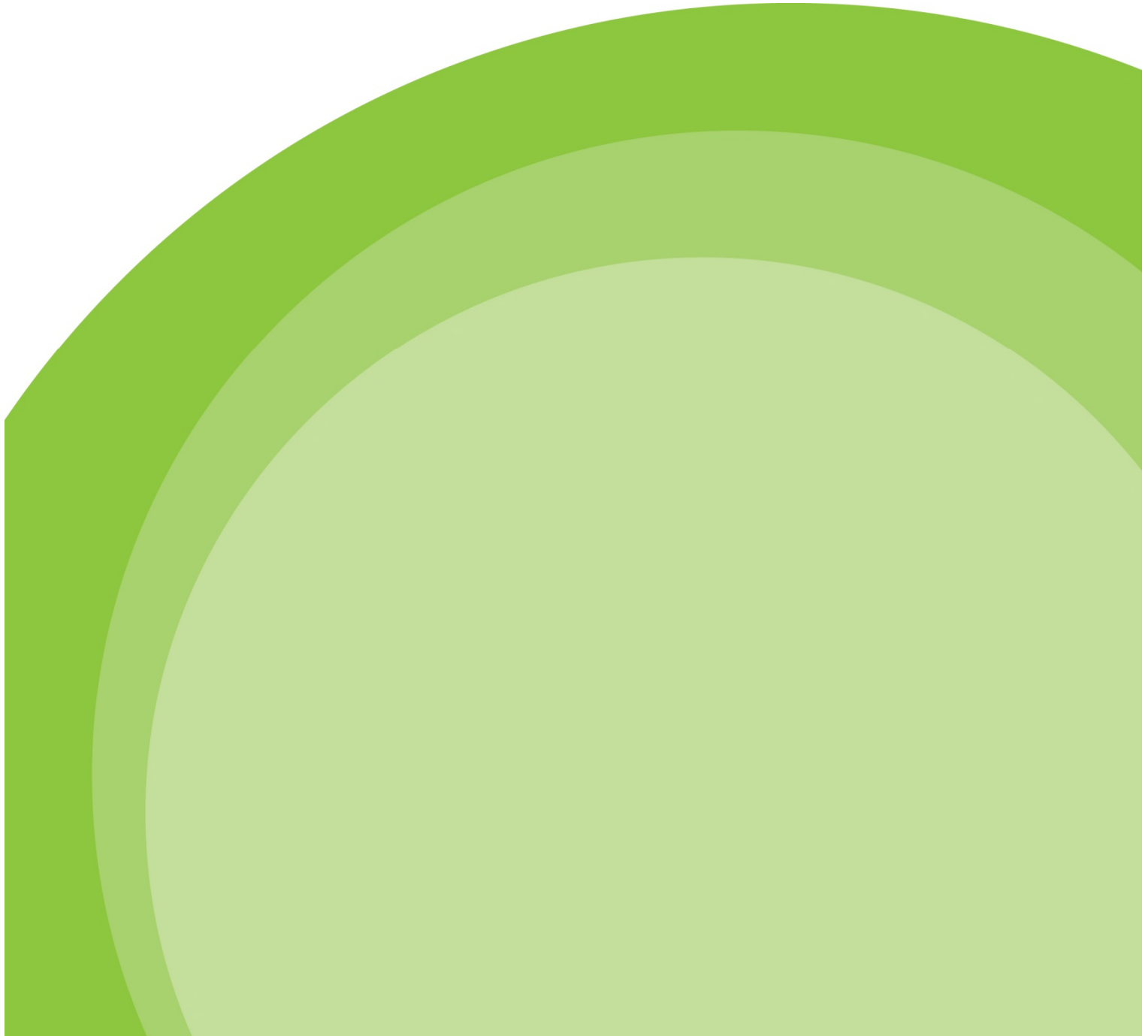


# **Central Bedfordshire & Luton Green Belt Study Appendices 2 & 3**

**July 2017**



## **Appendix 2**

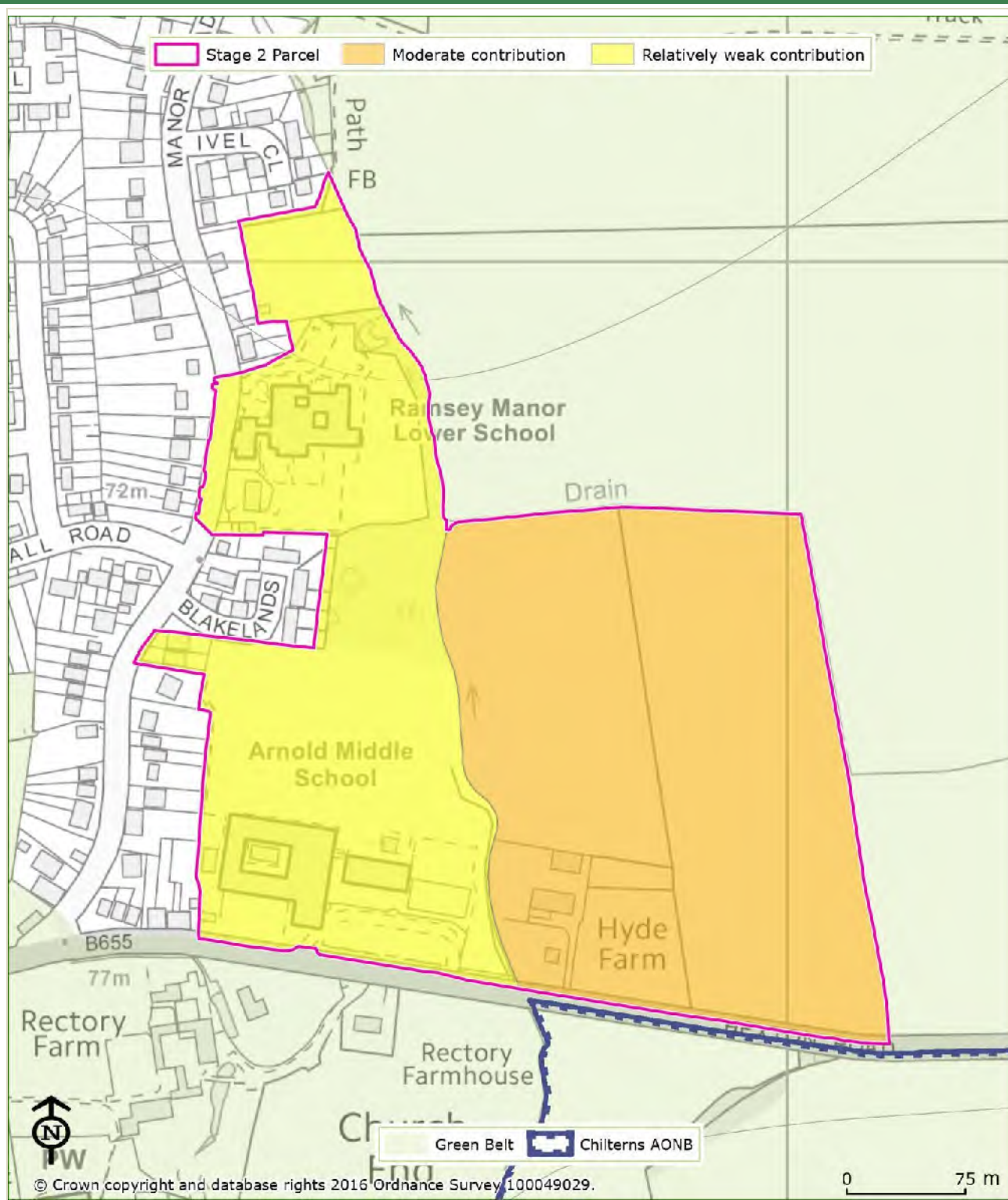
### Stage 2 assessments

Land Parcel Ref: BC2a

Parcel Type: Stage 2 Parcel

Area (ha)

13.9



Land Parcel Ref: BC2a

Parcel Type: Stage 2 Parcel

Area (ha)

13.9

## Parcel description

This parcel consists of Ramsey Manor Lower School, Arnold Middle School and Hyde Farm on the eastern edge of Barton-le-Clay. The school grounds make up a considerable portion of the parcel and are separated from Hyde Farm by a small stream.

The B655 runs the entirety of the southern boundary leading into the centre of Barton-le-Clay. The uneven settlement edge of Barton-le-Clay made up of back gardens of adjacent properties and Manor Road forms the western boundary and continues around to a stretch of the northern boundary. The eastern extent is defined mostly by tree belts and hedgerows forming field boundaries.

The schools within the parcel comprise relatively large buildings and associated infrastructure which together with the uneven settlement edge has an urbanising influence and creates a strong relationship with the settlement. The eastern edge is more open where hedgerow loss has occurred. The pasture fields around Hyde Farm have a degree of separation from the settlement by a heavily treed watercourse and relate more strongly to the wider countryside to the east.

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## Conclusion

The area adjacent to the built edge including Ramsey Manor Lower School and Arnold Middle School makes a relatively weak contribution to Green Belt purposes, and the heavily-treed watercourse to the east of the schools would make a strong potential alternative Green Belt edge. The land to the east of the watercourse, around Hyde Farm, is considered to make a moderate contribution to Green Belt purposes.

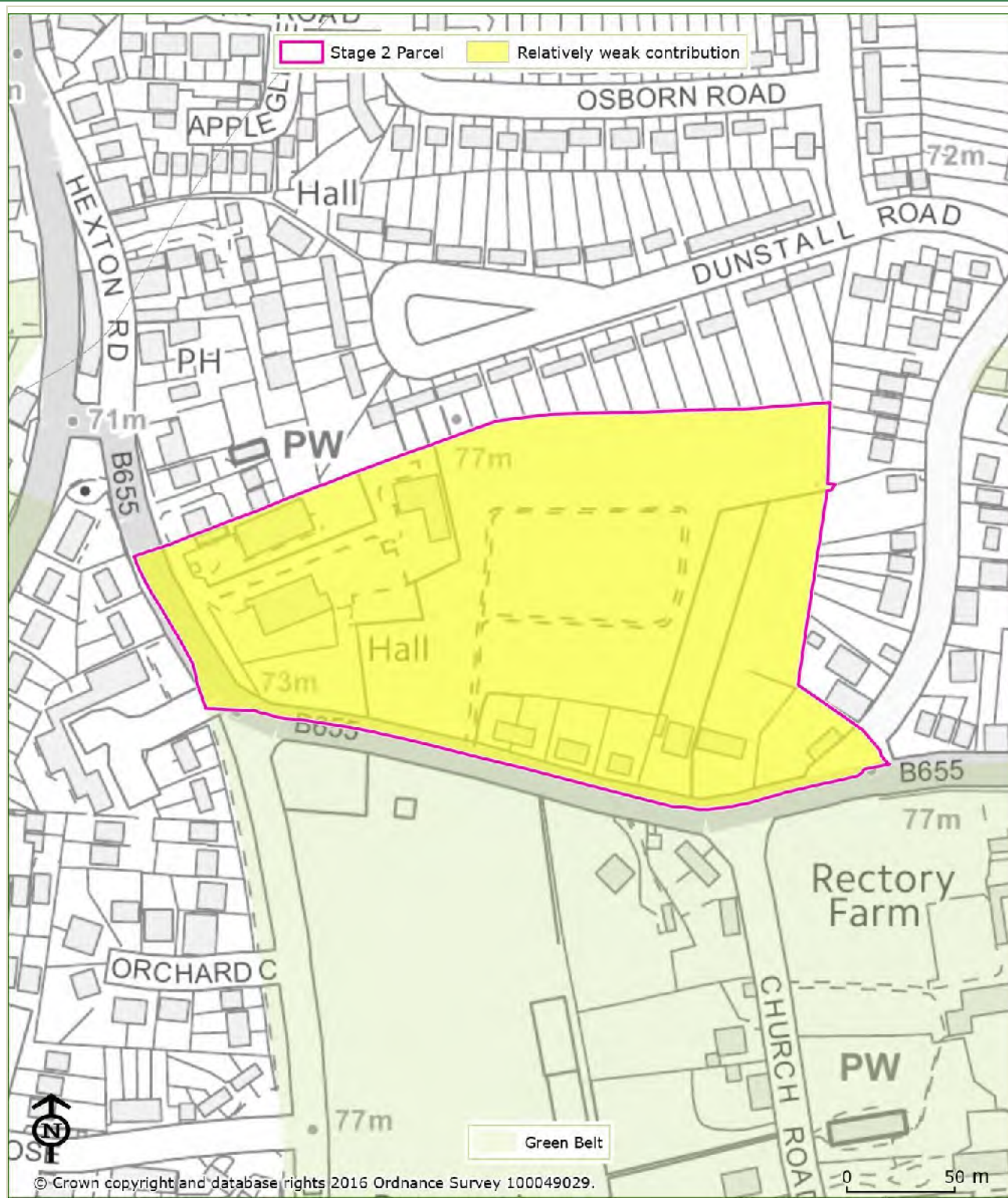
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Land Parcel Ref: BC3a

Parcel Type: Stage 2 Parcel

Area (ha)

4.4





Land Parcel Ref: BC3a

Parcel Type: Stage 2 Parcel

Area (ha) 4.4

## Parcel description

This parcel comprises an area of allotments with Barton village hall and doctors surgery in the west and a small number of residential properties in the south.

The parcel is surrounded by development on all 4 sides. The back gardens of adjacent properties make up the northern and eastern edge whilst the B655 runs along the southern boundary and continues around the west. Several properties are located adjacent to the B655 but are set back from the road and are contained by tree planting.

The built edge is relatively open and the parcel contains urbanising development which creates a strong relationship with the settlement. Trees are located along the southern edge and together with the B655 provide a strong separation from the wider countryside beyond.

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## Conclusion

The parcel makes a relatively weak overall contribution to Green Belt purposes. The tree-lined B665 provides a strong distinction from the wider countryside and would create a strong potential alternative Green Belt boundary.

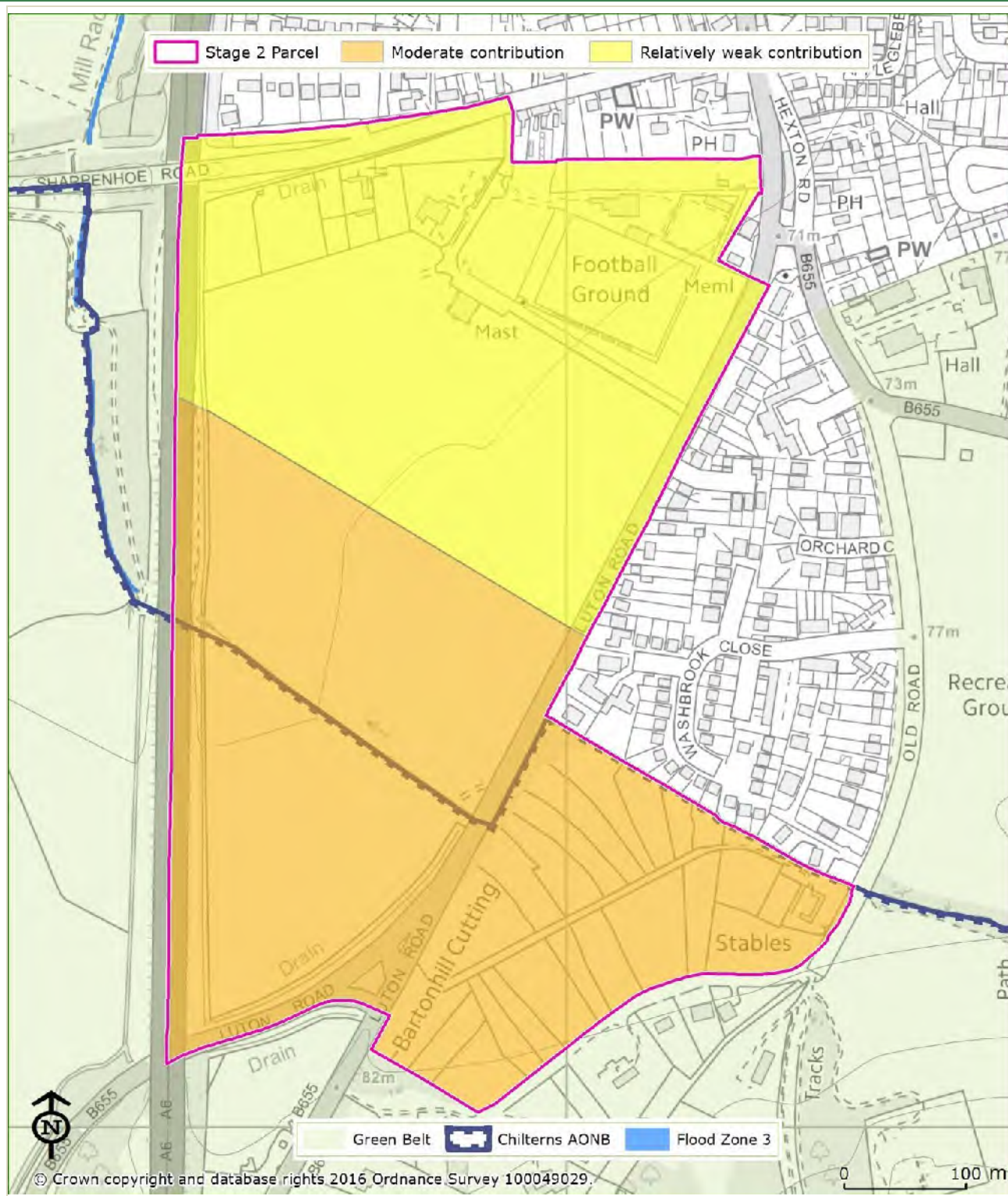
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Land Parcel Ref: BC4a

Parcel Type: Stage 2 Parcel

Area (ha)

31.9



Land Parcel Ref: BC4a

Parcel Type: Stage 2 Parcel

Area (ha) 31.9

## Parcel description

This parcel comprises a mix of arable, pastoral and recreational fields to the south of Barton-le-Clay. Barton Rovers Football Club and associated sports pitches are situated to the settlement edge in the north with agricultural fields well-defined by hedgerow and hedgerow trees located further south. Built development is limited to small buildings associated with the football club and scout hut in the north and stables in the southern corner.

The parcel abuts the inset settlement along Sharpen hoe Road to the north and the B655 to the east, and is set within a broader arable landscape. The tree-lined A6 forms the western boundary, whilst to the south wooded slopes mark the scarp edge of the Barton Hills.

The football ground and associated buildings in the north have a relatively strong urbanising influence over the parcel and the hedgerow along Luton Road allows for relationship between the northern fields and settlement. The land slopes away to south, to a shallow valley with a watercourse and associated hedgerow, creating a degree of separation from the settlement edge and a stronger relationship with Barton Hills beyond. To the east of Luton Road there is weaker separation between the settlement edge on Ashbrook Close and the paddocks that form the south-eastern part of the parcel, but the landform rises to the south and has a strong relationship with Barton Hills.

---

## Conclusion

The area in the north containing Barton Rovers Football Club and training facilities makes a relatively weak contribution to Green Belt purposes. The A6 to the west and mature hedgerow to the south would constitute a strong potential alternative Green Belt edge, aligning fairly closely to the existing edge to the east of Luton Road (south of Washbrook Close). Land further south within the parcel is considered to make a moderate contribution to Green Belt purposes.

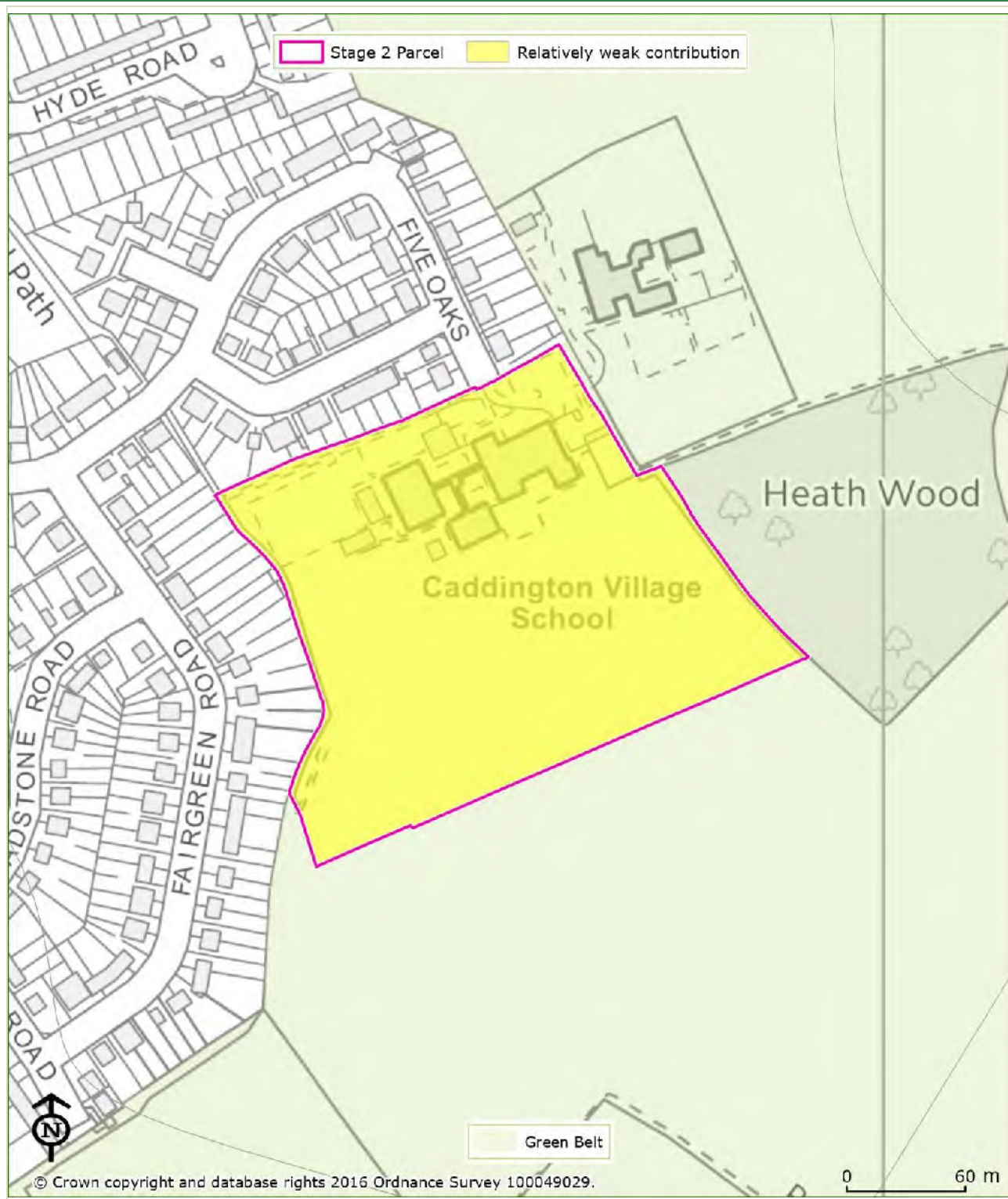
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Land Parcel Ref: C1a

Parcel Type: Stage 2 Parcel

Area (ha) 4.1



Land Parcel Ref: C1a

Parcel Type: Stage 2 Parcel

Area (ha) 4.1

## Parcel description

The parcel comprises the majority of the buildings of Caddington Village School (the part that was formerly Five Oaks Middle School), and associated playing fields. The buildings are clustered close to the inset settlement edge on Five Oaks. The parcel also abuts the inset edge to the west, on Fairgreen Road, although mature trees create some visual separation along part of the boundary. A hedgerow separates the north-eastern corner of the parcel, close to the school buildings, from the rest of the school site (the buildings and playing fields of the former Willowfield County Primary), and a block of woodland, Heath Wood, is a prominent feature along the eastern edge of the parcel. A fence and broken tree line separate the school from a large arable field to the south.

The school buildings relate fairly strongly to the built-up edge, in what is a fairly flat landscape, and whilst the playing fields are undeveloped the presence of Heath Wood creates containment to the east, and trees provide some separation to the south.

