

Central Bedfordshire Council Local Plan (2015-2035)

Stage 3 Green Belt Study

(January 2018)



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Central Bedfordshire Stage 3 Green Belt Study

Final Report

Prepared by LUC
December 2017

Project Title: Central Bedfordshire Stage 3 Green Belt Study

Client: Central Bedfordshire Council

Version	Date	Version Details	Prepared by	Checked by	Approved by
0.1	21/04/2017	Draft Report	Josh Allen Richard Swann Nick Hilton	Josh Allen	Nick Hilton
0.2	28/04/2017	Final Report V1	Josh Allen Richard Swann Nick Hilton	Josh Allen	Nick Hilton
0.3	22/12/2017	Final Report V2	Josh Allen	Josh Allen	Philip Smith



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1 Introduction

- 1.1 LUC was commissioned jointly by Central Bedfordshire Council and Luton Borough Council in 2016 to undertake an assessment of the Green Belt within Central Bedfordshire and Luton.
- 1.2 The aim of the 2016 Study was to assess the extent to which the Green Belt land contributed to the purposes of Green Belt, as set out in paragraph 80 of the National Planning Policy Framework (NPPF). The Study did not advise on the suitability or potential of land in the Green Belt for development.

The purposes of Green Belt

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

- 1.3 The 2016 Study was undertaken in two stages.

Stage 1

- 1.4 Stage 1 was a desk-based assessment of the degree to which the Green Belt within Central Bedfordshire meets the purposes of Green Belt as described above. In addition, Stage 1 assessed the openness¹ of Central Bedfordshire's main settlements within the Green Belt, making recommendations on which settlements should be inset, i.e. not designated as Green Belt, and which settlements should be washed over, i.e. covered by the designation.
- 1.5 Luton Borough Council completed a Stage 1 strategic assessment of the six parcels of Green Belt within the Borough in 2014. These parcels were therefore not assessed again in Stage 1 of this Study.
- 1.6 Whilst it was possible to draw high-level conclusions on the potential risk of harm to the Green Belt at this stage (by assuming that land making a high contribution to one or more purpose would, if released, cause a high level of harm) the focus at Stage 1 was on contribution.

Stage 2

- 1.7 Stage 2 drew on the Stage 1 assessments, including Luton Borough Council's 2014 Stage 1 assessment, to isolate areas of the Central Bedfordshire and Luton Green Belt which perform relatively weakly against the NPPF Green Belt purposes and are therefore likely to cause less harm to the Green Belt if released for development.
- 1.8 All weakly performing areas of the Green Belt were visited for further on-site assessment. The field visits were used to verify and, where necessary, expand upon judgements made previously. Where appropriate, permanent and readily recognisable boundaries defining relatively weakly performing areas were highlighted as potential alternative Green Belt boundaries.
- 1.9 In addition, three of Central Bedfordshire's washed over Green Belt settlements were visited at Stage 2 to verify whether urbanising influences identified remotely during Stage 1 sufficiently compromised their openness to recommend that they be inset in the Green Belt.

¹ Openness in a Green Belt sense relates to lack of built development more than visual openness, although the two often go hand in hand. The key distinction is that where vegetation provides visual enclosure this does not reduce Green Belt openness, even though it might in practice mean that development would have less visual impact. Openness is therefore judged based on the scale and density of existing development.

Associated Studies

- 1.10 Alongside the Stage 1 and Stage 2 Green Belt assessments, Central Bedfordshire commissioned two Growth Options Studies: one with its immediate neighbours (Aylesbury Vale District Council, North Hertfordshire District Council and Luton Borough Council) covering the Luton Housing Market Area (HMA) and another covering the northern area of Central Bedfordshire that falls outside the Luton HMA.
- 1.11 The Council is now in the process of assessing sites for potential inclusion in its emerging Local Plan to 2035. The most sustainable locations for development may well be in Green Belts and these locations should be identified in plans unless the positive effects of the allocation would be outweighed by effects on the overall integrity of the Green Belt according to an assessment of the whole of the Green Belt according to the five NPPF purposes.
- 1.12 Accordingly a list of 88 Green Belt sites that may be suitable for development has been generated. These are sites which have passed the initial sieving process and which the Council consider are worthy of further consideration for residential development. In addition to these potential residential sites, a further site has been identified for possible allocation as a new Rail Freight Interchange (RFI) at Junction 11a of the M1.

Stage 3

- 1.13 The Stage 1 study was focused on *contribution* to Green Belt purposes, and the Stage 2 assessment was limited to areas assessed as making a relatively weak contribution. This Stage 3 is concerned with identifying *harm* to the Green Belt that could result from the release of any of 87 specific sites, which were either submitted through 'call for sites' processes or are strategic sites identified by the Council. It combines consideration of their Green Belt contribution with an analysis of boundaries and of how the release of the land in question, or subdivisions of it, would affect the contribution of other Green Belt land. Taken together these elements provide an understanding of the potential to harm the Green Belt if the land was released for development. Additionally we identify options for minimising and mitigating this harm. This will provide the Council with the evidence required to determine whether the sustainability benefits of each allocation would outweigh any potential harm to the Green Belt following the application of mitigation measures.
- 1.14 Should the local authority conclude that there are exceptional circumstances for making alterations to the existing Green Belt boundaries, the conclusions set out in this Stage 3 Study Report will be used to inform the redefinition of the Green Belt boundary through the Local Plan-making process.
- 1.15 Similar to the 2016 Study, this Stage 3 Study does not have regard to environmental, policy or land-use constraints and designations that exist within the Green Belt, such as landscape areas, SSSIs, and floodplains - except insofar that these are considered to be relevant to the purposes of Green Belts and the definition of permanent, readily recognisable Green Belt boundaries.
- 1.16 In addition, this Stage 3 Study gives consideration to the long term impact of the strategic growth within Central Bedfordshire and the wider region on the South Bedfordshire Green Belt and the high level policy mechanisms that might be employed to help protect the integrity of the Green Belt and the wider countryside within Central Bedfordshire.
- 1.17 Chapter 2 in the 2016 Study Report sets out the context to Stages 1, 2 and 3, in terms of planning policy and the evolution and character of the South Bedfordshire Green Belt.

Report structure

- 1.18 The remainder of the report is structured in the following Chapters:
 - **Chapter 2** describes the Study methodology, including the criteria used to assess the Green Belt sites.
 - **Chapter 3** reports the findings of the Stage 3 assessment work.

- **Chapter 4** outlines potential options for mitigation of Green Belt harm and beneficial use of Green Belt land.
- **Chapter 5** provides guidance on making changes to the Green Belt.

2 Study Methodology

- 2.1 In the absence of definitive national guidance on how to undertake Green Belt studies, a method statement was drawn-up based on LUC's extensive experience of undertaking Green Belt assessments, information collated on the context and background of the South Bedfordshire Green Belt and good practice elsewhere (see Chapter 2 of the 2016 Study Report).
- 2.2 The methodology used to assess the Green Belt in Stages 1 and 2 of the Study is set out in detail in Chapter 3 of the 2016 Study Report.

