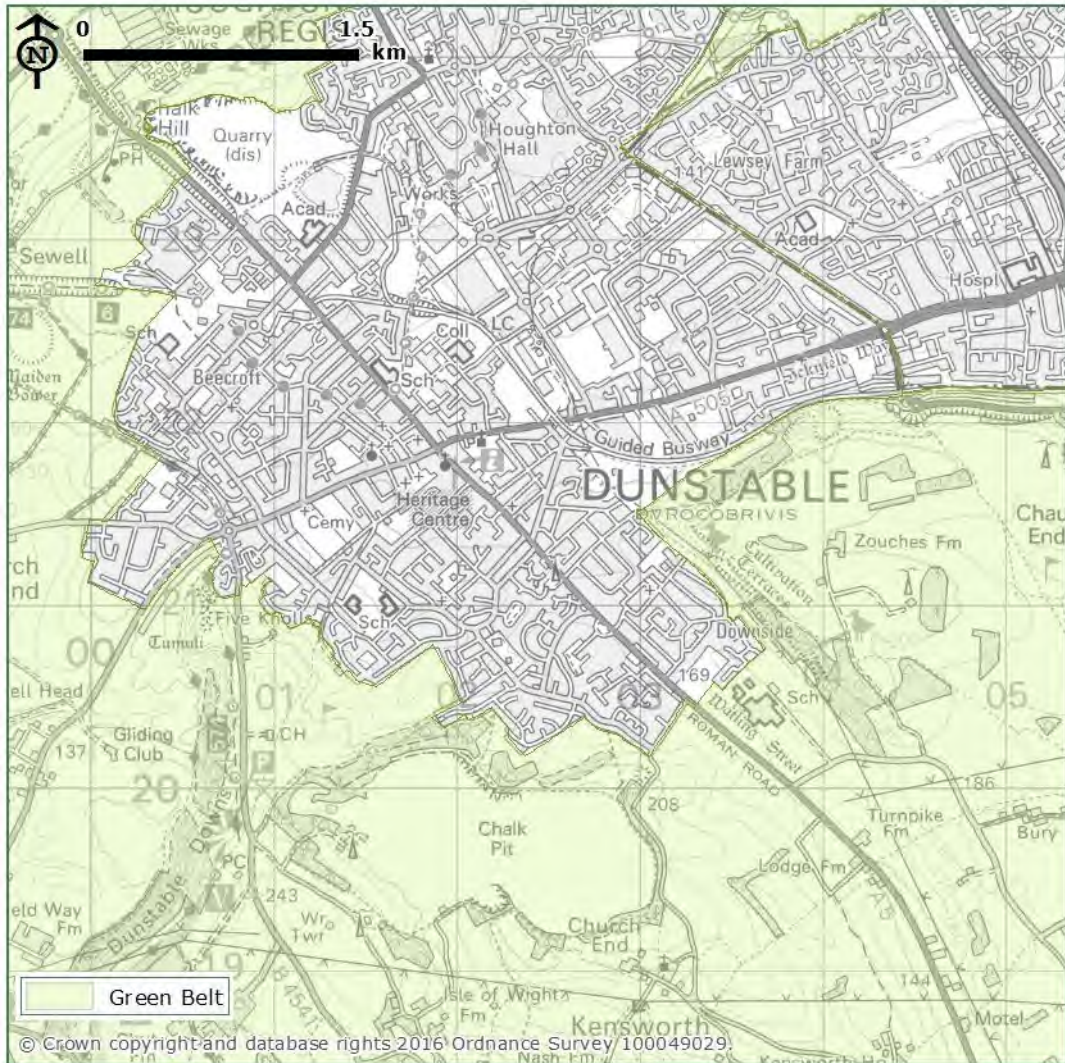
Figure 4.1: Amphill



- 4.12 Amphill is a densely developed urban settlement.
- 4.13 **It is therefore recommended that Amphill continue to be inset within the Green Belt.**

## Dunstable

Figure 4.2: Dunstable



- 4.14 Dunstable is a densely developed urban settlement contiguous with the urban areas of Houghton Regis to the North and Luton to the east.
- 4.15 **It is therefore recommended that Dunstable continue to be inset within the Green Belt.**

## Flitwick

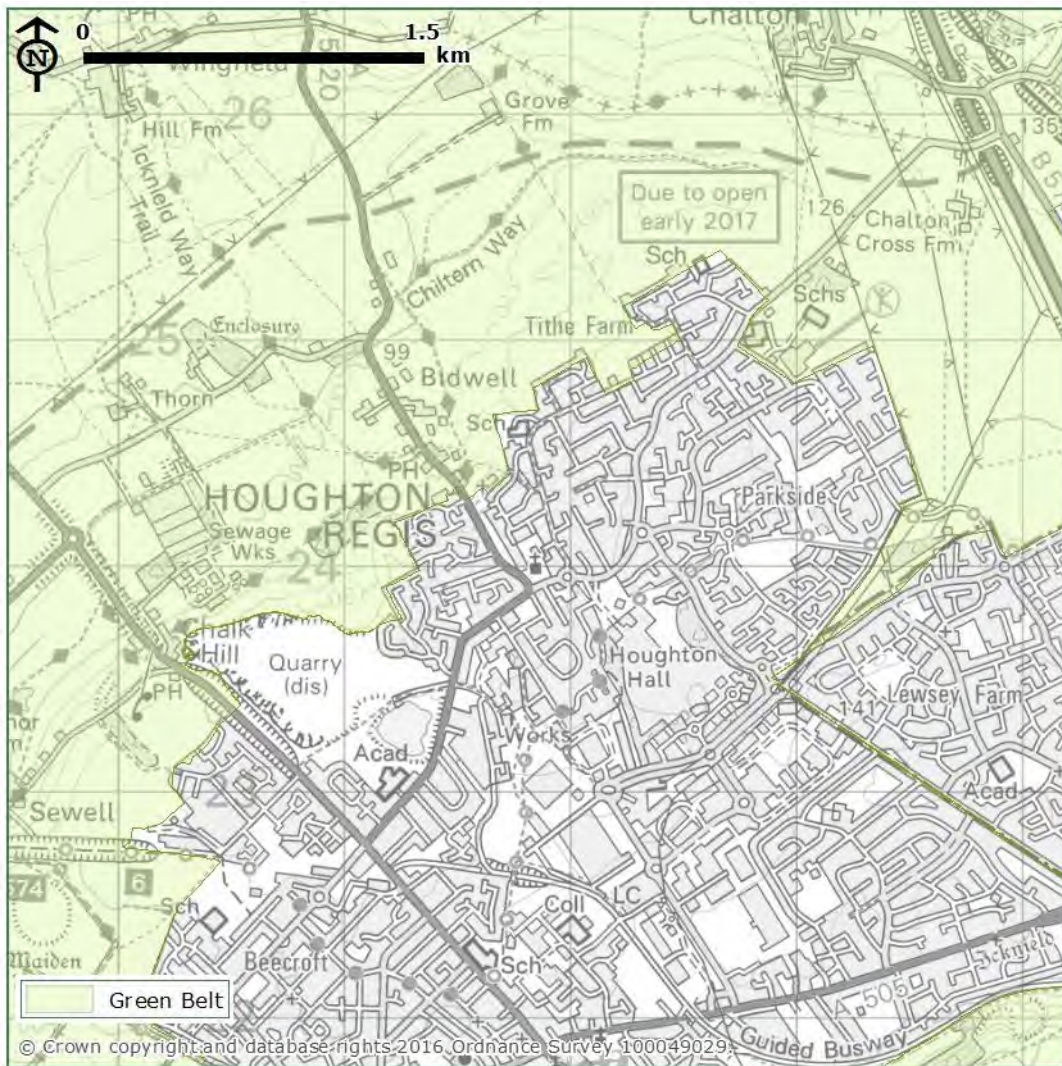
Figure 4.3: Flitwick



- 4.16 Flitwick is a densely developed urban settlement.
- 4.17 **It is therefore recommended that Flitwick continue to be inset within the Green Belt.**

## Houghton Regis

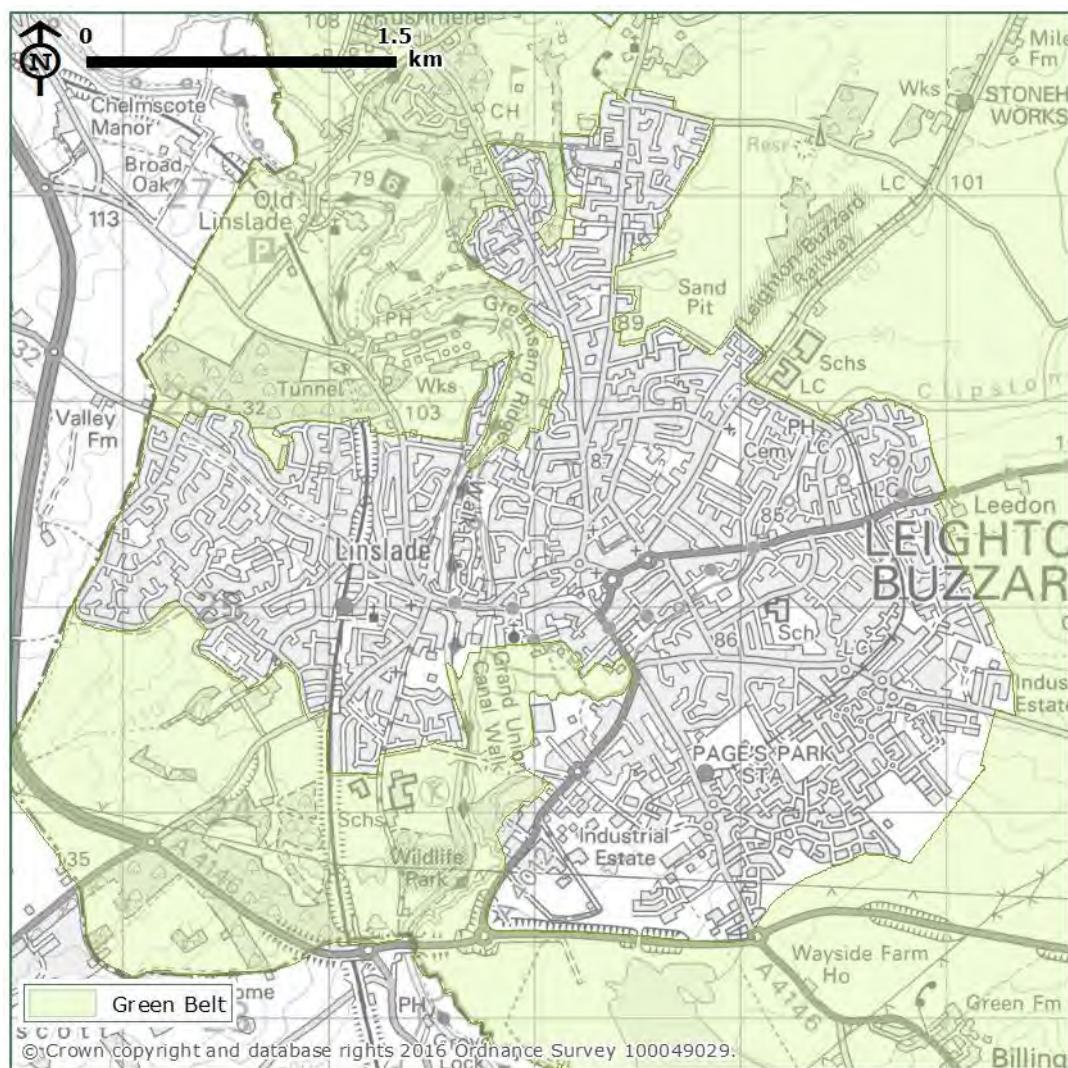
Figure 4.4: Houghton Regis



- 4.18 Houghton Regis is a densely developed urban settlement contiguous with the urban areas of Dunstable to the south and Luton to the east.
- 4.19 **It is therefore recommended that Houghton Regis continue to be inset within the Green Belt.**