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## Conclusion

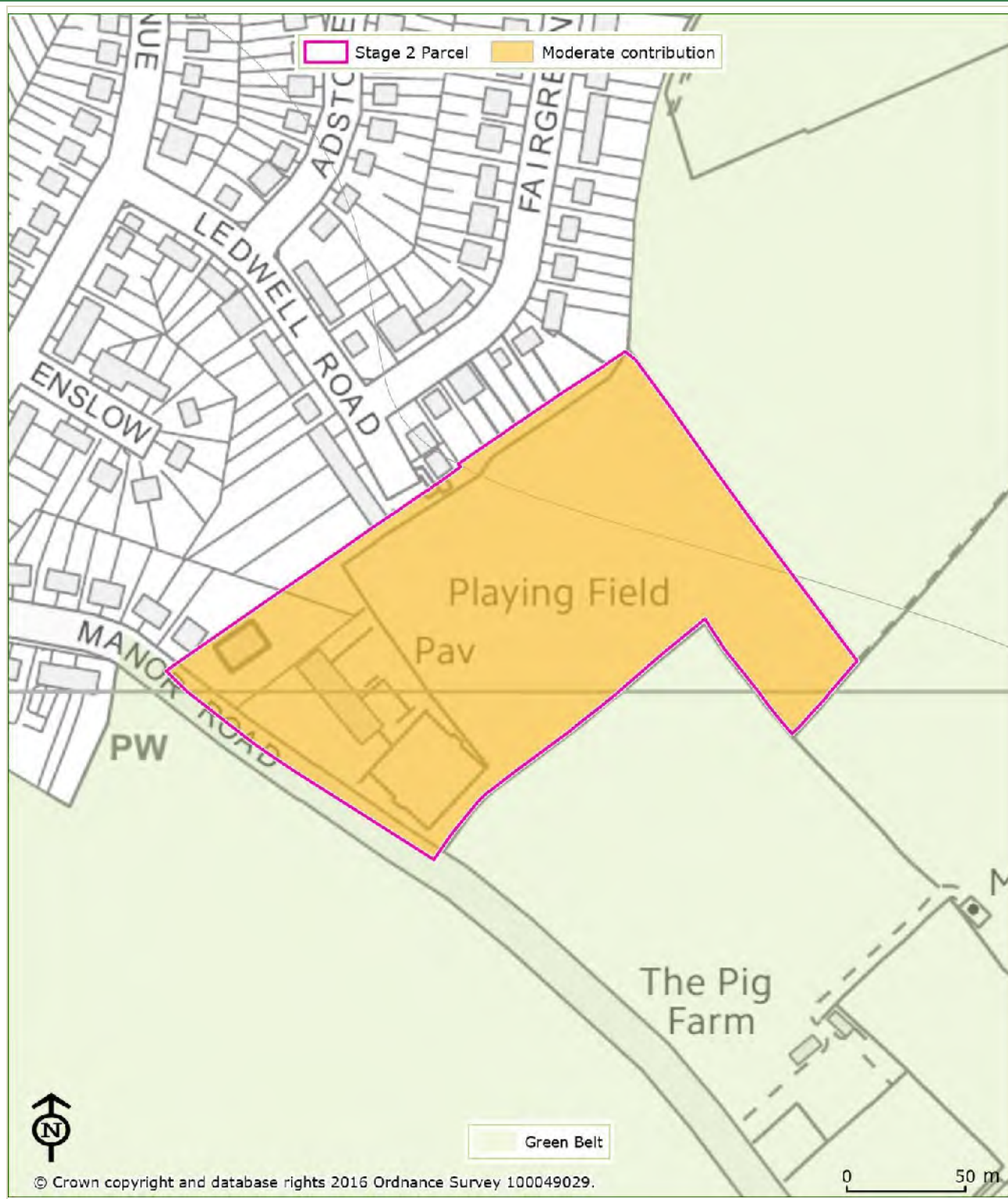
The parcel is considered to make a relatively weak contribution to Green Belt purposes. Potential alternative Green Belt boundaries: Heath Wood would form a strong boundary to the east, and the tree-line along the southern edge of the school site is consistent with the settlement edge further west.

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Land Parcel Ref: C1b

Parcel Type: Stage 2 Parcel

Area (ha) 2.8



Land Parcel Ref: C1b

Parcel Type: Stage 2 Parcel

Area (ha) 2.8

## Parcel description

The parcel contains the Church of St Thomas the Apostle and Caddington and District Sports and Social Club, consisting of a building and associated area of hard surfacing adjacent to Manor Road and a sports field to the east. The parcel has a relationship with the inset settlement edge to the north, where Ledwell Road ends at the edge of the playing field, and the Catholic Church is immediately adjacent to the last house on Manor Road, but trees along the road in front of the church, and between it and the sports club building, do create some distinction. A strong hedgerow contains the sports field to the south, but there is a stronger visual relationship with the open arable field to the east, and across Manor Road the parcel faces more arable farmland.

---

## Conclusion

On balance this parcel has sufficient openness, distinction from the settlement edge and relationship with the wider countryside to make a moderate contribution to preventing countryside encroachment. The inset settlement edge on Manor Road, Ledwell Road and Fairgreen Road is consistent, and any expansion of development in this direction would also weaken the gap between Caddington and the smaller settlements of Aley Green and Lower Woodside , in turn reducing the gap to the inset village of Slip End.

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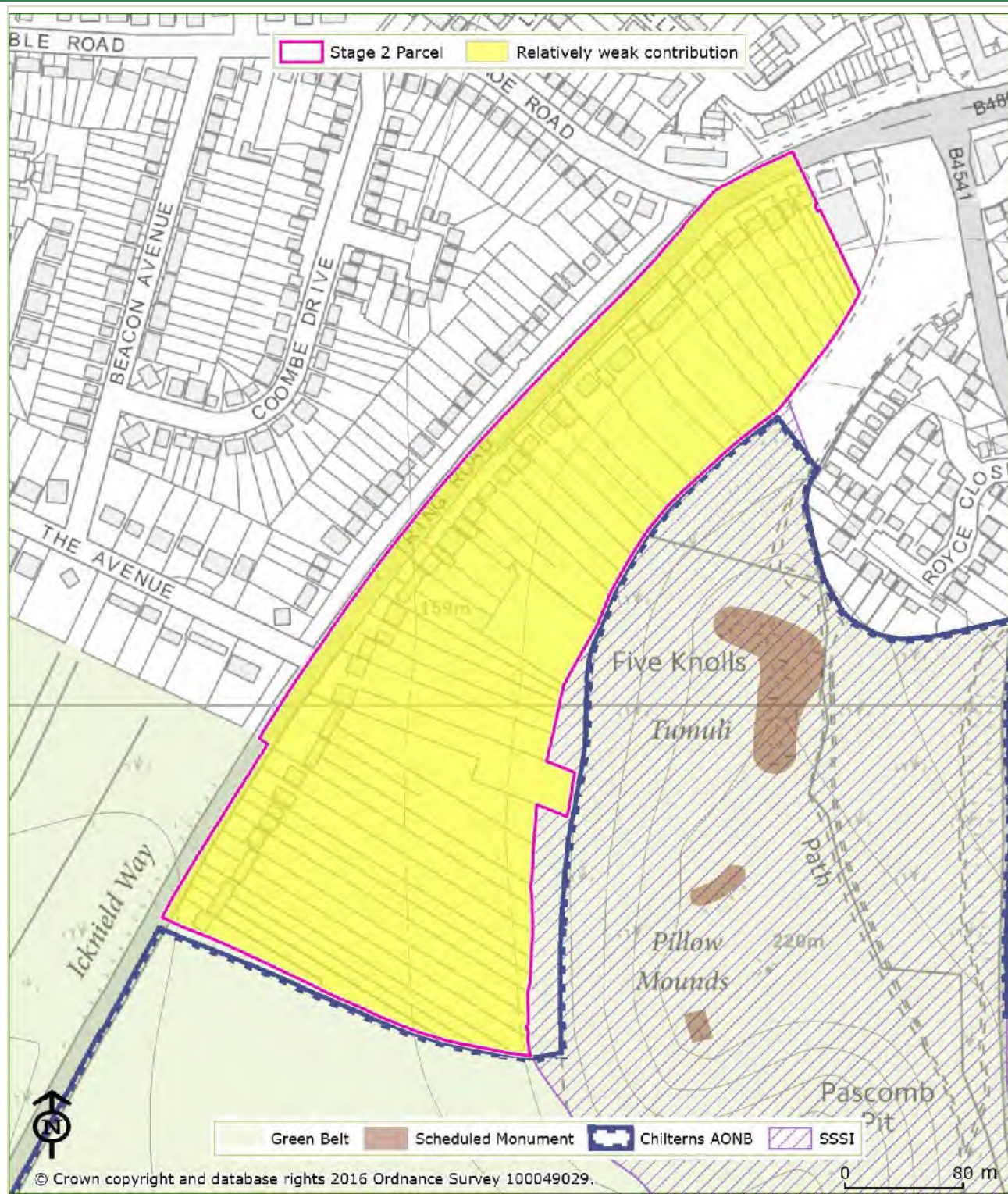


Land Parcel Ref: D2a

Parcel Type: Stage 2 Parcel

Area (ha)

10.2





Land Parcel Ref: D2a

Parcel Type: Stage 2 Parcel

Area (ha) 10.2

## Parcel description

Dwellings along the eastern side of Tring Road, between the Downs Service Station (close to the junction with Totternhoe Road) and the edge of Dunstable, and their long back gardens.

A strong belt of trees and scrub, strengthened by trees within the residential gardens, forms the eastern edge of the parcel, which is further defined by the strong break in slope that marks the foot of the Dunstable Downs chalk escarpment. The Chiltern Way long distance path and the Dunstable and Whipsnade Downs SSSI also follow this edge. To the south there is a clear distinction between the residential edge and a very open, undulating arable landscape to the south.

Tree cover within the parcel combines with trees within the inset settlement to the west of Tring Road to soften the settlement edge and create a transition to the more densely development area to the north, but regardless of this there is a strong distinction between the parcel and the downs to the east, and there is no significant distinction between the density of development to either side of Tring Road.

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## Conclusion

There is a clear distinction between the parcel and the wider countryside, and development within it relates it strongly to the inset settlement. Tring Road is a clear boundary feature, but the scarp foot would also be a strong potential alternative Green Belt boundary, marking a distinction between the settlement and the downland landscape beyond, and strengthened by the SSSI status of the Downs. Therefore the parcel is considered to make a relatively weak contribution to Green Belt purposes.

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Land Parcel Ref: D5a

Parcel Type: Stage 2 Parcel

Area (ha) 21.6

## Parcel description

A cluster of buildings associated with three schools - Manshead Upper School, Streetfield Middle School and St Mary's Lower School - surrounded by playing fields. The parcel occupies the floor of a steep-sided valley running south from Dunstable to Markyate and Flamstead, with the A5 Watling Street providing a road link. Reasonably strong hedgerows mark the edges of the parcel adjacent to the inset settlement edge, the well-hedged A5 forms a strong edge to the south-west and Dunstable Road forms the south-eastern boundary. To the north-west, close to the valley floor, the parcel edge is marked in part by the entrance drive to the schools, beyond which lies arable farmland, and in part by a hedgerow separating the area from a public recreation ground.

The strong topographical form of this parcel relates it to the urban area to the north but also to the open valley landscape to the south. Built development forms a fairly dense cluster, and although this has an urbanising influence it leaves open space to the south and east that relates to the broader, rural valley more than to Dunstable. There is a fairly narrow gap between the school buildings and the residential edge on Norfolk Road, but strong hedgerows and the absence of any vehicular access from this direction emphasise the separation between the two.

---

## Conclusion

Despite the extent of development in this area it is felt that there is sufficient separation from the inset settlement, which currently has a fairly even edge across both sides of Watling Street, and sufficient relationship between the site and the wider countryside, for any further settlement extension to constitute countryside encroachment. All of the parcel is therefore judged to make a moderate contribution to Green Belt purposes.

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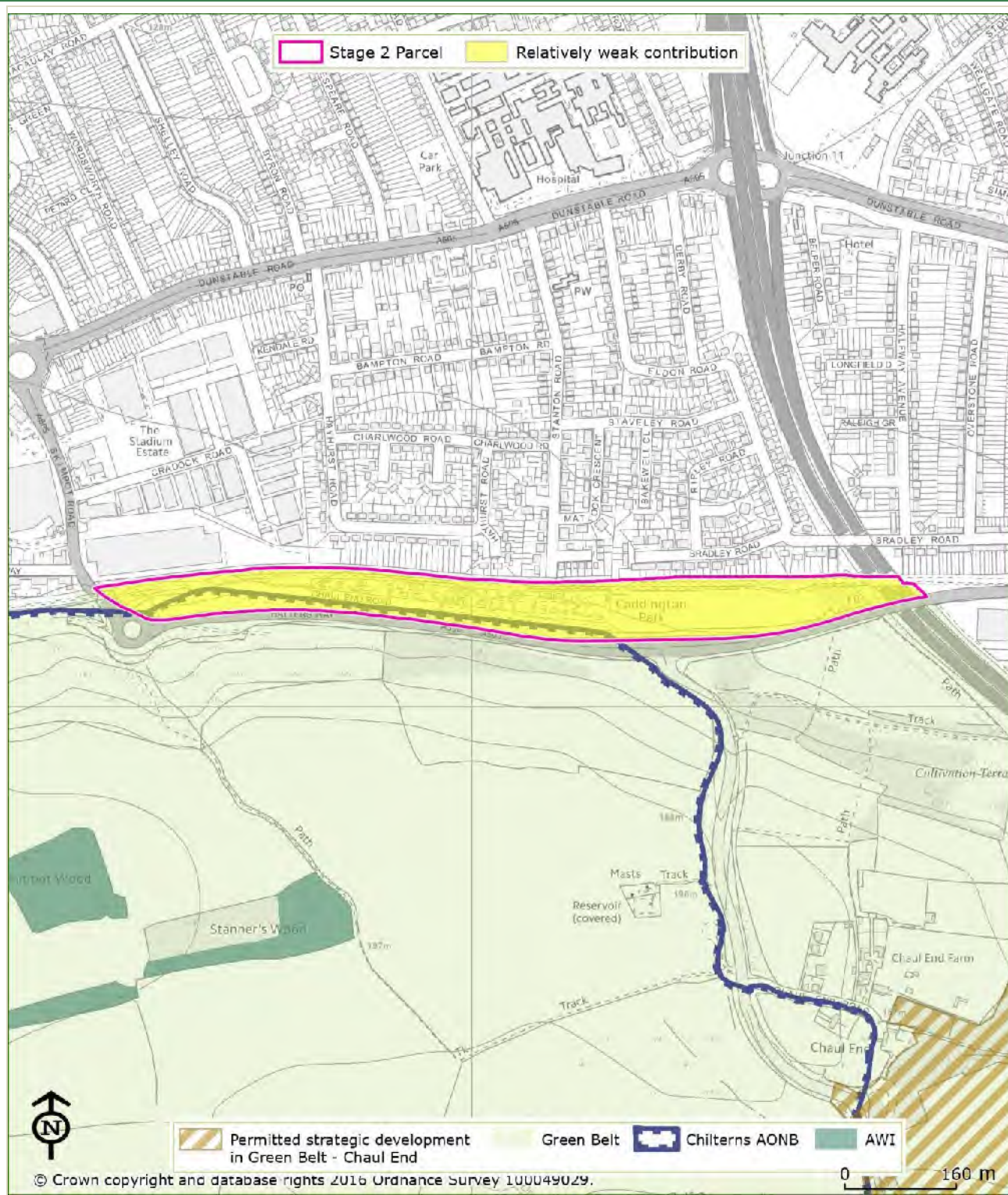


Land Parcel Ref: D5b

Parcel Type: Stage 2 Parcel

Area (ha)

8.0



Land Parcel Ref: D5b

Parcel Type: Stage 2 Parcel

Area (ha) 8.0

## Parcel description

A narrow strip of land which is split into an area of grassland to the east and a park home site, Caddington Park, to the west, accessed from Skimpot Lane. Dense tree cover occupies the remaining land to the west and south of Caddington Park.

The parcel is hemmed in by transport routes: the Luton-Dunstable Busway, edged by strong tree cover, separates it from the inset edge of Dunstable to the north and the A505 Hatters Way, also tree-lined, forms the southern edge. The short eastern and western edges of the parcel are marked by the M1 and the A505 Skimpot Road respectively. There is also a visual relationship with development in the urban area to the north.

Topographically there is some distinction between the eastern and western halves of the parcel in relation to the chalk scarp slope that defines this edge of Dunstable, with the eastern half situated beneath the foot of the slope but the steeper western half forming part of the slope, but the routeways and associated boundary vegetation are strong features which dominate the landscape structure.

---

## Conclusion

Although physically separated from the inset settlement this parcel is too contained to make any significant contribution to the wider countryside. Existing development within it and its strong relationship with urbanising features mean that it makes a weak contribution to Green Belt purposes. Hatters Way, the M1 and Skimpot Road would form a strong potential alternative Green Belt boundary.

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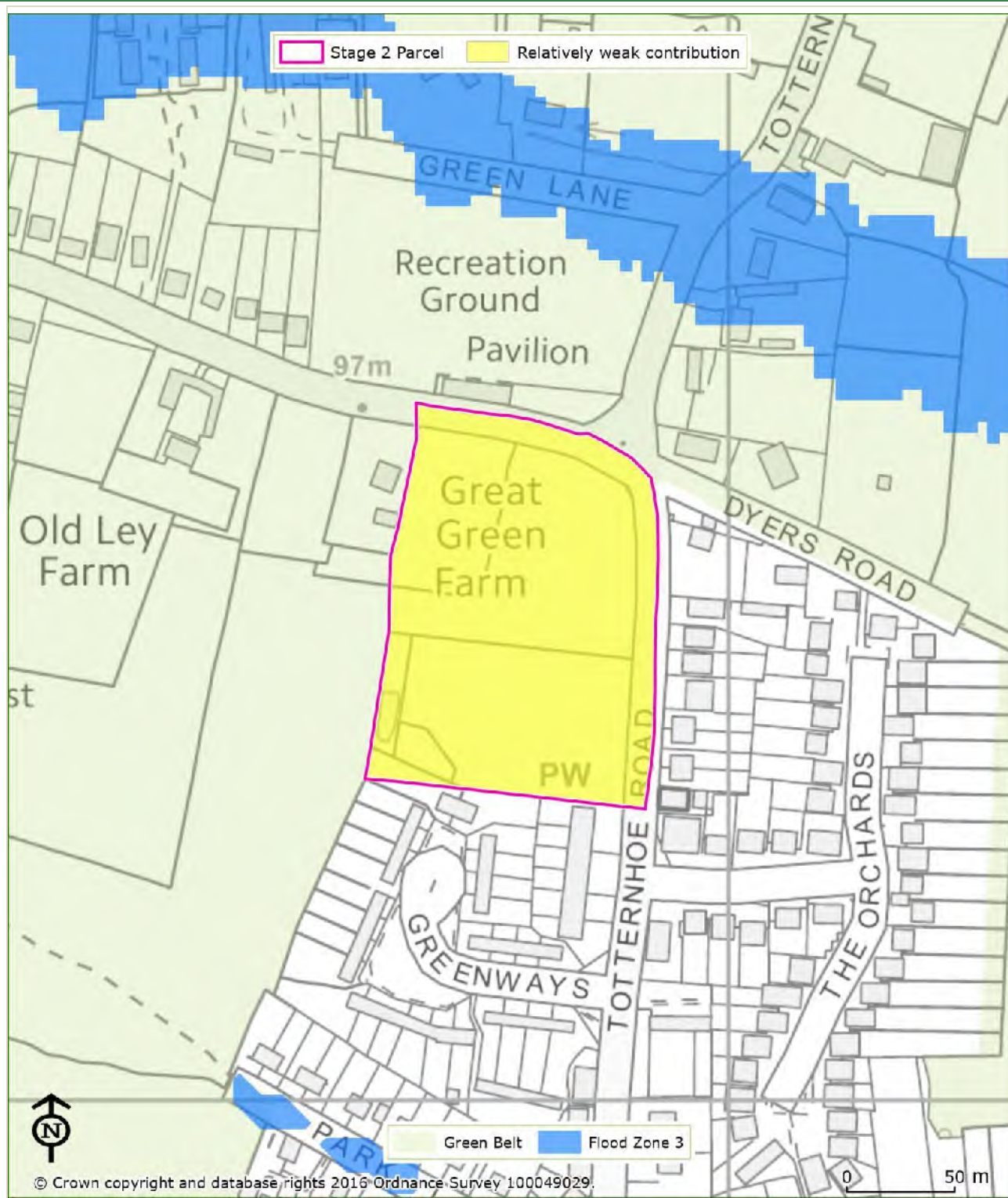


Land Parcel Ref: EB1a

Parcel Type: Stage 2 Parcel

Area (ha)

2.1



Land Parcel Ref: EB1a

Parcel Type: Stage 2 Parcel

Area (ha) 2.1

## Parcel description

Grazing fields in an area bounded by Totternhoe Road to the east and Greenways to the south, marking the inset settlement edge of Eaton Bray, with The Rye to the north and field boundaries and the boundary of a residential dwelling to the west.

The parcel contains no development, but houses to the south and across Totternhoe Road to the east have some urbanising influence. The Rye, and a single dwelling off it, set in well-treed grounds, provide additional containment. To the west the fields have only fenced boundaries, with further grazing land beyond, but a hedgerow with trees c.70m to the east creates a degree of separation from the wider countryside.

---

## Conclusion

The parcel makes a relatively weak contribution to Green Belt purposes. The fenced boundaries of the identified area are not visually strong, but align with the inset settlement edge to the south and so would make an appropriate potential alternative Green Belt boundary, although at the northern end the hedged boundary to a residential property may make a more suitable boundary than the parcel edge, which runs through the gardens. The hedgerow to the east could form an alternative boundary both here and to the south, but expansion into this area would increase encroachment on the countryside.

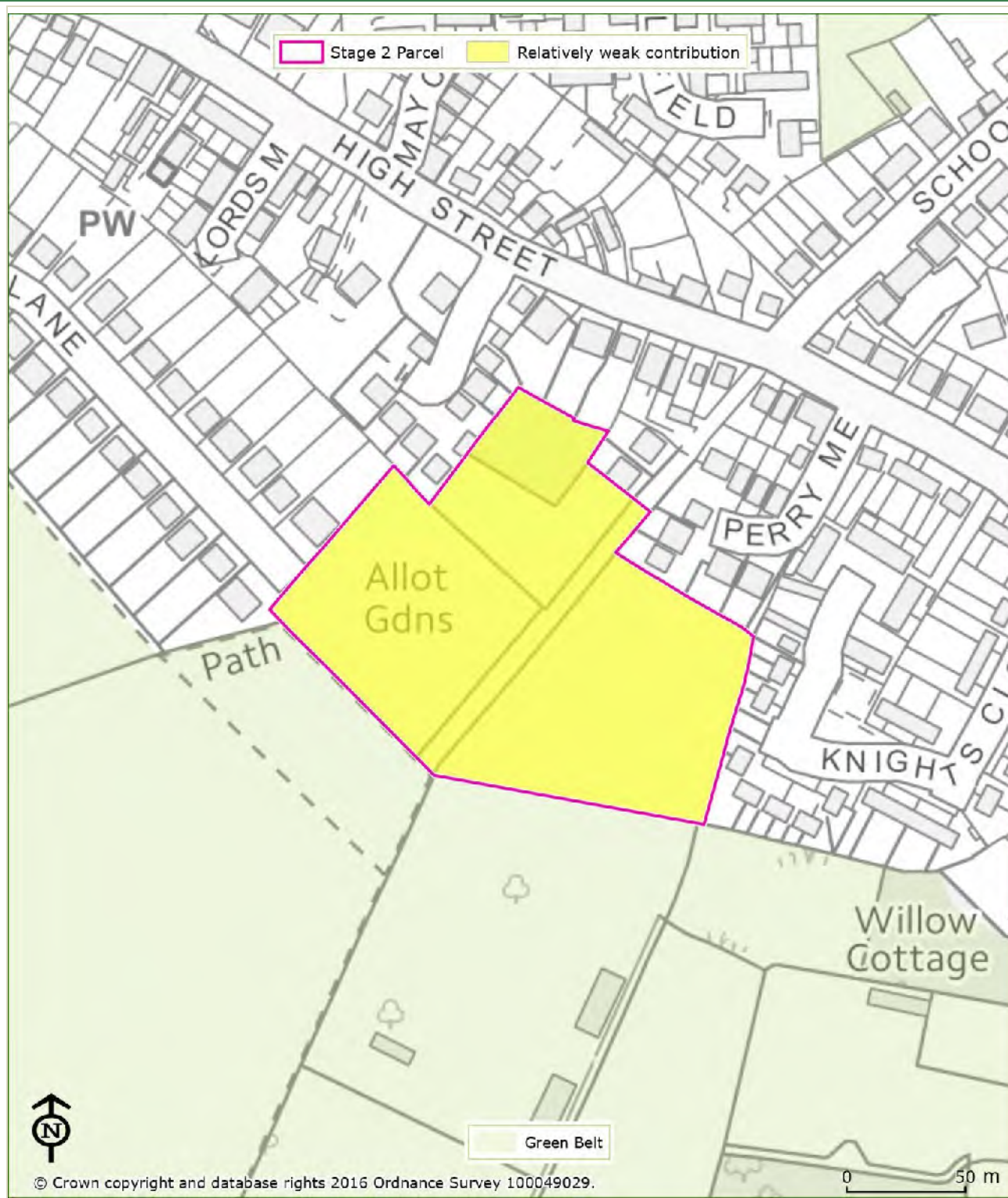
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Land Parcel Ref: EB1b

Parcel Type: Stage 2 Parcel

Area (ha)

2.1



Land Parcel Ref: EB1b

Parcel Type: Stage 2 Parcel

Area (ha) 2.1

## Parcel description

An area of open grassland to the east of The Meadows and allotments and a small area of tree-fringed grassland to the west.

The allotments align with housing on Church Lane, abut development on Woodside, and are distinct from open arable farmland to the south-east, from which they are separated by a hedgerow. The small grassland area to the north-west of the allotments, although distinct in character due to its tree cover, is contained by housing on three sides and lacks a significant relationship with the wider countryside. The larger area of grassland on the other side of The Meadows has housing along two sides - Perry Mead to the north and Knights Court to the east - although a hedgerow limits visibility of the latter. To the south there is no feature along what was formerly a hedgerow boundary, but orchard trees occupy the area to the south and so create some distinction.

---

## Conclusion

All of the defined area is considered to make a relatively weak contribution to Green Belt purposes, having a strong relationship with the settlement form and a degree of separation from the wider countryside. The hedgerow between the allotments and the arable field to the south-east forms a clear potential alternative Green Belt boundary feature, and combining this with a new edge along the former field boundary to adjoin the hedgerow to the south of Knight's Court would create a shorter Green Belt edge.

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Land Parcel Ref: FW2a

Parcel Type: Stage 2 Parcel

Area (ha) 20.2

## Parcel description

This parcel comprises a series of arable fields to the east of Flitwick. Existing development is limited to a couple of agricultural barns associated with Folly Farm in the northern corner of the parcel.