Assessment Approach

- 2.3 This study involved five key elements of work, as follows:
 - 1) Review of the 88² identified potential development sites and their sub-division (where appropriate) into smaller parcels of land to facilitate assessment.
 - 2) Assessment of the contribution of each land parcel to each of the Green Belt purposes identified in the NPPF.
 - 3) Assessment of the strength of potential alternative Green Belt boundaries.
 - 4) Assessment of the potential harm that release of land – either sites as a whole, parcels or smaller parts of parcels – would have on the Green Belt, taking account of its contribution to Green Belt purposes, the effect on the wider Green Belt and strength of revised boundaries.
 - 5) Identification of any additional mitigation measures, beyond the release of sub-site areas, that might reduce harm to the Green Belt and potential for beneficial uses of remaining Green Belt.
- 2.4 The extent of existing or potential beneficial use (i.e. for access, outdoor sport and recreation, landscape enhancement, visual amenity, biodiversity and improvement to damaged or derelict land) does not form part of the judgement of harm, as the NPPF makes it clear that beneficial uses are a desirable consequence of Green Belt designation rather than a reason for designation. It does however constitute part of the consideration of environmental factors that the Council will weigh up against Green Belt harm and other sustainability considerations before deciding on which areas of land may be suitable for release.
- 2.5 The key assessment elements and the format of the outputs are explained in more detail below.

1: Subdivision of Assessment Sites

- 2.6 The study assesses the potential harm to the Green Belt that could result from the release of the 88 potential sites. The sites vary considerably in size and form. A list of these sites is provided in **Table 2.1** below, and a map in **Figure 2.1**.
- 2.7 Where initial site analysis found that different parts of a site were likely to make different levels of contribution to Green Belt purposes, the site was subdivided into a number of separate assessment parcels. These are shown in **Figure 2.2**, with larger scale maps in **Figure 2.3**.
- 2.8 Sites were typically subdivided into parcels on the basis of existing landscape features, such as field or road boundaries. Assessments of Green Belt at District level or above, typically select 'strong' features as parcel boundaries, in line with the NPPF's reference, at paragraph 85, to the

² Two additional sites from the sieved list, NLP257, NLP546 and ALP260, have been excluded from the study as they lie within an area in which development has been approved and is considered 'committed'. This area, the Houghton Regis Strategic Urban Extension, was likewise excluded from the 2016 Study.

need to "define boundaries clearly, using physical features that are readily recognisable and likely to be permanent", but at this smaller scale it was sometimes necessary to define parcels with weaker physical boundaries.

- 2.9 It should be noted that in a number of cases sites overlap each other, or are identical. These sites and relevant parcels within the sites were therefore assessed more than once. The assessment text provides cross-reference to any such parcels.

Table 2.1: Summary of Sites Assessed





Site Ref	Site name	No. of parcels	Area (ha)
Amphill			
NLP048	Land off Station Road	1	3.26
Aspley Guise			
NLP062	Dingley Dell	1	0.64
NLP089	Land between 13 & 23 Mount Pleasant	1	0.59
NLP090	Land off Bedford Road, Aspley Guise	1	5.21
NLP168	Land off Meadow View	1	2.03
Barton le Clay			
ALP082	Top Orchard	1	0.45
ALP418	Land north of Higham Road/east of Bedford Road, Barton le Clay	1	72.39
NLP123	Land at Luton Road, Barton le Clay	1	7.03
NLP158	Land to the East of Barton le Clay	3	44.74
NLP382	Barton-le-Clay Northern Extension	1	72.41
Billington			
NLP537	Land South of Billington	1	1.04
Chalton			
ALP445	Land adjacent to The Willows	1	1.07
NLP435	Chapel Farm	1	3.18
NLP529	Land South of Chalton	1	12.23
Dunstable			
NLP539	Land west of Tring Road	1	7.16
Eaton Bray			
ALP072	Land off Totternhoe Road & The Rye, Eaton Bray	2	5.71
ALP103	Land to the rear of Bower Lane	1	8.07
ALP192	Land adjacent to 25-57 Bower Lane	1	0.57
ALP423	Land East of Northall Road	1	15.86
NLP013	Land at Park Lane, Eaton Bray	1	1.42
NLP483	Land off Eaton Park	1	2.69
Flitwick			
NLP039	Steppingley Road, Flitwick	1	9.00
Harlington			
ALP117	Land to the west of Midland Mainline Railway, Harlington	1	18.14
ALP123	Land off Gosswell End Road, Harlington	1	12.89
ALP181	Land west of Sundon Road, Harlington	1	6.39
ALP355	Land North of Gosswell End Road	1	2.46
NLP107	Land west of Sundon Rd, Harlington	1	6.39
NLP303	Land off Gosswell End Road, Harlington	1	13.70
NLP379	Land north of Gosswell End Road	1	2.80
NLP381	Land to the west of Harlington	3	93.27
NLP470	Land off Gosswell End Rd (Parcel 1)	1	0.83
NLP471	Land off Gosswell End Rd (Parcel 2)	1	0.81
Heath and Reach			
NLP544	Spinney Farm North	1	4.97
Hockliffe			
ALP184	Land R/O Manor Avenue, Woburn Rd, Hockliffe	2	2.28
NLP259	Land R/O Manor Avenue, Woburn Rd, Hockliffe	1	2.03
NLP298	Land south of Leighton Road	1	2.73

