Draft Central Bedfordshire Local Plan 2035 Consultation
Land at Leighton Road, Toddington, Beds

August 2017
# Contents

1. Introduction 1  
2. Response to Local Plan 2  
3. Land at Leighton Road, Toddington 7  
4. Summary and Conclusion 14  

Appendix 1: Site Location Plan 16  
Appendix 2: Landscape & Visual Appraisal 17  

---

David Wetherill  

**Client**  
Taylor Wimpey UK Ltd  

**Our reference**  
TAYR3023  

August 2017
1. Introduction

1.1 These representations have been prepared by Turley on behalf of Taylor Wimpey UK Ltd in respect of the Central Bedfordshire Local Plan 2015-2035 draft Plan consultation (July 2017).

1.2 Our client has important land interests in the Local Plan area, in particular at Toddington. As such this response focuses on issues particularly affecting Toddington.

1.3 Each of our responses relates to a particular policy or paragraph and this report is structured accordingly.
2. Response to Local Plan

Chapter 2: Key Themes

Objectively Assessed Need
2.1 The Local Plan clearly recognises the scale of growth likely to be required in the authority area over the Plan period and the challenges and opportunities this presents. In addition there is an acknowledgement of the relationship the authority has with the wider area and the need to both meet the requirements of the Duty to Cooperate, and to fully address the challenges and opportunities which the area faces.

2.2 The Local Plan has been informed by the Luton and Central Bedfordshire Initial SHMA (May 2017) which identifies population growth of 19.5% over the plan period for Central Bedfordshire. The Initial SHMA calculates the full Objectively Assessed need (OAN) for housing in Central Bedfordshire to be 32,000 dwellings in Central Bedfordshire over the period 2015 to 2035. For Luton the OAN is calculated to be 19,000 dwellings over the Plan period.

2.3 The SHMA recognises that further iterations of the Assessment will be required during the course of the preparation of the Local Plan. Indeed it is noted that consultation on a standardised approach to the calculation of OAN is scheduled for September 2017 and, according to correspondence from DCLG (dated 31st July 2017), any plans which have not been submitted by March 2018 will use the new standardised methodology. The consultation in September 2017 will however include what constitutes a reasonable justification for deviating from the standard methodology, and this will then be made explicit in the updates to the National Planning Policy Framework. From the Council’s programme for the preparation of the Local Plan at section 1.5 it is clear that the Plan will not be submitted until October 2018 at the earliest and therefore the Plan will need to be prepared with due regard to the standardised methodology, unless reasonable justification can be provided, in due course.

2.4 As such whilst the Initial SHMA (May 2017) is an appropriate basis for the current Local Plan consultation to be based upon, it is important that sufficient flexibility is allowed for to enable the strategy to evolve in parallel with the emerging evidence base on an iterative basis. We consider the conclusions of the SHMA and the full scale of the Council’s OAN further in respect of Policy SP1.

Duty to Cooperate and Unmet Needs
2.5 Whilst the SHMA itself covers the authority areas of Luton and Central Bedfordshire, it is important to note that Central Bedfordshire is in fact split across four functional Housing Market Areas (HMA). The largest number of Central Bedfordshire residents live in the Luton functional HMA. Almost 99% of the resident population currently living in the Luton housing market area were identified to live in either Luton Borough or Central Bedfordshire.

2.6 The Interim SHMA apportions the joint OAN across the four HMAs as identified on the diagram below.
2.7 Clearly Central Bedfordshire has a strong functional relationship with Luton Borough in particular. It is noted that Central Bedfordshire Council withdrew its draft Development Strategy in 2015, due to the failure to comply with the duty to co-operate in respect of Luton Borough Council and the proposed allocations to meet its needs. North Hertfordshire has agreed to provide 2,100 dwellings to help meet Luton's housing need by 2031. Other neighbouring authorities such as St Albans and Stevenage are severely constrained in terms of capacity, and therefore their ability to assist in meeting Luton's unmet needs is limited. The Plan identifies that through Duty to Co-operate discussions, Central Bedfordshire Council has agreed to provide for 7,350 homes within Central Bedfordshire within the Luton HMA. We support the proposals to meet Luton Borough Council's unmet needs.

2.8 Central Bedfordshire is one of the most accessible areas in East of England and the wider region given its rail and road links. Central Bedfordshire is well placed to contribute towards meeting this unmet need, given its close relationship with Luton.

2.9 Whilst we support the commitment to assist in meeting the unmet needs of Luton Borough, it is important that discussions continue with other neighbouring authorities in accordance with the duty to cooperate. The majority of the neighbouring authorities to Central Bedfordshire are also in the process of preparing new Local Plans, with these at various stages of completion. Discussions should continue with these authorities on whether any unmet needs will arise from these authorities.

**Growth Strategy**

2.10 We welcome the acknowledgement that there is a need to provide for a range of forms and scales of new development to meet the identified needs including growth at existing settlements and provision for large scale new communities.
2.11 Allocations need to be in most sustainable (in the sense of three elements of sustainability – economic, environmental and social) and accessible locations, and which deliver significant benefits, including community facilities and enhancements to the environment etc.

Chapter 5: Developing the Strategy and Chapter 7: Strategic Approach

2.12 Five growth scenarios have been tested through the Sustainability Appraisal which supports and underpins the Local Plan. Of the five growth scenarios, scenario 1 which proposes higher growth across all of Central Bedfordshire (the favoured scenario) is the most appropriate. This approach is the most effective in delivering sustainable development across the authority. It ensures that development is not all focussed in certain locations, which can have significant infrastructure issues. It is also unlikely that the housing market would be able to sustain such an approach.

2.13 The draft Local Plan subdivides the authority into four sub-areas. The SA supports growth in Areas A, B and C as having ‘positive effects’ on housing delivery and employment. Whilst the SA identifies that development within Area A will require the release of Green Belt, it also highlights that “such constraints have also restricted the opportunities for communities that can be associated with new development including new housing and supporting infrastructure.” As such whilst growth in Area A has an important role in meeting the needs of Luton Borough, it is also important in supporting the existing settlements within the sub-area. Whilst other sub-areas in the authority, which are not subject to Green Belt designation, have received growth recently through speculative developments, this has not been the case in Area A. As such the importance of allocating development within Area A is enhanced to ensure growth is allowed to support the existing communities and meet their needs.

2.14 Within Area A the growth locations being considered include:

- North of Luton – around 4,000 homes
- Limited extensions to larger towns and villages within the Green Belt - around 2000 homes collectively
- West of Luton – around 2,000 homes
- M1 Junction 11a – around 40 hectares for employment.

2.15 We support the recognition of the need to plan for extensions to larger towns and villages within the Green Belt. As highlighted by the SA this growth is important to support the existing communities and to meet the emerging needs. As discussed above, the exact quantum of development which the Plan will be required to plan for is at this stage unknown so it is important that there is flexibility for the towns and villages to accommodate additional development where needed and appropriate. When considering amendments to the Green Belt boundaries, in accordance with the requirements of the NPPF, it is important that consideration is given to the requirements beyond the current Plan period.
Policy SP1

2.16 The Plan seeks to deliver a minimum of approx. 43,000 (20,000 new and approx. 23,000 commitments) dwellings. In addition the Plan proposes to meet Luton’s unmet need of 7,400 dwellings. Clearly there is therefore recognition by the Council that there will be a significant need for new homes.

2.17 The evidence in the Luton and Central Bedfordshire Strategic Housing Market Assessment (SHMA) (May 2017) indicates that the more cautionary approach reflected by the upper end of the range (i.e. 54,960) is more likely to represent a minimum level of housing which should be planned for.

2.18 When adding in Luton’s unmet needs as well, the 43,000 figure (the lower end of the range) of housing is unlikely to meet the authority’s needs in full. Whilst the upper end (53,000) appears to allow for a generous contingency (including 10% buffer), the Council should be planning for this level of delivery now, for the Plan to be considered as having “positively prepared”.