The woodland of Flitwick Moor contains the parcel to the east, and strong hedgerows connect it to the settlement edge to the north and south. The settlement of Flitwick adjoins the parcel to the west with Malden Road and back gardens of properties along Malden Road making up the boundary. Malden Road Industrial Estate is also located along Malden Road to the west.

Tree planting is limited along the western edge which creates a relatively hard built edge and the commercial warehousing within the industrial estate with garish signage has a strong urban influence over the wider parcel. Flitwick Moor is a dense woodland and provides a strong separating feature from the wider countryside. The containment from the countryside and openness along the urban edge means that the parcel relates more strongly to the settlement than to the wider countryside.

---

## Conclusion

The parcel makes a relatively weak overall contribution to Green Belt purposes. The dense woodland to the east and connecting hedgerows to the north and south, the form associated with a Public Right of Way and the latter with the River Flit, would make a strong potential alternative Green Belt edge.

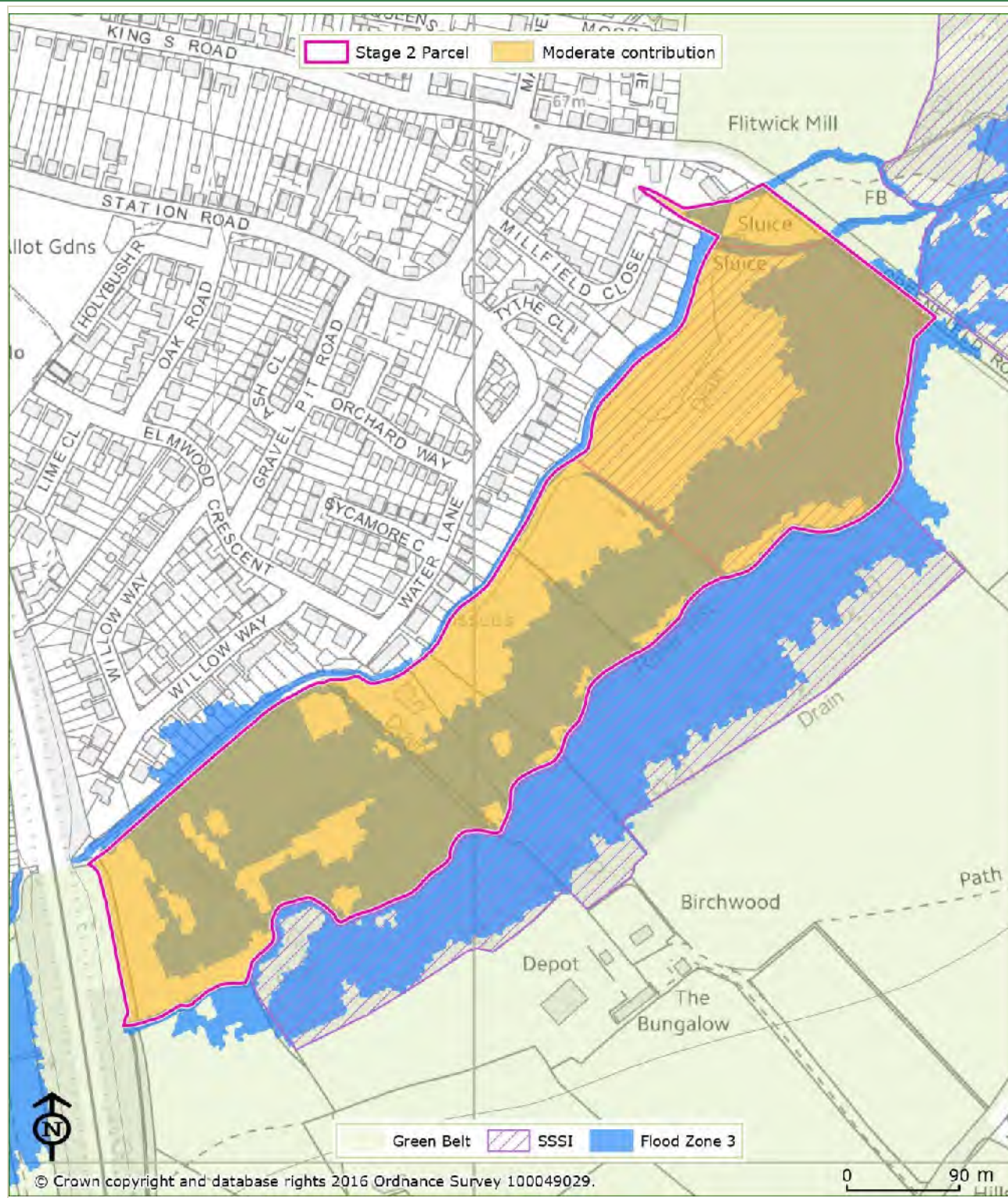
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Land Parcel Ref: FW3a

Parcel Type: Stage 2 Parcel

Area (ha)

13.3



Land Parcel Ref: FW3a

Parcel Type: Stage 2 Parcel

Area (ha) 13.3

## Parcel description

This parcel comprises a series of pasture fields defined by guppy hedgerows and tree belts.

The River Flit splits just north of the parcel and runs along much of the eastern and western perimeter flowing round to the south. The northern boundary follows Greenfield Road leading into Flitwick whilst the settlement edge runs along the western boundary. A length of railway on embankment also marks the western extent and a large swathe of woodland forms the southern edge and continues round to the east.

The parcel has a degree of separation from the wider countryside to the south east by woodland and a distinct change in landform, although the north eastern edge around Greenfield Road is more open and relates more to the countryside. The watercourse running along the settlement edge with substantial vegetation creates some distinction from the settlement of Flitwick, and although the urban edge is less visually contained in the north the designation of a SSSI adjacent to the inset edge in this area creates a barrier to settlement expansion. Land adjacent to the settlement edge at the southern end of the parcel is functional floodplain, strengthening the role of the watercourse as a boundary.

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## Conclusion

The parcel makes a moderate overall contribution to Green Belt purposes, and the channel defining the existing settlement edge constitutes a strong boundary.

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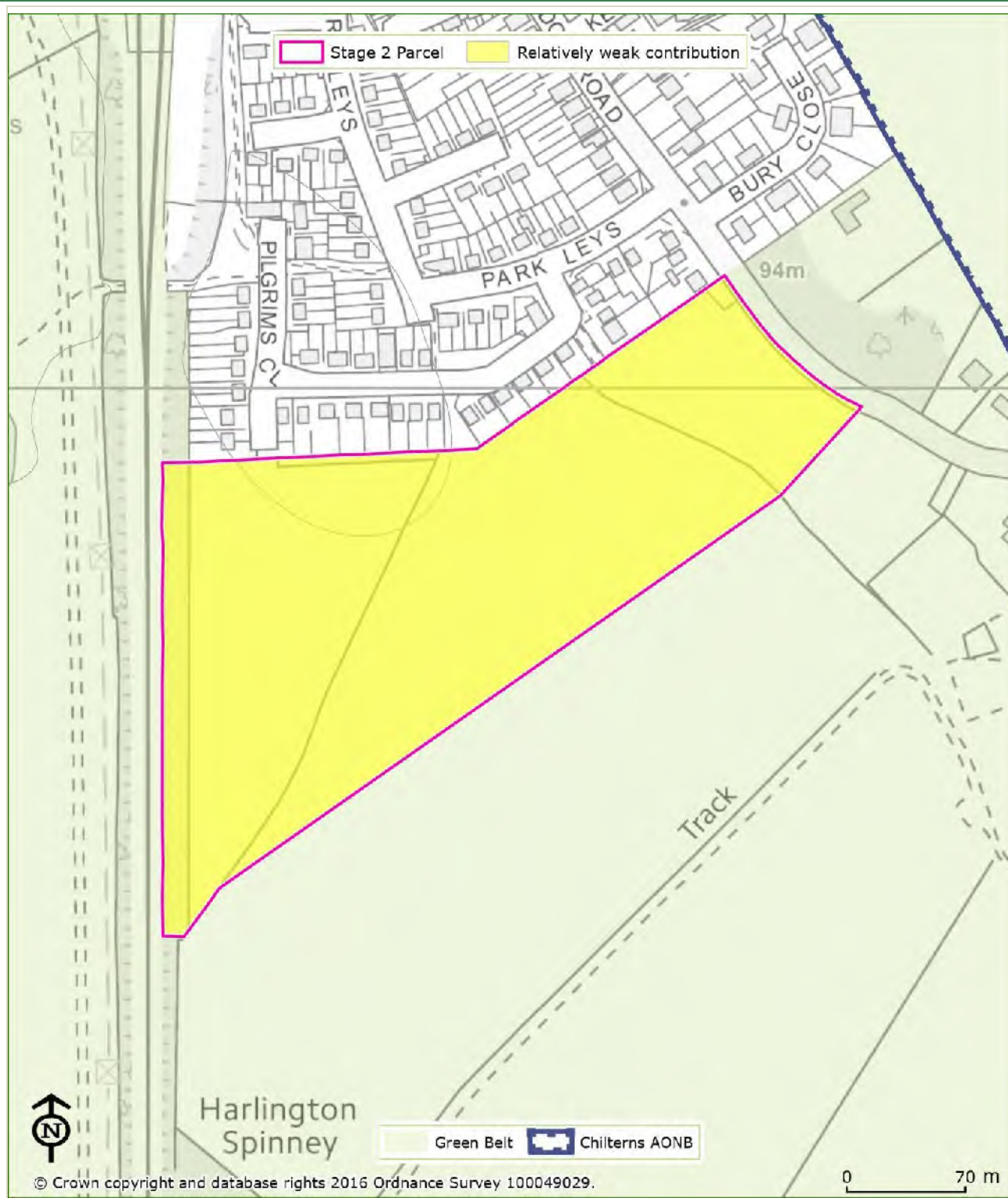


Land Parcel Ref: H2a

Parcel Type: Stage 2 Parcel

Area (ha)

6.8



Land Parcel Ref: H2a

Parcel Type: Stage 2 Parcel

Area (ha) 6.8

## Parcel description

This parcel comprises a series of pasture fields well-defined by mature hedgerows. The parcel is free from development and vegetation is limited to field boundaries.

The settlement edge of Harlington abuts the parcel to the north with some trees situated within back gardens along the boundary. A railway forms the western boundary and a mature hedgerow with hedgerow trees defines the southern extent whilst larger scale arable fields are located beyond. Sundown Road makes up the eastern edge and a small woodland copse is situated adjacent.

The hedge line to the south together with the tree-lined road in the east and railway embankment in the west provides a strong separation from the wider countryside. The openness of the built edge with Pilgrims Close facing out over the parcel has an urbanising influence and creates a relatively strong relationship between the parcel and settlement.

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## Conclusion

The parcel makes a relatively weak overall contribution to Green Belt purposes. Containing hedgelines would make a relatively strong potential alternative Green Belt boundary.

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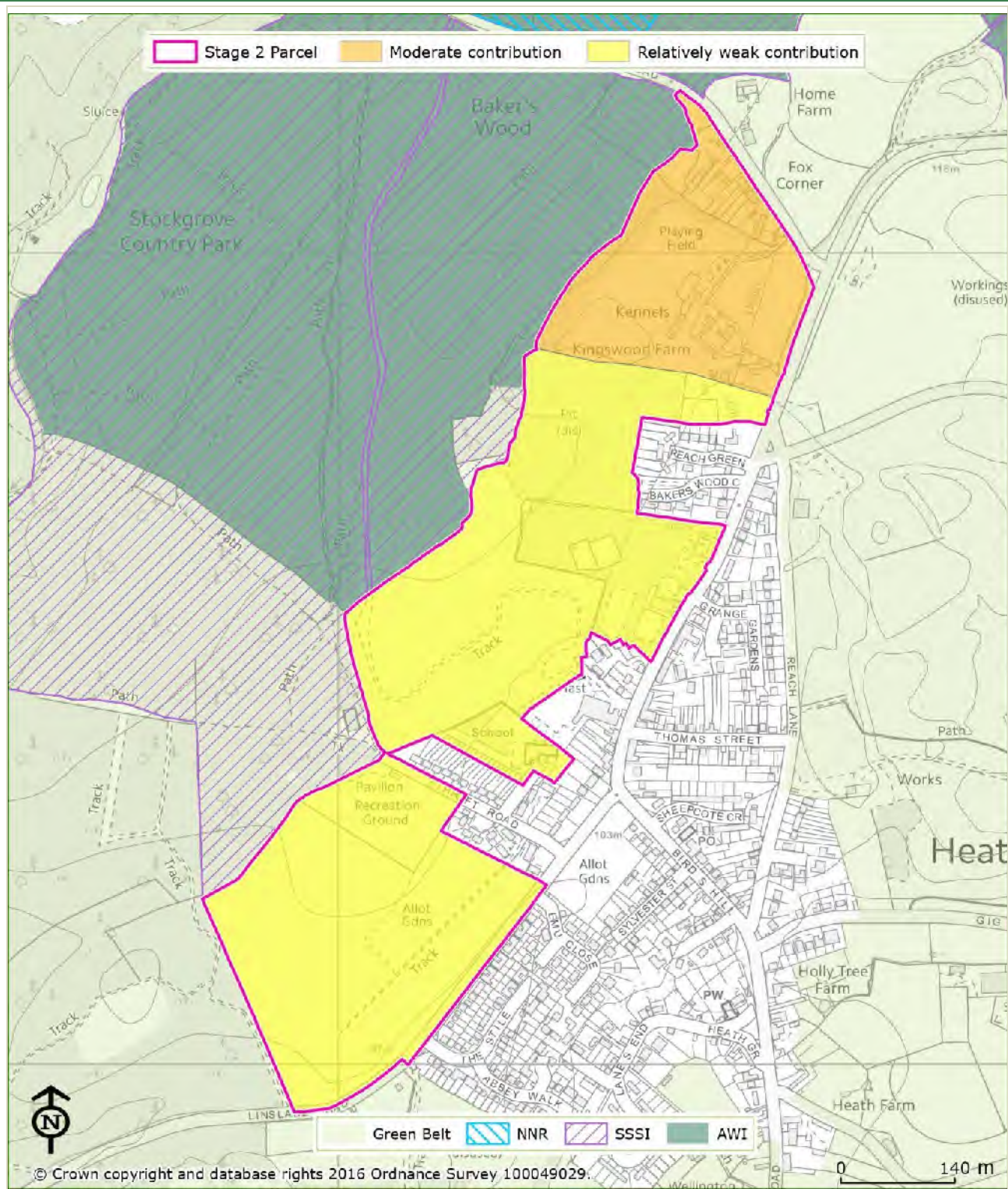


Land Parcel Ref: HAR1a

Parcel Type: Stage 2 Parcel

Area (ha)

30.4



Land Parcel Ref: HAR1a

Parcel Type: Stage 2 Parcel

Area (ha) 30.4

## Parcel description

The parcel comprises a series of recreational and pasture fields framing a disused sand pit on the settlement edge of Heath and Reach. Existing development is concentrated around the perimeter of the parcel near to the inset settlement and consists of St Leonards Lower School, Kingswood Farm and a small number of residential properties.

Boundaries of the parcel are formed by minor roads and dense woodland. Woburn Road and Linslade Road, with a number of pockets of inset development to the west of these roads, make up the western boundary. Linslade Road continues round to form much of the southern boundary whilst Brickhill Road marks the northern limit, again with some inset housing.

The areas of inset development to the west of Woburn Road and Linslade Road create a strong relationship between the parcel and the settlement of Heath and Reach. Furthermore, large areas of woodland associated with Bakers Wood and Stockgrove Country Park contain the parcel to the west and provides a strong barrier to the wider countryside. However, the northern end of the parcel, around Kingswood Farm, is more distinct from the settlement and has a greater relationship with the countryside.

---

## Conclusion

The area adjoining the settlement edge of Heath and Reach, excluding the area around Kingswood Farm, makes a relatively weak contribution to Green belt purposes, and the woodland to the west would form a strong potential alternative Green Belt edge. A hedgerow provides distinction from the Kingswood Farm area to the north, which is considered to make a moderate contribution to Green Belt purposes.

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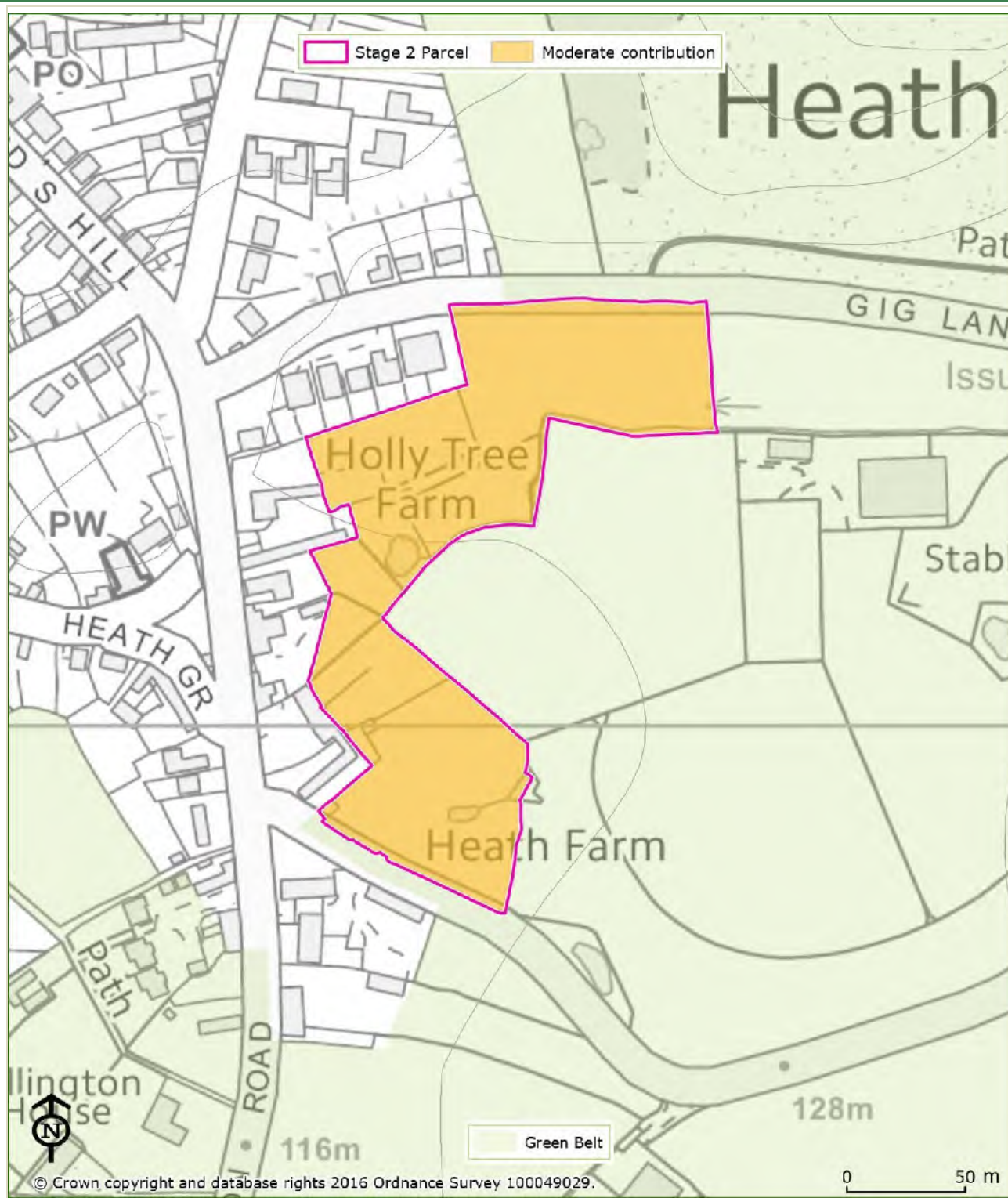


Land Parcel Ref: HAR2a

Parcel Type: Stage 2 Parcel

Area (ha)

1.9



Land Parcel Ref: HAR2a

Parcel Type: Stage 2 Parcel

Area (ha) 1.9

## Parcel description

This parcel comprises a small number of pasture fields and the back gardens of adjacent properties to the south east of Heath and Reach.

Gig Lane and Eastern Way extend from the settlement along the northern and southern boundary respectively. Tree belts run either side of Gig Lane with an existing mineral workings further north. Post and rail fencing form the boundary to Eastern Way with a farmstead located beyond. The eastern edge is more varied with post and rail fencing contrasting with stretches of mature tree belts. The settlement edge in the west is also varied with tree belts along the western boundary and within gardens containing adjoining development.

The relatively strong settlement edge where boundary vegetation lines back gardens contrasts with the weaker edge where adjoining properties overlook parcel and have a minor urbanising influence. Small belts of trees provide localised areas distinct from the countryside but there are gaps where development would be perceived as sprawl.

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## Conclusion

There is sufficient openness for the parcel to be considered to make a moderate contribution to Green Belt purposes.

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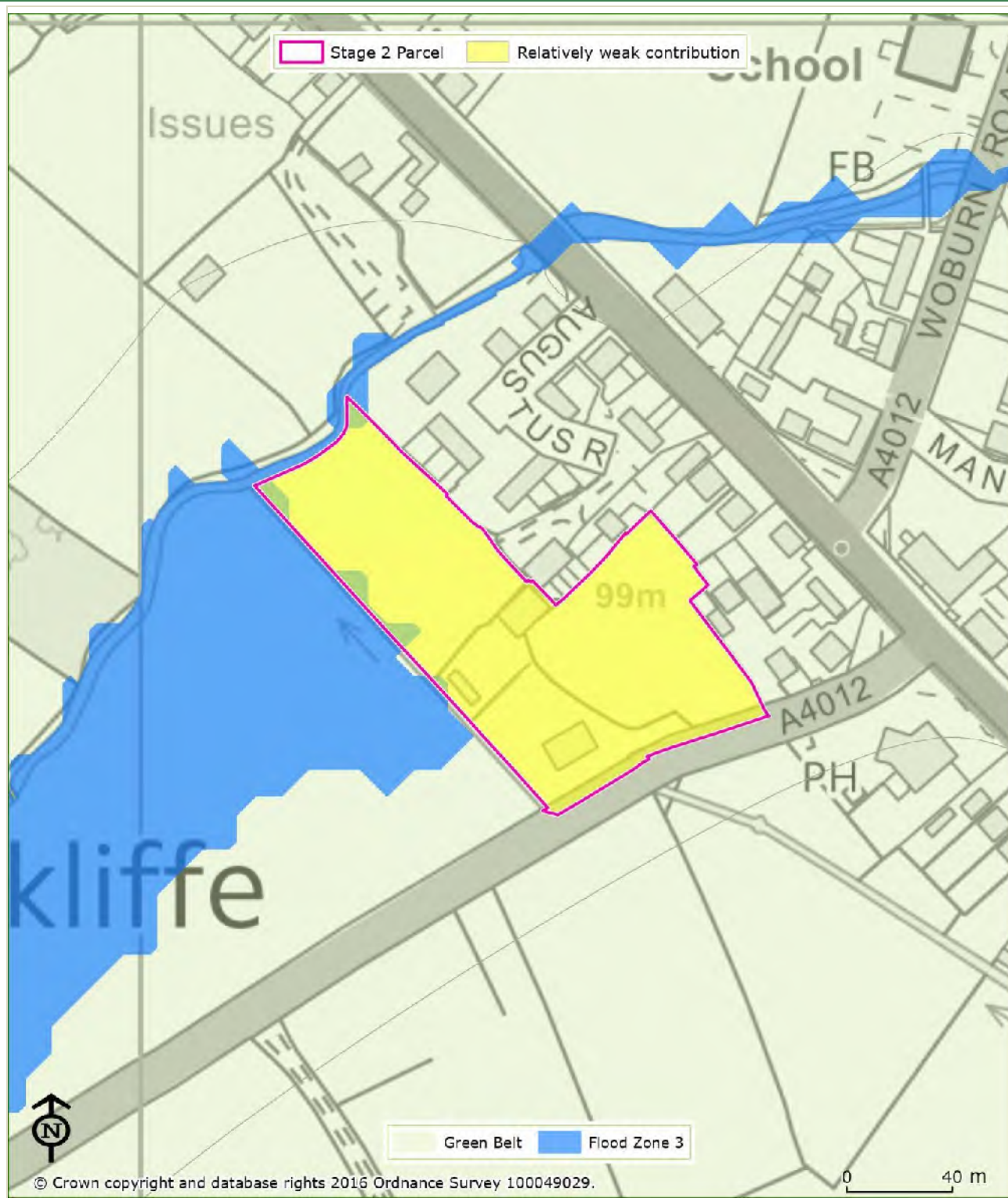


Land Parcel Ref: HL1a

Parcel Type: Stage 2 Parcel

Area (ha)

1.2



Land Parcel Ref: HL1a

Parcel Type: Stage 2 Parcel

Area (ha) 1.2

## Parcel description

This parcel contains an area of rough grassland and a single dwelling on the western edge of Hockliffe. A small number of free standing trees are also located throughout the area.

The A4012 runs along the southern boundary where it passes over a small, tree-lined stream which flows along the western edge into Clipstone Brook in the north. Clipstone Brook is well-treed and bounds the parcel to the north extending from the settlement edge in the west.

The heavily treed watercourses form a strong separation from the wider countryside. The relatively open settlement edge and existing property within the parcel has a urbanising influence and creates a strong relationship between the settlement and parcel.