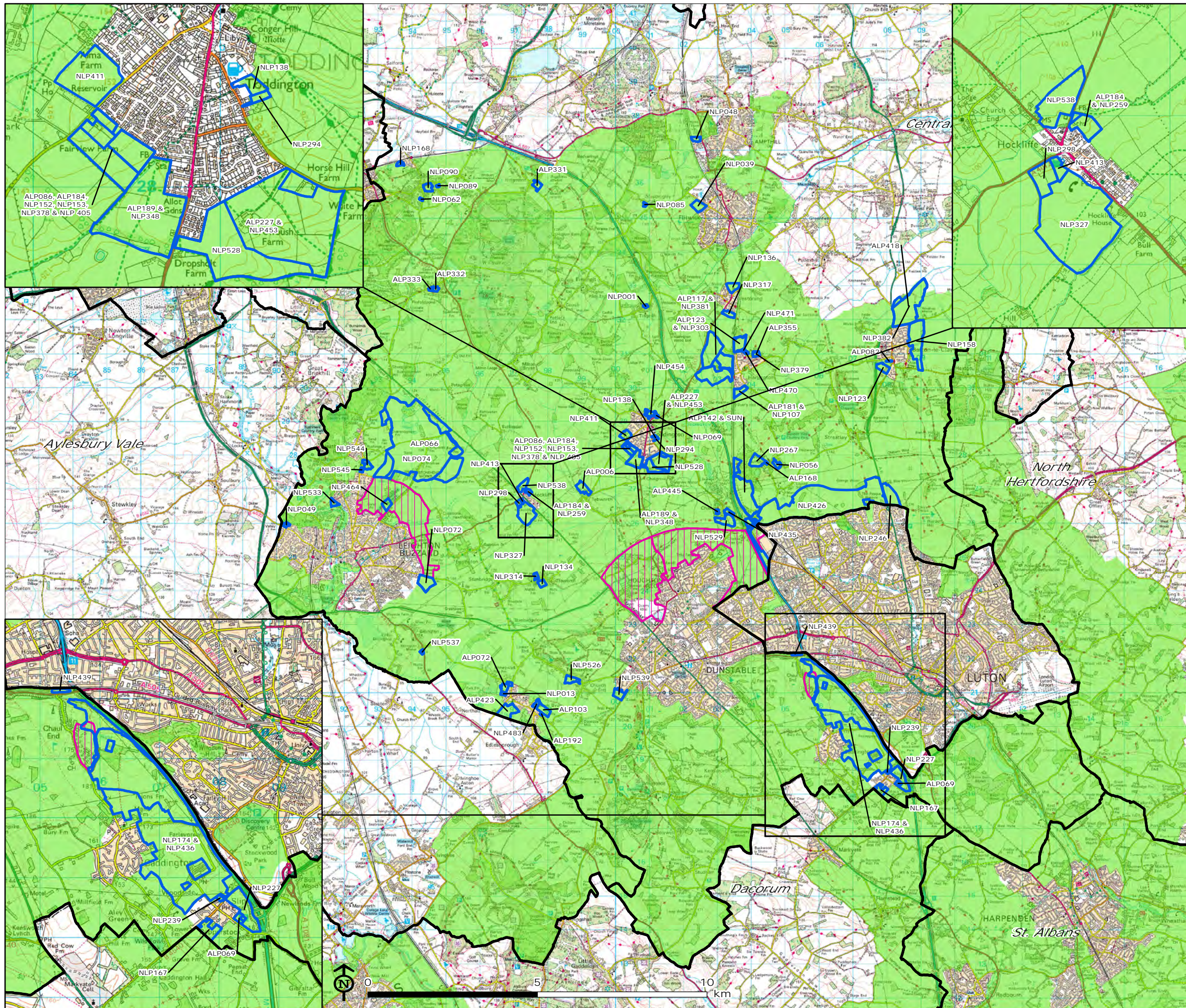
NLP327	Land to the South West of the A5, Hockliffe	1	24.20
NLP413	Land off Leighton Road	1	0.99
NLP538	Land North of Watling Street	1	6.35
Leighton Buzzard			
ALP066	Checkley Garden Village, Leighton Buzzard	4	381.82
NLP072	Stanbridge Road, Leighton Buzzard	1	15.37
NLP074	Checkley Wood Garden Village, Leighton Buzzard	4	364.89
NLP464	The Chiltern Hunt Land, Leighton Buzzard	1	5.52
NLP533	Land at Corbetts Farm	1	3.30
NLP545	Spinney Farm South	1	1.08
Leighton Linlade			
NLP049	Land to North of Soulbury Road	1	1.73
Luton			
ALP142	Land adj Sundon Quarry, Luton	1	49.97
NLP167	Land south of Markyate Road, Slip End, Luton	1	6.87
NLP174	Inions Farm (Bushwood), west of Luton	4	119.16
NLP246	Land at east of the A6 (Barton Rd), Luton	1	20.21
NLP426	North Luton SUE	7	283.81
NLP436	West of Luton	8	315.28
NLP439	Caddington Park, Luton	1	1.66
NLP525	Sundon RFI, Luton	2	56.82
Ridgmont			
ALP331	Land at Ridgmont	1	4.40
Slip End			
ALP069	Land at Front Street and New Street	1	1.62
NLP227	Land at Slip End	1	17.22
NLP239	Land at Church Road, Slip End	1	0.81
Steppingley			
NLP085	Land South of Rectory Road	1	0.94
Tebworth			
ALP006	Land at Ivy and Lane Farms	1	8.90
Tilsworth			
NLP134	Land south of Stanbridge Road and west of Dunstable Road	1	3.54
NLP314	Land adjoining 44 Stanbridge Rd	1	1.88
Tingrith			
NLP001	Tony's Field	1	0.99
Toddington			
ALP086	Middle Lakes, Toddington	1	2.83
ALP189	Land off Dunstable Road, Toddington	2	14.50
ALP227	Crowbush Farm, Toddington	2	32.90
NLP069	Land North of Statiobn Road, (adjacent to Tanners End)	1	0.90
NLP138	Land at Luton Road	1	1.46
NLP152	Land to the south east of Leighton Rd Toddington	1	0.71
NLP153	Land to the south east of Leighton Rd Toddington	2	2.12
NLP184	Middle Lakes, Toddington	1	2.83
NLP294	Land at Luton Road	1	0.44
NLP348	Fairview Farm, Toddington	2	14.58
NLP378	Land at Leighton Rd Toddington	3	9.32
NLP405	Land to the east of Leighton Rd Toddington	2	6.53
NLP411	Alma Farm, Toddington	1	6.61
NLP453	Land between Luton Rd and Dunstable Rd, Toddington, including Crowbush Farm	2	34.51
NLP454	Land off Long Lane	1	4.58
NLP528	Dropshort Farm	2	11.59
Totternhoe			
NLP526	Church End Farm	1	6.37
Upper Sundon			
ALP168	The Willows	1	0.52

ALP393	Land at Common Lane	1	11.13
NLP056	Land at Streatley Road	1	3.49
NLP267	Land at Common Lane, Upper Sundon	1	11.00
Westoning			
NLP136	Land off Flitwick Rd Westoning	1	7.51
NLP317	West View Farm, Westoning	1	4.74
Woburn			
ALP332	Land off Leighton Street 1	1	1.86
ALP333	Land off Leighton Street 2	1	0.94