Chapter 8: Housing Growth Locations

2.19 Chapter 8 identifies locations for growth, which will be refined to form a shortlist of preferred site allocations in the next version of the plan. At this stage non-strategic growth locations at the towns and villages have not been identified. It is understood that these will form part of a future consultation on the Local Plan. We consider the suitability of Toddington, and specifically our client’s land interest at land at Leighton Road, to accommodate development further in Section Three of this report.

Chapter 9: Green Belt, Coalescence and Settlements

2.20 The Central Bedfordshire Green Belt extends across approximately 40% of the Plan area. Importantly the area covered is that which most closely relates to Luton which the Plan area has a close functional relationship with. We support the Council’s recognition of the need to release Green Belt. These releases are required both to meet the unmet needs of Luton Borough which the authority has committed to meeting, but also to meet its own needs and support its existing communities. As highlighted above, it is important that in considering revisions to the Green Belt boundaries the Council looks beyond the current Plan period.

2.21 The draft Local Plan is supported by a review of the Green Belt. We understand that this review will be updated and expanded upon as required during the Local Plan consultation process. We consider the findings of the Green Belt study in respect of our client’s land interests at Toddington in Section Three of this Statement.

Chapter 10: Settlement Envelopes and Settlement Hierarchy

2.22 The Council’s Settlement Hierarchy proposes a hierarchy of four tiers of settlements. The top tier of settlements are known as major service centres. Toddington is a second tier settlement, known as minor service centres.
2.23 The supporting text to the policy advises that the hierarchy “helps to provide a framework for considering the levels of new development to be directed through the Development Management process.”

2.24 We feel that Toddington should be considered as a major service centre, particularly given its high ranking within the Initial Settlements Capacity Study (May 2017), discussed further below. In particular, we wish to highlight that Toddington is only 2 miles to a mainline rail connection, and accordingly it was selected as one of the 5 settlements with the highest capacity for growth in Area A.

2.25 Toddington’s current classification as a minor service centre does not recognise the sustainability credentials of the settlement, and in doing so limits the potential of the settlement to take an appropriate level of future growth.

Chapter 12: Specific Housing Policies

2.26 We provide the following comments on the specific housing policies:

2.27 **Policy H1 (Housing mix)** – The policy should be fluid in nature so that it reflects the most up to date evidence (as required by the NPPF). At the current point the most up to date evidence is the Initial SHMA (2017).

2.28 **Policy H4 (Affordable Housing)** – A 30% affordable housing requirement would appear to be appropriate provided it reflects the most up to date SHMA evidence. However, the policy should be clear that the requirement is subject to viability to accord with the NPPF.

2.29 **Policy H6 (Starter Homes)** – We support the policy aspiration that Starter Homes should form part of the Affordable Housing offer, to be determined on site by site basis.

2.30 **Policy T1 (Connectivity), T2 (Mitigation) and T3 (Safety & Design)** – Any development, including any proposed allocations, should demonstrate through appropriate evidence that there is sufficient capacity on transport networks and any impacts can be mitigated as necessary (provided that it is viable to do so). The policies should encourage development to be steered to the areas where the least infrastructure mitigation is necessary in the first instance. Toddington is located 2 miles away from a mainline train station.

2.31 **Policy HQ9 (Larger sites)** – In order to deliver high quality sustainable development that provides real health and wellbeing benefits, which the Plan should aspire to, Development Briefs and Design Codes will be necessary. In particular, Design Codes will ensure large scale development delivers more consistent outcomes across multiple phases. Design Codes are also beneficial in expediting the reserved matters process so that housing can be delivered quicker, whilst offering greater certainty for developers. The proposed thresholds for when Development Briefs and Design Codes are necessary are appropriate.
3. Land at Leighton Road, Toddington

3.1 ‘Land at Leighton Road, Toddington’ comprises 22 acres of land. It comprises small to medium sized pastoral fields with a landscape framework of field boundary hedgerows and tree belts.

3.2 The site is located adjacent to the south western settlement edge of Toddington. The site lies north of Dunstable and northeast of Leighton Buzzard, approximately 6.5km and 8.7km respectively. The site is located in Flood Zone 1, which is the lowest category of flood risk. The site currently lies wholly within the Green Belt.

3.3 To the north west, the site is bound by Leighton Road, which joins Harlington Road within Toddington, leading to junction 12 of the M1 to the northeast. To the south, Leighton Road becomes Todddington Road joining Watling Street (A5) to the southwest of Toddington.

3.4 To the southwest, the site is bound by a pair of agricultural fields, with a tree belt on their south western boundary, and further agricultural fields beyond.

3.5 To the southeast, the site is bound by a wedge-shaped tree belt, the eastern side of which follows the edge of a small watercourse, with an irregularly shaped arable field, and a recent housing development at Randall Close and some allotments further to the east.

3.6 To the northeast the site is bound by the south western edge of the residential development at Toddington. There is a small children’s play area which serves the existing residential development to the northeast which lies outside of the Site boundary.

3.7 The site is visually well contained by the network of boundary hedgerows and tree belts. The majority of existing landscape features on the site including the hedgerows, tree belt and individual trees have the potential to be retained in development proposals. Enhancement planting to the southern site boundary will help to provide a strong physical boundary to the edge of development.

3.8 It is anticipated that the site could deliver an extension to Toddington of approximately 250 dwellings. Taylor Wimpey UK Ltd would be keen to engage with the LPA regarding their aspirations and requirements for the development of the site to inform the emerging proposals for the site. Further engagement would then take place with key stakeholders, statutory consultees and local residents in the development of more detailed proposals for the site.

3.9 Although the Council have yet to propose locations for extensions to existing towns and villages, the evidence base has started the assessment process. We comment on the various evidence base documents in their assessment of the suitability of Toddington as a location for development, and land at Leighton Road more specifically as an extension to the existing settlement, below.
Initial Settlements Capacity Study

3.10 The Initial Settlements Capacity Study (May 2017) has undertaken an assessment of the overall sustainability of settlements within Central Bedfordshire.

3.11 The location was one of the 34 settlements that were considered in the study. The majority of settlements were considered to have a low capacity, with only 9 settlements with medium or high capacity (assuming Green Belt release). Toddington was one of the few settlements found to have medium capacity.

3.12 Following this the study then considered 5 locations with the highest capacity for growth in Area A, when considering Green Belt contributions with railways connections. As Toddington is only 2 miles to a mainline rail connection, it was selected as one of the 5 settlements with the highest capacity for growth.

3.13 We agree that Toddington is a sustainable location, and that there are no significant constraints to the capacity of the settlement to accommodate additional development. Accordingly the settlement should be a focus of sustainable growth. It is considered that the proposals for development represent an important opportunity to support the existing community and its facilities.

Luton HMA Growth Options Study

3.14 The Council’s Luton HMA Growth Options Study (July 2017) has assessed a series of growth locations within the Luton HMA, including the part that falls within the administrative area of Central Bedfordshire. The site was one of the 32 locations that were considered in the study, albeit considered as a part of a larger site (L13). This followed a sieving exercise to remove sites that were situated within areas of primary constraint or could not be grouped to form larger strategic options. The assessment concluded that the site had an overall deliverability of medium and was subject to only 8 secondary constraints (of a total of 17). The secondary constraints identified are as follows:

- Listed Building
- Conservation Area
- Priority Habitat Inventory
- Locally Designated Wildlife Site
- Locally Identified Sensitive Landscape
- Grade 1, 2 or 3 agricultural land
- Surface water flooding (1:100)
- Publically accessible open space.

3.15 We consider each of these constraints in turn below. In summary it is considered that the matters identified do not represent in principle constraints to development and that the matters raised can be satisfactorily addressed through the design of the proposals.
3.16 With reference to Conservation Areas, Toddington Conservation Area is located in the centre of the settlement (as outlined in brown in fig 3.2). The majority of Listed Buildings are located within this Conservation Area, with one located to the north-west of the site (fig 3.1). We therefore do not consider that the location of Conservation Areas or Listed Buildings represent a constraint to the development of the site.