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## Conclusion

The parcel makes a relatively weak contribution to Green Belt purposes. The water courses and thick tree belts which surround it would form a strong potential alternative Green Belt boundary.

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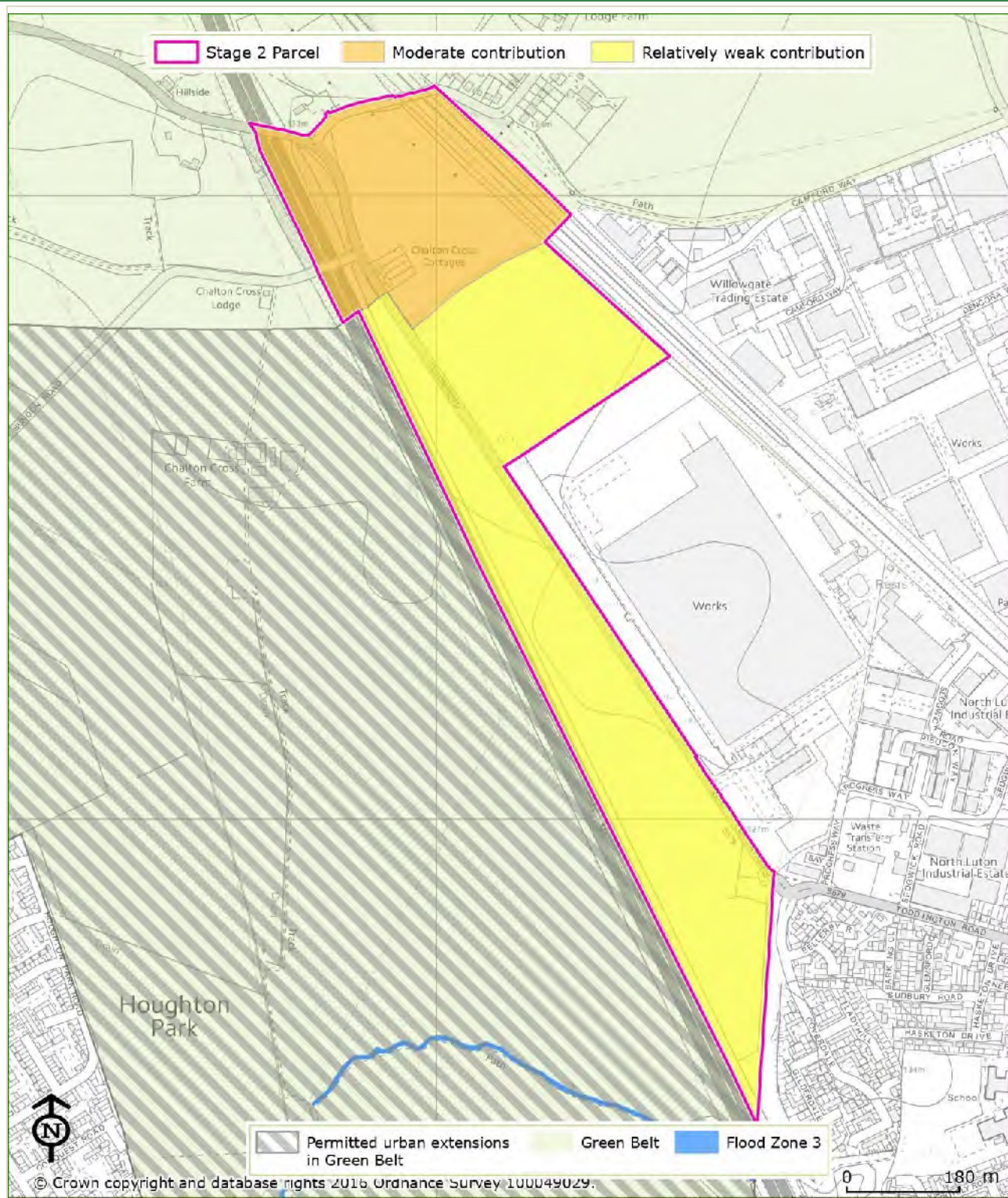


Land Parcel Ref: L1a

Parcel Type: Stage 2 Parcel

Area (ha)

37.3





Land Parcel Ref: L1a

Parcel Type: Stage 2 Parcel

Area (ha) 37.3

## Parcel description

Mostly arable farmland, located in a strip to the west of the Vauxhall Aftersales Warehouse between the B579 Luton Road and the M1, and in two fields to the north of the warehouse, divided by a hedgerow and contained by Luton road to the west, the railway line to the east and Sundon Road to the north. Although related in terms of land use to the broader rural landscape around it, the strong relationship with commercial development to the south and also across the railway line to the east at Sundon Park and strong containment by infrastructure limit the parcel's connection to the wider Green Belt. Land to the west of the M1, up to a point just south of the Sundon Road motorway bridge, is to form part of a large urban extension to Houghton Regis, delimited to the north by a new road currently under construction. It is noted, however, that the landform slopes gently uphill away from the urban edge as far a low ridge in the northernmost field, roughly parallel to Houghton Road, after which it slopes downward more steeply into the valley which forms the head of the River Flit. The field to the north, although contained by Sundon Road, is also physically close to outlying residential development to the east of the railway line.

## Conclusion

The future settlement edge to the west of the M1 will align with the edge of the Sundon Park industrial estate to the east of the railway line, so the land that lies between these to the south - i.e. the strip to the west of the Vauxhall warehouse and the field immediately to the north - will make little contribution to Green Belt purposes. However the northernmost field topographically relates more strongly to the wider countryside to the north, and also serves a role in maintaining the separate character of the hamlet of dwellings on Sundon Road, and so is considered to make a moderate contribution to Green Belt purposes. The hedgerow separating the two arable fields would be suitable as a potential alternative Green Belt boundary feature.

Land Parcel Ref: L5a

Parcel Type: Stage 2 Parcel

Area (ha)

1.2



Land Parcel Ref: L5a

Parcel Type: Stage 2 Parcel

Area (ha) 1.2

## Parcel description

A small piece of steeply sloping ground occupying an island in between the A1081 Airport Way, the B653 Lower Harpenden Road and the A505 Gypsy Lane. The parcel is populated with Scots Pine. Airport Way forms the Green Belt inner boundary along most of Luton's edge between the M1 and the airport, and the parcel is entirely disconnected physically from its surroundings by major roads, but its tree cover does create a relationship with similar woodland on the northern edge of the Luton Hoo estate to the south.

---

## Conclusion

Despite its visual relationship with other woodland, to either side of the Green Belt boundary, the parcel is too small and too contained to make any significant contribution in Green Belt terms, and Airport Way would form a strong, potential alternative Green Belt boundary, as it already does to the east and west. However there may be little purpose in removing it from the Green Belt, given its development constraints and its visual value as part of the urban-rural landscape interface.

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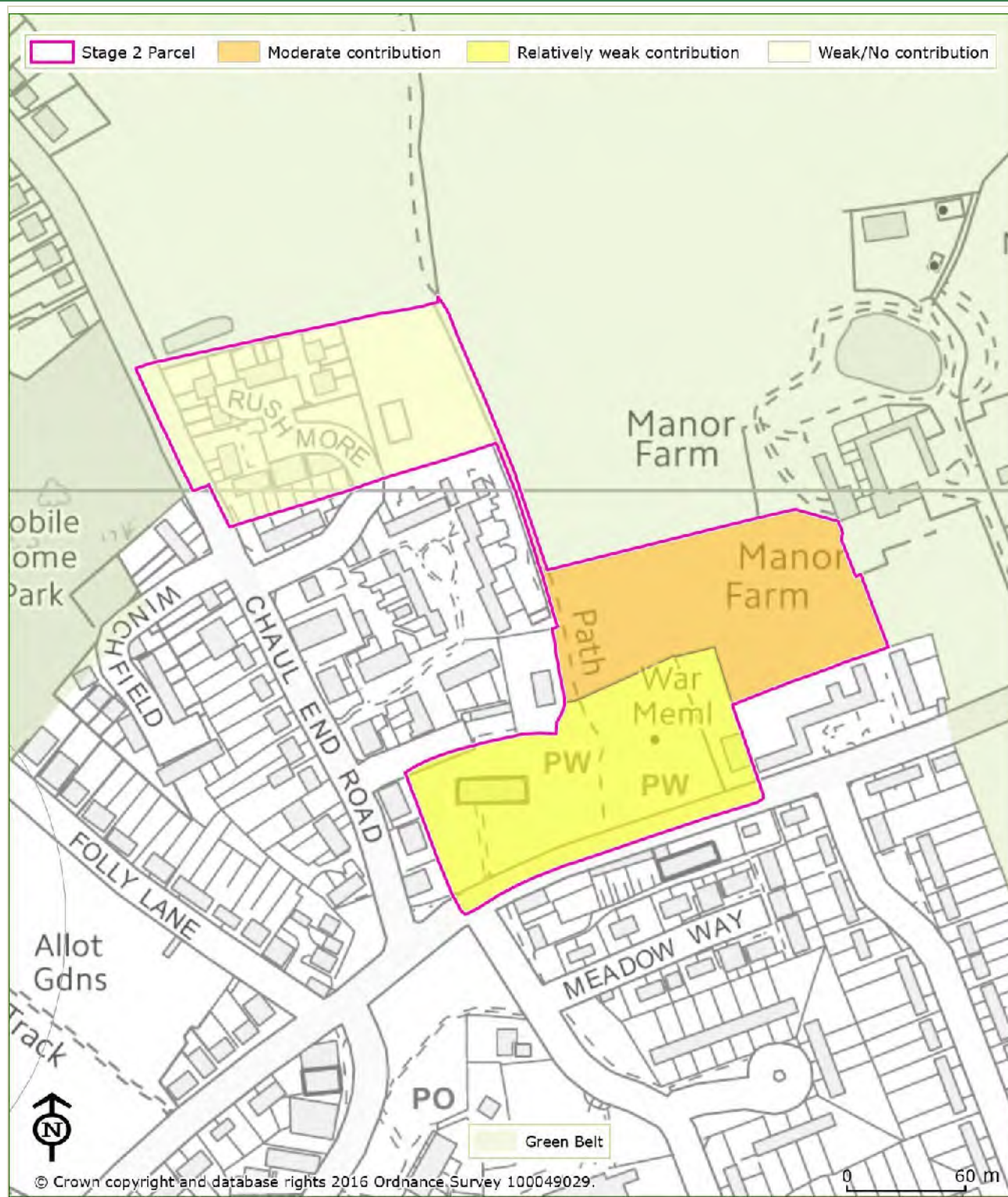


Land Parcel Ref: L6a

Parcel Type: Stage 2 Parcel

Area (ha)

3.7



Land Parcel Ref: L6a

Parcel Type: Stage 2 Parcel

Area (ha) 3.7

## Parcel description

There are two parts to this parcel: the space between the inset settlement edge on Luton Road and the edge to the west on Rushmore Close and, to the north, an area adjacent to Chaul End Road. The former includes All Saints Church and its grounds and one dwelling on Luton Road and, to the north of these, an arable field. The latter is occupied by an extension of Rushmore Close and an adjacent children's playground and recreational open space.

The churchyard is largely contained by built development. It has strong surrounding tree cover which gives it a degree of distinction from surrounding residential development, but it has a limited relationship with the wider countryside. The arable field is also strongly contained by tree cover; it abuts the inset settlement edge to the west and south-east, and the buildings of Manor Farm to the north-east, but the latter are not urbanising in character. The gap between the inset settlement edges and the farm complex contributes to countryside setting of the farm.

Dense residential development on Rushmore Close occupies most of the parcel area alongside Chaul End Road, which is strongly contained by well treed hedgerows. A hedgerow separates the recreational space from the housing, but it is too well-contained to have any significant role in preventing encroachment on the wider countryside.

---

## Conclusion

The extension to Rushmore Close and the adjacent recreational area make only a weak contribution to Green Belt purposes, and the trees surrounding the parcel make a relatively strong potential alternative Green Belt boundary.

The churchyard is too contained to make more than a relatively weak contribution to preventing countryside encroachment, and the hedgerow along its northern edge would form a stronger Green Belt boundary than the current one, where there is no clear distinction between the one house within the Green Belt and the adjacent block of similar houses which are inset.

The arable field plays a stronger role in preventing countryside encroachment by preserving the gap between the settlement edge and Manor Farm, and so is considered to make a moderate contribution to Green Belt purposes.

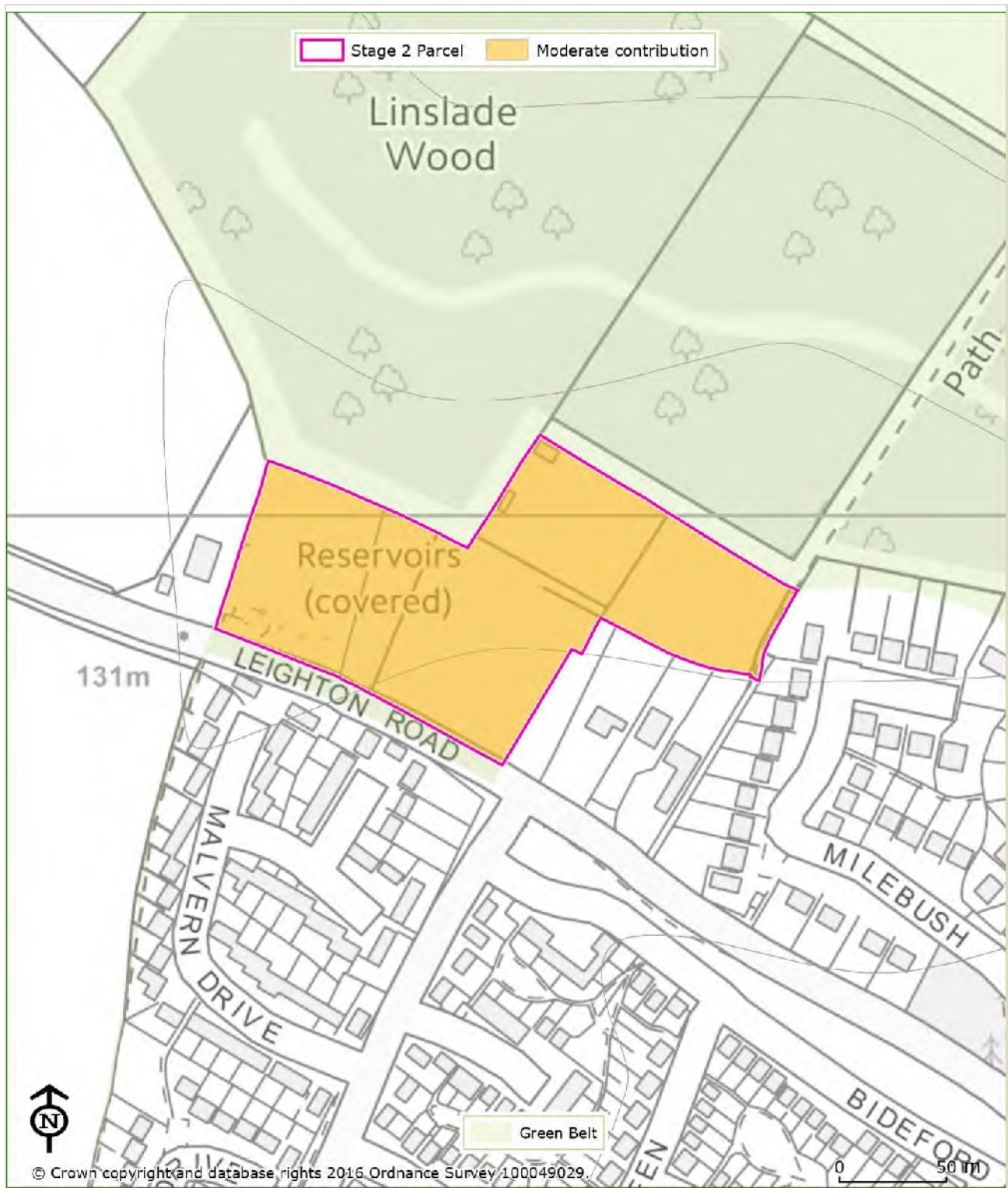
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Land Parcel Ref: LL1a

Parcel Type: Stage 2 Parcel

Area (ha)

2.1





Land Parcel Ref: LL1a

Parcel Type: Stage 2 Parcel

Area (ha) 2.1

## Parcel description

This parcel contains a series of small rectilinear pasture fields as well as a small covered reservoir on the northern edge of Linslade. The fields are mostly defined by post and wire fencing with tree cover concentrated around the edges of the parcel, although a small tree belt is situated between the reservoir and adjacent fields.

The tree-lined Leighton Road runs along the southern edge connecting the centre of Linslade to the north west whilst the back gardens of existing properties make up the eastern edge. Linslade Wood marks the northern extent and a small tree belt provides the separation between an isolated dwelling and the parcel.

Linslade Wood provides a great sense of enclosure and a strong distinction from the wider countryside. Mature tree belts running along the perimeter of the parcel limit the relationship the parcel has with the adjacent settlement. Existing development is set back and mature boundary vegetation creates a soft settlement edge and acts as a clear separating feature.

The parcel is distinct from the wooded high ground of Linslade Wood and so does not contribute to the historic setting of Linslade.

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## Conclusion

The parcel has a sense of separation from both the countryside and the settlement and so makes a moderate contribution to Green Belt purposes.

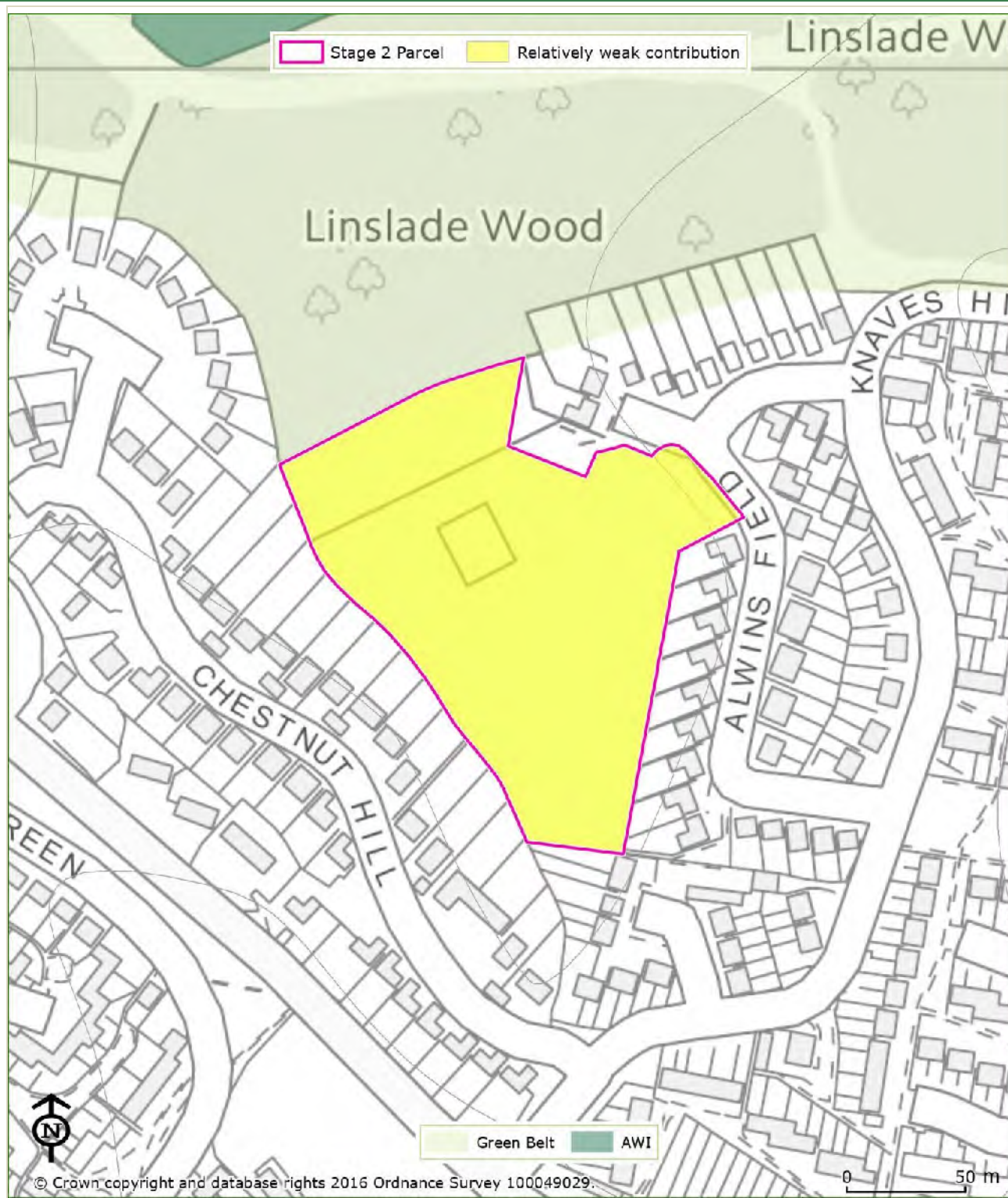
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Land Parcel Ref: LL1b

Parcel Type: Stage 2 Parcel

Area (ha)

2.1



Land Parcel Ref: LL1b

Parcel Type: Stage 2 Parcel

Area (ha) 2.1

## Parcel description

This parcel comprises a recreation ground and includes open playing fields, allotments and a children's playground on the northern edge of Linslade.

Back gardens of existing settlement border the parcel to the east, south and west whilst Linslade Wood marks the northern edge.

Despite a thick tree belt running along the western boundary, housing in the south and east have a considerable urban influence over the parcel, which creates a strong relationship between the parcel and the settlement. Woodland of Linslade Wood beyond the allotments contains the parcel to the north and provides a strong separation from the wider countryside.

The parcel is distinct from the wooded high ground of Linslade Wood and so does not contribute to the historic setting of Linslade.

---

## Conclusion

The parcel relates more strongly to settlement than to the wider countryside and so makes a relatively weak contribution to Green Belt purposes. Linslade Wood, which already forms the Green Belt boundary along most of the settlement edge in this area, would make a strong alternative Green Belt boundary.

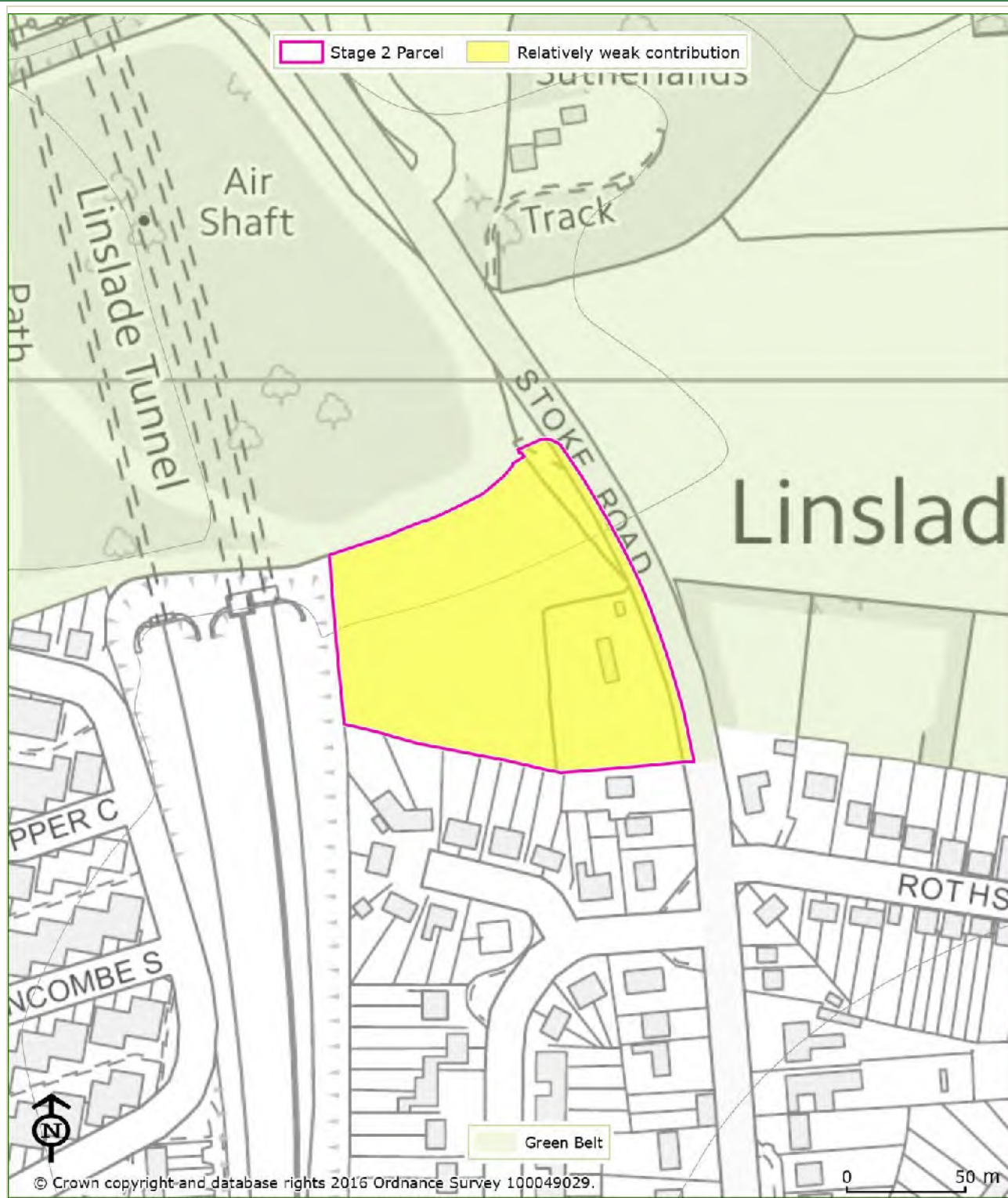
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Land Parcel Ref: LL1c

Parcel Type: Stage 2 Parcel

Area (ha)

1.4





Land Parcel Ref: LL1c

Parcel Type: Stage 2 Parcel

Area (ha) 1.4

## Parcel description

This parcel comprises an area of rough grassland and a relatively large property in the south eastern corner. Formal gardens surround the isolated dwelling and are generally well contained by trees.