Central Bedfordshire -
Stage 3 Green Belt Study

Green Belt Sites Overview

-  District boundary
-  Site boundary
-  Committed Development
-  Green Belt







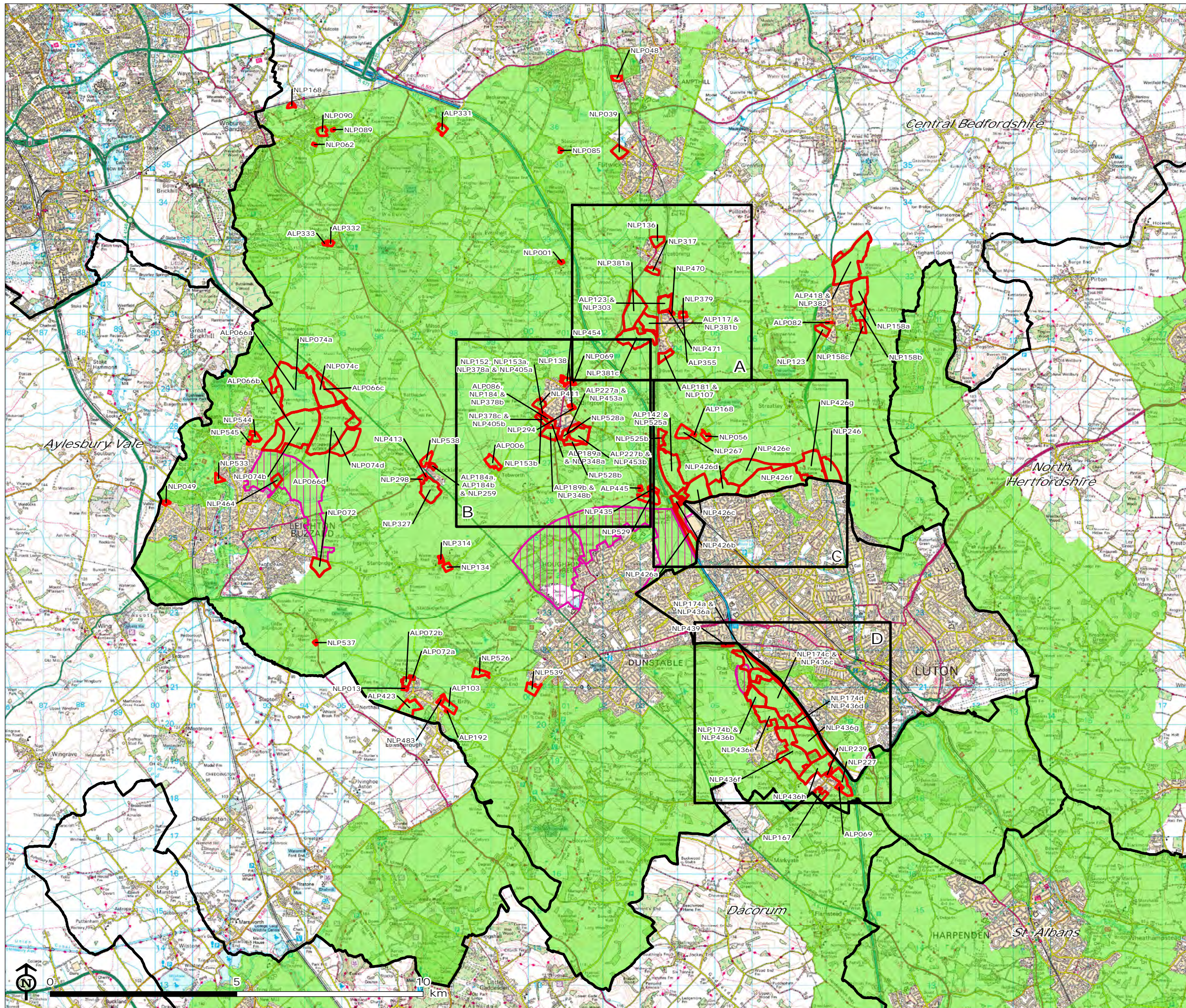
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Central Bedfordshire -
Stage 3 Green Belt Study