3.17 With reference to Priority Habitat Inventory and Locally Designated Wildlife Sites, it is noted that Dropshort Marsh is located to the south of the site. According to the Council’s website, this is designated as an SSSI, County Wildlife Site and Trust Nature Reserve. As more detailed proposals for the site are developed, these will be accompanied by a more detailed ecology strategy for the site. These designations are not considered to represent a constraint to development of the site.
3.18 The Growth Options Study identifies the site as a Locally Identified Sensitive Landscape. No such designation is shown on the Council’s adopted proposals maps and no updated plans have been prepared to support the emerging Local Plan to date. The Council have undertaken a Landscape Character Assessment which divides the authority into 38 landscape character areas. The site falls within Hichcliffe Clay Hills (Category 8A). The Assessment does not define areas which are formed of especially sensitive landscapes and is an evidence base document to form policy and not policy in itself. It is unclear therefore on what basis the Council has asserted that the site is a Locally Identified Sensitive Landscape. In any event it is considered that the development of the site would not have a detrimental impact on landscape. A Landscape & Visual Appraisal for the proposed site is enclosed at Appendix 2, produced by CSA Environmental. This appraisal concluded that the site is visually well contained by the network of boundary hedgerows and tree belts, and the majority of existing landscaping features on the site including the hedgerows, tree belt and individual trees have the potential to be retained. The southern boundary of the site will be reinforced and enhanced to provide a defensible boundary to the proposed development, as recommended by the findings of Landscape & Visual Appraisal.

3.19 In terms of publically accessible open space, it is noted from the Council’s website that “small amenity space”, “large recreation space” and “allotments” are located to the east of the site. Given they fall outside of the site, the proposals do not result in the loss of this open space. Furthermore the development has the potential to supplement this provision. Therefore this is not considered to be a constraint to development.

3.20 The Natural England Agricultural Land Classification Maps identify the site as being comprised of Grade 3 agricultural land, which is “good to moderate”. This is comparable with much of the agricultural land in the authority area. The Council has recognised that as a result of its OAN, it will need to release some greenfield land for development and this will inevitably lead to the loss of some Grade 3 agricultural land given the nature of the authority area.

3.21 The site is entirely located in flood zone 1 and is therefore subject to the lowest probability of flooding. Whilst, as identified by the Council, there are areas at risk of surface water flooding within the site, these are only on parts of the site as shown on the

Figure 3.3: naturalengland.org.uk
As more detailed proposals for the site are developed, these will be accompanied by a more detailed drainage strategy for the site. In any event, it is considered that the surface water flooding areas do not represent a constraint to development of the site and can be addressed through an appropriate drainage strategy in due course.

Figure 3.4: https://flood-warning-information.service.gov.uk/long-term-flood-risk/map

Central Bedfordshire and Luton Green Belt Study

3.22 The Study (November 2016) has tested the performance of the Central Bedfordshire and Luton Borough Green Belt. The site has been assessed as part of a wider land parcel (T4) as shown on the plan below.

Figure 3.5: Green Belt Assessment Area

3.23 In assessing parcel T4, the assessment reached the following conclusions:
<table>
<thead>
<tr>
<th>Purpose 1 – Check the unrestricted sprawl of large built-up areas</th>
<th>Council’s Assessment</th>
<th>Turley Comment</th>
<th>Turley Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Weak / No contribution</td>
<td>We agree with the Council’s conclusion in respect of this purpose.</td>
<td>Weak/No Contribution</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Purpose 2 – Prevent neighbouring towns merging into one another</th>
<th>Council’s Assessment</th>
<th>Turley Comment</th>
<th>Turley Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Weak / No contribution</td>
<td>We agree with the Council’s conclusion in respect of this purpose.</td>
<td>Weak/No Contribution</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Purpose 3 – Assist in safeguarding the countryside from encroachment</th>
<th>Council’s Assessment</th>
<th>Turley Comment</th>
<th>Turley Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Moderate contribution</td>
<td>As highlighted by the Council in table 4.3, almost all parcels contribute to this purpose to a greater or lesser extent. Contrary to the Council’s assessment, it is considered that the site has a close relationship with the existing settlement of Toddington. It should be noted that the assessment considered a much larger site, and so issues of encroachment will be less with the proposed site. We would also contend that southern encroachment has already occurred along the Dunstable Road and we would not be proposing to extend settlement limits beyond this. To assist, existing boundaries of the site will be reinforced to provide a defensible boundary to the proposed development.</td>
<td>Weak/No Contribution</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Purpose 4 – Preserve the setting and special character of historic towns</th>
<th>Council’s Assessment</th>
<th>Turley Comment</th>
<th>Turley Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Weak/No Contribution</td>
<td>We agree with the Council’s conclusion in respect of this purpose.</td>
<td>Weak/No Contribution</td>
<td></td>
</tr>
</tbody>
</table>
3.24 Given the above, we disagree with the Study’s conclusion that the site assists in safeguarding the countryside from encroachment, and we consider the site to be the most appropriate location for growth around the settlement.

**Site Assessment Framework (July 2017)**

3.25 The site has been assessed under the Council’s Site Assessment Framework for Housing under site references number NLP152, NLP153, NLP184, NLP378, NLP405, ALP091 and ALP086.

3.26 The assessment concluded that the “site to be considered further as part of the Local Plan” for sites NLP152, NLP184 and ALP086.

3.27 The assessment concluded that the “a portion of the site to be considered further as part of the Local Plan” for sites NLP153, NLP378 and NLP405. This was due to the “impact of the full site, due to its size, scale and local topography, would have on the character of the settlement”.

3.28 The assessment concluded that the “site to be excluded from Local Plan process” for site ALP091 (Land at 117 Leighton Road) due to site not “being well related to Toddington” (hence failing Stage 1b).

3.29 We argue that all of the above sites (which make up our single site) should come forward, particularly as southern encroachment has already occurred along the Dunstable Road and we would not be proposing to extend settlement limits beyond this. The site is also visually well contained by the network of boundary hedgerows and tree belts. The southern boundary of the site will be reinforced and enhanced to provide a defensible boundary to the proposed development, as recommended by the findings of Landscape & Visual Appraisal (Appendix 2).
4. Summary and Conclusion

4.1 These representations have been prepared by Turley on behalf of Taylor Wimpey UK Ltd in respect of the Central Bedfordshire Local Plan 2015-2035 draft Plan consultation (July 2017).

4.2 Our client has important land interests in the Local Plan area, in particular at Toddington. As such this response focuses on issues particularly affecting Toddington.

4.3 Each of our responses relates to a particular policy or paragraph and this report is structured accordingly. In summary our submission are:

- **Chapter 2: Key Themes**

  *Objectively Assessed Need* - whilst the Initial SHMA (May 2017) is an appropriate basis for the current Local Plan consultation to be based upon, it is important that sufficient flexibility is allowed for to enable the strategy to evolve in parallel with the emerging evidence base on an iterative basis. This is particularly in light of the likely implementation of the standardised OAN calculation prior to the submission of the Local Plan.

  *Duty to Cooperate and Unmet Needs* – We support the commitment to assist in meeting the unmet needs of Luton Borough. It is important that discussions continue with other neighbouring authorities in accordance with the duty to cooperate.

  *Growth Strategy* – We welcome the acknowledgement that there is a need to provide for a range of forms and scales of new development to meet the identified needs including growth at existing settlements and provision for large scale new communities.

- **Chapter 5: Developing the Strategy and Chapter 7: Strategic Approach**

  We support the Council’s decision to proceed on the basis of scenario 1 which proposes higher growth across all of Central Bedfordshire. The recognition of the need for growth in Area A is also supported. This growth is needed to meet the needs of Luton Borough but also to meet the needs of the sub-area and support the existing settlements contained therein.

- **Policy SP1**

  The Council’s proposed housing target is considered to underestimate the OAN. When adding in Luton’s unmet needs as well, the 43,000 figure (the lower end of the range) of housing is unlikely to meet the authority’s needs in full. Whilst the upper end (53,000) appears to allow for a generous contingency (including 10% buffer), the Council should be planning for this level of delivery now, for the Plan to be considered as having been “positively prepared”.