A highspeed railway runs along the western boundary in cutting just before it enters a tunnel under Linslade Wood, which together with a mature field boundary marks the northern edge. Stoke Road defines the eastern extent and is reinforced by a thick tree belt along the outer edge of the field. Back gardens of properties adjoin the southern edge and is relatively open save for a small tree belt that also contains the property within the parcel.

Mature field boundaries to the north and east, together with Linslade Wood beyond provide a relatively strong distinction from the wider countryside. The land gently slopes up from the built edge but the adjacent development and railway infrastructure places an urbanising influence over the parcel so that it relates relatively strongly to the settlement.

The parcel is distinct from the wooded high ground of Linslade Wood and so does not contribute to the historic setting of Linslade.

---

## Conclusion

The parcel relates more strongly to the settlement than to the wider countryside and so makes a relatively weak contribution to the Green Belt. Mature field boundaries to the north and east, with Stoke Road alongside the latter, would form a strong potential alternative Green Belt boundary.

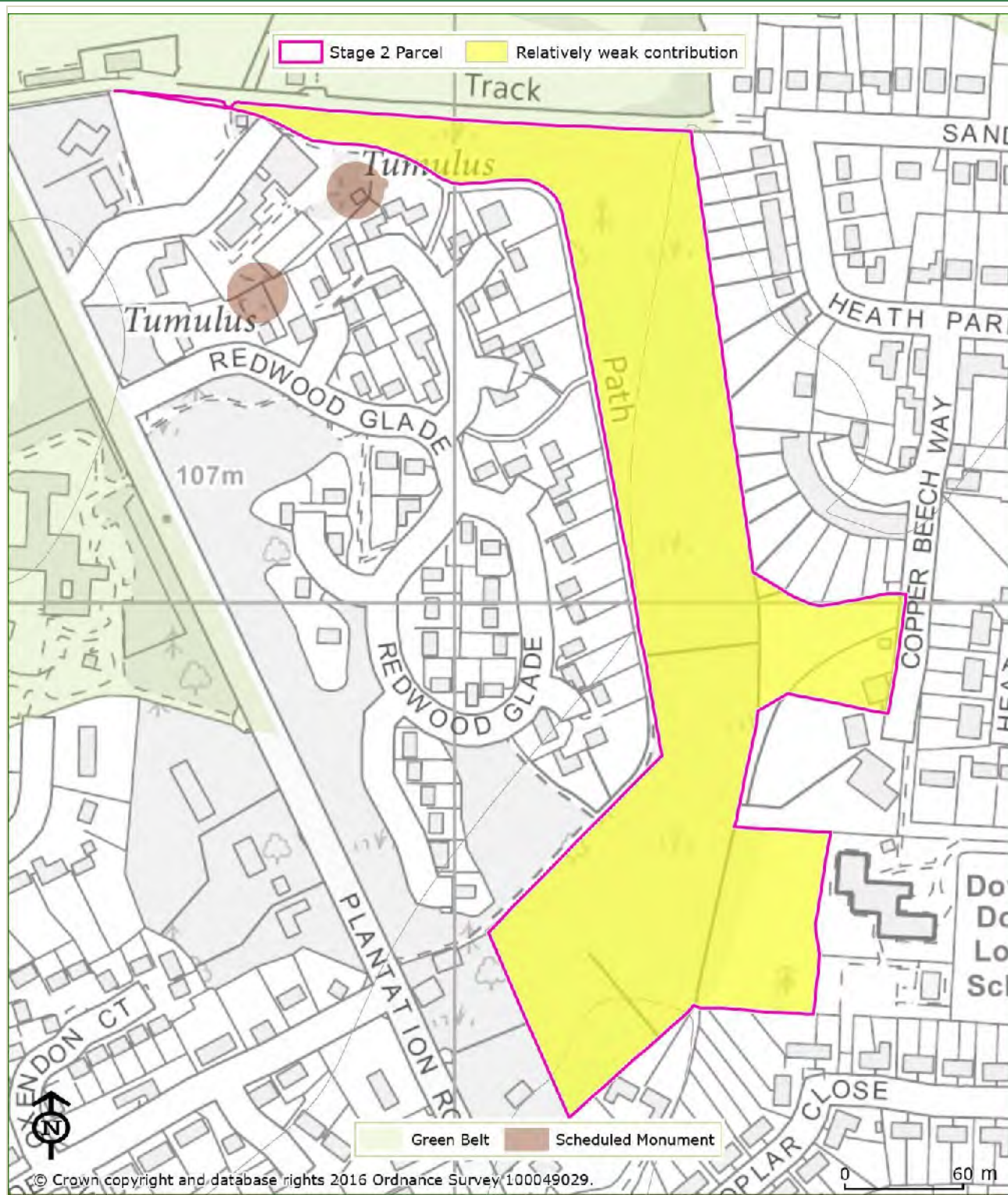
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Land Parcel Ref: LL4a

Parcel Type: Stage 2 Parcel

Area (ha)

4.6



Land Parcel Ref: LL4a

Parcel Type: Stage 2 Parcel

Area (ha) 4.6

## Parcel description

This parcel consists entirely of woodland save for a small area of amenity grassland in the east, whilst existing development is limited to a single dwelling along the inner eastern edge.

A tree lined footpath forms the northern boundary with Leighton Buzzard Golf Club situated beyond and the back gardens of adjacent properties make up the boundaries to the east, south and west.

Woodland typically has a weak relationship with the settlement, but this parcel is almost entirely contained by residential development and so has a weak relationship with the wider countryside.

The parcel is situated within the extent of Leighton Buzzard and has a minimal relationship with the historic setting.

---

## Conclusion

The parcel relates more strongly to the settlement than to the wider countryside and so makes a relatively weak contribution to Green Belt purposes. The bridleway that runs along the northern edge of the parcel would constitute a relatively strong potential alternative Green Belt boundary that would be simpler in form than the extended existing Green Belt edge defined by the parcel's woodland boundaries.

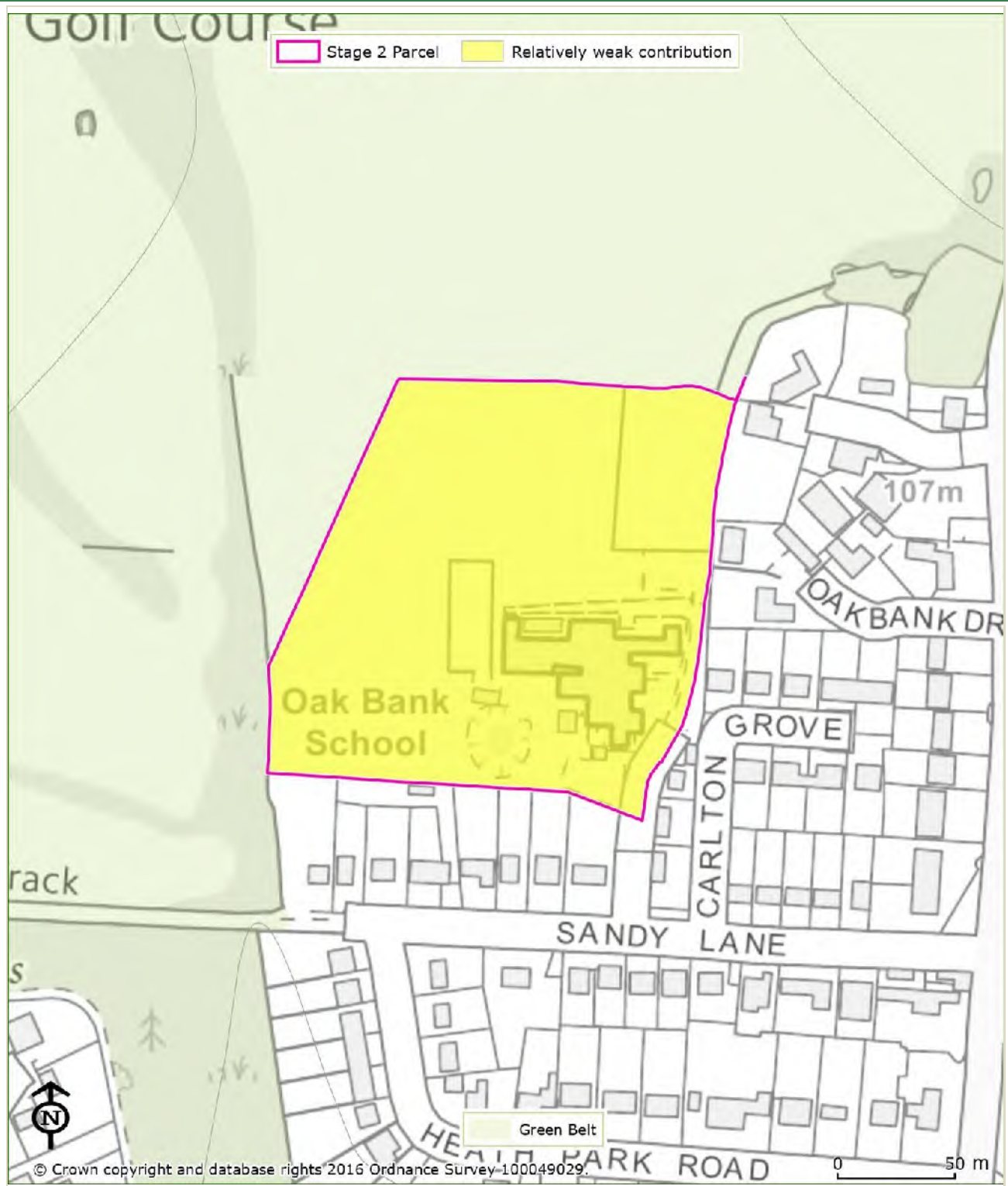
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Land Parcel Ref: LL5a

Parcel Type: Stage 2 Parcel

Area (ha) 2.9



Land Parcel Ref: LL5a

Parcel Type: Stage 2 Parcel

Area (ha) 2.9

## Parcel description

This parcel consists of Oak Bank School and includes the associated playing fields to the north of Leighton Buzzard.

A thick tree belt contains the parcel to the north and west whilst existing properties make up the eastern and southern edges. Swathes of woodland within the golf club join up with the parcel boundary in the south west before the land gently slopes up to the centre of the course further west.

Urbanising development in the form of the school buildings and adjoining properties has a large influence. Mature tree belts provide a relatively strong separation between the parcel and Leighton Buzzard Golf Club beyond. Trees within back gardens soften the built edge to a degree but the school premises combine with the new properties along the school access road to form a strong relationship between the parcel and settlement.

The well-treed nature of the golf club just beyond the parcel forms part of the wider rural setting.

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## Conclusion

The parcel relates more strongly to the settlement than to the wider countryside and so makes a relatively weak contribution to the Green Belt. The parcels tree boundaries would form a relatively strong potential alternative Green Belt boundary.

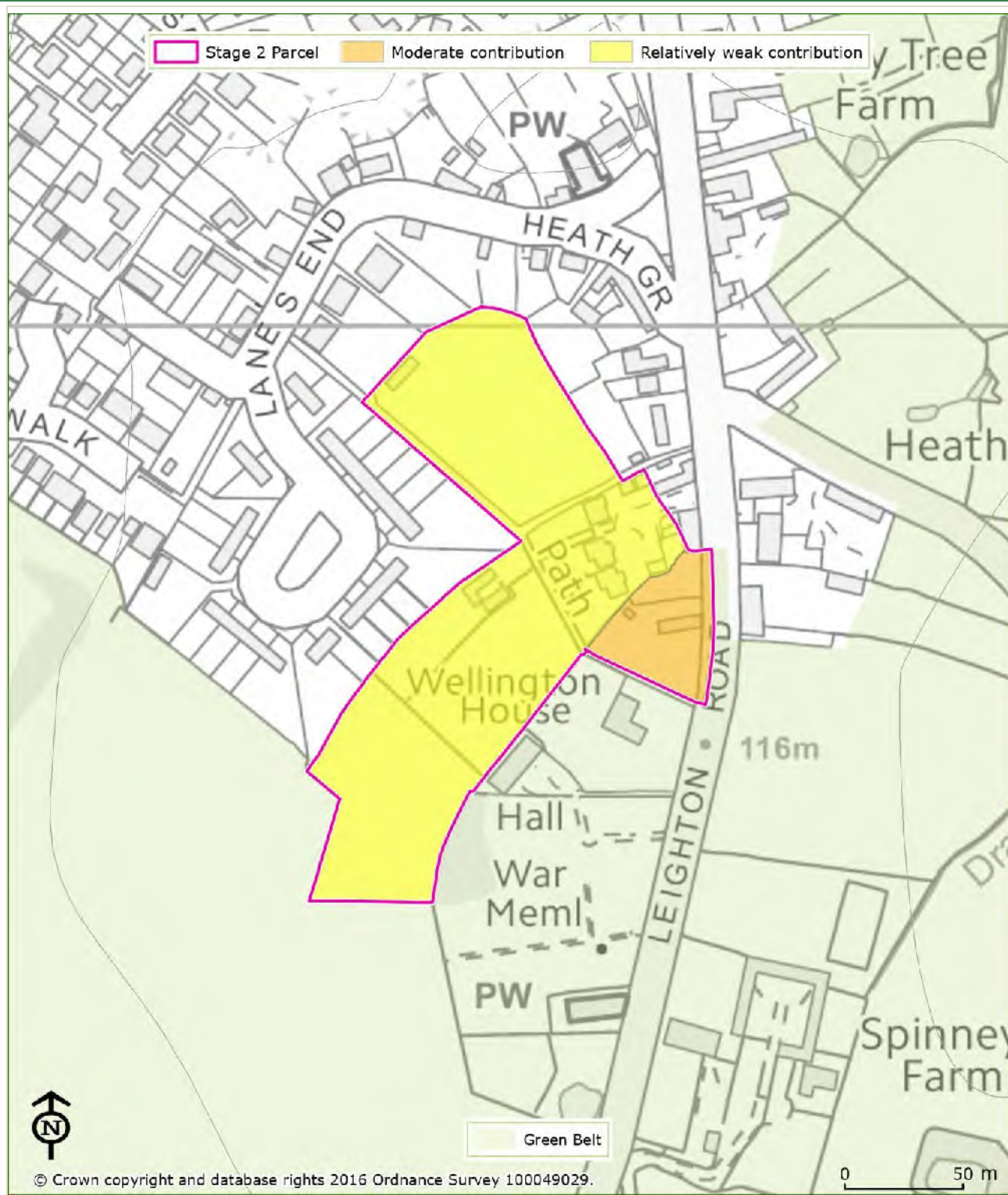
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Land Parcel Ref: LL6a

Parcel Type: Stage 2 Parcel

Area (ha)

2.0





Land Parcel Ref: LL6a

Parcel Type: Stage 2 Parcel

Area (ha) 2.0

## Parcel description

This parcel comprises rectilinear pasture fields containing a small barn and stable block and is bisected by a public footpath. The parcel also includes Evans Yard, a small number of residential properties in the centre off Leighton Road.

Existing development forms the northern edge of the parcel and encompasses the northern field on 3 sides. Leighton Road forms the eastern edge whilst mature hedgerows and trees define the southern and western extent. A few isolated properties are situated close to the western boundary but these are generally well treed and distinct from the adjacent pastures.

Vegetation to the south and west provides a strong separation from the few adjoining properties and wider countryside beyond. Urbanising development overlooks the northern field and runs along the northern edge which creates a strong relationship with the settlement. Development at Evan's Yard, off Luton Road also has an urbanising influence, but the property on Leighton Road to the south of Evans Yard has more in common in terms of character with other adjacent Green Belt dwellings.

---

## Conclusion

Most of the parcel relates more strongly to the settlement than to the wider countryside and so makes a relatively weak contribution to the Green Belt, but the property on Leighton Road to the south of Evans Yard makes a moderate contribution. Trees and hedgerows provide potential alternative Green Belt boundaries.

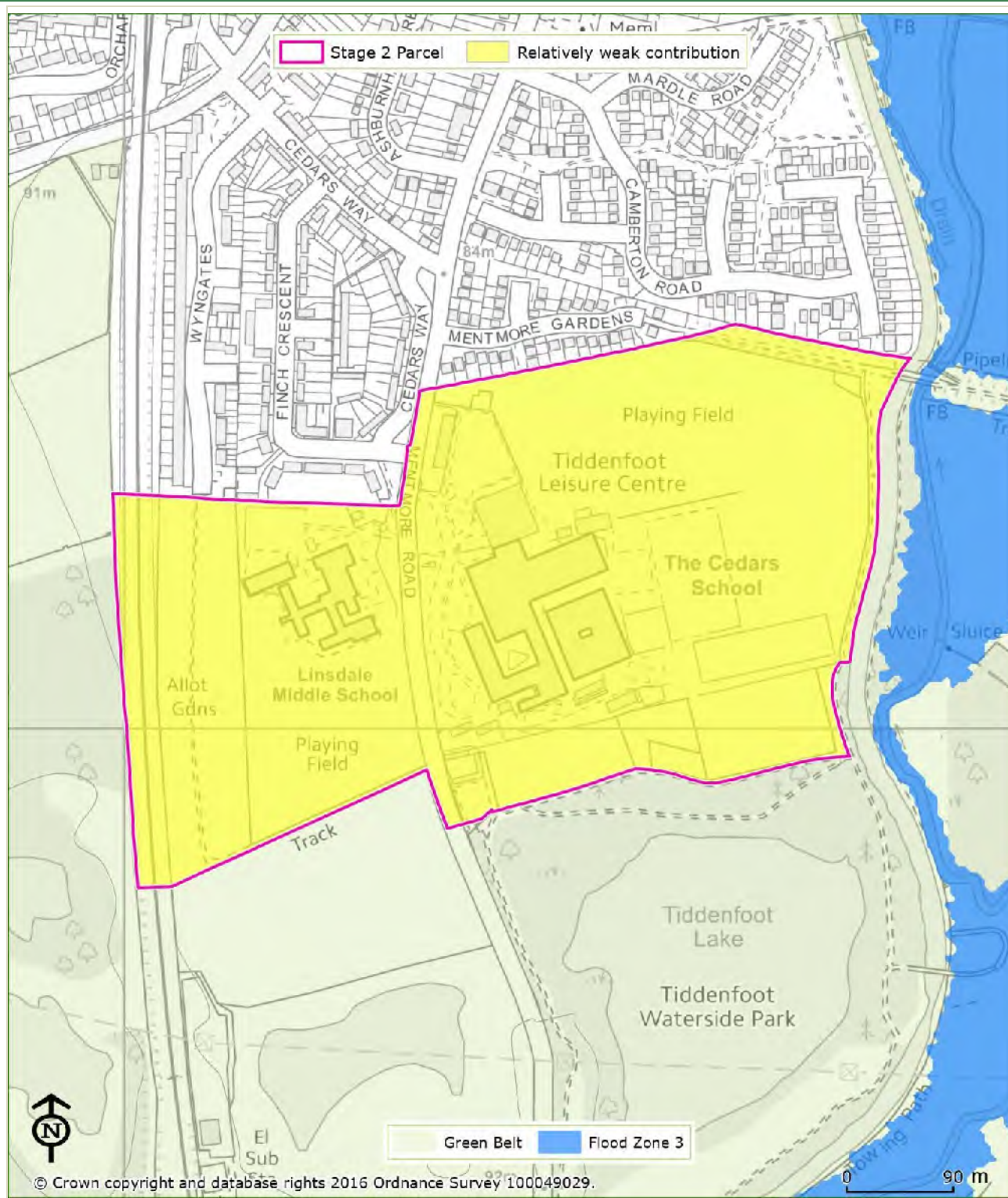
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Land Parcel Ref: LL10a

Parcel Type: Stage 2 Parcel

Area (ha)

20.8



Land Parcel Ref: LL10a

Parcel Type: Stage 2 Parcel

Area (ha) 20.8

## Parcel description

This parcel comprises Linslade Middle School, The Cedars School and Tiddenfoot Leisure Centre and associated playing fields, as well as a small allotments occupying a small area along the western edge. Mentmore Road also bisects the parcel from north to south.

The parcel extends from the settlement of Linslade in the north with properties running close to the boundary. The Grand Union Canal and railway line defines the eastern and western extent respectively whilst the woodland surrounding Tiddenfoot Lake and a mature hedgerow forms the southern edge.

A disused railway runs along a small stretch of the northern perimeter and provides a degree of separation between the parcel and settlement. However, the school buildings, flood lighting relating to the sports facilities and adjoining residential properties at Mentmore Gardens have a strong urbanising influence over the parcel and creates a strong relationship with the settlement. Strong boundary features also provide a strong separation from the wider countryside.

The Grand Union Canal passes along the eastern edge and is listed as a key characteristic to the historic setting of Linslade. The parcel has a limited relationship with the setting due to the containment provided by mature tree belts running along the associated footpath and the openness of fields further east of the parcel relate more strongly. Similarly the high ground to the west of the railway line plays a role in the setting of Linslade, but the openness of the parcel doesn't contribute to the setting role of that high ground.

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## Conclusion

The parcel relates more strongly to the settlement than the wider countryside and so makes a relatively weak contribution to Green Belt purposes. The railway line, hedgerow, woodland and canal form a strong potential alternative Green Belt boundary.

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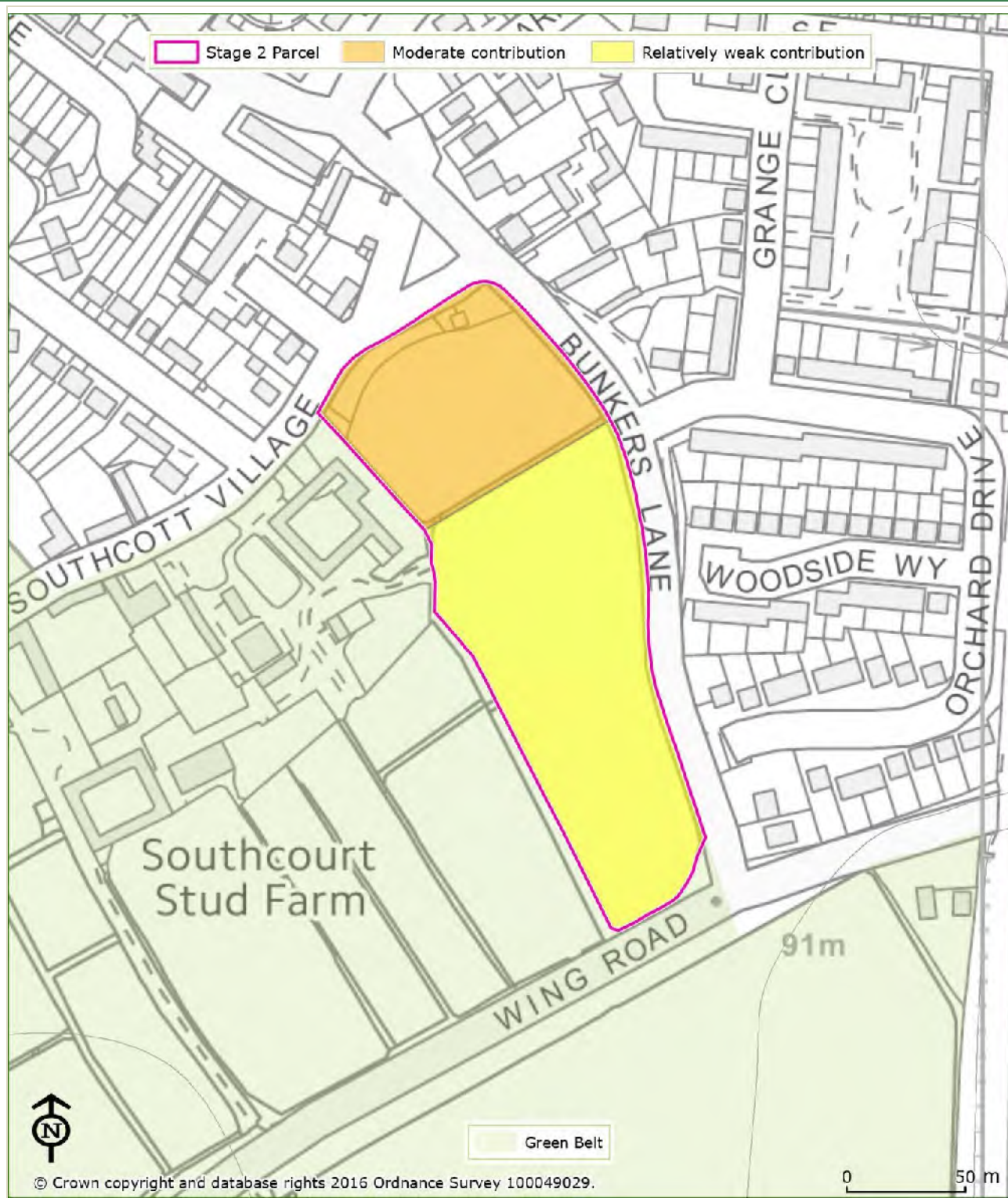


Land Parcel Ref: LL11a

Parcel Type: Stage 2 Parcel

Area (ha)

2.1



Land Parcel Ref: LL11a

Parcel Type: Stage 2 Parcel

Area (ha) 2.1

## Parcel description

This parcel comprises sloping pasture fields on the south western edge of Linslade. Development is limited to a small sub-station, situated along the northern edge.