## Leighton Linlade

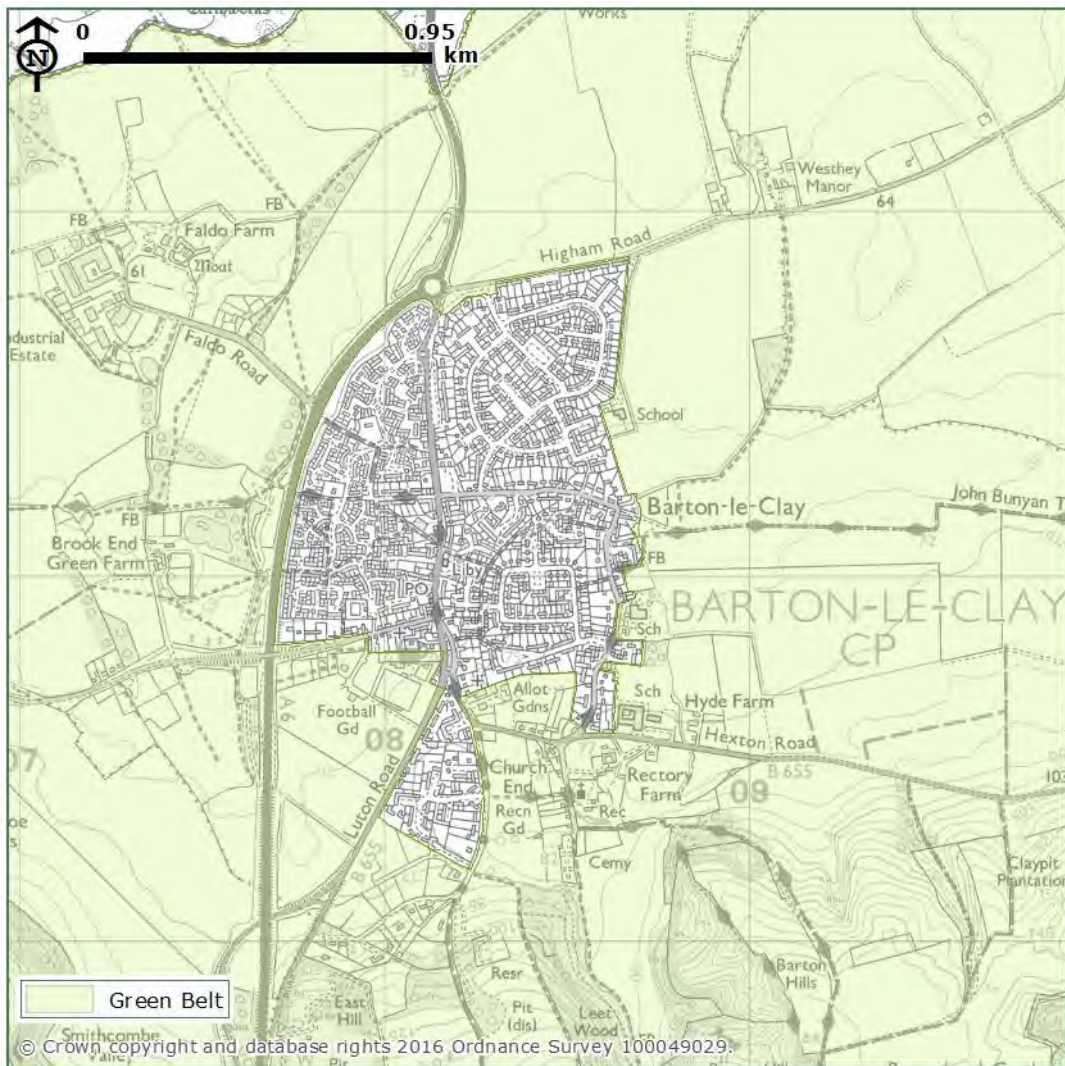
Figure 4.5: Leighton Linlade



- 4.20 Leighton Linlade is a densely developed urban settlement comprised of the contiguous urban areas of Leighton Buzzard and Linlade.
- 4.21 **It is therefore recommended that Leighton Linlade continue to be inset within the Green Belt.**

## Barton-Le-Clay

Figure 4.6: Barton-Le-Clay



4.22 Barton-Le-Clay is a densely developed urban settlement.

4.23 **It is therefore recommended that Barton-Le-Clay continue to be inset within the Green Belt.**

## Caddington

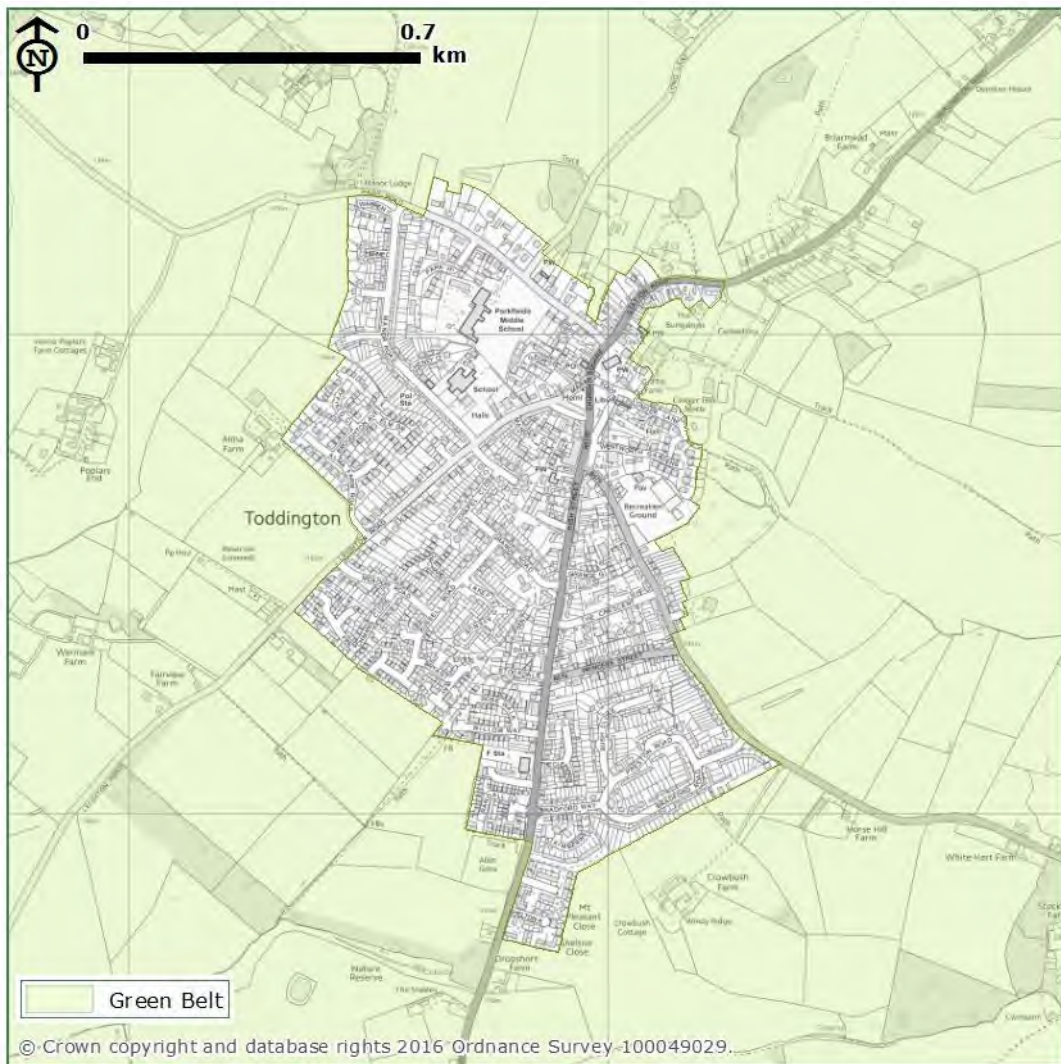
Figure 4.7: Caddington



- 4.24 Caddington comprises a dense network of residential cul-de-sacs connected to dense development along its main roads, namely Dunstable/Luton Road and Manor Road.
- 4.25 The settlement's edges are defined by private gardens backing on to agricultural fields.
- 4.26 While the village contains private gardens, playgrounds and playing fields, its overall density contrasts with the openness of the surrounding Green Belt.
- 4.27 **It is therefore recommended that Caddington continue to be inset within the Green Belt.**

## Toddington

Figure 4.8: Toddington

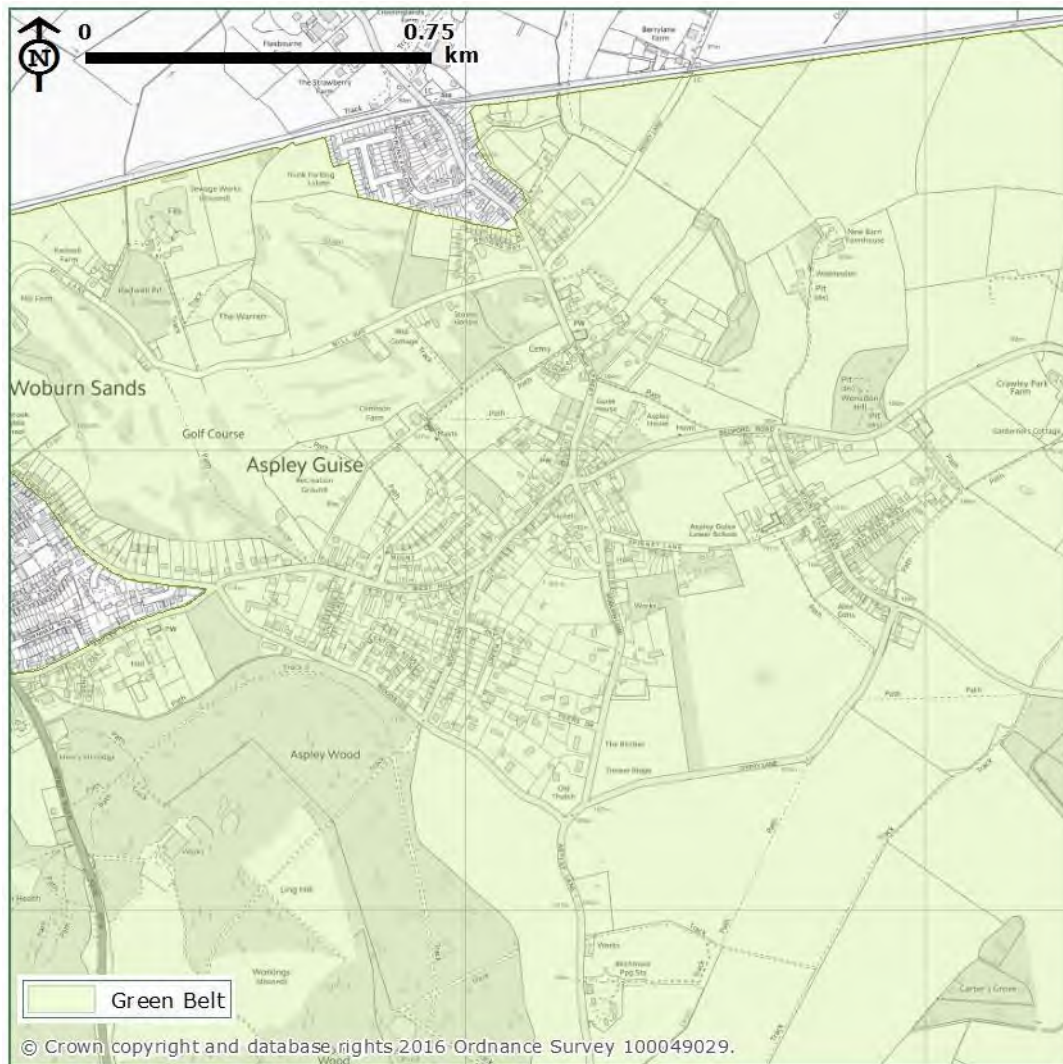


- 4.28 Toddington comprises a dense network of residential cul-de-sacs connected to dense development along its main roads, namely High Street and Leighton Road. The development along Station Road at the northern end of the parcel is largely one house deep either side of the road and therefore retains a more open character than the majority of the village. This area, however, is still contiguous with the rest of the settlement.
- 4.29 The settlement's edges are lined by private gardens backing on to agricultural fields.
- 4.30 While the village contains private gardens, playgrounds and playing fields, its overall density contrasts with the openness of the surrounding Green Belt.
- 4.31 **It is therefore recommended that Toddington continue to be inset within the Green Belt.**



## Aspley Guise

Figure 4.9: Aspley Guise



- 4.32 Aspley Guise is a sprawling and disjointed settlement, comprising both rural and urbanising influences. The majority of the settlement is made-up of large detached dwellings set within large gardens and set back from roads behind generous verges, hedges/walls, which contributes to the sense of openness and 'ruralness'.
- 4.33 Sprawling ribbon development from Woburn Sands along Weathercock Lane/West Hill grows denser towards the historic centre of the village. However, the red brick buildings and walls and mature vegetation contribute to the rural scene.
- 4.34 The undulating topography, open green spaces and tall trees within and around the village add to a sense of integration with the surrounding countryside. Development is largely restricted to the northern side of Woodside Road at the southern edge of the settlement and the western side of Woburn Lane at the eastern edge of the settlement. This maintains open views out to the surrounding agricultural land and woodland.
- 4.35 However, the following features contribute to a more urban character:
- The densely-packed semi-detached and terraced dwellings along Duke Street and San Remo Road.
  - The relatively modern detached dwellings along The Mount cul-de-sac.
  - Despite the density in these parts of the village, the vast majority of this development is one dwelling deep either side of the roads.