Green Belt Parcels Overview

-  District boundary
-  Parcel boundary
-  Committed Development
-  Green Belt







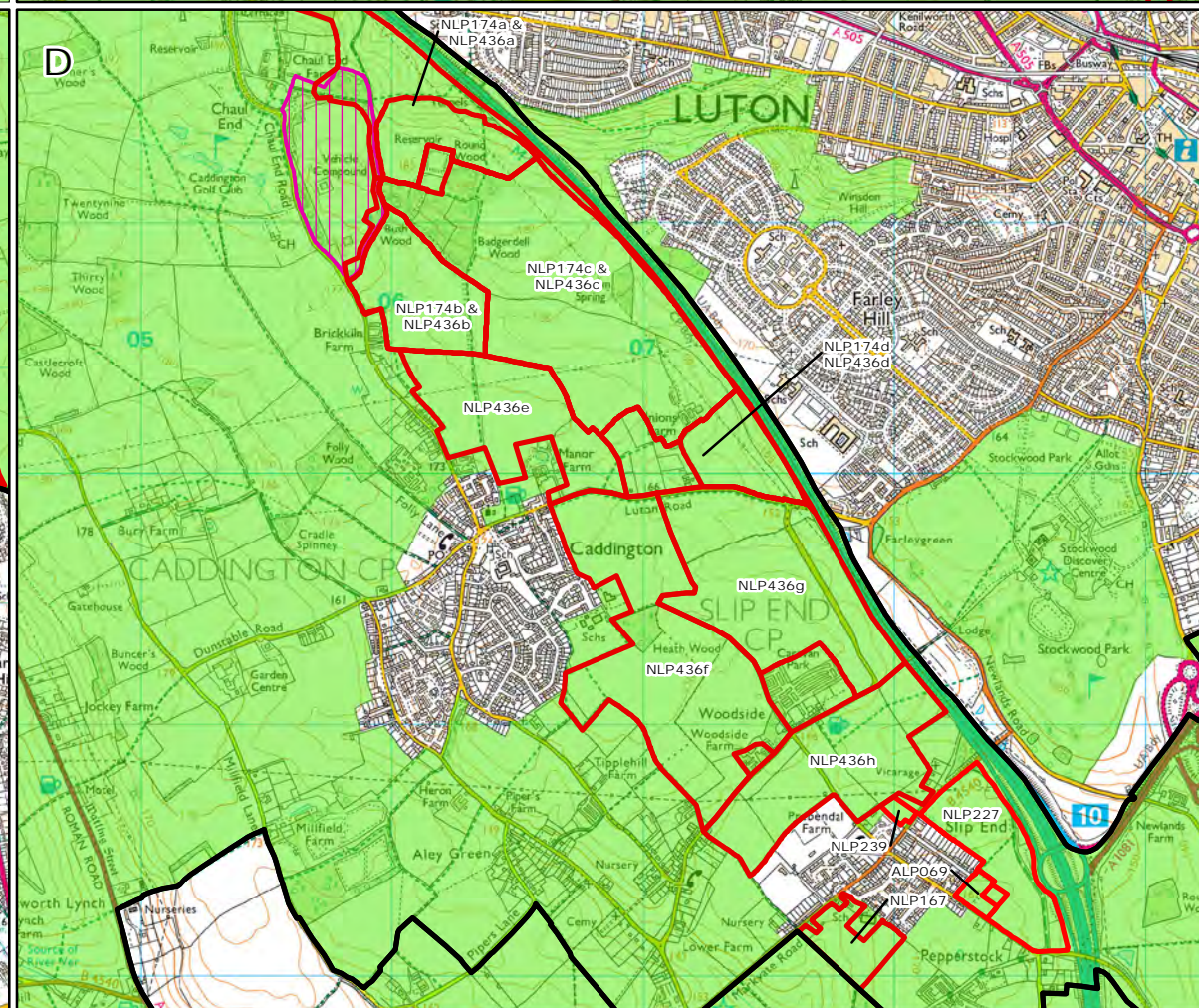
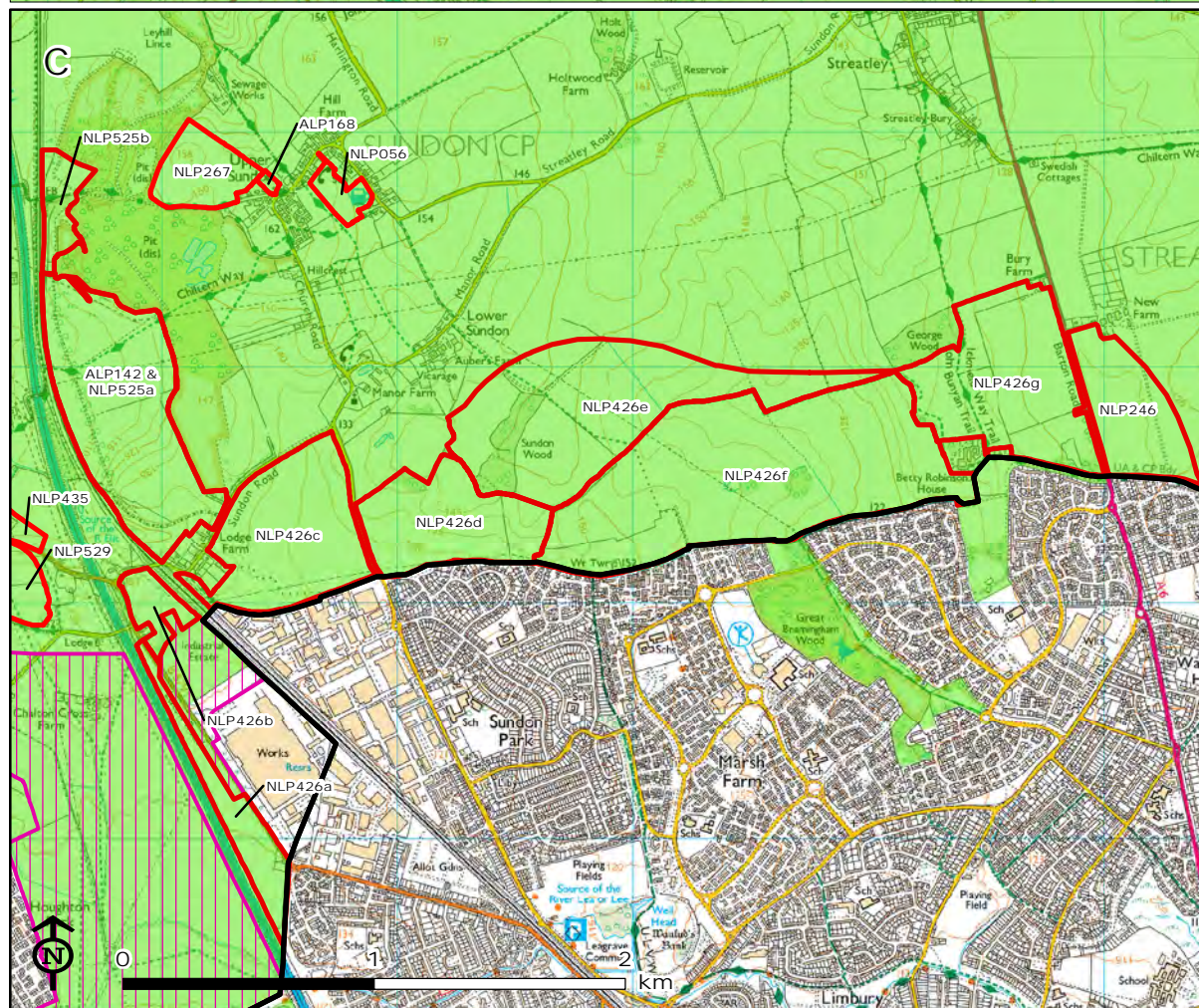
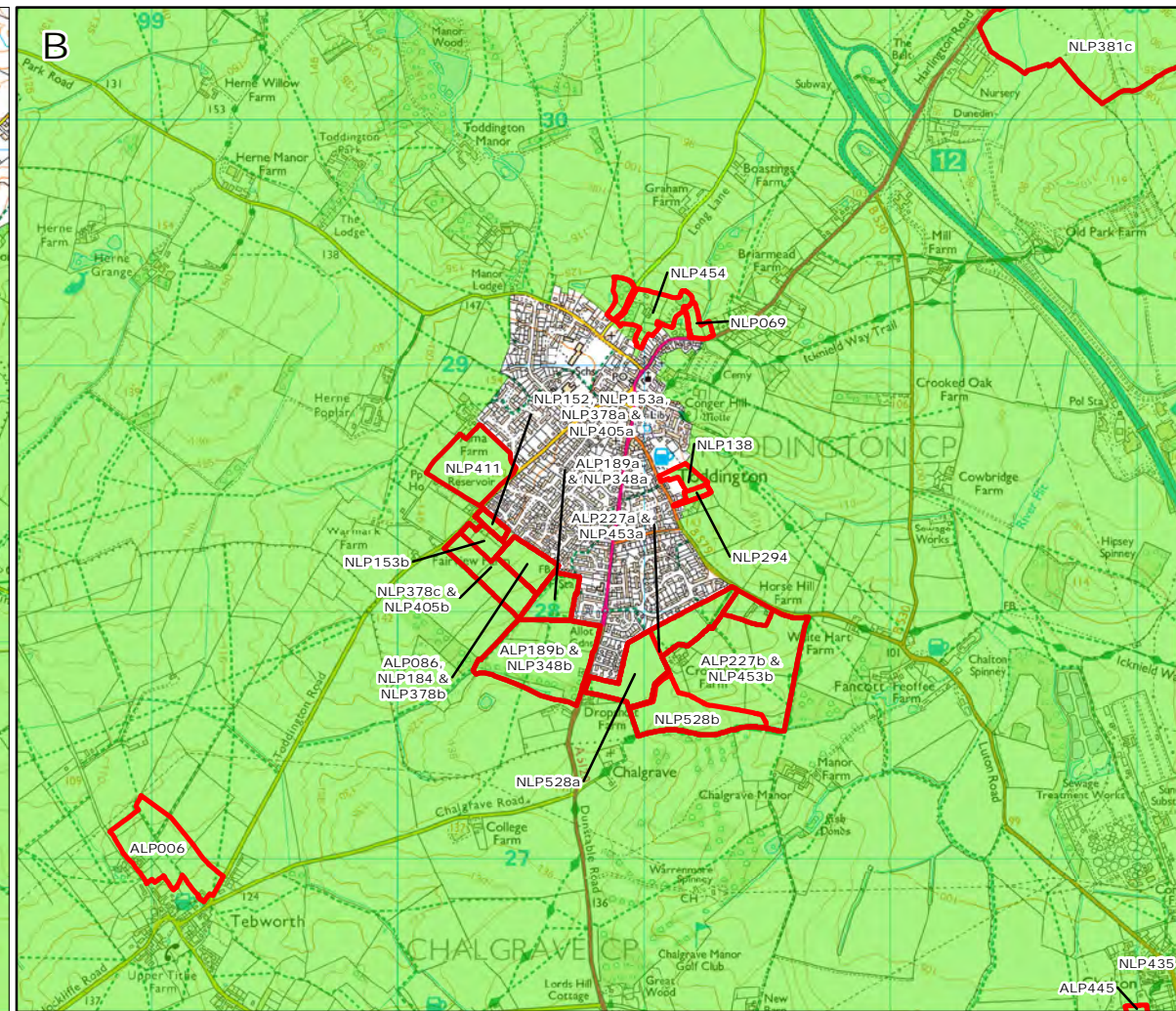
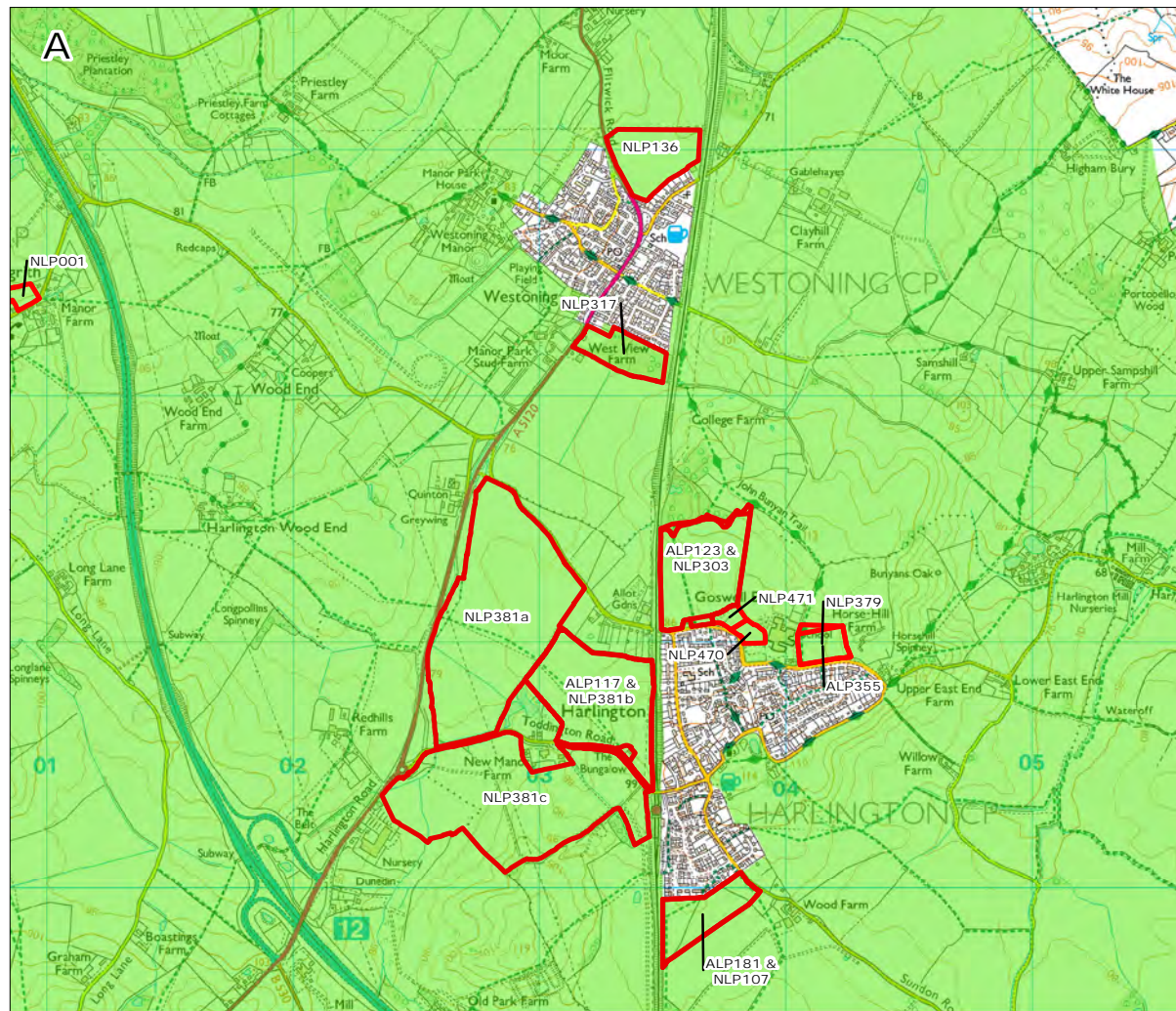
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Central Bedfordshire -
Stage 3 Green Belt Study