Southcott Village and Bunker Lane make up the northern and eastern boundaries with residential properties fronting on to them. Wing Road runs along the southern edge and a tree belt marks the western extent with further pasture fields beyond.

The openness of the northern and eastern boundaries creates a relatively strong relationship with the settlement. A ridge line runs east-west across the parcel and the land slopes away from it to the south which creates a strong distinction from the settlement in the southern area and a greater relationship with the wider countryside.

---

## Conclusion

The small, northern field at the junction with Southcott Village and Bunkers Lane makes a relatively weak contribution to Green Belt purposes. It is surrounded on 3 sides by existing built development, with clear outer boundary hedge and tree lines that could constitute a potential alternative Green Belt edge. The field to the south is more strongly separate from the inset settlement, and makes a moderate contribution to Green Belt purposes.

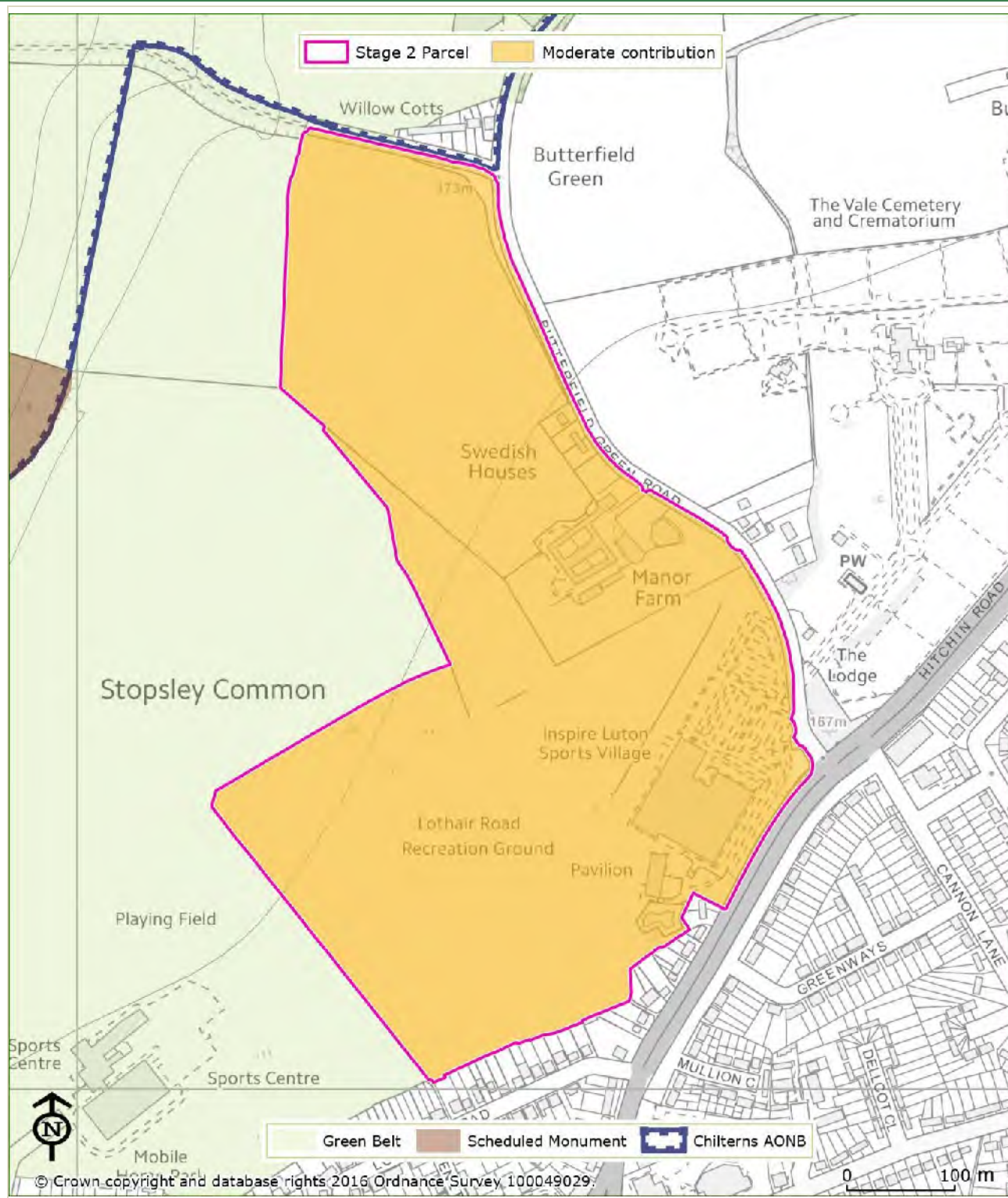
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Land Parcel Ref: P2a

Parcel Type: Stage 2 Parcel

Area (ha)

26.1





Land Parcel Ref: P2a

Parcel Type: Stage 2 Parcel

Area (ha) 26.1

## Parcel description

The parcel includes, from south to north, Lothair Road Recreation Ground, the Inspire Luton Sports Village, the buildings of Manor Farm and several adjacent residential dwellings, grazing land around the farm complex and an arable field to the north.

The parcel abuts the inset settlement edge along Lothair Road and the A505 Hitchin Road to the south, and along Butterfield Green Road, where land to the east is allocated in current saved (2001-11) and submission (2011-31) local plan policies for development of the Butterfield Green Technology Park. Hedgerows with strong tree cover, and a block of woodland to the north-west of the recreation ground, bound the western side of the parcel, other than a gap to the east of the woodland block, and the dead-end Butterfield Green Road and the hamlet of Butterfield Green (inset from the Green Belt alongside adjacent land to the east) lie to the north.

Stopsley Common is a large and very open plateau to the west of the parcel, running up to the steep chalk scarp-top above Bushmead, so a key consideration is the relationship between this parcel and the common. The Inspire building and associated parking have no separation from the inset settlement edge, and so make little contribution to Green Belt purposes, but are relatively contained by vegetation and distinct in form from the residential edge. Lothair recreation ground is a contained area, but tree cover behind houses along Lothair Road also creates a degree of separation from the built-up area. Trees and scrub vegetation create some separation between Inspire Luton and Manor Farm, so the latter, and other dwellings along Butterfield Green Road, retain a rural character. The relationship between the northern half of the parcel and the urban edge could change if Butterfield Green Technology Park is developed, but regardless of this it contributes to preserving an open link between Stopsley Common and countryside to the north.

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## Conclusion

The Inspire Luton Sports Village represents significant development within the Green Belt, but Lothair Park is large enough, and sufficiently separate from the built-up edge, to retain an open, countryside character, and therefore make a moderate contribution to Green Belt purposes. Removal of this area from the Green Belt would significantly extend the inset settlement edge. Manor Farm and the fields to the north are considered to make a moderate contribution to preventing countryside encroachment, even in the event that the Butterfield Green Technology Park is developed.

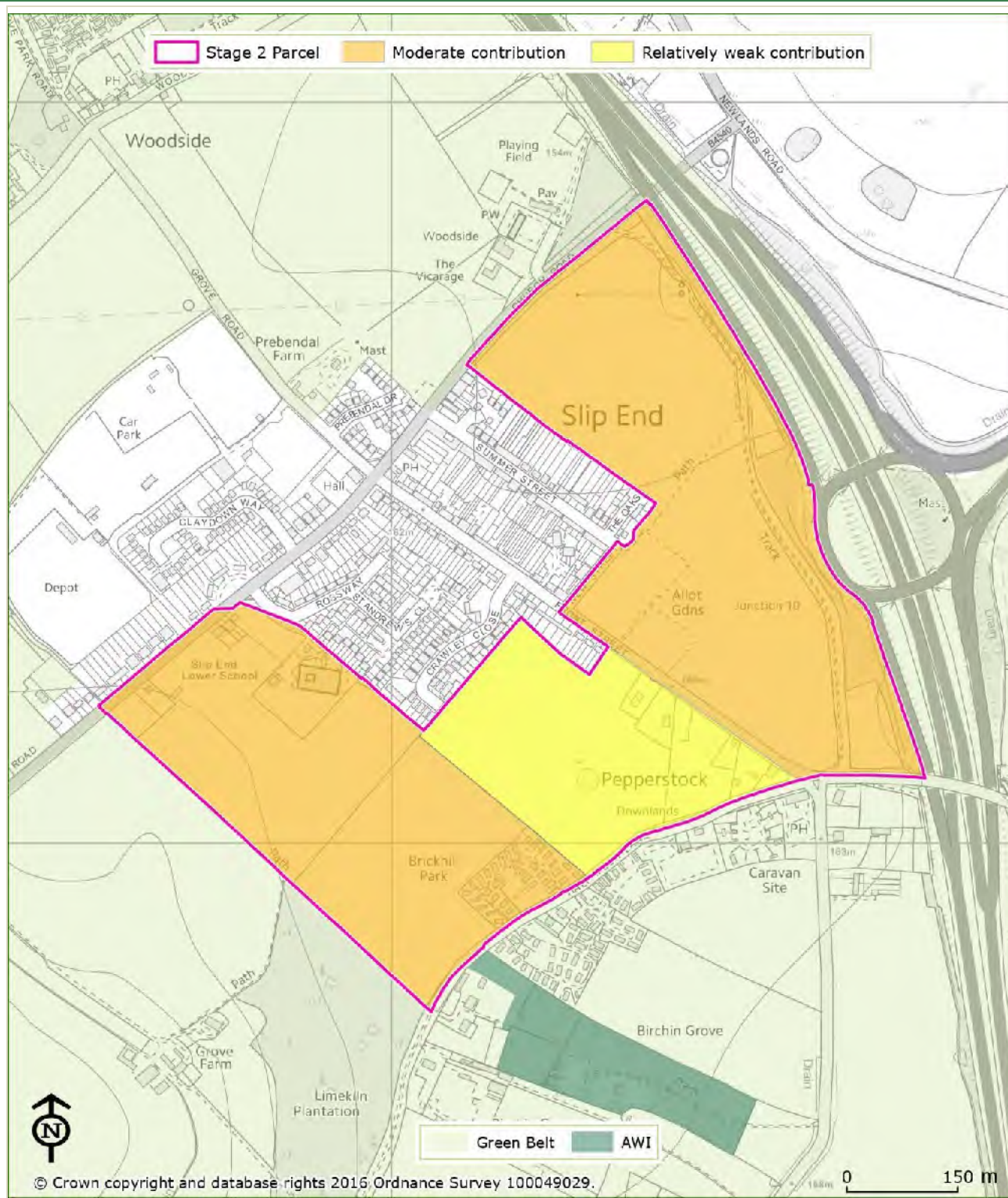
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Land Parcel Ref: SE1a

Parcel Type: Stage 2 Parcel

Area (ha)

45.7



Land Parcel Ref: SE1a

Parcel Type: Stage 2 Parcel

Area (ha) 45.7

## Parcel description

This parcel comprises a band of arable and pasture fields wrapping around much of the eastern and southern edge of Slip End and is bisected by Front Street from east to west. Slip End Lower School and a few residential dwellings are situated adjacent to the built edge in the west and are relatively well contained by tree planting, and isolated dwellings along Front Street are contained by mature tree belts. A small warehousing unit is also located along Front Street a short distance to the east of the settlement edge, opposite an allotment. Away from the inset settlement edge the parcel extends south-eastwards out to Half Moon Lane, including park homes at Brickhill Park.

The B4540 Church Road forms the north-western edge of the parcel, passing underneath the motorway and through Slip End. A strong hedgerow runs along most of the inset settlement edge between Church Road and Front Street, but to the south-east there is no separation between the settlement and the parcel. To the south-west, along Markyate Road and Rossway, the inset settlement edges have stronger tree and hedgerow cover. The outer edges of the parcel are defined by the M1 (around Junction 10) to the north and east, Half Moon Lane to the south-east and a field boundary hedgerow to the south-west. Stockwood Park lies to the north of the motorway, separating the parcel from the large built-up area of Luton. To the south-west the land falls away towards a narrow, steep-sided valley, part of a wider network of valleys which run out from the high chalk ridge to the south of Dunstable.

The motorway forms strong containment to the north and east, but a mature, well-treed hedgerow provides a strong visual barrier and there is no built development within the parcel north of Front Street. The landform in this area adds to a sense of distinction from the inset settlement: a distinct valley cuts through the centre of the northernmost field, parallel to Church Road, and to the east the land slopes down towards the motorway.

Land to the south-east between Slip End and Pepperstock is more contained by development and also occupies high ground at a similar elevation, and so relates less strongly to the wider countryside, but to the west of this the landform falls away, and the parcel's outer boundary is weaker, giving the area a stronger relationship with the countryside to the west.

The parcel is too separated from Luton to contribute to its historic setting.

---

## Conclusion

The fields contained by Front Street, by the inset settlement edge of Slip End on Crawley Close, by Half Moon Lane and by a hedgerow to the south-west, as indicated on the map above, are considered to make a relatively weak contribution to Green Belt purposes. These features would form a stronger potential alternative Green belt boundary than the existing inset edge, but would call into question the status of the adjacent park home development at Pepperstock.

Land within the Stage 2 parcel to the west of this area, and to the north of Front Street, is judged after on-site assessment to make a moderate contribution to preventing encroachment on the countryside.

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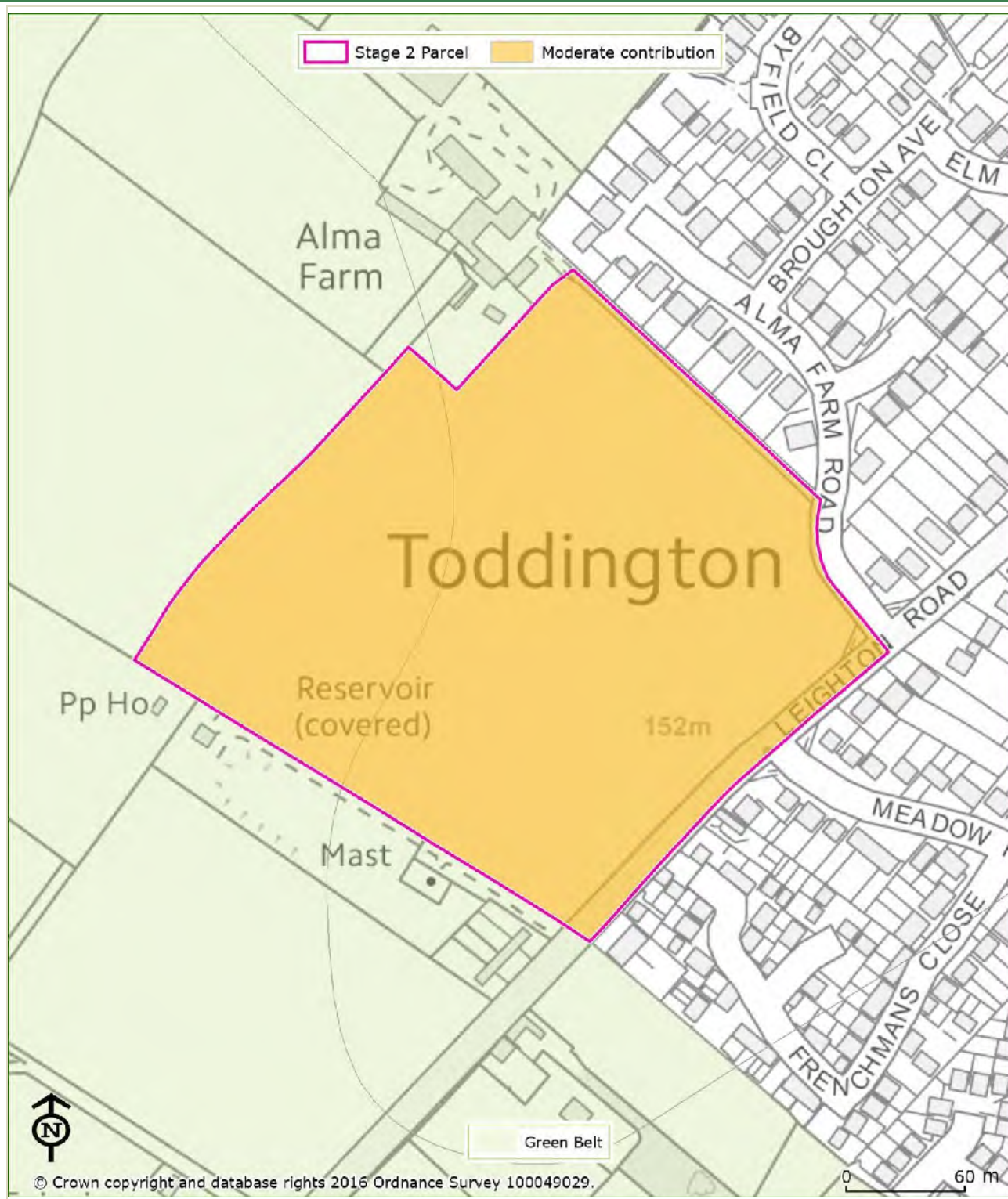


Land Parcel Ref: T4a

Parcel Type: Stage 2 Parcel

Area (ha)

7.0



Land Parcel Ref: T4a

Parcel Type: Stage 2 Parcel

Area (ha) 7.0

## Parcel description

This parcel comprises a large, open and rectilinear pasture field gently sloping away from the built edge of Toddington.

The northern boundary is made up of Alma Farm Road and the back gardens of adjoining properties. Existing properties front on to Leighton Road which runs along the eastern edge. A mature hedgerow also runs along the inner edge of the eastern boundary and continues round to the south with a communication mast and covered reservoir just beyond. The southern extent is also defined by a hedgerow and contains a few hedgerow trees.

Although the stark built edges of Toddington to the north and east have an urbanising influence that strengthen the relationship the land within the parcel has with Toddington, the limited vegetation in and around the parcel together with the slightly elevated position of the land which slopes down to the south west, away from the built edge, means that there is a sense of openness and a relatively strong relationship with the wider countryside.

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## Conclusion

The parcel is considered to make a moderate contribution to safeguarding the countryside from encroachment.

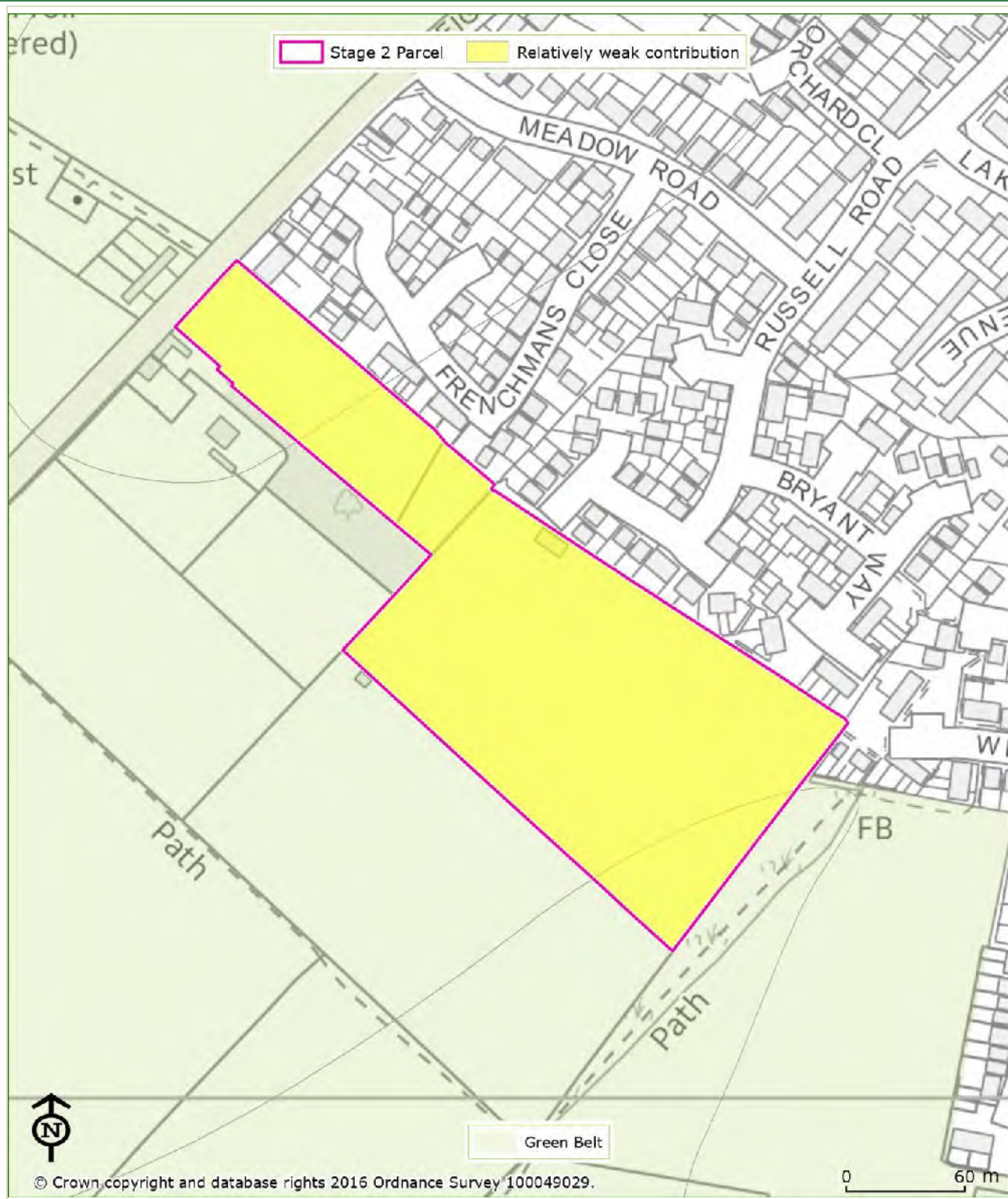
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Land Parcel Ref: T4b

Parcel Type: Stage 2 Parcel

Area (ha)

3.7





Land Parcel Ref: T4b

Parcel Type: Stage 2 Parcel

Area (ha) 3.7

## Parcel description

This parcel consists of two rectilinear fields and a small playground to the south west of Toddington. A small barn is also situated close to the northern edge.

Leighton Road runs along the western boundary whilst mature tree belts make up the southern and eastern edges. A small terrace of housing and some barns are located off Leighton Road just south west of the parcel. More pasture fields continue beyond the parcel to the south and west. Back gardens of existing properties adjoin the parcel to the north with some tree planting along the boundary.

The well-treed boundaries to the east, south and west provide a relatively strong separation from the wider countryside whilst the hard built edge has an urbanising influence over the parcel and provides a strong relationship with settlement. The landform within the parcel is consistent with that within the settlement, with no strong separating features between the parcel and the urban edge.

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## Conclusion

The parcel makes a relatively weak overall contribution to Green Belt purposes. The tree belts and woodland block that contain the parcel would make a relatively strong potential alternative Green Belt boundary.

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Land Parcel Ref: WE2a

Parcel Type: Stage 2 Parcel

Area (ha) 5.5



Land Parcel Ref: WE2a

Parcel Type: Stage 2 Parcel

Area (ha) 5.5

## Parcel description

This parcel comprises an area of scrubby grassland to the south of We stoning and a derelict farmstead located along the western edge.

The parcel extends from the southern edge of We stoning bound to the west by the A5120 and to the east by a railway. The residential edge is largely open with limited tree planting within back gardens. A hedgerow marks the southern limit and continues around the perimeter to the east and west. Pasture fields neighbour the parcel to the west whilst larger scale arable fields occupy the area beyond to the south and east.

Strong boundary features in the way of the A5120, railway and hedgerow provide a clear distinction between the parcel and the wider countryside. The relatively open settlement edge has an urbanising influence and creates a strong relationship between the parcel and settlement.

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## Conclusion

The parcel makes a relatively weak overall contribution to Green Belt purposes. Its outer hedgerow, together with the A5120 and railway line, would make a strong potential alternative Green Belt boundary.