- 4.36 While it was considered unlikely that the urban characteristics in Aspley Guise were significant enough to compromise the rural character and openness of the majority of the village, it was recommended that the village be visited at Stage 2 to verify these judgements and establish whether further consideration might be given to inseting Aspley Guise in the Green Belt.

### Eaton Bray

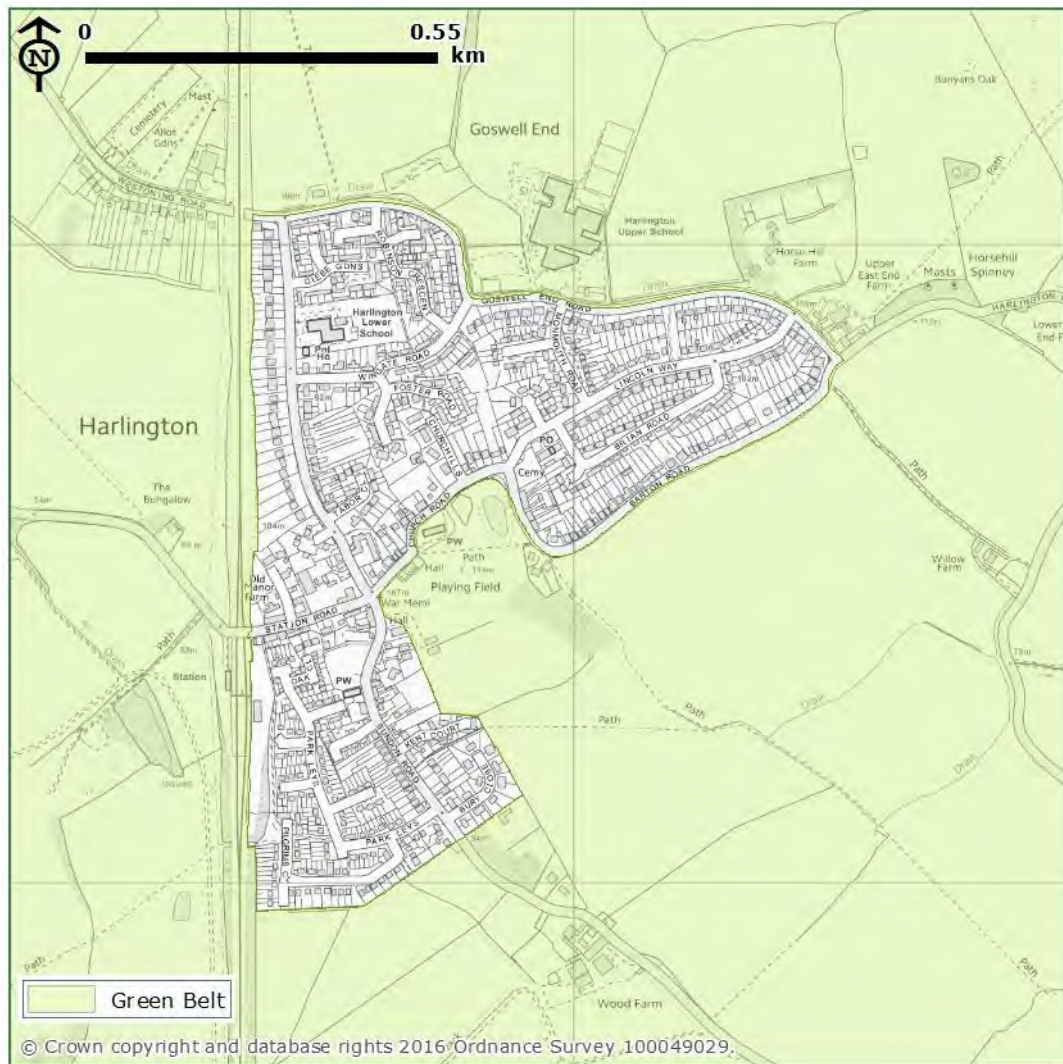
Figure 4.10: Eaton Bray



- 4.37 Eaton Bray comprises a dense network of residential cul-de-sacs connected to dense semi-detached and terraced ribbon development along its main roads, notably Totternhoe Road/High Street/Moor End. The development along Moor End is merged with similar development associated with the village of Edlesborough in the neighbouring District of Aylesbury Vale and outside the Green Belt.
- 4.38 The majority of the settlement's edges are lined by private gardens backing on to agricultural fields – the settlement is inward facing towards the road.
- 4.39 While the village contains private gardens, junction verges, playgrounds and playing fields, its overall density contrasts with the openness of the surrounding Green Belt.
- 4.40 **It is therefore recommended that the village continue to be inset within the Green Belt.**

## Harlington

Figure 4.11: Harlington



- 4.41 Harlington is comprised of a dense network of suburban residential streets containing a mixture of relatively modern detached, semi-detached houses and maisonettes.
- 4.42 The edges of southern half of the settlement are largely lined by private gardens backed on to agricultural fields, creating the feeling of a settlement inward facing towards the road. The northern half is lined by roads which are open to agricultural fields, creating a greater sense of openness.
- 4.43 A large secondary school represents a significant urbanising influence on the countryside at the northern edge of the settlement.
- 4.44 While the village contains private gardens, junction verges, playgrounds and playing fields, its overall density contrasts with the openness of the surrounding Green Belt.
- 4.45 **It is therefore recommended that the village continue to be inset within the Green Belt.**

## Heath and Reach

Figure 4.12: Heath and Reach



- 4.46 Heath and Reach is comprised of a dense network of suburban residential streets and cul-de-sacs containing a mixture of relatively modern dwellings and historic red brick buildings. The change in topography between the south eastern and north western halves of the settlements, combined with a large area of allotments creates a sense of openness within parts of the village; however, this sense of openness is significantly less than the wider countryside.
- 4.47 **It is therefore recommended that the village continue to be inset within the Green Belt.**

## Hockliffe

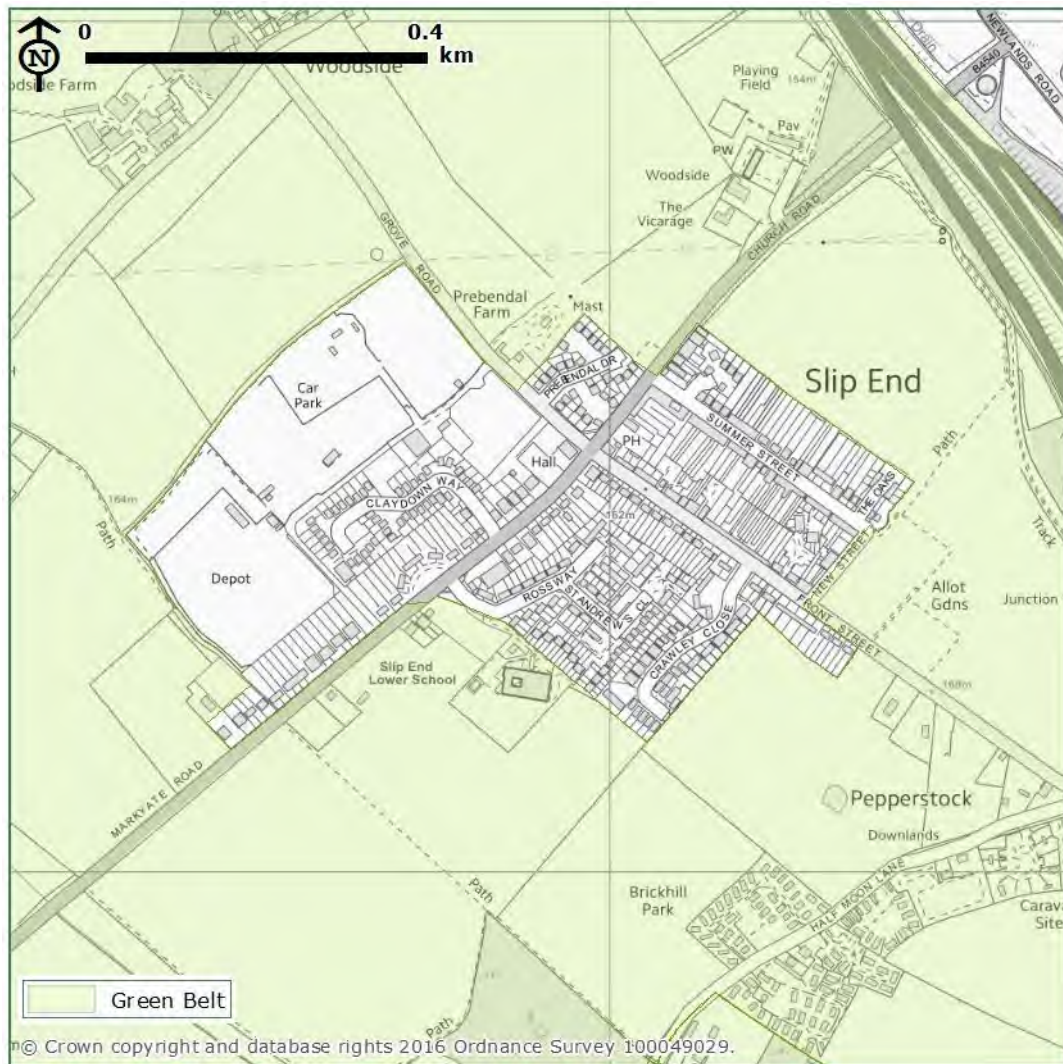
Figure 4.13: Hockliffe



- 4.48 Hockliffe is a very compact, dense village of ribbon development along Watling Street (Roman road). Several historic buildings line the wide, open Roman road; however, the vast majority of village is comprised of densely developed suburban and urban cul-de-sacs to the north of the Roman road.
- 4.49 These densely developed cul-de-sacs have relatively little public open space and small private gardens which back on to agricultural fields, limiting the sense of openness within the majority of the settlement.
- 4.50 **It is therefore recommended that the village continue to be inset within the Green Belt.**

## Slip End

Figure 4.14: Slip End



- 4.51 Slip End comprises a dense network of suburban residential streets containing a mixture of relatively modern detached, semi-detached houses and maisonettes, two terraced streets at its northern end (Summer Street and Front Street) and a large area of hardstanding used to store cars.
- 4.52 The majority of the settlement's edges are lined by private gardens backing on to agricultural fields – the settlement is inward facing towards the road. Mature trees line the terraced streets to the north and car storage area to the west, marking the urban edge apart from the wider open countryside.
- 4.53 While the village contains private gardens, junction verges, playgrounds and playing fields, its overall density contrasts with the openness of the surrounding Green Belt.
- 4.54 **It is therefore recommended that the village continue to be inset within the Green Belt.**