Green Belt Parcels Overview

-  District boundary
-  Parcel boundary
-  Committed Development
-  Green Belt



Map Scale @ A3: 1:30,000



2: Assessment of Green Belt Contribution

- 2.10 The assessment analysed how each of the identified land parcels performs against each of the Green Belt purposes, with the exception of the fifth purpose - the encouragement of recycling of derelict and other urban land to assist in urban regeneration.
- 2.11 The fifth purpose was not assessed as part of this study as measuring accurately the extent to which individual parcels contribute to this process of recycling of derelict and other urban land is problematic. While it would be possible to undertake a spatial analysis of the supply brownfield land relative Green Belt parcels (at conurbation, authority, settlement, Housing Market Area or Strategic Green Belt Areas scales), there are significant concerns about the validity of any judgements based on the results. It is not possible to identify and measure a causal link between the policy restraint in a particular Green Belt parcel and the recycling of urban land elsewhere, in part reflecting the complexity of the development process, the locational requirements of different types of development and variations in the property market over time.
- 2.12 This Study therefore acknowledges that Purpose 5 is important and should be afforded equal weight with Purposes 1-4, but that it is not possible to assess the performance of Purpose 5 on a parcel-by-parcel assessment for the purpose of this small scale review.
- 2.13 All four assessed Green Belt purposes are considered to relate to the relationship between the land area in question, developed land and the countryside. This relationship is influenced by the location of the parcel, the extent of openness within it and the role of physical elements, including boundary features, in either separating the parcel from, or connecting it to, built-up areas and the wider countryside.
- 2.14 In some locations, land that is not currently developed has been approved for development that is considered strategic in nature, and therefore 'committed'. Where this is the case, the areas in question are marked on assessment maps and treated as urban areas for assessment purposes.
- 2.15 The assessment criteria used to undertake the analysis are set out in the following tables for each respective purpose.

Purpose 1: Checking the unrestricted sprawl of large built-up areas

- 2.16 It is possible to argue that all Green Belt prevents the unrestricted sprawl of large built up urban areas, because that is its principal purpose as a strategic planning designation. However, the Study requires one area (or parcel) to be distinguished from another in terms of the extent to which they perform this purpose. This requires a detailed, site specific assessment against this strategic purpose.

Definition of 'Sprawl'

- 2.17 There is no clear definition of what constitutes urban sprawl. The PAS guidance states in relation to Purpose 1:
- "The terminology of 'sprawl' comes from the 1930s when Green Belt was conceived. Has this term changed in meaning since then? For example, is development that is planned positively through a local plan, and well designed with good masterplanning, sprawl?"*
- 2.18 The guidance emphasises the variable nature of the term 'sprawl' and questions whether positively planned development constitutes 'sprawl'. The RTPI Research Briefing No. 9 (2015) on Urban Form and Sustainability is also not definitive on the meaning of sprawl:
- "As an urban form, sprawl has been described as the opposite of the desirable compact city, with high density, centralised development and a mixture of functions. However, what is considered to be sprawl ranges along a continuum of more compact to completely dispersed development. A variety of urban forms have been covered by the term 'urban sprawl', ranging from contiguous suburban growth, linear patterns of strip development, leapfrog and scattered development."*
- 2.19 For the purpose of this Study, urban sprawl is defined according the Oxford Dictionary as "spreading out of built form over a large area in an untidy or irregular way". Given this definition, land immediately adjacent to the large built up area is likely to contribute to this purpose, as it provides the boundary and zone of constraint to urban expansion. Nevertheless it should be

recognised that sprawl as described can be equally damaging to the overall integrity of the Green Belt, wherever it may arise.