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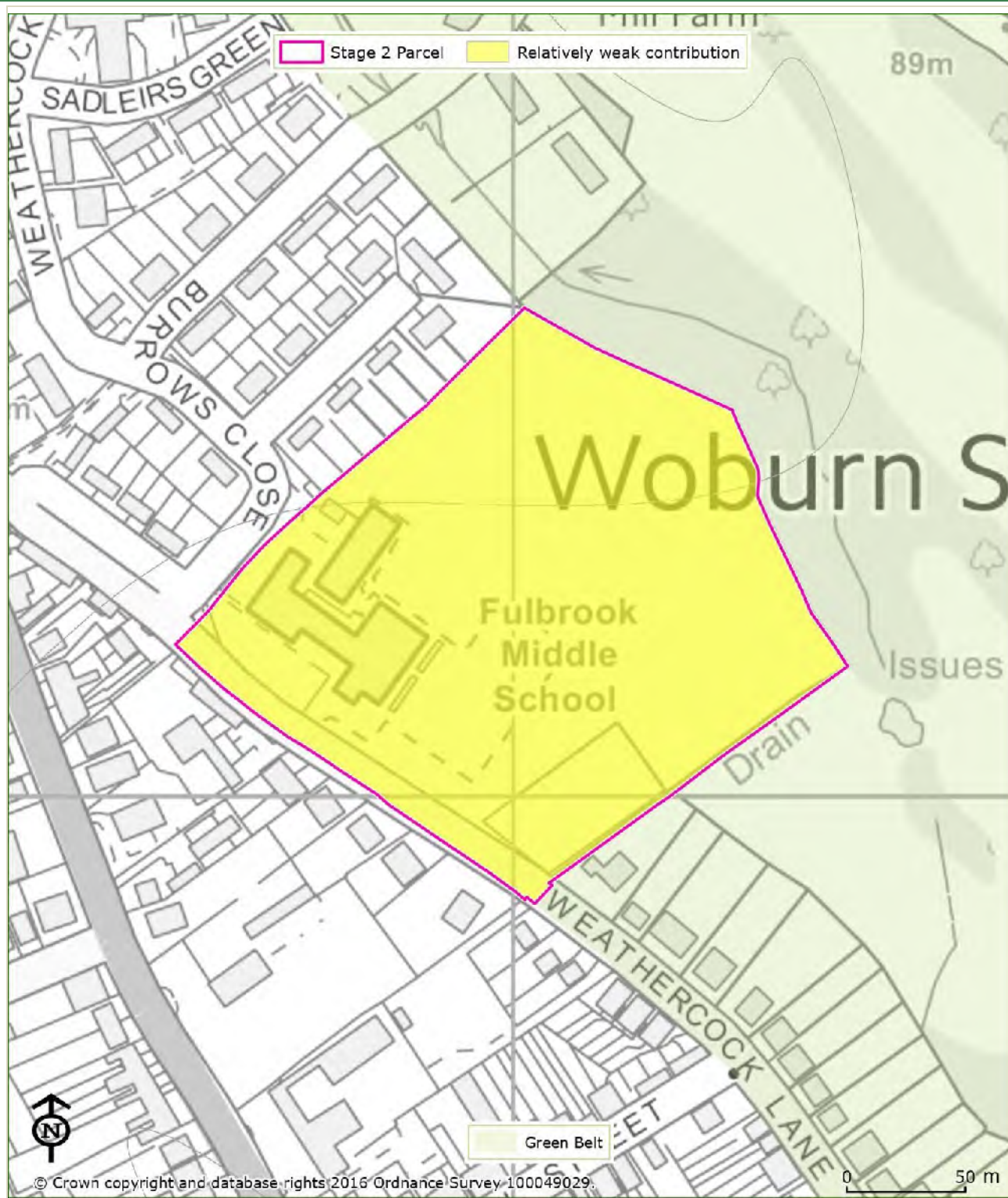


Land Parcel Ref: WS1a

Parcel Type: Stage 2 Parcel

Area (ha)

3.9



Land Parcel Ref: WS1a

Parcel Type: Stage 2 Parcel

Area (ha) 3.9

## Parcel description

The buildings and playing fields of Fallbrook Middle School. The school buildings lie in the eastern corner of the site, adjacent to the inset settlement edge on Weathercock Lane to the south and Burrows Close to the north. A broad belt of trees creates strong separation from Aspley Guise and Woburn Sands Golf Club to the north-east and trees also bound the south-eastern side of the school grounds, adjacent to houses along Weathercock Lane.

The parcel is largely open, but clearly relates to the settlement and is contained from the wider countryside. Houses to the east on Weathercock Lane, although within the Green Belt, are not significantly different in form to those within the inset edge to the south of the road, and their exclusion from the defined built-up area reflects the strength of Weathercock Lane as a boundary rather than a less urban built form.

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## Conclusion

The parcel is sufficiently contained from the wider landscape, and related to the urban area, to make only a relatively weak contribution to Green belt purposes. The trees to the north and east would make a relatively strong potential alternative Green Belt boundary.

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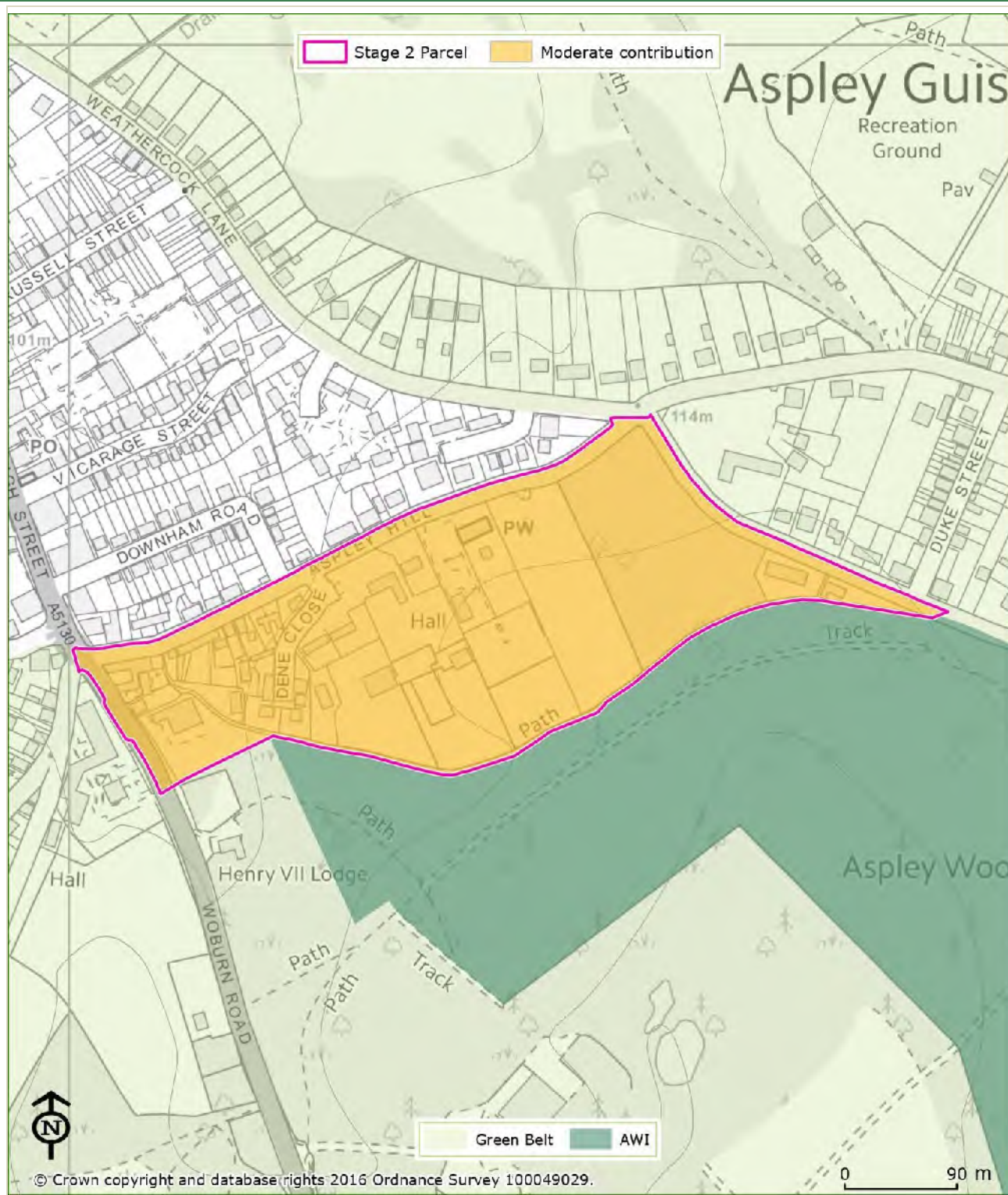


Land Parcel Ref: WS2a

Parcel Type: Stage 2 Parcel

Area (ha)

9.0





Land Parcel Ref: WS2a

Parcel Type: Stage 2 Parcel

Area (ha) 9.0

## Parcel description

Land to the south of Aspley Hill, contained by Woodside to the east, the A5130 Woburn Road to the west and Aspley Wood to the south. The western end of the parcel is mostly developed, with properties fronting onto Aspley Hill and Woburn Road and also houses set behind these, on Dene Close. Further west developed is more dispersed, with tree cover adding to the distinction between this and the inset settlement edge to the north of Aspley Hill.

The majority of the parcel has a distinctly lower development density than the adjacent inset settlement. It is contained to the south by extensive woodland, and so relates strongly to the settlement; however elevation does create some distinction, with the parcel occupying similar terrain to the washed-over settlement areas to the east, between Woodside and West Hill, and to the west along Sandy Lane and Church Road.

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## Conclusion

The area is largely contained from open countryside, but there is consistency in terms of the location of the inset settlement boundary along main routes through the settlement - West Hill, Aspley Hill and Hardwick Road - marking a degree of transition to generally less dense settlement, with more tree cover. Contribution to Green Belt purposes is therefore considered to be moderate.

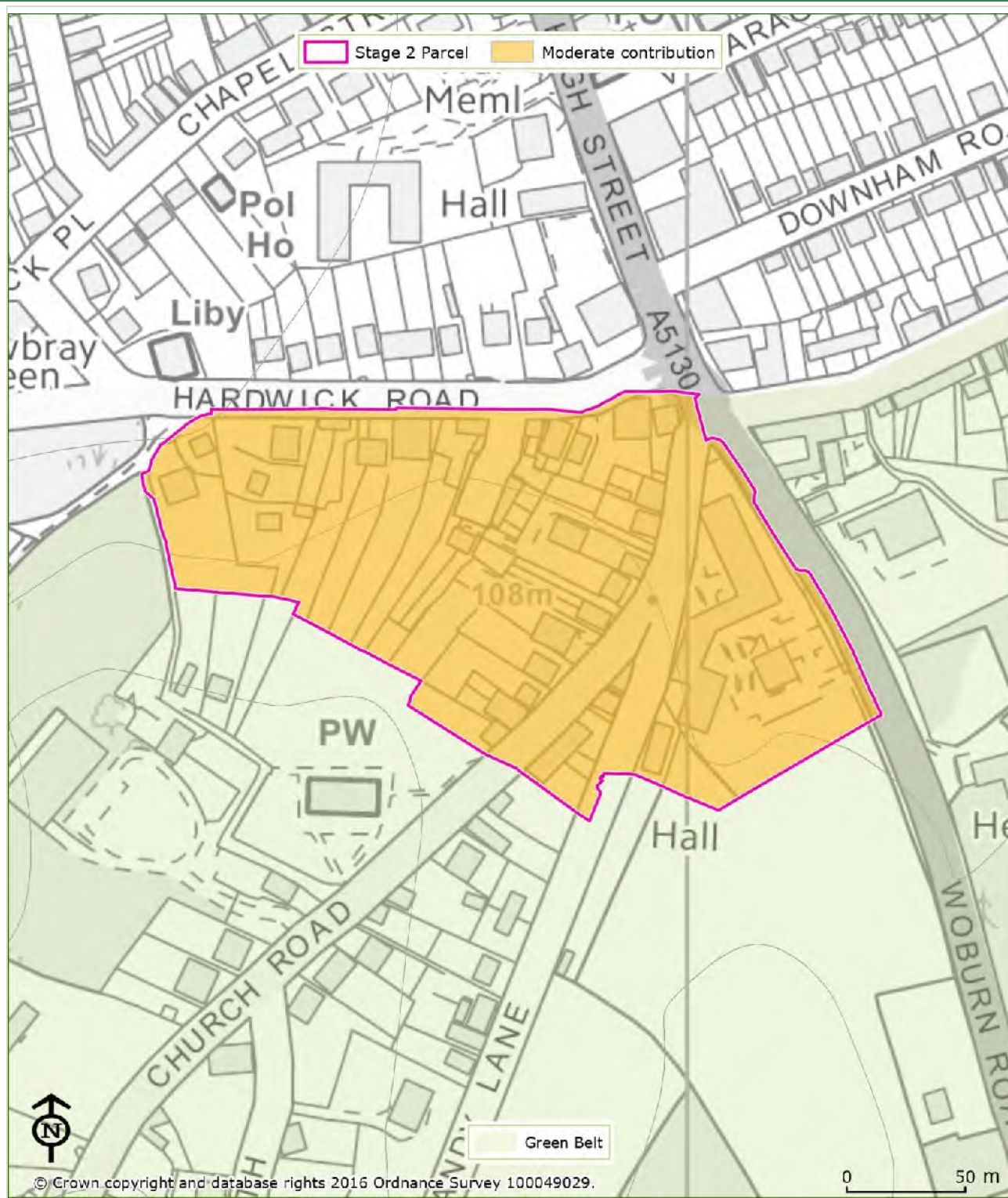
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Land Parcel Ref: WS3a

Parcel Type: Stage 2 Parcel

Area (ha)

3.5



Land Parcel Ref: WS3a

Parcel Type: Stage 2 Parcel

Area (ha) 3.5

## Parcel description

Development along the southern side of Hardwick Road, and around the northern end of Church Road and Sandy Lane, contained by the A5130 Woburn Road to the east and a small woodland block to the west. St Michael's churchyard provides open space to the south, aligning with the southern edge of the Aspley Court development to the east of Sandy Lane, but there is no clear edge to the parcel in the middle between Church Road and Sandy Lane.

The density of development at the northern end of Church Lane, including Aspley Court and Hardwick Mews, is similar to that within the inset settlement to the north of Hardwick Road, but the land slopes uphill relatively steeply away from the settlement edge, and tree cover, particularly in the western half of the parcel, gives the area a stronger relationship with the rest of Aspley Heath to the south than with Woburn Sands. Open, undeveloped fields to the west, and to the south of Aspley Court, add to the relationship between this area and the wider countryside.

---

## Conclusion

The parcel is considered to be sufficiently distinct from the inset settlement of Woburn Sands to make a moderate contribution to Green Belt purposes. Hardwick Road forms a consistent Green Belt edge with Aspley Hill and West Hill, marking a degree of transition southwards to generally less dense settlement, with more tree cover.

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## Appendix 3

### Record of duty to co-operate discussions, including method statement consultation

A key part of the Study 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. **Appendix 3** records the duty to co-operate discussions around the method.

The first table summarises comments received from neighbouring authorities in advance of the Stakeholder Workshop with duty to cooperate partners. The comments were discussed by the Steering Group at the Stakeholder Workshop.

The table is followed by a chronological record of the minutes from the Steering Group meetings, as well as selected e-mails recording key methodological discussions.

A record of the duty to cooperate discussions on the final report can be found in paragraph 3.101 in the main body of the report.

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 given one week 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.

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. Bedford Borough Council and Milton Keynes Council's comments are summarised alongside the Steering Groups responses in the table below.

#### Comments received from neighbouring authorities on the Study method statement and Stage 1 parcels for assessment

Respondent	Comments Summary	Steering Group Responses/Actions to Comments
Bedford Borough Council	"...we would like to see further explanation of the statements in paragraphs 5.13 and 5.14 of the Method Statement, in particular why it would be premature to review smaller settlements in the Green Belt before the definition of the spatial strategy and the methodology that will be used to determine whether settlements should be washed over or inset."	It was agreed at the stakeholder workshop that the assessment of consistency between inset and washed-over settlements in the Green Belt would not be delayed until the completion of the Growth Options Study. The smaller settlements within the study area which are currently washed over by and inset within the Green Belt were therefore subjected to a desk-based assessment in Stage 1 of the Study. The methodology and findings of this assessment are outlined in the main body of the final report.
	"...we would like to receive further explanation of the relationship between the Green Belt Study and the Luton Housing Market Area Growth Options Study."	<p><b><u>Extract from e-mail from Central Bedfordshire Council to Bedford Borough Council (06/07/2016):</u></b></p> <p>"Whilst both of these studies are being undertaken by LUC, they are being done separately. There are different teams working on the two studies and the Green Belt review is due to be completed in July. The outcomes of this study will then feed in to the Growth Options Study. It is not the purpose of the Green Belt Study to identify land to be removed from the Green Belt as a result of the Growth Options Study.</p> <p>In the event that the Growth Options Study identifies a location which is within the Green Belt which we wish to take forward to deliver growth, it will be the responsibility of the Council to determine if there are exceptional circumstances to remove the land from the Green Belt through the local plan.</p> <p>I hope this provides the clarification you were after. Please feel free to come back to me if you have any further queries."</p>
Milton Keynes Council	"Milton Keynes Council supports in principle the concept of a Green Belt review in Central Bedfordshire and Luton."	<p><b><u>Extract from e-mail from Central Bedfordshire Council to Milton Keynes Council (08/06/2016):</u></b></p>
	"In view of the current work being undertaken by the National	"We discussed this point with the consultants at the workshop and at this stage we

Respondent	Comments Summary	Steering Group Responses/Actions to Comments
	<p>Infrastructure Commission on promoting the potential of the Cambridge – Milton Keynes-Oxford corridor and the key transport infrastructure planned for this corridor including east-west rail and an Expressway. You may wish to consider making an assessment of the land south of the Bletchley to Bedford railway line, east of parcel WS1, which is within the study area. Should this land be retained as it contributes to the purposes of the Green Belt or alternatively should this land or some part of it be released to facilitate the growth potential of the Cambridge – Milton Keynes – Oxford corridor?"</p> <p>"Please be aware that this Council concluded in April public consultation on a Plan:MK Strategic Development Directions document as part of the process of producing a new Local Plan (Plan:MK) for the Borough. For more information about Plan:MK and its progress please see the Council's website at: <a href="https://www.milton-keynes.gov.uk/planning-and-building/planning-policy/plan-mk">https://www.milton-keynes.gov.uk/planning-and-building/planning-policy/plan-mk</a>"</p>	<p>not reviewing parcels that do not have known or committed development. We do recognise the potential opportunities that the EWR project may offer but will be looking at this separately from the Green belt review.</p> <p>We are hoping to arrange a meeting with yourselves in the near future to discuss this and the work we are progressing around our Local Plan. I sent an email to Sam Dix earlier today to try and arrange."</p>
Buckinghamshire County Council	<p>LUC received a phone call from Buckinghamshire County Council on 02/06/2016 requesting another copy of the method statement for their review. (The original had been sent to the Council's Development Management team).</p>	<p><b><u>Extract from e-mail from LUC to Buckinghamshire County Council (02/06/2016):</u></b></p> <p>"...please find attached a copy of the method statement for the Central Bedfordshire &amp; Luton Green Belt Study which was previously sent to the Council's development management team along with the below covering e-mail.</p> <p>Please note that the consultation window closed on Wednesday 25<sup>th</sup> May and culminated in a Stakeholder Workshop last Thursday (26<sup>th</sup> May); however, we would still be interested in the County's views on the attached as soon as possible.</p> <p>In acknowledgement of the importance of consistency across the region, LUC has reviewed and summarised the County's Joint Stage 1 Green Belt study in Appendix 1 of the method statement. The overarching principles of County's own Stage 1 Green Belt Study are considered to be consistent with the methodology outlined for this Study."</p> <p><b><u>Buckinghamshire County Council responded to LUC (02/06/2016):</u></b></p> <p>"Thank you very much for this email.</p> <p>Very helpful.</p>



Respondent	Comments Summary	Steering Group Responses/Actions to Comments
		<p>We will review the information and respond with any comments as soon as possible."</p> <p>No response was received.</p>

# Minutes Luton HMA Growth Options Study & Central Bedfordshire and Luton Green Belt Study



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Purpose Joint Inception Meeting

Meeting Date 23/03/2016

Name	Organisation / Email	Att	Dist
Lynsey Hillman-Gamble	Central Bedfordshire Council	•	•
Andrew Marsh	Central Bedfordshire Council	•	•
Kevin Owen	Luton Borough Council	•	•
David Carter	Luton Borough Council	•	•
Troy Hayes	Troy Planning / Luton Borough Council	•	•
Jon Grantham	LUC	•	•
Philip Smith	LUC	•	•
Jon Pearson	LUC	•	•
Josh Allen	LUC	•	•
Steven Pritchard	BBP Regeneration		

## Meeting Purpose

The purpose of the Inception Meeting was to introduce the project teams, begin discussions on the two studies' scopes, methodologies and work programmes.

Representatives from Central Bedfordshire Council, Luton Borough Council, LUC and BBP Regeneration attended the joint inception meeting. A summary of discussions and the subsequent actions relating to the Green Belt Study is provided below.

## Green Belt Study Actions

### 1 Study Method

LUC agreed to draft a detailed method statement outlining an approach to the Joint Green Belt Review, including drafted detailed assessment criteria, key definitions etc.

Considering the methodological discussion during the inception meeting, the method statement will provide direction and clarity on the roles of Stages 1 and 2 of the study.

Once agreed with the commissioning authorities, the method statement will be disseminated to the neighbouring authorities for consultation in advance of a 'stakeholder workshop' with officers (date of workshop to be confirmed).

### 2 New Green Belt

Agreed the existing Green Belt will be comprehensively reviewed to inform the Growth Options Study; however, consideration and assessment of parcels of non-Green Belt land for designation will be completed once the outcomes of the Growth Options Study are known.

### 3 Planned Development Sites in the Green Belt

Agreed to exclude strategic development sites within the Green Belt with planning permission, such as Houghton Regis North 1 & 2 and East of Leighton Linlade, from assessment. The inner boundaries of parcels for detailed assessment against the purposes will therefore be drawn along the consented boundaries of the new development sites.

*Post-meeting note:* LUC received GIS data from Central Bedfordshire Council which marked areas representing the planned urban extensions to Luton and Leighton Linlade. These were used to define the new permitted urban edges of Luton and Leighton Linlade.

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# Minutes Central Bedfordshire & Luton Green Belt Study



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Purpose Stakeholder Workshop

Project number 6773

Date 26/05/2016

Name	Organisation / Email	Att.	Dist.
Sue Frost	Central Bedfordshire	•	
Lynsey Hillman-Gamble	Central Bedfordshire	•	•
Andrew Marsh	Central Bedfordshire	•	•
Sue Clark	Central Bedfordshire	•	
Troy Hayes	Luton	•	•
Kevin Owen	Luton	•	•
David Carter	Luton	•	•
Paul Castleman	Luton	•	
David Hill	North Hertfordshire	•	
Philip Smith	LUC	•	•
Richard Swann	LUC	•	•
Josh Allen	LUC	•	•

## Meeting Purpose

The purpose of the stakeholder workshop was to obtain feedback on the draft Green Belt method statement from participating and neighbouring authorities, with a view to reaching agreement on the methodology for the study and key cross-boundary considerations.

Representatives from Central Bedfordshire, Luton and North Hertfordshire attended the workshop. Comments were received from Milton Keynes Council and Bedford Council in advance of the meeting. All comments were discussed at the meeting. A summary of these discussions and the subsequent actions is provided below.

## Minute

## Action

### 1 Feedback on the methodology

Discussion on the timing and role of Stage 2 of the Green Belt Study. Consensus reached that Stage 2 should not consider potential to mitigate harm to the Green Belt, including the consideration of preferred allocations and specific mitigation measures.

Stage 1 to assess the strategic contribution of Central Bedfordshire's Green Belt to the Green Belt purposes.

Stage 2 to isolate areas of least harm to the Central Bedfordshire and Luton Green Belt, drawing on Stage 1 judgements and site visits.

LUC clarified that the assessments of Broad Areas would draw-out the strategic differences in contribution to the Green Belt purposes.

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CBC to consider, at a later stage, whether they would like to commission LUC to advise on the potential to mitigate harm to the Green Belt at specific locations following the definition of a preferred development strategy.

On reflection of the discussions re: the scope and timing of Stage 2, LUC wrote clarifying text on the roles of Stages 1 and 2 and a streamlined work programme. Method statement revised accordingly.

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# Minutes Central Bedfordshire & Luton Green Belt Study



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## Purpose

## Stakeholder Workshop

LUC confirmed that the commentary on the contribution of parcels/broad areas to the Green Belt purposes will consider the contribution of land in preventing merging between villages. This will not affect parcel ratings, but may assist in Local Plan policy development.

Assessment of consistency between inset and washed-over settlements in the Green Belt to be completed before the completion of the Growth options Study.

Discussion between authorities on the scope and robustness of the definition of 'historic towns'. Consensus was reached that Ampthill would be included as a historic town.

The contribution of Green Belt land to the setting and special character of the historic town of Luton was discussed and the contributions of land parcels assessed in Luton & North Hertfordshire's Green Belt studies to date noted.

Method statement revised accordingly.

Luton Borough Council to provide further text on the characteristics of the historic town of Luton. Central Bedfordshire to provide further evidence to support the inclusion of Ampthill, and potentially other settlements, as historic town.

## 2 Parcelling Feedback

It was agreed to include an additional parcel at the edge of Harpenden (HP1).

Discussion on the outer boundary of D4 and whether the quarry should be included. It was concluded that the long term permission for extraction was justification for not extending the parcel further to the south.

## 3 Cross-boundary Feedback

Discussion on the need to engage Milton Keynes in discussion on the gap between Milton Keynes and Central Bedfordshire.

CBC to contact Milton Keynes to discuss their intentions with regard to this gap and to gauge their potential reaction to a proposal to extend the GB across this area. Following further duty-to-cooperate dialogue between CBC and MK, a decision will be made as to whether this area is considered further in the Green Belt study.

North Hertfordshire in the process of amending their Green Belt review work.

North Hertfordshire to provide copy of amended Green Belt study once complete so that the outcomes of both studies can be checked for consistency.

CBC to coordinate the drafting of responses to neighbouring authorities which have provided feedback on the method

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# Minutes Central Bedfordshire & Luton Green Belt Study



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## Purpose

## Stakeholder Workshop

statement, namely Milton Keynes and Bedford.

LUC to draft text to support CBC's response on:

- Assessment of consistency between inset and washed-over settlements in the Green Belt to be completed before the completion of the Growth options Study.
- Clarification on the maturity of the Cambridge-Milton Keynes-Oxford corridor plans, including the exact route of east-west rail link and Expressway.