• **Chapter 8: Housing Growth Locations**

   Toddington should be included as a growth location in the next iteration of the Plan as a non-strategic growth location. Our client’s land interests to the east of Toddington are considered to be an appropriate location to accommodate this growth.

• **Chapter 9: Green Belt, Coalescence and Settlements**

   We support the Council’s recognition of the need to release Green Belt.

• **Chapter 10: Settlement Envelopes and Settlement Hierarchy**

   We feel that Toddington should be considered as a major service centre, particularly given its high ranking within the Initial Settlements Capacity Study (May 2017). Toddington’s current classification as a minor service centre does not recognise the sustainability credentials of the settlement, and in doing so limits the potential of the settlement to take an appropriate level of future growth.

• Detailed comments are also provided on a number of the specific housing policies set out in **Chapter 12** of the draft Local Plan.
Appendix 1: Site Location Plan
Appendix 2: Landscape & Visual Appraisal
Land at Leighton Road
Toddington, Bedfordshire

Initial Landscape and Visual Appraisal

Prepared by CSA Environmental

on behalf of Taylor Wimpey UK Ltd

Report No: CSA/2922/01

April 2016
<table>
<thead>
<tr>
<th>Report Reference</th>
<th>Date</th>
<th>Revision</th>
<th>Prepared by</th>
<th>Approved by</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>CSA/2922/01</td>
<td>08/04/2016</td>
<td>A</td>
<td>BS</td>
<td>CA</td>
<td>Minor amendments to Site boundary</td>
</tr>
</tbody>
</table>
# CONTENTS

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.0 Introduction</td>
<td>2</td>
</tr>
<tr>
<td>2.0 Landscape Policy Context</td>
<td>4</td>
</tr>
<tr>
<td>3.0 Site Context</td>
<td>7</td>
</tr>
<tr>
<td>4.0 Site Description and Visibility</td>
<td>11</td>
</tr>
<tr>
<td>5.0 Ability of the Site to Accommodate Development</td>
<td>15</td>
</tr>
<tr>
<td>6.0 Conclusion</td>
<td>21</td>
</tr>
</tbody>
</table>

## Appendices
- Appendix A: Location Plan
- Appendix B: Aerial Photograph
- Appendix C: Photosheets
- Appendix D: ‘MAGIC’ Map and Heritage Information
- Appendix E: Extent of Green Belt and Area of Great Landscape Value
- Appendix F: Methodology
1.0 INTRODUCTION

1.1 CSA Environmental has been appointed by Taylor Wimpey UK Ltd to undertake an initial landscape and visual appraisal of land at Leighton Road, Toddington ('the Site'). The purpose of this report is to support a call for sites by Central Bedfordshire Council as part of the work on their emerging Local Plan.

1.2 This appraisal describes the existing landscape character and quality of the Site and the surrounding area. The report then goes on to discuss the ability of the Site to accommodate development and the potential landscape and visual effects on the wider area.

1.3 The Site is currently situated within the Green Belt and this report also considers the impact of releasing the Site in terms of the functions and purposes of the Green Belt. The assessment also looks at a wider study area surrounding the Site in order to redefine the Green Belt boundary and determine the extents of developable land.

1.4 For the purpose of this appraisal it has been assumed that the proposed development will comprise: residential development, associated infrastructure and landscaping.

1.5 The Site lies on the south western edge of Toddington in Bedfordshire. It lies within the parish of Toddington, and within Central Bedfordshire.

1.6 The Site is approximately 22 acres in size, and comprises a series of small to medium sized pastoral fields. For ease of discussion through the appraisal, these have been labelled A to F on the Aerial Photograph at Appendix B. The location and extent of the Site is shown on the Location Plan at Appendix A.

Methodology

1.7 This appraisal is based on a site visit undertaken by a suitably qualified and experienced Landscape Architect in April 2016. The weather conditions at the time were clear and visibility was good.

1.8 In landscape and visual appraisal, a distinction is drawn between landscape effects (i.e. effects on the character or quality of the landscape irrespective of whether there are any views of the landscape, or viewers to see them) and visual effects (i.e. effects on people’s views of the landscape from public vantage points, including Public Rights of Way and other areas with general public access, as well as effects from any residential properties). This report therefore considers the potential impact of the development on both landscape character and visibility. The methodology utilised in this report is contained in Appendix F.
1.9 Photographs contained within this document (see Appendix C) were taken using a digital camera with a lens focal length approximating to 50mm, to give a similar depth of vision to the human eye. In some instances images have been combined to create a panorama. The photographs perform two functions, the first to show the character of the Site and its surroundings, and the second to show the visibility of the Site.
2.0 LANDSCAPE POLICY CONTEXT

National Planning Policy Framework ('NPPF')

2.1 National policy is set out in The National Planning Policy Framework ('NPPF') and those parts relevant to this appraisal are summarised below.

2.2 Paragraph 14 states that at the heart of the NPPF is a presumption in favour of sustainable development, which it states should be seen as a golden thread running through both plan-making and decision-taking.

2.3 Section 7 of the NPPF sets out the requirements of good design and Paragraph 56 states that:

'Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.'

2.4 Paragraph 58 states that local and neighbourhood plans should develop robust policies which set out the quality of development which will be expected based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics. Planning policies and decisions among others should aim to ensure development:

- will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation; and
- are visually attractive as a result of good architecture and appropriate landscaping.

2.5 Paragraph 61 notes that planning policies should address the connections between people and place and the integration of new development into the natural, built and historic environment.

2.6 Section 9 of the NPPF sets out national Green Belt policy and states the essential character of the Green Belt is its openness, permanence and ability to serve the following functions:

- 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; and
to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

2.7 Section 11 of the NPPF deals with conserving and enhancing the natural environment. Paragraph 109 of the document states that the planning system should contribute to the protection and enhancement of the natural and local environment through, among others protecting and enhancing valued landscapes.

Central Bedfordshire Local Planning Policy

2.8 For the purposes of local planning policy, the Site is located in the southern part of Central Bedfordshire Council. The council is currently working on their emerging Local Plan which will guide development to 2031. The Local Plan is in the early stages, with the Call for Sites having started on the 22nd February 2016. Until such time as the new Local Plan is formally adopted, the policies contained in the South (Bedfordshire) Local Development Plan (adopted 2004, for the period until 2011) remain relevant, insofar as they are compliant with the NPPF. This development plan consists of a Written Statement setting out the policies and proposals for the area, supported by the Proposals Map. The main landscape policies relevant to the Site are as follows:

2.9 **Policy GB1 Control of Development in the Green Belt** states that planning permission within the Green Belt will not be granted except in very special circumstances and then sets out the exceptions which include agriculture and forestry, small scale sports and outside recreation facilities, cemeteries, infilling within villages or major previously developed sites, re-use of existing buildings, and engineering or other operations which do not affect the openness of the Green Belt.

2.10 **Policy GB3 Green Belt Villages** identifies Toddington as one of the Category 3 villages which are excluded from the Green Belt, and therefore where new development and redevelopment will be permitted within their boundaries.

2.11 **Policy NE1 Development in the Countryside** states that development which is otherwise acceptable in the Green Belt, will not be permitted where it has an adverse effect on the landscape character, important landscape features, or on the existing forms and patterns of settlement, as well as its location sitting, scale or design.

2.12 **Policy NE3 Areas of Great Landscape Value** seeks to protect the landscape character and setting of Areas of Great Landscape Value.

2.13 **Policy NE4 Protection and Enhancement of Trees and Woodlands** requires the retention of existing trees, woodland and hedgerows in new
developments where this would result in unacceptable harm to the character, recreational value or ecology of the site or the surrounding area. Where removal is unavoidable, replacement planting will be required and works controlled.

2.14 **Policy R10 Children's Play Area Standard** sets out the Council’s requirements for children’s play area provision where a new development comprises 12 or more dwellings. Play areas will be required to be equipped and surfaced, with seating and planting provided.

2.15 **Policy R11 Provision of New Urban Open Space in New Residential Developments** requires the provision of adequate formal and informal urban open space, with the precise size and type of provision determined according to the nature of the development and type of housing.