Assessment criteria

- 2.20 The land needs to have a relationship with a large built-up area to make a contribution to this purpose. Where land has a relationship with the edge of a large built-up area, the strength of its contribution will be greater if it has a stronger relationship with the surrounding countryside than with the urban area, and lacks urbanising influences. Conversely a parcel will make a weaker contribution to this purpose if it: has a stronger relationship with the adjacent large built-up area than with the wider countryside; lacks proximity to the built-up area; or is already developed.
- 2.21 In line with the 2016 Study, Luton/Dunstable/Houghton Regis and Leighton Linlade are considered to constitute 'large built-up areas'.
- 2.22 Key questions asked in relation to purpose 1, the prevention of sprawl of large, built-up areas, are:
 - Does the parcel lie in adjacent to, or in close proximity to the large built up area?
 - To what extent does the parcel contain existing urban sprawl?
 - To what extent does the parcel exhibit the potential for sprawl? i.e. does land relate sufficiently to a large built-up area for development within it to be associated with that settlement or vice versa?
 - Does land have a strong enough relationship with the large built-up area, and a weak enough relationship with other Green Belt land, to be regarded more as infill than expansion?

Purpose 1: Check the unrestricted sprawl of large built-up areas	
Development/land-use: less development = stronger contribution Location: closer to settlement = stronger contribution Separating features: stronger relationship with countryside than settlement = stronger contribution Connecting features: weaker relationship between settlement and countryside = stronger contribution	
<div style="display: flex; flex-direction: column; align-items: center;"> <div style="margin-bottom: 10px;">Stronger Contribution</div> <div style="margin-bottom: 10px;">↑</div> <div style="margin-bottom: 10px;">↓</div> <div style="margin-bottom: 10px;">Weaker Contribution</div> </div>	<p>The parcel is adjacent to the large built-up area but relates strongly to the wider countryside – development would represent significant expansion of the large built-up area into countryside.</p> <p>The parcel is not adjacent to the large built-up area and development here would not constitute sprawl from the large built up area</p>

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

- 2.23 Land that is juxtaposed between towns will make a contribution to this purpose, and the stronger the relationship between the towns, the stronger the contribution of any intervening open land will be. Physical proximity is the initial consideration but both built and natural landscape elements can act to either decrease or increase perceived separation – e.g. a direct connecting road link or shared landform may decrease perceived separation whereas a barrier feature such as a woodland block or motorway may increase the perception of separation. Land that lacks a strong sense of openness, due to the extent of existing development that has occurred, will also make a weaker contribution.

2.24 In line with the 2016 Study, Luton/Dunstable/Houghton Regis, Leighton Linlade, Ampthill and Flitwick are considered to constitute 'towns', but it is recognised that gaps between smaller settlements can in turn contribute to gaps between towns.

2.25 Key questions asked in relation to purpose 2, preventing the coalescence of towns, are:

- Does the parcel lie directly between two settlements being considered under Purpose 2?
- How far apart are the towns being considered?
- Is there strong intervisibility between the towns due to topography, etc?
- How much of a gap is required to avert perceived coalescence, taking into consideration the role of physical features in creating either separation or connectivity?
- How do the gaps between smaller settlements affect the perceived gaps between towns?

Purpose 2: Prevent neighbouring towns from merging

Development/land-use: less development = stronger contribution

Location: juxtaposed between towns = stronger contribution

Separating features: lack of features between towns = stronger contribution

Connecting features: stronger relationship between towns = stronger contribution

Stronger Contribution



Weaker Contribution

The parcel plays an essential role in preventing the merging or erosion of the visual or physical gap between settlements. Development of this parcel would result in the physical or visual coalescence of settlements, or a significant narrowing of the physical gap with no physical elements to preserve separation

Development of this parcel would result in little or no perception of the narrowing of the gap between settlements

Purpose 3: to assist in safeguarding the countryside from encroachment

2.26 The contribution a parcel makes to safeguarding the countryside from encroachment can be directly related to the extent to which it displays the characteristics of countryside – i.e. a lack of dense and urbanising development, and land uses associated with countryside – and the extent to which it relates to the adjacent settlement and to the wider countryside.

2.27 PAS guidance states that:

“The most useful approach is to look at the difference between urban fringe – land under the influence of the urban area - and open countryside, and to favour the latter in determining which land to try and keep open, taking into account the types of edges and boundaries that can be achieved.”

2.28 It is important to recognise that Green Belt does not function as a series of isolated parcels: the assessment of a defined parcel will reflect the nature of landscape elements or characteristics within that parcel but must also reflect its relationship with the wider Green Belt.

2.29 Key questions asked in relation to purpose 3 are:

- To what extent does the land exhibit the characteristics of the countryside and is open?
- Disregarding the condition of land, are there urbanising influences within or adjacent which reduce the sense of it being countryside?

- Does land relate more strongly to settlements or to the wider countryside?

Purpose 3: Assist in safeguarding the countryside from encroachment

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

Location: further from settlement or from urban encroachment in neighbouring parcels = stronger contribution

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

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

Stronger Contribution



Weaker Contribution

The land parcel displays the characteristics of the countryside, is open and there is little or no sense of urban encroachment from either within the parcel, or from neighbouring land. The parcel relates strongly to the wider countryside and has a sense of separation from the settlement. Development would represent encroachment into the countryside

The parcel is too lacking in openness to be considered countryside, or has few countryside characteristics within it and lacks relationship with the wider Green Belt countryside

Purpose 4: to preserve the setting and special character of historic towns

- 2.30 Whilst many settlements have historic elements, this Green Belt purpose is only relevant to settlements of a certain size – i.e. towns – which retain a historic character connected to surrounding landscape elements, and which it is impractical to protect solely through Conservation Area designations. Whilst many settlements have historic elements, this Green Belt purpose is only relevant to settlements of a certain size which have retained an historic character to which surrounding landscape elements make a key contribution.
- 2.31 In line with the 2016 Study, Ampthill, Leighton-Linslade and Luton are considered to constitute historic towns.
- 2.32 The connection between a historic town’s historic character and the wider countryside does not have to be physical, indeed successions of development often isolate core historic areas from the surrounding countryside; it is often a visual connection. This visual connection can be defined through movement through the area or views into or out of the settlement.
- 2.33 The key questions asked in relation to purpose 4 are:
- What is the relationship of the land with the historic town?
 - Does the land form part of the setting and/or special character of an historic town?
 - What elements/areas important to the setting and special character of a historic town would be affected by loss of openness?
- 2.34 The 2016 Study detailed (at paragraphs 3.35-3.56) the aspect of those settlements’ landscape settings that are considered of key importance. To summarise: for Ampthill the wooded parklands rising above the settlement to the north and west were the key features of interest; for Leighton-Linslade the riverside landscapes of the Ouzel Valley, and for Luton its relationship with the River Lea and surrounding hills, scheduled monuments and estate parklands.