## Westoning

Figure 4.15: Westoning



- 4.55 Westoning is comprised of a dense network of residential streets and cul-de-sacs connected to dense ribbon development along Park Road/High Street.
- 4.56 The majority of the settlement's edges are lined by private gardens backed on to agricultural fields, the exception being its eastern edge which borders a railway line.
- 4.57 Small clusters of private gardens and the playing fields of the village school represent the only significant open spaces that punctuate the dense urban areas; however these make a limited contribution to opening out the settlement to the wider open countryside.
- 4.58 **It is therefore recommended that the village continue to be inset within the Green Belt.**

## Woburn

Figure 4.16: Woburn

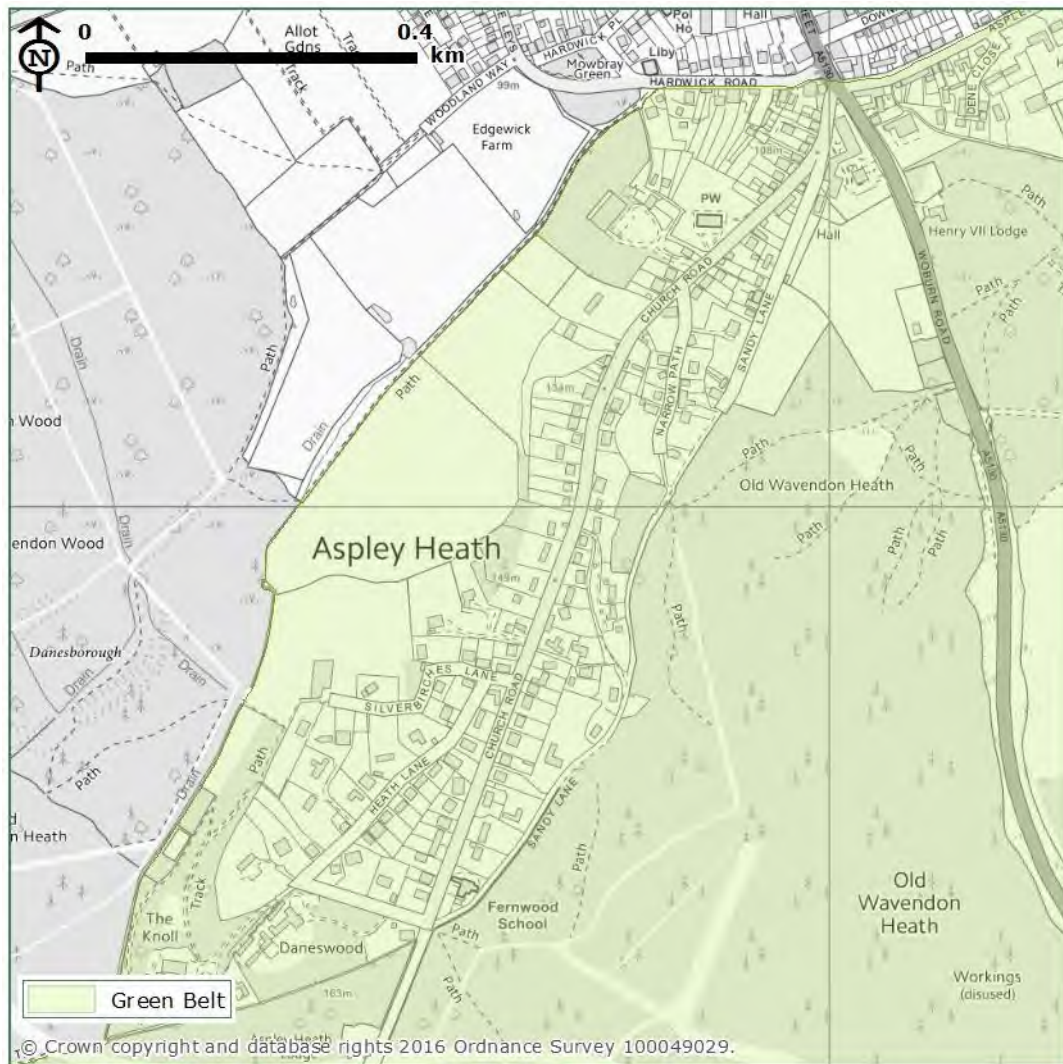


- 4.59 Woburn is compact, historic settlement containing a long avenue of tall town houses in its historic core and pockets of more suburban detached, semi-detached and bungalow dwellings clustered around cul-de-sacs, including Drakeloe Close to the north, Timber Lane to the west and London End to the south.
- 4.60 The main roads along which this historic village has developed are relatively wide, creating a strong sense of openness in contrast to the strong urbanising influences; however, the suburban cul-de-sacs are more enclosed and inward facing with limited views of the wider countryside.
- 4.61 **It was recommended that the village be visited at Stage 2 to verify these judgements and establish whether further consideration might be given to inseting Woburn within the Green Belt.**



## Aspley Heath

Figure 4.17: Aspley Heath



- 4.62 Aspley Heath mainly comprises large, detached dwellings set back from the wooded Church Road. The vegetation and sense of openness afforded by the large private gardens contribute to a rural character.
- 4.63 The northernmost end of the village (north of the church) is the much more densely developed and urban in character and includes a dense cluster of flats and maisonettes at Aspley Court. This portion of the village is more consistent in character with the larger, denser and altogether more urban village of Woburn Sands which sits to the north of Hardwick Road and Aspley Hill, just outside the Green Belt; however, these two roads represent the most appropriate permanent and readily recognisable boundaries for the Green Belt within the immediate vicinity.
- 4.64 **It is therefore recommended that the village continue to be washed over by the Green Belt designation.**

## Chalton

Figure 4.18: Chalton



- 4.65 Chalton largely consists of ribbon development along Luton Road. The majority of the buildings are relatively modern in character giving a suburban feel to the village; however, almost all the dwellings that line the roads within the village are one house deep, maintaining a sense of openness across the majority of the village.
- 4.66 A long cul-de-sac, Chalton Heights, sits at the southern end of the village. Lined by inward-facing houses and bungalows with private back gardens backing on to agricultural land, it is suburban in character. Similarly, in the northern third of the village, Forge Close, contains a small collection of inward-facing homes arranged around communal parking areas and garages.
- 4.67 The suburban characteristics of this small village are mitigated by the gradient of the land upon which the village sits, which gradually grows in height toward its southern end giving open views of the countryside to the north, particularly from Chalton Heights.
- 4.68 **It is therefore recommended that the village continue to be washed over by the Green Belt designation.**

## Eversholt

Figure 4.19: Eversholt



- 4.69 Eversholt comprises a disparate collection of detached dwellings spread unevenly along a number of small country lanes. It is rural in character with no clear settlement edge.
- 4.70 **It is therefore recommended that the village continue to be washed over by the Green Belt designation.**

## Husborne Crawley

Figure 4.20: Husborne Crawley



- 4.71 Husborne Crawley comprises a disparate collection of detached dwellings spread unevenly along Turnpike Road. It is rural in character with no clear settlement edge.
- 4.72 **It is therefore recommended that the village continue to be washed over by the Green Belt designation.**

## Kensworth

Figure 4.21: Kensworth



- 4.73 Kensworth is a long thin village with two distinct character areas – ribbon development and suburban estates.
- 4.74 The sprawling ribbon development along Common Road/Isle of Wight Lane largely comprises of detached dwellings of varying densities and sizes. The vast majority of this development is one dwelling deep and often set back from the road, maintaining openness and a connection with the wider countryside along the full length of the road.
- 4.75 Two densely developed estates emanate from the southern side of Common Road and represent a significant urbanising influence on the countryside within the immediate vicinity. The estates contain a diverse range of modern housing types which are much denser and more enclosed than the rest of the village. The tightly-packed dwellings have relatively small private gardens and small pockets of communal open space which do little to improve the sense of openness.
- 4.76 **The combined scale of the suburban estates compromises the rural character and openness of a significant proportion of the village. It was therefore recommended that the village be visited at Stage 2 to verify these judgements and establish whether further consideration might be given to inseting Kensworth, or part of it, in the Green Belt.**

## Ridgmont

Figure 4.22: Ridgmont



- 4.77 Ridgmont is a relatively small, historic village largely comprising ribbon development along High Street and Eversholt Road. The buildings along the roads vary in density and scale but are generally only one dwelling deep, which maintains a sense of openness. There are views of the wider countryside from the core of village around the open ground that surrounds the church.
- 4.78 **It is therefore recommended that the village continue to be washed over by the Green Belt designation.**

## Stanbridge

Figure 4.23: Stanbridge



- 4.79 Stanbridge comprises of four roads of ribbon development arranged in a diamond formation around a small cluster of irregular-shaped agricultural fields. The fields in the centre of the village maintain a strong sense of openness along the roads which face on to them. The ribbon development along the southern road (Peddars Lane) is dominated by large detached dwellings set within large private garden with open views of the countryside to the south. The ribbon development along the western road (Station Road) is comprised of denser detached and semi-detached dwellings built closer to the road edge, but with open views of the fields to the east and west. The northern end of the western road opens out into a village green which lines the southern edge of the northern road (Stanbridge Road/Tilsworth Road). Stanbridge Road/Tilsworth Road runs east into the centre of the village complete with village church, school and hall which overlook the open green, churchyard and open countryside to the south. There are also intermittent views of the higher open agricultural fields to the north.
- 4.80 The densest area of development within the village lies in its north eastern corner along Orchard Way and the cul-de-sacs of Beacon View, Lords Close and Green Close. The roads are lined by detached dwellings set within private gardens. All four roads overlook the open countryside to the south.
- 4.81 **It is therefore recommended that the village continue to be washed over by the Green Belt designation.**

## Steppingley

Figure 4.24: Steppingley



- 4.82 Steppingley is a small, open cluster of detached dwellings, a pub and a church centred on a junction between three country roads – Rectory Road, Eversholt Road and Flitwick Road. The buildings are spread unevenly with no clear settlement edge.
- 4.83 **It is therefore recommended that the village continue to be washed over by the Green Belt designation.**



## Streatley

Figure 4.25: Streatley



- 4.84 Streatley is a thin irregular shaped village centred on a junction between two country roads – Sharpenhoe Road and Church Road. The village’s historic centre sits between Sundon Road and Sharpenhoe Road and contains the village church and a cluster of detached dwellings, most of which are set within large, private gardens. The church grounds and gardens create a strong sense of openness. The ribbon development emanating north and south from the village’s centre is largely situated on one side of the road, maintaining open views of agricultural fields to the east and west.
- 4.85 **It is therefore recommended that the village continue to be washed over by the Green Belt designation.**

## Studham

Figure 4.26: Studham



4.86 Studham village can be split into two distinct character areas:

- A small cluster of historic dwellings, a village pub and hall north of the rural junction on which the village is centred. The buildings are relatively dense in distribution but wholly rural in character with open views of the open countryside to the south and east. Open allotments sit to the east of this cluster of development.
- The majority of the village's development is located to the west of the open junction off Church Road. The road slopes upwards into scattered pockets of remnant woodland. The trees grow amongst detached, semi-detached and terraced dwellings organised along three cul-de-sacs – Swanells Wood, Church Close and Valley Close. Many of the dwellings are set back from the roads within large private gardens. While the trees screen views of the wider countryside, the gardens combined with the mature trees give a strong sense of openness.

4.87 The dwellings organised around an open patch of greenspace in Church Close represent the most suburban and closed area of development in the village, but the greenspace in the centre of the close maintains openness.