2.16 **Policy R14 Protection and Improvement of Informal Recreational Facilities in the Countryside** states that existing facilities will be improved and protected to ensure access to informal recreation in the countryside. This includes improving access into the wider countryside for walkers, horse riders and cyclists. It goes on to require landscape enhancement, habitat management improvement and resolution of public access issues, especially on the urban fringe.

2.17 **Policy R15 Retention of Public Rights of Way Network** requires the retention of existing Public Rights of Way, and the opposition to any diversion or closure which would result in restricting access to the countryside for informal recreation.

Central Bedfordshire Council Strategic Housing Land Availability Assessment (SHLAA) June 2014

2.18 The SHLAA was undertaken by Central Bedfordshire Council in 2014 to inform the Local Plan preparation and to provide the council with a general understanding of the development potential of sites within the district.

2.19 The majority of the Site is not identified in the SHLAA except for a small land parcel identified by reference number 323 (Russell Road) which equates to Area D of the Site. The parcel is assessed in the report as being unsuitable for development given its location within the Green Belt and its size, which is not considered suitable as a strategic allocation in the Development Strategy. This is however being reviewed as part of the Call for Sites.
3.0 SITE CONTEXT

Site Context

3.1 The Site is located adjacent to the south western settlement edge of Toddington. The Site lies north of Dunstable and northeast of Leighton Buzzard, approximately 6.5km and 8.7km respectively.

3.2 To the north west, the Site is bound by Leighton Road, which joins Harlington Road within Toddington, leading to junction 12 of the M1 to the northeast. To the south, Leighton Road becomes Toddington Road joining Watling Street (A5) to the southwest of Toddington.

3.3 To the southwest, the Site is bound by a pair of agricultural fields, with a tree belt on their south western boundary, and further agricultural fields beyond.

3.4 To the southeast, the Site is bound by a wedge-shaped tree belt, the eastern side of which follows the edge of a small watercourse, with an irregularly shaped arable field, and a recent housing development at Randall Close and some allotments further to the east.

3.5 To the northeast the Site is bound by the south western edge of the residential development at Toddington. There is a small children’s play area which serves the existing residential development to the northeast which lies outside of the Site boundary.

National Landscape Character

3.6 Natural England has produced profiles for England’s National Character Areas (‘NCA’), which divides England into 159 distinct natural areas, defined by a unique combination of landscape, biodiversity, geodiversity, cultural and economic activity. The Site lies within the southeast of the Bedfordshire and Cambridgeshire Claylands Character Area (Area profile 88).

3.7 The Bedfordshire and Cambridgeshire Claylands NCA is described as comprising a broad, gently undulating lowland plateau dissected by shallow river valleys. Despite it consisting of predominantly open, large-scale arable farmland, there are a number of semi-natural habitats which support a number of rare and scarce species. Varied scattered woodland, some of which is ancient is a feature. The NCA is sparsely populated away from the urban centres and other settlements which are clustered around the main transport and rail routes. In the areas of urbanisation, there has been a decline in tranquillity. History and a sense of place are supported by the rich geological and archaeological remains in the area.
District Landscape Character

3.8 The Central Bedfordshire Landscape Character Assessment (2015) was produced by LUC on behalf of Central Bedfordshire Council.

3.9 The Site is situated in the east of the Toddington – Hockliffe Clay Hills Landscape Character Area (LCA) 8A.

3.10 The key characteristics of LCA 8A include:

- Agricultural land consists of a mix of land in arable cultivation, with predominantly medium-scale fields, and pasture land;
- The landscape pattern is clearly defined by hedgerows and scattered, mature hedgerow trees with wide grass verges and drainage channels;
- Good survival of enclosure fields, many with remaining ridge and furrow pasture;
- Small woodland copses and areas of ancient woodland are a feature, some contained within historic parks;
- Views from higher elevations, including the hill top village of Toddington, into the neighbouring LCAs to the east and north, while it is more enclosed on lower elevations;
- Urban fringe influences around the settlements of Leighton Buzzard on the west and Toddington on the east;
- Primary transport routes including the M1, A5 (T) Watling Street, A5120, A4012 and their associated infrastructure, with some conifer screening dilute the rural character of the landscape and contrast to the historic winding lanes;
- The Icknield Way Trail runs to the east of Toddington on the eastern edge of the character area; and
- Villages generally retain their historic form around village greens and pubs, with late 20th century development at the settlement edges.

3.11 The Landscape Strategy guidelines for the LCA recommend enhancing the landscape by conserving, restoring and improving the positive features of the landscape to strengthen the landscape pattern and visual integrity. The hedgerow network gives the landscape a distinctive land cover pattern and its other features add to a clear sense of place. Where there is new development on the edge of a settlement, care should be taken to ensure an appropriate rural interface between it and the rural landscape beyond.

3.12 From our own assessment of the Site, we would note that it is fairly typical of Landscape Character Area 8A, comprising pastoral fields contained within a strong network of hedgerow lined fields.
Green Belt

3.13 The Site falls within the Green Belt, the extent of which is shown in Appendix E.

Designated Sites and Heritage Assets

3.14 The Multi Agency Geographic Information for the Countryside Map (‘MAGIC’) and the electronic South Bedfordshire Proposals Map (read in conjunction with the policies contained within the Written Statement) indicate that the Site is not covered by any statutory or non-statutory designations for landscape character or quality (please refer to Appendix D).

3.15 There are no Scheduled Monuments or Listed Buildings on the Site. The nearest Listed Buildings lie respectively northwest and southeast of the Site, being the Grade II Listed Herne Poplar Farmhouse and the Grade I listed Church of All Saints, Chalgrave. There are a number of listed buildings between 1km and 2km from the Site to the northwest and southeast, and several contained within the Toddington and Tebworth Conservation Areas. The Toddington Conservation Area covers the northern part of the settlement, approximately 0.4km to the northeast of the Site (see Appendix D). Adjacent to the northern edge of Toddington, and extending north and west, is an area designated locally as an Area of Great Landscape Value (see Appendix E).

Tree Preservation Orders

3.16 There are a number of Tree Preservation Orders (‘TPO’) covering trees on the northern, eastern and western boundaries of field E of the Site. These are T169 to T177 which are covered by TPO No2 1972. This was ascertained by studying The Toddington Parish Tree Preservation Order citation and the accompanying Tree Preservation Order Map from Central Bedfordshire Council’s website under reference SB/TPO/72/0002 on 6th April 2016.
Public Rights of Way

3.17 There are no Public Rights of Way which run through the Site.

3.18 Public footpath FP62 runs within the tree belt adjacent to the south eastern boundary of the Site, linking the southern residential area of Toddington to the wider countryside. Where it crosses the parish boundary between Toddington and Chalgrave parishes, it becomes footpath number FP9, joining Toddington Road to the southwest.

3.19 Leaving from the same point as public footpath FP62, public footpath FPA62 runs within agricultural fields roughly south. It becomes FP23 from the parish boundary between Toddington and Chalgrave parishes, joining Chalgrave Road north of College Farm. A small spur extends east to join Dunstable Road between the allotment gardens and the southern edge of the settlement within Randall Close (FP89).

3.20 Public footpath FP64 runs along the external side of the south western Site boundary, linking Toddington Road to public footpath FP62 at the south eastern corner of the Site.

3.21 To the west of the Site there is a large network of public footpaths which cross the landscape. The closest of which is public footpath (FPA3), running south off public footpath FP13, which extends from the western settlement edge of Toddington into the arable fields to the west.
4.0 SITE DESCRIPTION AND VISIBILITY

Site Description

4.1 The Site comprises six small to medium sized, roughly rectangular fields, which have been subdivided into parcels for the purpose of the Site description, as shown on the Aerial Photograph at Appendix B.

4.2 Area A comprises a small rectangular field. The edge of Toddington forms the north eastern boundary, with residential properties on Frenchmans Close overlooking the parcel. The parcel is bound to the north west by Leighton Road.