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

Development/land-use: less development = stronger contribution

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

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

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

Stronger Contribution



Weaker Contribution

The parcel's openness is a key element in the relationship between the settlement and key characteristics identified as contributing to special character or historic setting – development would detract significantly from the town's historic character

The parcel does not form part of the setting of an historic town

3: Assessment of Potential Alternative Boundaries

- 2.35 The role of a parcel's boundary features in influencing the contribution to Green Belt purposes, through their role as separating or connecting features, formed part of the assessment process described above. However the nature of a boundary in comparison to the existing Green Belt edge, or potential alternatives boundaries outside of the assessment parcel is also a consideration when determining whether a boundary is "*readily recognisable and likely to be permanent*" (NPPF paragraph 85), and will in turn affect the impact that release of the parcel might have on adjacent Green Belt (as set out above).
- 2.36 Features considered to constitute strong potential Green Belt boundaries include natural features such as substantial watercourses and water bodies, and man-made features such as motorways, A and B roads and railway lines. Less prominent or less permanent features such as walls, woodland, hedgerows, tree lines, streams and ditches are considered to constitute moderate strength boundaries, and edges lacking clear definition on the ground form weaker boundaries.
- 2.37 The suitability of an alternative Green Belt boundary also depends on its relationship with existing boundaries in terms of the resulting form. An overly extended or convoluted shape is likely to cause greater harm than a simpler, more direct alignment in terms of its impact on the relationship between built development and open countryside. For each of the assessment parcels, commentary is provided on the nature of the existing boundary and any suggested alternatives.

4: Assessment of Harm to Green Belt

- 2.38 With reference to the size, shape and location of the assessment parcel, the nature of its boundaries, and its relationship with other elements that form boundaries within the landscape, judgements were made concerning the impact that the release of the parcel would have on the contribution of adjacent Green Belt.
- 2.39 Combining this judgement with the assessment of the parcel's contribution to Green Belt purposes, and taking into consideration boundary strength and potential for mitigation, a rating was given for the level of harm that can be expected to result from the release of the parcel.

Consideration was then given as to whether there are any scenarios for release of less than the full parcel that would result in reduced harm to the Green Belt.

- 2.40 The assessment of potential harm was given as a rating, using a 5-point scale (of low, low-moderate, moderate, moderate-high and high) using professional judgement to weigh up the parcel assessment comments. Absolute definitions equating Green Belt harm to suitability for release cannot be given. However, areas where a high degree of potential harm to the Green Belt has been identified, this relates to land which makes a strong contribution to the Green Belt purposes and/or its release for development would have a significant effect on the strength of the surrounding Green Belt. Vice versa, areas where a low potential for harm to occur has been identified, this relates to areas which do not make a strong contribution to the Green Belt purposes and its release would not have a significant effect on the contribution of the surrounding Green Belt.
- 2.41 For each site, consideration was also given to whether the harm resulting from release of the site would be greater if considered in combination with the release of any other identified sites – i.e. whether there was any potential for cumulative harm.
- 2.42 Commentary is provided in the assessment on how the judgements relating the level of harm have been made. The harm ratings and accompanying comments are intended to contribute alongside judgements regarding environmental and sustainability impacts, and potential housing yields, to aid final decisions regarding the suitability of release of Green Belt land.

5: Identification of Potential Mitigation

- 2.43 Potential mitigation is in the first instance identified through the subdivision of sites into smaller parcels that have potential to rate differently in terms of Green Belt harm, and secondly through the identification of smaller parts of some parcels that are considered to have potential to cause less harm to Green Belt, if released, than the parcel as a whole.
- 2.44 If decisions are made to remove land from the Green Belt, the Council should seek to minimise any harm to the remainder of the Green Belt. This will include careful masterplanning of development to ensure that harm is minimised, ensuring Green Belt boundaries are defined, and that positive uses for the wider Green Belt are secured. This study provides guidance on these issues. **Chapter 4** of this report sets out:
- what 'design principles' could be applied to parcels of land that have been identified as potentially suitable for release from the Green Belt (i.e. to minimise potential harm to the Green Belt).
 - what opportunities there are to enhance the beneficial use of the Green Belt, i.e. to provide access and recreation opportunities; to retain and enhance landscapes, enhance visual amenity and biodiversity; or to improve damaged and derelict land.
- 2.45 The study does not consider measures which might reduce environmental harm, or improve sustainability.
- 2.46 Beneficial use is considered in terms of the possible enhancements noted in NPPF paragraph 81 (see **Chapter 1** above) including:
- Improving access.
 - Improving opportunities for outdoor sport and recreation.
 - Retaining and enhancing landscapes.
 - Improving visual amenity.
 - Increasing biodiversity.
 - Improving damaged and derelict land.

Output Format

- 2.47 The assessment findings for Tasks 1-4 are presented in **Appendix 1** on a site by site basis. For each site the following information is provided:
- The site reference number, name and size.
 - A map of the site, in context with the defined Green Belt and any nearby settlements.
 - An aerial photograph covering the same area, to illustrate the nature of land cover.
 - A brief description of the site in terms of its land use, boundaries and relationship with defined urban areas (i.e. settlements outside of Green Belt, or inset within but excluded from it).
 - Comments on the relationship between the site, settlements and countryside, to support the subdivision of the site for assessment purposes and the judgements made in the assessment of contribution to Green Belt.
 - A list of parcels into which the site was divided; a site which requires no subdivision has a parcel reference that matches the site reference, whereas a site which is subdivided is appended with an additional letter (e.g. NLP426a). Cross-reference is made to any other sites under which the same land is assessed.
- 2.48 For each parcel within a site the following is provided:
- A map showing the location of the parcel, in the context of the site and any adjacent parcels – this map also shows any nearby sites, and the boundaries of any areas for which permission for strategic development has been granted, and which are considered likely to come forward (termed 'committed' development).
 - A representative photograph of the parcel.
 - The name of the Stage One assessment parcel of which this Stage Three parcel forms part, together with the highest contribution rating(s) given to the parcel in the Stage One study.
 - Where applicable, the name of the Stage Two assessment parcel of which this Stage Three parcel forms part, together with the contribution rating given to the parcel in the Stage Two study.
 - Text assessing (descriptively) the contribution of the parcel to each of the Green Belt purposes.
 - The name of the potential development location identified in the Luton HMA Growth Options Study (LUC, 2016) that is applicable to the parcel, together with the spatial option(s) identified for that location. Five possible spatial options were identified in the HMA Study (see table 2.9 in the HMA Study report): new settlements, village extensions, growth in transport corridors, urban extensions and urban intensification around public transport hubs.
 - Text assessing the strength of any potential alternative Green Belt boundaries – either the parcel boundaries or sub-divisions within it – with reference to any relevant boundary features outside of the parcel that are relevant to its relationship with settlements or with the wider Green Belt.
 - Judgement of the level of harm that would result from the removal of the parcel, or any strategic subdivision of it, from the Green Belt, taking into consideration the impact of release on the contribution of adjacent Green belt. Different release options, where applicable, were assessed as separate 'scenarios'. Each rating is accompanied by a small inset map showing the harm rating for that scenario, colour-coded by rating.
- 2.49 Text is provided to comment on the potential for any 'cumulative release scenarios' to have a greater effect on the Green Belt than is reflected in the ratings given to parcels or sites in isolation.
- 2.50 To conclude the assessment of each site an assessment is given for harm that would result from the release of the whole site, illustrated by a colour-coded map.

Reporting and review

- 2.51 Following the completion of the Stage 3 assessment work, the Study was written-up into a report for publication. This report draws together the findings of the Stage 3 assessments and makes general recommendations on how the Councils might take forward the findings of the Study through the plan-making process.