4.88 **It is therefore recommended that the village continue to be washed over by the Green Belt designation.**

## Tilsworth

Figure 4.27: Tilsworth



- 4.89 Tilsworth is a small historic village largely comprised of ribbon development along Stanbridge Road. The buildings along the road vary in density and scale but are generally only one dwelling deep maintaining a sense of openness. Openness is further improved by intermittent long range views of the wider countryside to the south. Most of the dwellings within the village are set back from the road within large private gardens adding to the strong sense of openness.
- 4.90 Open village greens clearly define the two junctions in the village to the rural residential Dickens Lane and Bury Rise, which contains the densest and most modern dwellings within the village. Although suburban in character, this inward-facing cul-de-sac is too small to have a significant effect of the overall rural and open character of the village.
- 4.91 **It is therefore recommended that the village continue to be washed over by the Green Belt designation.**

## Totternhoe

Figure 4.28: Totternhoe



- 4.92 Totternhoe village is dominated by a long stretch or ribbon development along Castle Hill Road/Church Road. The road runs along a south-facing slope which offers long-ranging views of the open countryside to the south. This feature maintains a strong sense of openness and a connection with the wider countryside along the full length of the road.
- 4.93 The densest areas of development within the village sit to the north of the road within cul-de-sacs which cut up and along the sloping sections of the ridge – Castle Close, Brownlow Road, Park Avenue and Lancotbury Close. Two narrow caravan parks emanate from the southern side of the road. While the majority of the dwellings along roads and within the cul-de-sacs are modern and suburban in character, the uninterrupted views of the wooded slopes to the north and long-ranging views of the open countryside to the south and east mitigate their urbanising influence.
- 4.94 The gradient of the slope in and around Church End to the east is much gentler; however, open views of the Dunstable Downs to the east and the countryside to the south. Furthermore, the age and character of the dwellings grows older and openness is maintained by a large recreation ground to the north, larger private gardens and small pockets of agricultural land and allotments.
- 4.95 **It is therefore recommended that the village continue to be washed over by the Green Belt designation.**

## Upper Sundon

Figure 4.29: Upper Sundon



- 4.96 Upper Sundon largely consists of ribbon development along Common Lane/Streatley Road. The buildings – a mixture of terraced, semi-detached and detached houses – are at a relatively high density along the roads, but are generally only one house deep so that open views of the wider countryside are felt in the village. The sense of openness is improved by open agricultural fields which sit in between and opposite sections of ribbon development.
- 4.97 A large densely developed cul-de-sac at the south western end of the village (Hills View) has more suburban character, containing collections of inward-facing houses, maisonettes and bungalows arranged around communal parking areas and garages. In isolation, this cul-de-sac is relatively small and has a limited impact on the openness of the Green Belt within the rest of the village and indeed the wider countryside.
- 4.98 **It is therefore recommended that the village continue to be washed over by the Green Belt designation.**

### Settlements requiring on-site assessment at Stage 2

- 4.99 Following the desk-based assessment of Central Bedfordshire's Major Service Centres, Minor Service Centres, Large Villages and Small Villages in the Green Belt using topographic OS base mapping and aerial and road-side imagery, three settlements were found to contain characteristics of a scale and nature which contradicted their status as washed over settlements in the Green Belt:
- Aspley Guise

- Kensworth
- Woburn

4.100 These contradictory characteristics were visited in the field at Stage 2 to verify the desk-based judgements made at Stage 1 and inform final recommendations.

## 5 Stage 2 Assessment Findings and Recommendations

- 5.1 The main aim of Stage 2 of the Study is to isolate areas of the Central Bedfordshire and Luton Green Belt which perform relatively weakly against the Green Belt purposes and are therefore likely to cause less harm to the Green Belt if released for development.
- 5.2 The first task conducted at Stage 2 of the Study was to draw on the Stage 1 assessment of Central Bedfordshire's Green Belt and Luton Borough Council's 2014 Stage 1 assessment to isolate areas of the Green Belt judged to make no more than a 'relatively weak' contribution to all of the Green Belt purposes.
- 5.3 Land achieving higher ratings was not isolated at Stage 2 on the grounds that releasing land making higher contributions to just one Green Belt purpose posed a greater risk of harm to the fulfilment of that Green Belt purpose and thus the integrity of the Green Belt.
- 5.4 As outlined above, variations in the performance of land within individual parcels and broad areas were noted in the assessment text (**Appendix 1**). It was these textual judgements drawing out spatial variations in the contribution of parcels to the Green Belt purposes which were used to isolate the portions of parcels and broad areas which performed relatively weakly across all the Green Belt purposes and not the individual purpose ratings for each parcel, which prudently reflect the portions of land within each parcel which make the greatest contribution to each purpose.
- 5.5 At this stage of the Study it was acknowledged that the desk-based judgements had been made remotely and had yet to be verified in the field. Therefore, when identifying the Stage 2 areas of relatively weak contribution, LUC erred on the side of caution by deliberately defining Stage 2 areas which were considered to be borderline moderate to weak contribution, minimising the chance of missing weakly performing areas.
- 5.6 The conclusions of Luton Borough Council's Stage 1 assessment of Green Belt were reviewed in the same way as the textual judgements of the Central Bedfordshire Stage 1 Study.

## Review of Luton Borough Council's Stage 1 Green Belt Study<sup>25</sup>

5.7 **Table 5.1** records the evaluation of the conclusions of Luton Borough Council's Stage 1 assessment drawing on the Study's findings to isolate areas of weaker-performing Green Belt for further consideration at Stage 2.

**Table 5.1: Review of Luton Borough Council's Stage 1 Green Belt Study**

Green Belt Parcels	Ratings Against Green Belt Purposes				Overall Contribution	Summary of Stage 1 Commentary	Stage 2 Review
	1 – Restricting Sprawl	2 – Preventing Merging	3 – Safeguarding Countryside	4 – Preserving Setting			
Site 1: Warden Hill	Medium	Medium	High	N/A	High/Medium	<p>The existing Green Belt boundary is not clearly defined on the ground, as a result of the proposed Luton East Circular Road (North) proposal. The current Green Belt boundary follows the outer edge of the safeguarded road boundary.</p> <p>Rated highly due to the land within the site being designated as AONB, a County Wildlife Site and a scheduled earthwork, Drays Ditches, running along the northern boundary.</p>	<p>'Site 1' at Warden Hill lies adjacent to parcel L4 within Central Bedfordshire to the north and east. Overall, both parcels are considered to make a strong/high contribution to the Green Belt purposes.</p> <p>There is no clearly distinguishable weak performing area of Green Belt.</p>
Site 2: Stopsley	High	Low	High	N/A	Medium	<p>The Regional Sports Centre at the southern edge of the parcel has been demolished and replaced by the Inspire: Luton Sports Village, which is</p>	<p>'Site 2' at Stopsley lies adjacent to parcel L4 within Central Bedfordshire to the north. Both parcels are considered to make a strong/high contribution to the</p>

<sup>25</sup> Luton Green Belt Study, Luton Borough Council, 2014



Green Belt Parcels	Ratings Against Green Belt Purposes				Overall Contribution	Summary of Stage 1 Commentary	Stage 2 Review
						<p>positioned on the eastern corner of the area.</p> <p>The western third of the site is dominated by a steep chalk escarpment. The southern end of the escarpment has been identified as part of the route for the Luton East Circular Road (North), which also skirts the majority of the western edge of the parcel. In this area, the existing Green Belt boundary is not clearly defined as a result of the Luton East Circular Road (North) proposal.</p> <p>The eastern section of the site categorised as 2D Farmland to the west of Butterfield Green Road, now contains the Inspire Luton Sports Village building, and carpark, sports pitches and informal recreational areas should remain covered as Green Belt. A more detailed study and analysis of land to the west of Butterfield Green road including Land Unit 2D is recommended in the Stage 2 Green Belt study.</p>	<p>majority of Green Belt purposes.</p> <p>In line with the recommendations of the Stage 1 Green Belt assessment, it was proposed that the land to the west of Butterfield Green road including Land Unit 2D be reviewed at Stage 2 and visited in the field.</p>
Site 3: Oaklet Wood	High	Low	High	N/A	Medium	Rural woodland representing a clear robust boundary.	'Site 3' at Oaklet Wood lies adjacent to Green Belt within North Hertfordshire District – outside the area of this study.

Green Belt Parcels	Ratings Against Green Belt Purposes				Overall Contribution	Summary of Stage 1 Commentary	Stage 2 Review
							There is no clearly distinguishable weak performing area of Green Belt.
Site 4: Putteridge	High	Low	High	N/A	Medium		<p>'Site 4' at Putteridge lies adjacent to Green Belt within North Hertfordshire District – outside the area of this study.</p> <p>There is no clearly distinguishable weak performing area of Green Belt.</p>
Site 5: Dane Street	High	Low	Medium	N/A	Medium	Open and contiguous with wider rural Green Belt land. The airport perimeter fence to the north represents a permanent well defined Green Belt boundary.	<p>'Site 5' at Dane Street lies adjacent to L5 within Central Bedfordshire to the south. Overall, both parcels are considered to make a strong/high contribution to Green Belt purpose 1.</p> <p>There is no clearly distinguishable weak performing area of Green Belt.</p>
Site 6: Sommeries	High	Low	High	N/A	Medium		<p>'Site 6' at Sommeries lies adjacent to L5 within Central Bedfordshire to the south. Overall, both parcels are considered to make a strong/high contribution to Green Belt purpose 1.</p> <p>There is no clearly distinguishable weak performing area of Green Belt.</p>

## Review of the Central Bedfordshire Stage 1 Green Belt Study

- 5.8 **Table 5.2** and **Table 5.3** record which Stage 1 parcels and broad areas in Central Bedfordshire contain portions of land performing relatively weakly against all Green Belt purposes with justification on why or why not. **Figure 5.1** illustrates the location of the relatively weak performing areas.
- 5.9 Following the identification of the weakly performing areas of Green Belt based on the Stage 1 desk-based assessment, all weakly performing areas were visited in the field.

**Table 5.2: Review of Stage 1 parcels in Central Bedfordshire to identify relatively weak performing areas**

Parcel	Stage 2 Area	Justification
AH1	No	All of the land within the parcel is considered to make a strategic contribution <sup>26</sup> to Green Belt purposes.
AH2	No	All of the land within the parcel is considered to make a strategic contribution to Green Belt purposes.
AH3	No	All of the land within the parcel is considered to make a strategic contribution to the purposes of Green Belt.
AH4	No	All of the land within the parcel is considered to make a strategic contribution to the purposes of Green Belt.
BC1	No	All of the land within the parcel is considered to make a strategic contribution to the purposes of Green Belt.
BC2	Yes	Fields around the schools in the south-western corner of the parcel may make a weaker contribution to Green Belt purposes.
BC3	Yes	The area to the north of the B655, contained by the inset settlement on three sides, may make a relatively weak contribution to Green Belt purposes.
BC4	Yes	The parcel, or parts of it, may make a relatively weak contribution to Green Belt purposes.
BC5	No	All of the land within the parcel is considered to make a strategic contribution to the purposes of Green Belt.
C1	Yes	The contained fields in which Caddington Village School and the village Playing Field are located may make a relatively weak contribution to Green Belt purposes.

<sup>26</sup> Parcels and broad areas considered to make a strategic contribution to the Green Belt purposes contain land which was considered to make at least a 'moderate contribution' to one or more of the Green Belt purposes.

Parcel	Stage 2 Area	Justification
C2	No	All of the land within the parcel is considered to make a strategic contribution to the purposes of Green Belt.
C3	No	All of the land within the parcel is considered to make a strategic contribution to the purposes of Green Belt.
C4	No	All of the land within the parcel is considered to make a strategic contribution to the purposes of Green Belt.
D1	No	All of the land within the parcel is considered to make a strategic contribution to the purposes of Green Belt.
D2	Yes	The houses and gardens on Tring Road at the northern end of the parcel may make a relatively weak contribution to Green belt purposes.
D3	No	All of the parcel is considered to make a strong contribution to Green Belt purposes.
D4	No	All of the land within the parcel is considered to make a strategic contribution to the purposes of Green Belt.
D5	Yes	Caddington Park and adjacent land in a narrow strip at the foot of the scarp, and the area around Manshead and Streetfield schools, may make a relatively weak contribution to Green Belt purposes.
EB1	Yes	Fields at the junction of Totternhoe Road and The Rye, and to either side of The Meads (including allotments to the west) may make a weaker contribution to Green Belt purposes.
EB2	No	All of the land within the parcel is considered to make a strategic contribution to the purposes of Green Belt.
FW1	No	All of the land within the parcel is considered to make a strategic contribution to the purposes of Green Belt.
FW2	Yes	The land between Maulden Road Industrial Estate and Flitwick Moor may make a relatively weak contribution to Green Belt purposes.
FW3	Yes	The area between the inset settlement edge at the northern end of the parcel and the River Flit may make a relatively weak contribution to Green Belt purposes.
FW4	No	All of the land within the parcel is considered to make a strategic contribution to the purposes of Green Belt.
FW5	No	All of the land within the parcel is considered to make a strategic contribution to the purposes of Green Belt.