4.3 Area B is a narrow strip of land comprising a mixed deciduous and evergreen tree belt with scrub, indented to the southwest by a clearing for some farm buildings. The area extends from the rear garden of the neighbouring property on Leighton Road towards the southeast, ending roughly in the centre of the Site, abutting Area E. There is a children’s play area adjacent to its north eastern corner associated with the residential properties on the edge of Toddington to the north.

4.4 Area C, abutting Area B to the southwest, comprises a small pastoral field, with a group of mature trees, some of which are evergreen along Leighton Road. There are further scattered trees in the interior of the parcel to the west. Hedgerows line the south western and south eastern boundaries, while to the northeast it is bound by the tree belt of Area B.

4.5 Area D, abutting Area C to the southwest, comprises a small pastoral field, with mainly dense hedgerows forming the boundary to the northwest with Leighton Road, and those to the northeast and southeast. To the southwest, the boundary is dominated by brambles, with public footpath FP64 on its external edge, adjacent to a large arable field.

4.6 Area E is the largest parcel, located to the east of Area B, comprising a medium sized pastoral field. The edge of Toddington forms the north eastern boundary, with the residential properties on Russell Road and Bryant Way overlooking the parcel. Vegetated garden hedgerows and trees line this boundary. Strong hedgerows form the boundaries to the southwest and northwest, supported on the latter by the tree belt in Area B. To the southeast, outside the parcel, a wedge shaped tree belt forms the boundary.

4.7 Area F is a medium sized pastoral field, abutting Area E to the southwest. The wedge shaped tree belt continues as the south eastern boundary of this parcel, with dense hedgerows marking the remaining boundaries.
**Topography**

4.8 The topography of the Site slopes from the northwest to the southeast, with the high point at around 150m Above Ordinance Datum (‘AOD’), falling gradually to the stream which passes the south eastern corner at 130m AOD.

4.9 The land surrounding the Site is undulating, with gentle valleys formed around a series of streams. To the north of the Site, Toddington sits on a local high point at approximately 154m AOD, with the valleys to its north and south typically falling up to 50m, to 100m AOD.

**Visibility**

4.10 The level of vegetation cover to the field boundaries within and bounding the Site, provide a good level of screening to the majority of the Site from its surroundings, although there are some more open views particularly from the south west.

4.11 The following section describes representative views of the Site from public vantage points in the vicinity.

**West**

4.12 Views of the Site from Leighton Road running adjacent to the north western Site boundary are largely screened by the boundary hedgerow and trees. Views over the hedgerow are possible although limited to views of parcel D and trees along the Site’s internal field boundaries (Photograph 3). Glimpsed views into parcel A are also possible (Photograph 1).

4.13 Views from properties on the eastern side of Leighton Road immediately adjacent to the western Site boundary look out across the western part of the Site, from predominantly first floor windows. Tree cover offers some screening of the rest of the Site from these properties. Views from properties on the western side of Leighton Road to the north west and south west are more oblique, with vegetation to the property boundaries and on the edge of the Site screening the majority of the Site from view.

4.14 Occasional glimpsed views of the Site are possible from a short section of public footpath FPA3 to the north west of the Site, although field boundary vegetation screens the majority of Site from view.

**South**

4.15 Views of the Site from public footpath FP64 running adjacent to the south western boundary are partially screened by hedgerow vegetation along the Site boundary. The boundary adjacent to parcel D comprises a low bramble hedgerow, with views into the Site possible over the
hedgerow (Photograph 4 & 5). The hedgerow is more substantial adjacent to parcel F and screens views into the Site, except for the occasional glimpsed views through gaps (Photographs 6 & 7).

4.16 Views of the Site from public footpaths FP62 and FPA62 to the south are filtered by vegetation along the various field boundaries. The southern boundary hedgerow and trees are visible along this route as well as properties on the edge of Toddington (Photographs 14 – 17). Views from these routes further to the south become increasingly screened by the woodland belt stretching between Toddington Road and Dunstable Road.

4.17 Long distance views of the Site from public footpath FP23 adjacent to Chalgrave Road (a localised high point) are possible, seen in the context of the surrounding fields, with the properties on the edge of Toddington visible on the horizon (Photograph 18).

**East**

4.18 Views of the Site from public footpath FP62 running adjacent to the eastern Site boundary are predominantly screened by the tree belt along the Site boundary, with occasional glimpsed views of parcels E & F visible through gaps in the vegetation (Photograph 9).

4.19 Views of the Site from public footpath FPA62 which is more elevated, is similarly screened to the north by the boundary tree belt (Photograph 12), although views over the vegetation into parcel F are possible to the south with the roofs of housing immediately north of the Site also visible (Photograph 13).

4.20 Views of the Site from properties on the edge of Randall Drive have first floor views looking towards the Site with parcel F visible above the tree belt and the rest of the Site being largely screened from view.

**North**

4.21 Views of the Site are possible from a number of properties on Russell Road, Frenchmans Close and Bryant Way where vegetation along the norther boundary is limited. Views into the Site are also possible from the end of Russell Road where there is field gated access into the Site (Photograph 11).

4.22 Views of the Site from the children’s playground to the immediate north of the Site are screened by the established vegetation along the northern Site boundary (Photograph 10).

4.23 Views of the Site from Leighton Road to the north are largely screened by Site boundary vegetation, with some glimpsed views into parcel A (Photographs 1 & 2).
Landscape Quality, Value and Sensitivity

4.24 The Site comprises a series of small to medium sized fields, with field boundaries defined by hedgerows and scattered trees and a narrow tree belt. The field boundary hedgerows are generally assessed as having medium landscape value with the mature trees located along the eastern boundary and within the tree belt assessed as having high landscape value. There is no public access across the Site although the pastoral fields within the Site are overlooked by a number of properties to the north and users of the public footpath to the south and are likely to be valued at a local level. These fields are assessed as being of medium landscape value.

4.25 The overall landscape character of the Site is fairly typical of the Hockliffe Clay Hills LCA, comprising pastoral fields bound by a network of hedgerow field boundaries. The Site’s overall landscape character is assessed as being of Medium quality and Medium sensitivity.
5.0 ABILITY OF THE SITE TO ACCOMMODATE DEVELOPMENT

5.1 This section provides a brief appraisal of the ability of the Site to accommodate a mixed use development, in terms of the landscape and visual constraints and effects. It then continues to consider the implications of releasing the land from the Green Belt.

5.2 It is anticipated that the proposed development will comprise residential development and is assumed that the built form will be between 2 and 2.5 storeys.

5.3 The following landscape opportunities and constraints should be considered in any development proposals and include:

- Creation of strong pedestrian links to the surrounding Public Rights of Way to the south and east, as well as links to the children’s play area to the north.
- Retention of the existing landscape framework of field boundary hedgerows, tree belt and individual trees where practicable.
- Retention of trees covered by Tree Preservation Orders and suitable buffer to ensure safeguarding of these trees.
- Creation of new areas of public open space including opportunities for informal play and recreation.
- Enhancement of the north eastern boundary adjacent to properties on Russell Road, Frenchmans Close and Bryant Way with new hedgerow and tree planting;
- Enhancement of the south eastern and south western Site boundaries with new hedgerow and tree planting, reducing the visibility of the Site from the south.
- Proposed built form to positively address Leighton Road and the south western approach into Toddington.

Relationship to Existing Development

5.4 The Site is bound to the north east by the settlement of Toddington, and to the northwest by Leighton Road. There are also a number of terraced houses along Leighton Road to the north of the Site, which lie outside of the settlement boundary.

5.5 Development of the Site should maximise opportunities to interact with the surrounding built form, with strong links to existing amenities and transport links along Leighton Road. It is anticipated that proposed vehicular access into the Site would be off Leighton Road and proposed development should positively address Leighton Road, set back with
new landscape proposals to provide an attractive new entrance into the settlement.

5.6 Development of the Site has the potential to deliver new areas of public open space and informal play facilities, serving both new and existing residents, maximising pedestrian links to the existing residential area to the north. Development also creates an opportunity to provide improved connections to recreation including the surrounding network of public footpaths.