## 4 Other Feedback

Discussion and agreement that only permitted allocations/infrastructure would be acknowledged in the parcelling and assessment of Green Belt. All other allocations, e.g. South of Stockford Park and Junction 10a, will be ignored.

CBC to send through boundary of permitted Chaul End Green Belt development, so that this can be excluded from assessment.

Discussion on New Green Belt/alternative designations to protect meaningful gaps etc. Case for new Green Belt to be revisited once CBC identified exceptional circumstances.

LUC to provide high-level advice on the potential for alternative designations in final report. Clarified in Method Statement.

Discussions on enhancement of the Green Belt and positive uses.

LUC to provide high-level advice on the potential for positive uses in the Green Belt in final report. Clarified in Method Statement.

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# Minutes Central Bedfordshire & Luton Green Belt Study



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Purpose Progress Meeting

Project number 6773

Date 23/06/2016

Name	Organisation / Email	Att.	Dist.
Lynsey Hillman-Gamble	Central Bedfordshire	•	•
Andrew Marsh	Central Bedfordshire	•	•
Cllr Sue Clark	Central Bedfordshire	•	
Troy Hayes	Luton	•	•
Kevin Owen	Luton		•
Philip Smith	LUC	•	•
Richard Swann	LUC	•	•
Josh Allen	LUC	•	•

## Meeting Purpose

The purpose of the progress meeting was to obtain feedback on the draft outputs of Stages 1 and 2 of the Green Belt study to date, with a view to finalising the areas to visit in the field.

Central Bedfordshire Council confirmed that the Council was broadly very happy with the outputs of the Study to date. Luton Borough Council requested more time to review the outputs. Luton Borough Council's comments on the outputs and LUC's subsequent responses are recorded separately below.

## **Minute**

## **Action**

### Stage 1 Assessments

LUC gave an overview of some minor alterations to the Green Belt parcels.

LUC sent e-mail illustrating these minor parcel alterations for clarity. LUC's e-mail clarifying minor alterations to the Green Belt parcels is outlined below.

Discussion around the study's definition of Milton Keynes as a 'large built-up area' (in Green Belt terms). The Stage 1 assessment of parcels WS1, WS2 and WS3 and Broad Area A currently recognise it as such; however, the role that the Green Belt land within the parcel plays is recorded as moderate-relatively weak in recognition of the fact that there is a significant area of open countryside between Milton Keynes and Woburn Sands.

LUC agreed to report this clearly in the Final Report and recommend further dialogue between authorities going forward.

LUC provided a high-level explanation of the assessment process.

### Inset/Washed over Settlement Assessment

LUC summarised that Aspley Guise, Woburn and Kensworth would benefit from visits to determine whether their urbanising features compromise the openness of these washed over settlements.

Aspley Guise, Woburn and Kensworth to be visited.

LUC to change reference to Development Strategy Settlement Hierarchy from adopted

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# Minutes Central Bedfordshire & Luton Green Belt Study



**Purpose** Progress Meeting

## **Reporting**

Central Bedfordshire stressed importance that the final report clearly communicates the method used to define the Stage 2 parcels of weak performing Green Belt.

Central Bedfordshire suggested that it would be valuable to have an 'overview' map in the final report, illustrating each Stage 1 and Stage 2 parcels contribution to all Green Belt purposes.

## **Programme**

Luton expressed a need for more time to review the Stage 1 and Stage 2 outputs in detail before the study move forward and agreed to feedback on the outputs early w/c Monday 27<sup>th</sup> June.

to withdrawn.

LUC agreed and confirmed that an 'overview' map illustrating both the Stage 1 and Stage 2 parcels contributions to all purposes will be prepared for the final report.

LUC agreed to prepare a revised work programme for Steering Group approval.

Luton Borough Council's comments on the outputs are recorded below.

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E-mail sent by LUC to Steering Group on 24/06/2016 following Progress Meeting on 23/06/2016

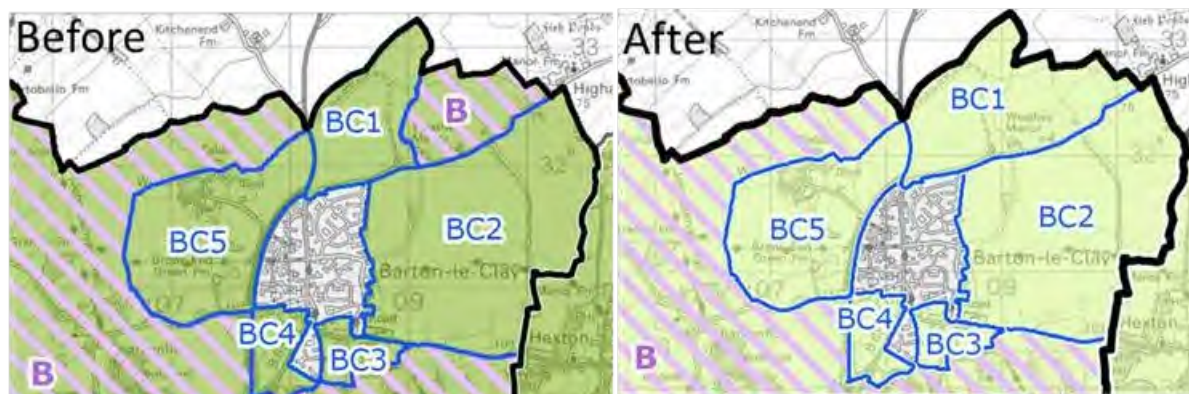
**Title: Minor amendments to Green Belt parcels**

Good afternoon,

I mentioned in our progress meeting yesterday that we made some minor changes to the Green Belt parcels/Broad Areas during the assessments.

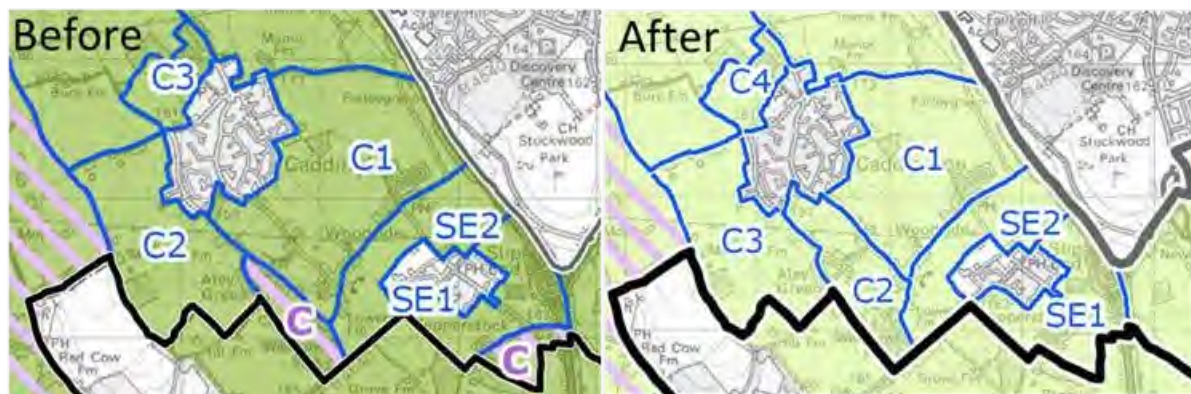
Upon assessing Broad Areas B and C, it became apparent that the assessment would be simpler and clearer if the isolated pockets of Broad Areas B and C were assessed as part of neighbouring parcels. These changes had no significant effects on the ratings for the affected parcels/broad areas.

**Broad Area B Change**



**Broad Area C Changes**

Including the westernmost portion of Broad Area C into the Caddington parcels, resulted in a greater contrast between the northern and southern areas of parcel C1. Therefore, in order to draw out any subtle differences in contribution of land to the GB purposes, it made sense to separate-out the southern portion of parcel C1 into a new parcel (C2).



Kind regards...

No further discussion occurred on this matter.



**On 27<sup>th</sup> June 2016 Luton Borough Council issued comments (in black below) on the Green Belt Study outputs circulated by LUC on 20<sup>th</sup> June 2016**

**On 28<sup>th</sup> June 2016 LUC issued clarifications in response (in red below) to Luton Borough Council's comments. The clarifications were subsequently accepted by both Central Bedfordshire Council and Luton Borough Council.**

1. It is unclear from the documents provided what Stage 1 is comprised of and we would like clarification of this. It was our understanding that Stage 1 would have its own section of the GB Study and that the assessment of parcels in Luton would be part of Stage 2 and that critically Stage 2 would assess parcels that cross boundaries irrespective of their performance as this was the logic of doing a joint study.
  - **Stages 1 (complete) and 2 (partially complete) have been undertaken in accordance with the methodology that we agreed at and following the workshop on 26 May. In summary:**
  - **Stage 1** represents an assessment of the contribution of Central Bedfordshire's Green Belt to the Green Belt purposes. Defined parcels have been 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. In addition, the brief requires LUC to consider whether the settlements within the Green Belt should remain inset within or washed over by the Green Belt designation. Therefore, the openness of Central Bedfordshire's main settlements within the Green Belt has also been reviewed and recommendations made on which settlements should be inset / washed over (three settlements have been identified for further consideration). The Stage 1 outputs therefore include:
    - four overview maps of the Stage 1 Study area illustrating the ratings for each Stage 1 parcel/broad area against each of the four purposes.
    - Stage 1 assessment reports for each parcel/broad area, including detailed descriptions of each parcel, performance ratings against each purpose and accompanying commentary.
    - Green Belt Settlement Assessment of openness with recommendations.
  - **Stage 2** draws on both Central Bedfordshire and Luton's separate Stage 1 assessments to identify the areas of the Green Belt in both local authorities that make the least contribution to the Green Belt purposes and are therefore likely to cause less harm to the Green Belt if released for development (although other factors may dictate otherwise). On-site assessments of these areas will be undertaken to verify and where necessary expand upon judgements made remotely. These on-site assessments will inform recommendations on alternative permanent and readily recognisable boundaries, which will have regard to primary constraints (listed in the method statement) and highlight 'areas of least harm' to the Green Belt. In addition, LUC has confirmed it will visit the three washed over settlements identified at Stage 1 for further consideration as inset settlements. To date, we have prepared the following Stage 2 outputs:
    - An overview map illustrating draft 'relatively weak performing' areas of Green Belt for site-based assessment and boundary definition.

- A schedule showing the relationship between Central Bedfordshire's Stage 1 parcels and the 'relatively weak performing' areas isolated for further consideration at Stage 2.
  - A review of Luton's Stage 1 assessment, including justification for why each Luton Stage 1 parcel was or was not been taken forward to Stage 2.
  - At the inception meeting LUC raised the possibility of parceling the Green Belt land with both Luton and Central Bedfordshire at Stage 1, which would have created cross-boundary parcels; however, concerns were raised by Luton that this might undermine the judgements made in the Borough's separate Stage 1 study. It was therefore agreed that the Borough's Stage 1 study would be reviewed alongside Central Bedfordshire's Stage 1 study to identify 'weaker performing areas' for further consideration at Stage 2. There is no reason why these 'weaker performing areas' shouldn't cross the Green Belt boundary, it just so happened, following the review of both Stage 1 assessments, that they didn't. Defining and assessing separate parcels at Stage 2 that specifically crossed the Borough boundary (irrespective of performance) would only result in a duplication of the work carried out within both authorities' Stage 1 assessments, and any 'weaker performing areas' identified within these 'cross-boundary' parcels would be the same as those already identified. Indeed the value of a joint study is the methodology and outputs are agreed by both authorities as an appropriate evidence base.
  - Our submission costed and programmed for the preparation of one final report which will outline the relationship between the Stage 1 and Stage 2 assessments and their outputs.
2. A key comment from LBC is regarding the areas selected for detailed assessment in Stage 2. It is unclear as to how or why these locations were selected. We do not have the benefit of a draft report to explain this so we have relied on the study methodology. Paragraph 5.1 of the methodology states that:

*Stage 1 of this Study represents a strategic assessment of Central Bedfordshire's Green Belt. Defined parcels will be assessed and rated to determine their contribution as a whole to Green Belt purposes. These ratings will be supported by text which, where appropriate, will describe spatial variations in the contribution of land to the purposes within each parcel. Areas which, in their entirety or in part, are considered to potentially make no more than a 'relatively weak' contribution to any of the Green Belt purposes will be mapped and taken forward for assessment at Stage 2. Luton Borough Council has already completed a strategic assessment of its Green Belt. This will also be analysed to identify any areas of potentially weaker performance for further consideration at Stage 2.*

The above statement in the methodology is quite clear that any area, either in its entirety or in part considered to potentially make no more than a relatively weak contribution to any of the Green Belt purposes will be taken forward to Stage 2 for detailed assessment including site visits.

- The chosen wording in paragraph 5.1 of the agreed method statement is confusing. The text should read 'to all of the Green Belt purposes'. To be clear, the areas selected for on-site assessment represent areas of land which have been judged to make no more than a 'relatively weak' contribution to all of the Green Belt purposes. This is an important clarification.
  - There is no value in taking forward to Stage 2 areas that make a 'relatively weak' contribution to any Green Belt purpose, as parcels of land only need to make a contribution one Green Belt purpose to be important Green Belt (the NPPF does not weight the purposes).
  - The definition of the areas of 'relatively weak' contribution is based on the detailed commentary supporting the judgements made in both Stage 1 assessments and not the overall ratings for parcels. This is because the Stage 1 parcel ratings reflect the strongest level of contribution within the parcel for each purpose, whereas the commentary supporting these ratings importantly point out any variations in contribution across parcels. This perhaps reflects a limitation of the 'parcelling' approach to Green Belt assessment, as the extent of variation only becomes clear once the parcels have been assessed.
3. In addition, Para 3 of the Green Belt Study Brief says, "*The primary purpose of the study will be to assess all Green Belt land .... to identify any land which may only be making a limited or moderate contribution to Green Belt function*". Therefore the project brief sought to identify areas that were making a moderate contribution or less.
- The full text of the section of the brief described above specifically refers to Stage 1 of the Study.
  - A 5-point scale has been used in Stage 1 of the Central Bedfordshire study, identifying land making a strong, relatively strong, moderate, relatively weak contribution, or weak/no contribution each Green Belt purpose (1-4).
  - A 3-point scale has been used in Stage 1 of the Luton study, identifying land making a high, medium and low contribution to each Green Belt purpose (1-4)
4. On the basis of the above, it is considered that the sites selected for Stage 2 have not followed the methodology. Using the methodology, it is considered that the following parcels should be taken forward to Stage 2 for assessment. If the project brief were to be used to determine parcels to take forward to Stage 2 then the parcels that contribute 'moderately' to the Green Belt would also need to be added to the list below:
- The full text of the section of the brief described above specifically refers to Stage 1 of the Study, not Stage 2.
  - The areas selected for on-site assessment at Stage 2 represent areas of land which have been judged to make no more than a 'relatively weak' contribution to all of the Green Belt purposes.
  - There is no value in identifying areas that make a 'relatively weak' contribution to any Green Belt purpose, as parcels of land only need to make a contribution one Green Belt purpose to be important Green Belt (the NPPF does not weight the purposes).
  - We question the value of looking at moderately performing Green Belt parcels further at Stage 2 given that the main purpose of Stage 2 is to identify locations that

would minimise harm to the Green Belt. Furthermore, taking forward areas of land which have been judged to make no more than a 'moderate' contribution to all of the Green Belt purposes is likely to significantly increase the number of Stage 2 parcels required for assessment, well beyond the estimated 40 Stage 2 parcels budgeted and programmed for.

#### **Purpose 1**

- A (Relatively Weak)
- B (Weak / No Contribution)
- C (Weak / No Contribution)
- D (Relatively Weak)
- E (Weak / No Contribution)
- G (Weak / No Contribution)
- AH1 – AH4 (Weak / No Contribution)
- EB1 – EB2 (Weak / No Contribution)
- F1 – F5 (Weak / No Contribution)
- WE1 – WE3 (Weak / No Contribution)
- H1 – H3 (Weak / No Contribution)
- BC1 – BC5 (Weak / No Contribution)
- T1 – T4 (Weak / No Contribution)
- HL1 – HL3 (Weak / No Contribution)
- HAR1 – HAR2 (Weak / No Contribution)
- LL10 (Relatively Weak)
- C3 – C4 (Weak / No Contribution)
- HP1 (Weak / No Contribution)

#### **Purpose 2**

- D (Relatively Weak)
- G (Weak / No Contribution)
- H (Relatively Weak)
- AH1, AH3, AH4 (Weak / No Contribution)
- FW2, FW3 (Weak / No Contribution)
- FW4 (Relatively Weak)
- WE1, WE3 (Weak / No Contribution)
- WE2 (Relatively Weak)
- T1, T3, T4 (Weak / No Contribution)



- T2 (Relatively Weak)
- BC1 – BC5 (Weak / No Contribution)
- L2 (Relatively Weak)
- L3, L4, L6 (Weak / No Contribution)
- HR1 – HR2 (Weak / No Contribution)
- HL1 – HL3 (Weak / No Contribution)
- HAR1 – HAR2 (Weak / No Contribution)
- LL1, LL2, LL3, LL10, LL11 (Relatively Weak)
- LL4 – LL5 (Weak / No Contribution)
- EB1 (Relatively Weak)
- D2 – D5 (Weak / No Contribution)
- C1 – C4 (Weak / No Contribution)
- SE1 – SE2 (Weak / No Contribution)
- HP1 (Relatively Weak)

### **Purpose 3**

- G (Relatively Weak)
- BC4 (Relatively Weak)

### **Purpose 4**

For this purpose it is probably easier to list those parcels that were assessed as performing ‘moderately’ or better:

- A1, A2, A4
- L2 – L5
- D4
- C
- H
- LL1 – LL4, LL6 – LL9
- HL1
- AH1, AH2, AH4

### **Findings regarding Purpose 4**

5. It is currently unclear from the assessments why the following parcels around Luton have made a ‘relatively strong’ or ‘strong contribution’ to the Green Belt in terms of their role in preserving the setting and special character of Luton. We note the

assessment of parcels in the Oxfordshire Green Belt Study prepared by LUC which provide locally specific and detailed reasons for scoring the parcels. For example see assessment of Parcel OX22 in Cherwell District below:

#### **Purpose 4 - To preserve the setting and special character of historic towns**

##### **Issue 4a - Significance of historical and/or visual setting to the historic town**

Does the parcel contribute to the setting and 'special character' of Oxford?

**Rating:** Medium

##### **Notes:**

There is no visual relationship between this mostly low-lying area and the historic core of Oxford or other Oxford conservation areas, but in views from hills to the north-west (to the west of Yarnton, over which Shakespeare's Way approaches the city) the visual role of this area as a gap between Yarnton and Oxford is evident. With regard to Oxford's special character the approach from Yarnton/Kidlington is less significant than the approach along the Thames and Cherwell Valleys, but the presence of the Oxford Canal and associated long distance path, which run through the centre of the parcel, does add to significance. The canal is a conservation area, and its rural setting is one of its valued characteristics; the higher ground at the southern end of the parcel in particular is important in preserving this sense of rurality on approach to an area characterised by numerous transport routes. The majority of the parcel makes a 'medium' contribution but the higher ground at the southern end is considered to make a 'high' contribution.

- The structure of the Central Bedfordshire assessment outputs is slightly different to that of the Oxfordshire study. In the latter, all the assessment text was set out under the Green Belt purpose headings 1-5, but for Luton and Central Bedfordshire we have a box labelled 'description' which sets out all the information required to support the judgements made under the purpose 1-5 headings. It is in this description box, that references are made to the landscape elements which are considered to be significant in terms of historic settings, whilst the 'purpose 4' box has just a succinct conclusion, using terminology reflected in the definitions provided in Table 5.1 of the Method Statement. This approach is felt to provide a clearer assessment, in which repetition of comments under different purposes is avoided.
  - Relevant comments from the 'description' section for each of the parcels you have referenced are appended below:
6. Detailed and locally specific reasons are required to justify each parcel's contribution to each purpose if the study is to stand up to scrutiny. **Parcels L2, L3, L4, L5, D5.** These are considered in turn below.
- **Parcel L2:** The parcel is assessed as making a 'relatively strong' contribution to Purpose 4. The assessment pro-forma states that: *The parcel's openness, particularly on the higher ground, contributes to the relationship between the settlement and characteristics identified as contributing to historic setting. Development would detract from the town's historic character although there is less distinction between the parcel and the settlement in the east. It is unclear where the higher ground being referred to is located on the parcel or what characteristics are being considered as contributing to historic setting. It is unclear why development would detract from the town's historic character.*
  - The parcel is adjacent to Luton and plays a role in its historic setting due to the relationship with the wooded Sundon Hills further north.
    - **Parcel L3:** The parcel is assessed as making a 'relatively strong' contribution to Purpose 4. The assessment pro-forma states: *The parcel's openness*

*contributes to the relationship between the settlement and characteristics identified as contributing to the historic setting and development of the parcel would detract from the town's historic character. This description provides no concrete locally / site specific reasons for assessing this parcel the way it has.*

- The parcel is adjacent to Luton and forms part of the rural setting associated with Galley Hill.
  - **Parcel L4:** The parcel is assessed as making a 'strong contribution' to Purpose 4. The assessment pro-forma states: *The parcel's openness is a key element in the relationship between the settlement and key characteristics identified as contributing to the historic setting. Development here would detract significantly from the town's character. Again, there are no locally specific reasons / justification given for assessing this parcel as making a 'strong contribution'.*
- The parcel is adjacent to Luton and the Warden and Galley Hills are prominent landforms defining the built-up area. They also provide a striking backdrop and setting to Luton.
  - **Parcel L5:** The parcel is assessed as making a 'strong contribution' to Purpose 4. The assessment pro-forma states: *The parcel's openness contributes to the relationship between the settlement and characteristics identified as contributing to the historic setting. Development within the parcel would significantly detract from the town's historic character. As with the other parcel assessments, no locally specific reasons / justification is provided here.*
- The Luton Hoo Estate and the valley landform allow for views across the River Lea and these are recognised as important to the historic setting.
  - **Parcel D5:** The parcel is assessed as making a 'strong contribution' to Purpose 4. The assessment pro-forma states: *The parcel's openness is a key element in the relationship between the settlement and the historic setting of Luton. Development would detract significantly from the town's historic character. The edge of the parcel along Watling Street has no visual relationship with Luton and so does not contribute to this purpose. This assessment provides some local detail however it still does not explain why development would detract significantly from the town's historic character.*
- The chalk escarpment provides a dramatic backdrop to glimpsed views from Luton which is key element in the historic setting of the town.

7. In respect of Purpose 4, The Methodology states in Table 5.1 (Assessment Framework) that *"site visits are used to inform judgements regarding intervisibility between the historic cores of defined historic towns and their open surroundings. Landscape Character Assessments and Conservation Area Appraisals are used to inform the assessment of the contribution of setting to 'special character'"*

The assessment framework provides quite a clear need for site visits in order to inform judgement about intervisibility between historic cores of defined historic

towns and their open surroundings. It is therefore suggested that the parcels around historic settlements are subject to site visit before conclusions can be made about their contribution to this purpose.

- We have budgeted and programmed to only visit Stage 2 parcels. It is possible using topographic mapping, areal imagery and remote street views to state with confidence where parcels do not make a strategic contribution to the setting and special character of historic towns. We would, however, be happy to verify in the field the parcels judged to make a contribution to purpose 4. We could do this alongside our visits to the Stage 2 parcels.

In addition, it is not currently evident from the assessments if or how Landscape Character Assessments or Conservation Area Appraisals have been used to inform the assessment of the contribution of setting to 'special character'.

- We use all evidence available to us, which include Landscape Character Assessments and Conservation Area Appraisals. Where available, both have been used in this study; for example in relation to Ampthill (see para 4.13 of the method statement). The final report will include cited characteristics of each historic town used in the assessment of purpose 4, including text provided by Luton on 10/06/2016.

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**Luton Borough Council responded to LUC's clarifications via e-mail on 30<sup>th</sup> June 2016.  
Pertinent extracts from the e-mail are provided below:**

"Thank you for your responses to the points we raised...As you suggested in your comments, site visits to these parcels around Luton would be very helpful to clarify / verify your assessments 'on the ground' for Purpose 4 - and presumably the other purposes could also be verified as part of these site visits without much additional resource required.

As per the protocol in the Terms of Reference of the Steering Group (see below) we would ask that our comments (27 June) provided are logged and reported as part of the final study.

We are happy for the study to proceed on this basis."

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**LUC responded via e-mail to Luton Borough Council's e-mail dated 30<sup>th</sup> June 2016.  
Pertinent extracts from the e-mail are provided below:**

"Thank you for your comments.

As confirmed in our previous response, we have only budgeted and programmed for visiting the Stage 2 parcels. At Stage 1, topographic mapping, aerial imagery and 'Google Street View' was used to establish the role of Green Belt parcels and broad areas in contributing to the setting and special character of historic towns. We are confident that this desk-based assessment is sufficient where it is clear that parcels make no contribution. However, we have made arrangements to visit all Stage 1 parcels considered in the desk based assessment to be making a contribution (strong – relatively weak) to purpose 4 - to verify the level of contribution. For the record, this includes the following parcels:



- Ampthill parcels – AH1 – AH4
- Broad Areas B, C, D and H
- Caddington parcel – C1 and C4
- Dunstable parcels – D3 and D5
- Flitwick parcels – FW1, FW2 and FW3
- Hockliffe parcel – HL1
- Leighton Linlade parcels – LL1 – LL11
- Luton parcels – L2, L3, L4, L5 and L6
- Toddington parcel – T3

The minutes from our 3x meetings and your comments dated 27<sup>th</sup> June (alongside our responses) will be recorded in an Appendix to the final report.”