Parcel	Stage 2 Area	Justification
H1	No	All of the land within the parcel is considered to make a strategic contribution to the purposes of Green Belt.
H2	Yes	Fields on the southern edge of Harlington are contained by mature hedgerows and trees and relate well to existing development with adjoining back gardens quite open, and may therefore make a relatively weak contribution to Green Belt purposes.
H3	No	All of the land within the parcel is considered to make a strategic contribution to the purposes of Green Belt.
HAR1	Yes	The parcel, or parts of it, may make a relatively weak contribution to Green Belt purposes.
HAR2	Yes	Small areas adjacent to the settlement around Holly Tree Farm are more contained and relate better to the built edge, and may therefore make a relatively weak contribution to Green Belt purposes.
HL1	Yes	The contained field adjacent to Augustus Road may make a relatively weak contribution to Green Belt purposes.
HL2	No	All of the land within the parcel is considered to make a strategic contribution to the purposes of Green Belt.
HL3	No	All of the land within the parcel is considered to make a strategic contribution to the purposes of Green Belt.
HP1	No	All of the land within the parcel is considered to make a strategic contribution to the purposes of Green Belt.
HR1	No	All of the land within the parcel is considered to make a strategic contribution to the purposes of Green Belt.
HR2	No	All of the land within the parcel is considered to make a strategic contribution to the purposes of Green Belt.
L1	Yes	The area to the south of Sundon Road may make a relatively weak contribution to Green Belt purposes.
L2	No	All of the land within the parcel is considered to make a strategic contribution to the purposes of Green Belt.
L3	No	All of the land within the parcel is considered to make a strategic contribution to the purposes of Green Belt.
L4	No	All of the land within the parcel is considered to make a strategic contribution to the purposes of Green Belt.
L5	Yes	There is a small, isolated island of Green Belt to the north of the A1081 Airport Way dual carriageway, contained on all sides by roads. This may potentially make a relatively weak contribution to Green Belt purposes.

Parcel	Stage 2 Area	Justification
L6	Yes	Small fields adjacent to the village of Caddington may make a relatively weak contribution to Green belt purposes.
LL1	Yes	There are three areas of open space to the south of Linslade Wood which may make a relatively weak contribution to Green Belt purposes.
LL10	Yes	The area occupied by Cedars School, and the allotments between the school and the railway line, may make a relatively weak contribution to Green belt purposes.
LL11	Yes	The fields adjacent to Bunkers Lane to the south of Southcott may make a weaker contribution to Green Belt purposes.
LL2	No	All of the land within the parcel is considered to make a strategic contribution to the purposes of Green Belt.
LL3	No	All of the land within the parcel is considered to make a strategic contribution to the purposes of Green Belt.
LL4	Yes	The parcel, or parts of it, may make a relatively weak contribution to Green Belt purposes.
LL5	Yes	Oak Bank School and its playing fields may make a relatively weak contribution to Green belt purposes.
LL6	Yes	The development at Evans Yard, and fields to the north and west of it, may make a relatively weak contribution to Green Belt purposes.
LL7	No	All of the land within the parcel is considered to make a strategic contribution to the purposes of Green Belt.
LL8	No	All of the land within the parcel is considered to make a strategic contribution to the purposes of Green Belt.
LL9	No	All of the land within the parcel is considered to make a strategic contribution to the purposes of Green Belt.
SE1	Yes	Pepperstock and all of the parcel to the north of it may make a relatively weak contribution to Green Belt purposes.
SE2	No	All of the land within the parcel is considered to make a strategic contribution to the purposes of Green Belt.
T1	No	All of the land within the parcel is considered to make a strategic contribution to the purposes of Green Belt.
T2	No	All of the land within the parcel is considered to make a strategic contribution to the purposes of Green Belt.

Parcel	Stage 2 Area	Justification
T3	No	All of the land within the parcel is considered to make a strategic contribution to the purposes of Green Belt.
T4	Yes	Fields adjacent to settlement edge east of Leighton Road and to the south of Alma Farm Road may make a relatively weak contribution to Green Belt purposes.
WE1	No	All of the land within the parcel is considered to make a strategic contribution to the purposes of Green Belt.
WE2	Yes	The settlement edge field may make a relatively weak contribution to Green Belt purposes.
WE3	No	All of the land within the parcel is considered to make a strategic contribution to the purposes of Green Belt.
WS1	Yes	Fulbrook Middle School and its grounds may make a weaker contribution to Green Belt purposes.
WS2	Yes	The partially developed land on the settlement edge to the north of Aspley Woods may make a weaker contribution to Green Belt purposes.
WS3	Yes	The developed area at the north of the parcel, adjacent to the inset settlement edge, may make a relatively weak contribution to Green Belt purposes.

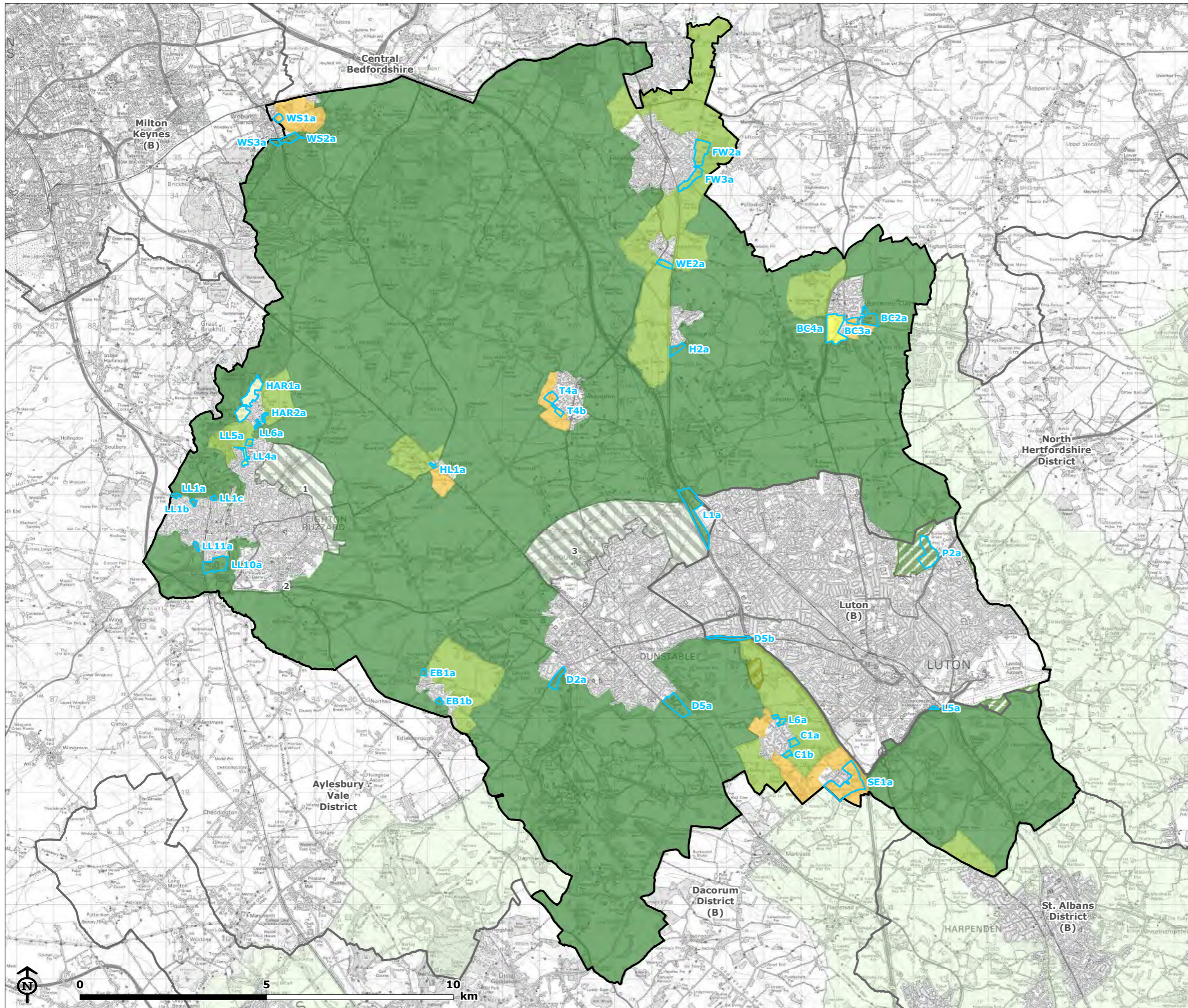
**Table 5.3: Review of Stage 1 broad areas in Central Bedfordshire to identify relatively weak performing areas**

Broad Area	Stage 2 Area	Justification
A	No	All of the land in Broad Area A is considered to make a strategic contribution to Green Belt purposes.
B	No	All of the land within the broad area is considered to make a strategic contribution to the purposes of Green Belt.
C	No	All of the land within the broad area is considered to make a strategic contribution to the purposes of Green Belt.
D	No	All of the land within the broad area is considered to make a strategic contribution to the purposes of Green Belt.
E	No	All of the land within the parcel is considered to make a strategic contribution to the purposes of Green Belt.
F	No	All of the land within the broad area is considered to make a strategic contribution to the purposes of Green Belt.
G	No	This area is rural and does not relate strongly to a settlement, so built development here would constitute significant encroachment on the countryside. In this respect contribution to Green Belt purposes is strong, but the parcel's outer edge location could be considered to reduce its role, with the area to the south of the A4146 adding little to the function already performed by adjacent Green belt land. However, whilst the A4146 could constitute a strong alternative boundary feature the fact that the existing Green belt edge abuts the Registered Park and Garden at Ascott could be considered to strengthen the role of the current boundary.
H	No	All of the land within the parcel is considered to make a strategic contribution to the purposes of Green Belt.



**CENTRAL BEDFORDSHIRE  
AND LUTON  
JOINT GREEN BELT STUDY**

**Figure 5.1: Areas of Relatively Weak Performing Green Belt Identified at Stage 2 using Stage 1 Assessments**



- Study area
  - Planning Authority boundary
  - Relatively weak performing areas
  - Permitted urban extensions in Green Belt
    - 1: East of Leighton Linslade
    - 2: Pulford Corner
    - 3: Houghton Regis North 1&2
  - Permitted strategic development in Green Belt - Chaul End
  - Green Belt
- Highest contribution in Stage 1 assessments**
- Strong contribution
  - Relatively strong contribution
  - Moderate contribution
  - Relatively weak contribution
  - Weak/No contribution
  - Green Belt within Luton\*\*

**Note:**  
\*\* All Green Belt assessed within Luton Borough Council's Stage 1 Study made a strong contribution to at least one Green Belt purpose.