**Landscape Features**

5.7 The Site is in pastoral use, and the main landscape features, including established hedgerows, trees and the tree belt are largely contained to the field boundaries. The Site has the potential to be developed, while retaining the existing landscape framework of trees and hedgerows.

5.8 The Site has the opportunity to be enhanced, with new landscape proposals including reinforced tree and hedgerow planting to Site boundaries as well as new areas of public open space and informal play opportunities.

**Public Rights of Way**

5.9 There are no Public Rights of Way within the Site however two footpaths run adjacent to the south west (FP64) and south east (FP62) Site boundaries. Development of the Site creates an opportunity to provide pedestrian links to both of these public footpaths, linking to the network of public footpaths to the south and east.

5.10 The landscape character along the public footpaths adjacent to the Site boundaries, will remain similar to that of the existing character through the retention of existing boundary vegetation, with views looking out across the fields to the south and east of the Site. Proposed development will be more prominent along these routes, albeit the retained boundary vegetation will provide a good level of screening.

**Visibility**

5.11 The visual appraisal in Section 4 identifies that the Site is generally well contained by the network of boundary hedgerows and tree belts which help to screen views of the Site. Views from the east are more elevated and look into parcel F in the south of the Site. The northern part of the Site is also overlooked by a number of properties on the edge of Toddington.
West

5.12 The proposed development will be visible from Leighton Road to the west of the Site, above the retained boundary hedgerow. The new vehicular access junction into the Site will also provide more open views into the Site. New tree planting to the Site entrance will help to soften views of new housing and infrastructure.

5.13 Views of the proposed development in parcels A & C will be possible from the first floor of properties on the eastern side of Leighton Road, with the retained tree belt helping to screen views of the rest of the Site. Views from properties on the western side of Leighton Road will be predominantly screened by vegetation although views of the proposed access road junction will be possible.

South

5.14 The proposed development will be visible from public footpath FP64 running adjacent to the southern Site boundary. Views of the proposed built form will be possible from the western section of this route, over the top of the existing low boundary hedgerow. Views from the eastern section of the route will be predominantly screened by the established boundary hedgerow, with glimpsed views through occasional gaps. New enhancement planting along the southern Site boundary will further screen the development from this route.

5.15 Views of the proposed development from public footpaths FP62 and FPA62 to the south will be predominantly of the first floors and roofs of built form, visible above the retained southern boundary hedgerow. The proposed development will be seen in the context of existing built form on the southern edge of Toddington in these views and enhancement planting along the southern Site boundary will provide further screening.

5.16 Long distance views of the proposed development from public footpath FP23 adjacent to Chalgrave Road (a localised highpoint) will be possible above the boundary vegetation. Proposed development will be seen in the context of existing built form on the edge of Toddington in these views and enhancement planting along the southern Site boundary will provide further screening.

East

5.17 The proposed built form will be predominantly screened in views from public footpath FP62 adjacent to the eastern Site boundary. Glimpsed views of the proposed built form will be possible through gaps in the boundary vegetation, although enhancement planting along the eastern boundary will provide further screening.
5.18 Views of the proposed development from the elevated public footpath FPA62 and properties on the edge of Randall Drive will be primarily of built form within parcel F, with retained boundary vegetation helping to screen the rest of the Site from view. Enhancement planting along the eastern Site boundary will further reduce views of the built form.

**North**

5.19 Views of the proposed development from properties on the edge of Russell Road, Frenchmans Close and Bryant Way will be of the proposed built form in parcels A and E, with the retained tree belt in parcel B screening development in the western part of the Site. Enhancement planting along the northern Site boundary will help to provide further screening of the built form in these views.

5.20 Views of the proposed built form from the children’s play area to the immediate north of the Site will be screened by the existing established boundary vegetation although new pedestrian links to the play area from the proposed development will open up glimpsed views of new housing.

5.21 Views of the proposed development from Leighton Road to the north will be predominantly screened by the retained tree belt in parcel B and vegetation to the Site boundary. Views of the proposed built form in parcel A will be possible above the retained vegetation.

**Landscape Quality and Value**

5.22 As set out in Section 4, the Site is not covered by any statutory or non-statutory designations for landscape character or quality. A number of the trees along the boundaries of the Site are however covered by a Tree Preservation Order.

5.23 The majority of the important landscape features occur along the field boundaries and include a number of mature trees and established tree belt. These features of high landscape importance are all capable of being retained and incorporated within a development scheme. Short sections of hedgerow will require removal to facilitate vehicular access into and through the Site.

5.24 New areas of public open space could be created with improved connectivity to the surrounding Public Rights of Way, as well as new informal play facilities, improving recreation opportunities in the local area.

5.25 We consider that the Site can be developed in line with the principles set out above to provide a well-integrated extension to the existing Toddington settlement. Appropriate landscape led development
proposals can be accommodated on Site without resulting in material harm to the surrounding countryside’s landscape and visual character.

**Impact of Releasing the Site from the Green Belt**

5.26 The Site lies within the Green Belt and the following section considers whether release of the Site would impact on the Green Belt purposes identified in the NPPF. The NPPF at paragraph 80 identifies the five purposes of Green Belts as:

- 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; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

5.27 The NPPF states at paragraphs 79 and 80, that the essential character of Green Belts is their openness, their permanence and their ability to serve the functions as set out above. The Framework notes that when defining Green Belt boundaries, local authorities should take account of the need to promote sustainable patterns of development and ensure that there would be sufficient safeguarded land outside the Green Belt in order to meet the long term development needs of the area. It continues to say that Green Belt boundaries should be defined clearly along physical features which are readily recognisable and likely to be permanent.

5.28 The Site is bound by existing built form along the north eastern boundary at Russell Road, Frenchmans Close & Bryant Way, with some scattered built form adjacent to the north east boundary along Leighton Road. It is also bound by a main road into Toddington from the south west. New housing would be well related to the adjoining urban edge and by designing the proposed built form with a strong relationship to the existing settlement and a robust boundary to the wider countryside, encroachment into the wider Green Belt will be prevented. As such the planned release of land for development on the Site would not encroach into the wider countryside or result in unrestricted urban sprawl.

5.29 In terms of the Site and neighbouring towns merging, the nearest settlement to the south west of Toddington is approximately 2km away at Tebworth. Development of the Site would lead to a relatively minor reduction in the gap between settlements and would not lead to these settlements merging.
5.30 The conservation area within Toddington lies some distance from the Site in the north of the settlement and there is no intervisibility between the Site and the Conservation Area. As such development would not affect the setting or special character of any historic town.

5.31 In terms of the 5th purpose of the Green Belt, the Call for Sites process recognises that there will be some requirement for release of Green Belt land to meet the district’s housing needs.

**Overview of Green Belt at the periphery of Toddington**

5.32 An overview of Green Belt land surrounding Toddington was carried out by a suitably qualified and experienced landscape architect in March 2016 and found that land to the south west of the settlement was most suitable for release from the Green Belt when assessed against the five purposes.

5.33 Land to the north east of the settlement lies adjacent to the Toddington Conservation Area, with the existing settlement edge strongly defined by woodland copses. The land here falls steeply and is visually prominent in long distance views from the north east. Development of land to the north east is likely to result in significant encroachment into the countryside and potentially affect the setting of the Conservation Area.

5.34 Land to the north west of the settlement lies within an Area of Great Landscape Value and slopes steeply away from the existing settlement edge. The countryside to the north west is open with long distance views and very few logical boundaries to define potential expansion of the urban area. Development of land to the north west is likely to result in significant encroachment into the countryside and potentially unrestricted sprawl.

5.35 Land to the south east of the settlement edge falls steeply to the east and is visually prominent in long distance views. The existing settlement edge is well defined by woodland copses. Development of land to the south east is likely to result in significant encroachment into the countryside.

5.36 Land to the south west of the settlement is flatter and visually well contained by tree belts. An established tree belt to the south west of the existing settlement could form a strong boundary to development, without resulting in significant encroachment into the countryside.