**Map Scale @ A3: 1:100,000**



## Findings of Stage 2 assessment

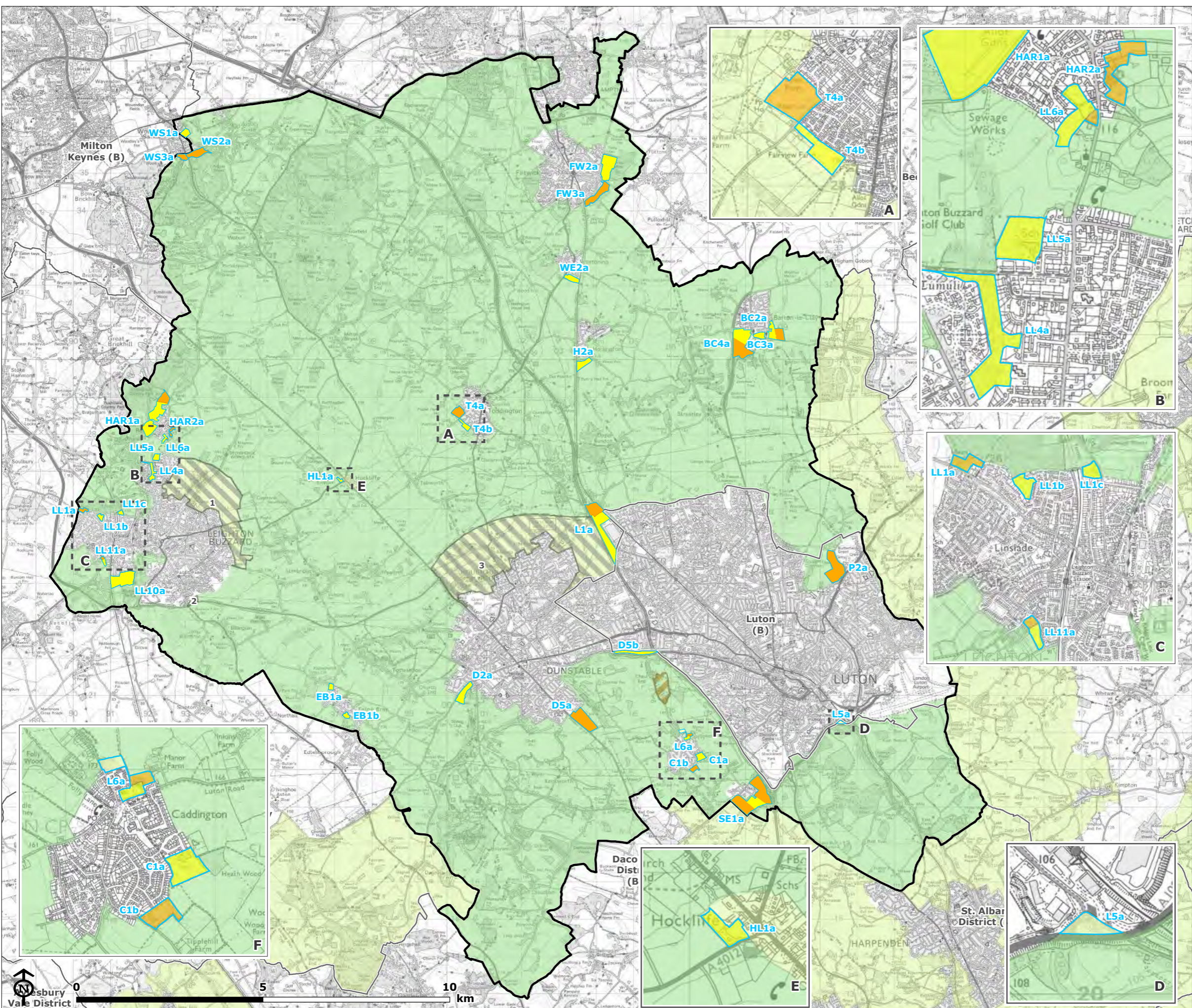
- 5.10 A total of 29 weakly performing areas were defined in Central Bedfordshire and Luton. Each area was visited in the field to:
- Verify and where necessary expand upon judgements made about the weak performing areas remotely.
  - Identify alternative permanent and readily recognisable boundaries around the weakly performing areas of the Green Belt to minimise harm to the Green Belt.
- 5.11 **Appendix 2** contains all the assessment sheets for all 29 weakly performing areas identified and visited at Stage 2. The Stage 2 assessment sheets expand on the desk-based judgements made at Stage 1 and draw on additional judgements made during the site visits to draw out finer variations in the overall contribution of land within the Stage 2 areas to the Green Belt purposes, thus isolating in more detail the areas of the Green Belt which are likely to cause less harm to the Green Belt if released for development.
- 5.12 **Figure 5.2** presents the finer variations in the contribution of land within the Stage 2 areas to the Green Belt purposes. All Green Belt in Central Bedfordshire and Luton outwith the mapped Stage 2 areas was assessed in the Stage 1 assessments to be making at least a moderate contribution to the Green Belt purposes. There are, however, small pockets of Green Belt land along the existing urban edges of inset settlements which perform less strongly – weakly even – against all of the purposes. These pockets of land tend to be influenced by the urbanising effects of the settlements they lie adjacent to, compromising the characteristics of countryside and/or limiting their relationship with the wider countryside. It is the limited openness and ‘ruralness’ of these locations which is often why they make limited contributions to the Green Belt purposes.
- 5.13 The information in **Figure 5.2** and **Appendix 2** fulfils the Stage 2 Study’s overall aim to isolate areas of the Central Bedfordshire and Luton Green Belt which perform relatively weakly against the Green Belt purposes and are therefore likely to cause less harm to the Green Belt if released for development.

## Findings following site-based assessments of washed over settlements

- 5.14 At Stage 1, three settlements – Aspley Guise, Kensworth and Woburn – were found to contain characteristics which may question their status as washed over settlements in the Green Belt. These settlements were visited at Stage 2 to verify the desk-based judgements made at Stage 1 and inform the final recommendations outlined below.

# CENTRAL BEDFORDSHIRE AND LUTON JOINT GREEN BELT STUDY

**Figure 5.2: Findings of the Stage 2 Site-based Assessments of Relatively Weak Performing Areas**



- Study area
  - Planning Authority boundary
  - Relatively weak performing areas
  - Green Belt of at least moderate contribution\*\*
  - Permitted urban extensions in Green Belt
    - 1: East of Leighton Linslade
    - 2: Pulford Corner
    - 3: Houghton Regis North 1&2
  - Permitted strategic development in Green Belt - Chaul End
  - Green Belt
- Stage 2 contribution**
- Moderate contribution
  - Relatively weak contribution
  - Weak/No contribution

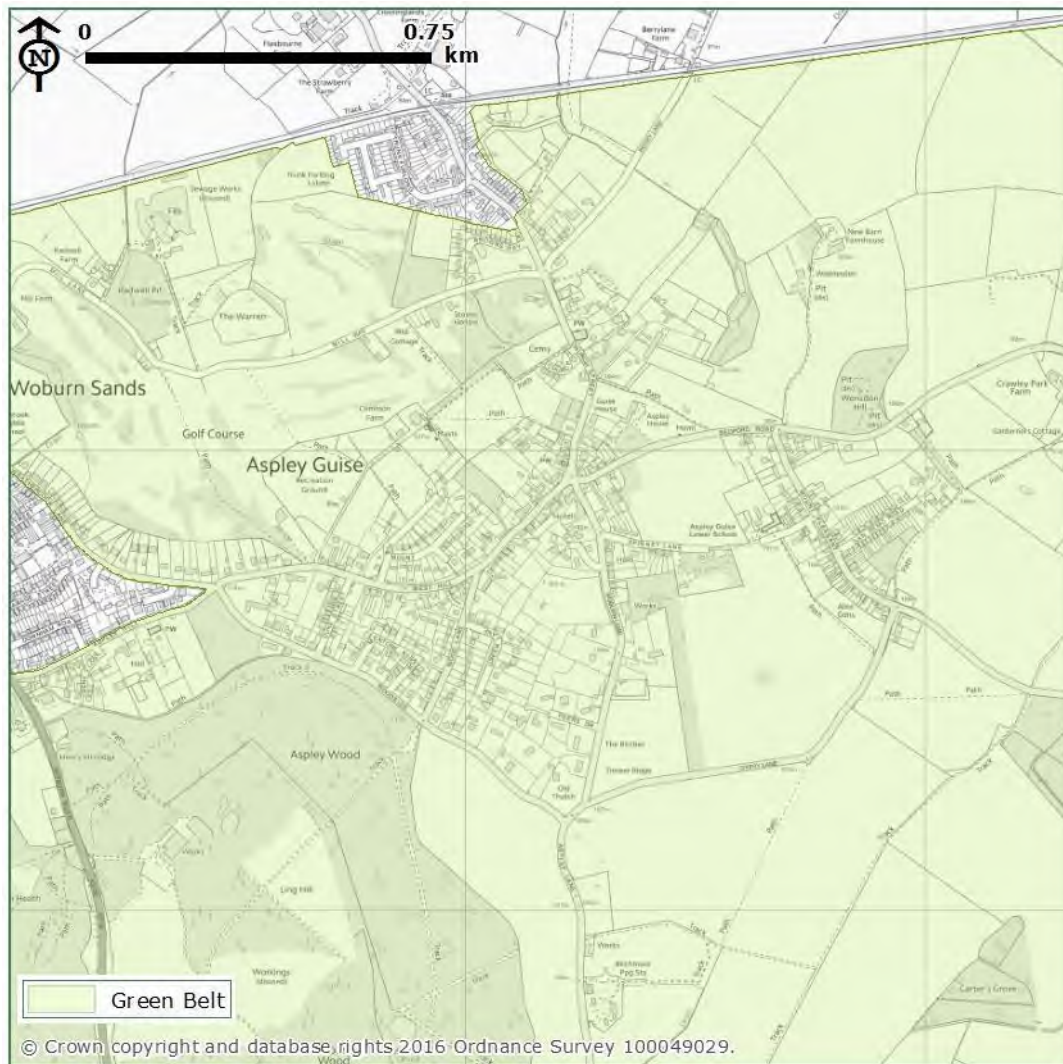
**Note**  
 \*\* All Green Belt in Central Bedfordshire and Luton outwith the mapped Stage 2 areas was assessed at Stage 1 to be making at least a moderate contribution to the Green Belt purposes.

Map Scale @ A3: 1:100,000



## Aspley Guise

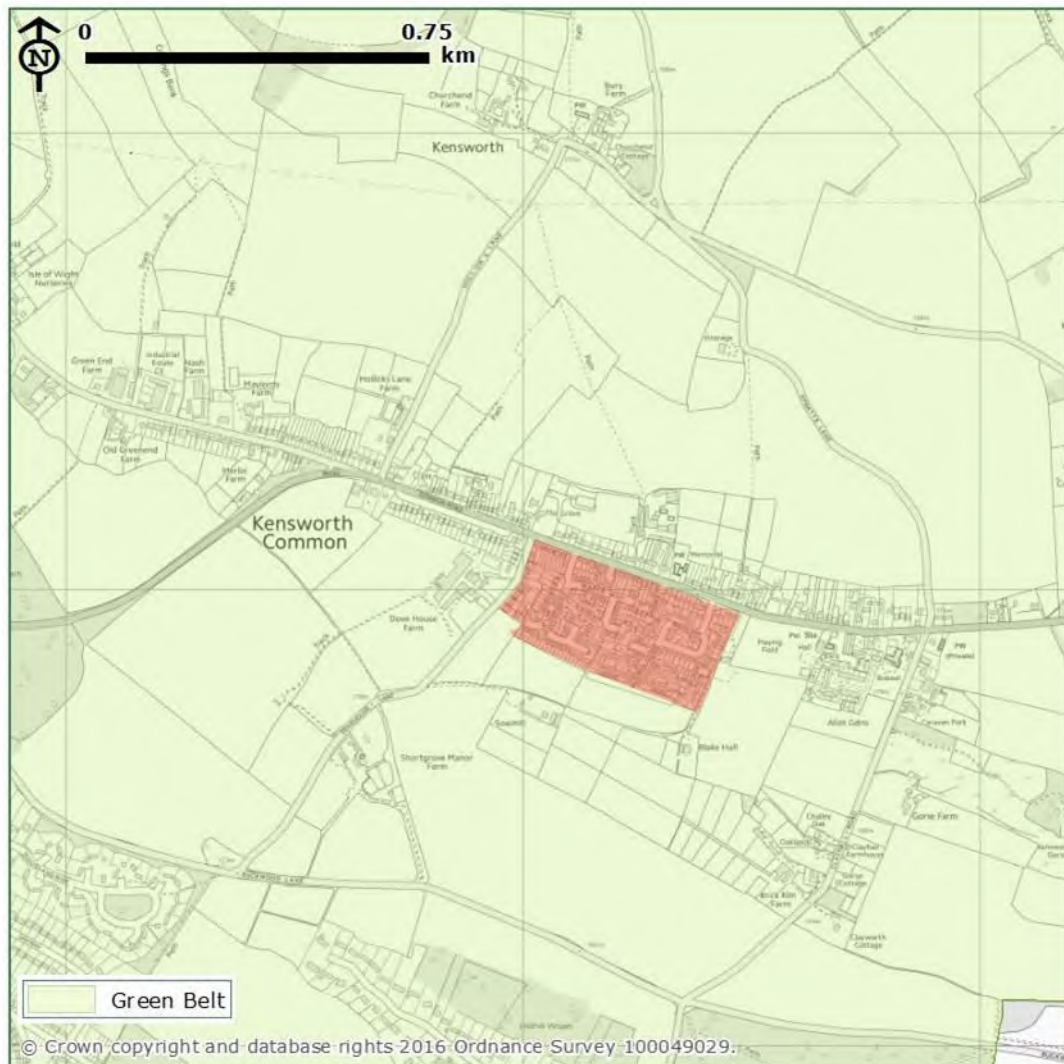
Figure 5.3: Aspley Guise



- 5.15 Three key elements distinguish Aspley Guise from the adjoining inset settlement of Woburn Sands: elevation, tree cover and dwelling density. Aspley Guise mostly lies on higher ground to the east and south of Woburn Sands, and these slopes are associated with stronger tree cover and, partly in consequence of both of these factors, typically larger dwellings arranged in a more dispersed pattern. There are several locations where houses are more closely arranged, such as Duke Street and San Remo Road, but these are separated from the inset edge by areas with a more open development form, and lack any landscape features to provide clear distinction from their surroundings.
- 5.16 **It is therefore recommended that Aspley Guise should remain washed over by the Green Belt.**

## Kensworth

Figure 5.4: Kensworth (Ridgway and Poplar Road Estates highlighted)



- 5.17 The urban form and character of the estates centred on Ridgway and Poplar Road suggest that insetting may be appropriate if it could be achieved without weakening the adjacent Green Belt. Viewed from the main road (the B4540 Common Road) there is little in terms of townscape character to distinguish this area from the rest of the linear settlement, but the tree-lined drive to Blake Hall (to the east) and Dove House Lane (to the west) provide physical landscape elements that could form boundaries. To the east of the Blake Hall drive a field provides a gap in the roadside housing, and to the west of Dovehouse Lane, Dovehouse Farm, although adjacent to the settlement edge, has a rural character.
- 5.18 The outer settlement edge between the Blake Hall drive and Dovehouse Lane is not strongly defined, but three small fields adjacent to it are contained by a strong hedgerow which is also a public right of way and which is in part edged by a road (leading to Kensworth Sawmills). Were these to be assessed as a Green Belt parcel it is likely that they would be considered to make a relatively weak contribution as they occupy a flat ridge top which, to the south, descends into a strong valley (along Buckwood Road).
- 5.19 While the effect of insetting the estates and the fields to the south on the remainder of the Green Belt could be limited, **it is recommended that Central Bedfordshire District Council makes this policy decision alongside other relevant planning considerations.**
- 5.20 Another housing estate, The Chilterns, lies to the east of the field noted above as forming a gap to the east of the Blake Hall drive. It has a relatively strong edge to the east, Clay Hall Lane, but

in isolation it is not considered large enough to warrant inseting, and to do so would weaken the Green Belt contribution of the field.

## Woburn

Figure 5.5: Woburn



- 5.21 Woburn has clusters of dense development but does not have an urban character. Although it has a clear centre it is not a strongly compacted settlement: areas of open space features prominently – for example to the sides of Park Street – and several of the denser areas of development – Timber Lane to the west and Eleanor Close and Drakeloe Close to the north – lie on the fringes of the village in quite rural settings. Dwellings around London End near the village centre are quite dense, but their layout, variety of ages and forms and presence of mature trees gives the area a rural, village character.
- 5.22 Most parts of the village are close to elements of the strong historic landscape structure associated with the Woburn Abbey estate that plays a strong role in the setting of the village – the Wayn Close avenue of trees to the south, Cowhill Belt to the east and Lower Drakeloe Pond to the north – so the village as a whole has a strong relationship with its landscape setting.
- 5.23 **It is therefore recommended that Woburn should remain washed over by the Green Belt.**

## 6 Conclusions and Next Steps

- 6.1 This Study is an important part of Central Bedfordshire Council and Luton Borough Council's Local Plan evidence bases and will inform the Luton Housing Market Area (HMA) Growth Options Study commissioned by the four authorities that fall within the Luton HMA; Aylesbury Vale District Council, Central Bedfordshire Council, Luton Borough Council and North Hertfordshire District Council.
- 6.2 The Luton HMA Growth Options Study will identify the most sustainable patterns for future growth within the HMA, providing an important framework within which to plan and negotiate the necessary supply of land to meet current and emerging housing and employment needs.
- 6.3 This final chapter draws some overall conclusions and recommendations.

### Overall performance of the Green Belt

- 6.4 The results of the Study reported in Chapters 4 and 5 represent a baseline assessment of the extent to which parcels of land making up the Green Belt within Central Bedfordshire and Luton meet Green Belt purposes 1, 2, 3 and 4 outlined in the NPPF. In doing this the Study highlights variations in contribution to the purposes, notably the areas that perform relatively weakly.
- 6.5 The majority of the Green Belt in Central Bedfordshire and Luton continues to serve its purposes very well, safeguarding the identity of South Bedfordshire by maintaining the openness of the countryside and protecting the dispersed settlement pattern. However, over 25 pockets of Green Belt land were identified at Stage 2 (**Figure 5.2** and **Appendix 2**) to be making a weak or relatively weak contribution to all the Green Belt purposes. These relatively small pockets of Green Belt all lie adjacent to the existing urban edges of inset settlements.
- 6.6 In terms of purpose 5 (encouraging the recycling of urban land), it can be concluded that the entire Green Belt has helped to meet this purpose historically and will continue to do so, noting that there remain some significant areas of brownfield land in the urban areas, many of which have already been earmarked for regeneration. It is important that the role of the Green Belt in supporting regeneration, particularly through the recycling of land, is considered appropriately in developing a long term spatial plan for the region and, along with other relevant issues, is factored into the development and appraisal of policy options.

### Making changes to the Green Belt

#### Helping to meet development requirements

- 6.7 The NPPF requires changes to the Green Belt to be made through the Local Plan process. This should include:
  - i. demonstration of exceptional circumstances, such as unmet housing or employment land needs, that cannot be met elsewhere; and
  - ii. consideration of the need to promote sustainable patterns of development, considering a range of local, regional and national issues such as economic growth, health and wellbeing, accessibility and biodiversity, cultural heritage and climate change resilience, as well as an assessment against Green Belt purposes.
- 6.8 A common interpretation of the policy position is that, where necessitated by development requirements, plans should identify the most sustainable locations, unless outweighed by adverse

effects on the overall integrity of the Green Belt according to an assessment of the whole of the Green Belt based around the five purposes.<sup>27</sup>

- 6.9 In other words, the relatively poor performance of the land against Green Belt purposes is not, of itself, an exceptional circumstance that would justify release of the land from the Green Belt. Therefore, the Stage 1 and Stage 2 parcel boundaries and potential alternative Green Belt boundaries identified in Stage 2 (**Appendix 2**) **are not intended to reflect potential development areas and the Study cannot be used as a means of allocating development land.**
- 6.10 The evaluation of options for development in the Green Belt will need to be the subject of further work, drawing on the findings of this Study alongside other considerations (such as infrastructure, environmental sensitivity) and related studies like the Luton HMA Growth Options Study.
- 6.11 Should the cooperating authorities decide to release land from the Green Belt, we recommend that outline masterplans are prepared to, amongst other things, minimise harm to the Green Belt. These masterplans should draw on the findings of this Green Belt Study to indicate precise development areas, new defensible Green Belt boundaries (existing or new features) and appropriate development heights and densities. Such an approach, together with specific policies for the development of the land, would help to engender public confidence and support, as well as mitigate harm to the remaining Green Belt.
- 6.12 Further evaluation and definition of development options in the Green Belt may benefit from more detailed/fine grained Green Belt assessment work, including targeted reassessment of parcels surrounding any potential Green Belt releases to inform judgements on the:
- **potential harm** caused by specific developments on the wider Green Belt; and
  - **potential measures to mitigate harm**, for example, the type, layout, massing, materials and landscaping of development.
- 6.13 Any further work should draw on the methodology and findings of this Green Belt Study.

#### Considering the need for safeguarded land

- 6.14 Paragraph 85 of the NPPF indicates that, when defining Green Belt boundaries, local planning authorities should, where necessary, identify areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period. No further guidance is provided on the circumstances where safeguarded land may be necessary.
- 6.15 On the basis of current trends, there are likely to be unmet housing needs beyond the plan period. We therefore recommend that the cooperating Councils collectively consider the need for safeguarding land. Where areas of the Green Belt are identified as being suitable for release in this plan period, parts of them may be retained as safeguarded land. The location of such areas should be informed by this Study and other evidence.

#### Making additions to the Green Belt

- 6.16 The NPPF requires local planning authorities to demonstrate exceptional circumstances before establishing new Green Belt. These exceptional circumstances cannot be demonstrated on the basis of a Green Belt study alone – they depend on a wider range of factors, including the definition of a preferred spatial strategy and the role that new Green Belt would play in this.
- 6.17 As noted in Chapter 3, in the absence of Green Belt land between Milton Keynes and Woburn Sands, the Green Belt to the south and east of Woburn Sands was considered to play a role in checking the sprawl of Milton Keynes into Central Bedfordshire. It is recommended, however, that Central Bedfordshire Council engages in further discussions with Milton Keynes Council about formalising the role of the Green Belt in shaping the growth of Milton Keynes. This may represent an exceptional circumstance for extending the Green Belt in this area.

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<sup>27</sup> Planning on the Doorstep: The Big Issues – Green Belt, Planning Advisory Service (PAS), 2015



### Potential for alternative designations to Green Belt

- 6.18 Much of the Green Belt within and close to urban areas plays an important role as 'green infrastructure'. This is particularly relevant to the corridors of Green Belt which extend into the urban area. These include parcels LL2, LL4 (also assessed at Stage 2 as LL4a) and LL10 (a portion of which was assessed at Stage 2 as LL10a) in Leighton Linlode and the southern half of Stage 1 parcel L1 (assessed at Stage 2 as L1a) in Luton. These green corridors make the towns better places to live, promoting health and wellbeing, biodiversity and resilience to climate change. Despite their positive uses, Stage 2 parcels LL4a and LL10a and a significant proportion of parcel L1a have been found to have little connection with the wider countryside and make a relatively weak contribution to the Green Belt purposes. Central Bedfordshire Council may therefore wish to explore alternative mechanisms for protecting the positive uses of these areas.
- 6.19 One option might be to re-designate the areas as 'Local Green Spaces', securing their protection as strongly as Green Belt. Paragraph 77 of the NPPF supports such an approach, although not specifically in relation to Green Belt land. Local Green Spaces are described as land of particular *'beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife'*. Some enhancement measures may be required in these locations before the case for re-designation can be made. For example, parcel L1a is currently made-up of open agricultural fields adjacent to the M1 motorway; however, the development of the large urban extension Houghton Regis North 1 and 2 to the west may enable appropriate investment into the positive use of the land at parcel L1a.

### Encouraging positive use of land in the Green Belt

- 6.20 Although the positive use of Green Belt land is not directly related to the purposes of Green Belt, the NPPF encourages local planning authorities to secure positive use of land in Green Belts, once defined.
- 6.21 The Study did not include a detailed assessment of existing positive uses of land in the Green Belt. However, the South Bedfordshire Green Belt does include significant areas of productive agricultural land, The Chilterns Area of Outstanding Natural Beauty, the Greensand Ridge Nature Improvement Area, Country Parks, Registered Parks and Gardens and other green and open spaces. The Green Belt also includes scrubland, woodland and the floodplains of several rivers. Despite this, there remains considerable scope to enhance the positive use of the Green Belt – particularly in terms of providing for informal recreation at the urban-rural edges of settlements. Key barriers include significant infrastructure adjacent to the existing urban edges of settlements, such as the Luton to Bedford railway, the M1 and a number of busy A roads, which make it difficult to access the surrounding countryside on foot or by bicycle. In addition, there is often a lack of convenient parking places that allow people to easily access the existing public footpath network.
- 6.22 It is recommended that, as part of the overall review of the Green Belt, the cooperating authorities should develop a strategy to secure greater positive use of the Green Belt with the aim of enhancing the environmental and social benefits derived from this important area of open land, helping underpin the region's ambitious plans for economic growth and regeneration.