5.37 The Site could be taken out of the Green Belt and the boundary redefined along the established tree belt to the south west, forming a strong defensible boundary to the settlement and ensuring the countryside beyond the Site is safeguarded.
6.0 CONCLUSION

6.1 The Site is located on the edge of the settlement of Toddington, in the district of Central Bedfordshire. It comprises approximately 22 acres of small to medium sized pastoral fields with a landscape framework of field boundary hedgerows and tree belts. The Site is assessed as being of an overall medium quality in terms of landscape character.

6.2 The Site is visually well contained by the network of boundary hedgerows and tree belts. Filtered views into the southern part of the Site are possible from public footpaths and a number of properties to the east. The northern part of the Site is also overlooked by a number of properties on the southern edge of Toddington.

6.3 The Site is located wholly within the Green Belt and any proposed development of the Site would need to come forward as part of a planned release of land from the Green Belt.

6.4 Development of the Site allows the opportunity to create new areas of public open space together with informal play facilities for the benefit of new and existing residents. Strong pedestrian links through the Site will also improve recreational access to the network of surrounding Public Rights of Way.

6.5 The majority of existing landscape features on the Site including the hedgerows, tree belt and individual trees have the potential to be retained in development proposals. Enhancement planting to the southern Site boundary will help to provide a strong physical boundary to the edge of development.

6.6 This appraisal found that the Site is capable of accommodating development in line with the principles set out in section 5, without resulting in material harm to the surrounding countryside’s landscape and visual character, or the objectives and purposes of the Green Belt.
Appendix A

Site Location Plan
Appendix B

Aerial Photograph
© CSA Landscapes Ltd. Do not scale from this drawing. Refer to figured dimensions only.
View south west along Leighton Road, adjacent to the northern corner of the Site  Photograph 01

View south west along Leighton Road, adjacent to existing properties  Photograph 02

**Project**: Land at Leighton Road, Toddington

**Drawing Title**: Photosheets

**Client**: Taylor Wimpey UK Ltd

**Drawing No.**: CSA/2922/103

**Date**: April 2016

**Drawn**: ES  **Checked**: BS
View north east across Leighton Road looking along the north western Site boundary  Photograph 03

View into the Site from Public Footpath FP64, adjacent to the junction with Leighton Road  Photograph 04

<table>
<thead>
<tr>
<th>Project</th>
<th>Land at Leighton Road, Toddington</th>
<th>Drawing No.</th>
<th>CSA/2922/103</th>
<th>Rev</th>
<th>A</th>
</tr>
</thead>
<tbody>
<tr>
<td>Drawing Title</td>
<td>Photosheets</td>
<td>Date</td>
<td>April 2016</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Client</td>
<td>Taylor Wimpey UK Ltd</td>
<td>Drawn</td>
<td>ES</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Checked</td>
<td>BS</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
View north across the Site from Public Footpath FP64  Photograph 05

View north west along Public Footpath FP64, adjacent to the south western Site boundary  Photograph 06
View south east along Public Footpath FP64, adjacent to the south western Site boundary  Photograph 07

View from Public Footpath FP62 towards the southern corner of Site  Photograph 08
View of boundary vegetation along south eastern boundary from Public Footpath FP62  Photograph 09

View across the children’s play area to the north of the Site  Photograph 10
View from Frenchmans Close towards the north eastern Site boundary  Photograph 11

View from the junction of Public Footpath FP62 and FPA62, towards the south eastern Site boundary  Photograph 12
View towards the south eastern Site boundary from Public Footpath FP62  Photograph 13

View towards the south eastern Site boundary from Public Footpath FP62, adjacent to the field boundary  Photograph 14
View towards the south eastern Site boundary from Public Footpath FP62, adjacent to the woodland belt **Photograph 15**

View towards the south western Site boundary from Public Footpath FP62 **Photograph 16**
View north towards the Site from Public Footpath FP62  Photograph 17

View from the junction of Public Footpath FP23 and Chalgrove Road, looking north towards the Site  Photograph 18

<table>
<thead>
<tr>
<th>Project</th>
<th>Land at Leighton Road, Toddington</th>
<th>Drawing No.</th>
<th>CSA/2922/103</th>
</tr>
</thead>
<tbody>
<tr>
<td>Drawing Title</td>
<td>Photosheets</td>
<td>Date</td>
<td>April 2016</td>
</tr>
<tr>
<td>Client</td>
<td>Taylor Wimpey UK Ltd</td>
<td>Drawn</td>
<td>ES</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Checked</td>
<td>BS</td>
</tr>
</tbody>
</table>
Appendix D

‘MAGIC’ map and Heritage Information
CSA/2922/102

April 2016

MAGIC Map Extract and Heritage Information

Land at Leighton Road, Toddington

© CSA Landscapes Ltd. Do not scale from this drawing. Refer to figured dimensions only.
Appendix E

Extent of Green Belt and Area of Great Landscape Value
Project: Land at Leighton Road, Toddington
Drawing Title: Extent of Green Belt and Area of Great Landscape Value
Client: Taylor Wimpey UK Ltd.
Date: April 2016
Scale: A4
Revision: A
Drawing No.: CSA/2922/104

Site Location
Greenbelt
Area of Great Landscape Value
Appendix F

Methodology
METHODOLOGY FOR LANDSCAPE AND VISUAL APPRAISALS

M1 In landscape and visual appraisal, a distinction is normally drawn between landscape/townscape effects (i.e. effects on the character or quality of the landscape (or townscape), irrespective of whether there are any views of the landscape, or viewers to see them) and visual effects (i.e. effects on people’s views of the landscape, principally from residential properties, but also from public rights of way and other areas with public access). Thus, a development may have extensive landscape effects but few visual effects (if, for example, there are no properties or public viewpoints nearby), or few landscape effects but substantial visual effects (if, for example, the landscape is already degraded or the development is not out of character with it, but can clearly be seen from many residential properties and/or public areas).

M2 The assessment of landscape & visual effects is less amenable to scientific or statistical analysis than some environmental topics and inherently contains an element of subjectivity. However, the appraisal should still be undertaken in a logical, consistent and rigorous manner, based on experience and judgement, and any conclusions should be able to demonstrate a clear rationale. To this end, various guidelines have been published, the most relevant of which (for appraisals of the effects of a development, rather than of the character or quality of the landscape itself), form the basis of the assessment and are as follows:-

- ‘Guidelines for Landscape & Visual Impact Assessment’, produced jointly by the Institute of Environmental Assessment and the Landscape Institute (GLVIA 3rd edition 2013); and
- ‘Landscape Character Assessment, Guidance for England and Scotland, 2002’, to which reference is also made. This stresses the need for a holistic assessment of landscape character, including physical, biological and social factors.

LANDSCAPE/TOWNSCAPE EFFECTS

M3 Landscape/townscape quality is a subjective judgement based on the value and significance of a landscape/townscape. It will often be informed by national, regional or local designations made upon it in respect of its quality e.g. AONB. Sensitivity relates to the ability of that landscape/townscape to accommodate change.

Landscape sensitivity can vary with:-

(i) existing land use;
(ii) the pattern and scale of the landscape;
(iii) visual enclosure/openness of views, and distribution of visual receptors;
(iv) the scope for mitigation, which would be in character with the existing landscape; and
(v) the value placed on the landscape.

M4 There is a strong inter-relationship between landscape/townscape quality and sensitivity as high quality landscapes/townscapes usually have a low ability to accommodate change.

M5 For the purpose of our appraisal, landscape/townscape quality and sensitivity has been combined and is assessed using the criteria in Table LE1. Typically, landscapes/townscapes which carry a quality designation and which are otherwise attractive or unspoilt will in general be more sensitive, while those which are less
attractive or already affected by significant visual detractors and disturbance will be generally less sensitive.

M6 The concept of landscape/townscape value is also considered, in order to avoid consideration only of how scenically attractive an area may be, and thus to avoid undervaluing areas of strong character but little scenic beauty. Landscape value is:

‘The relative value that is attached to different landscapes by society, bearing in mind that a landscape may be valued by different stakeholders for a whole variety of reasons.’

M7 Nationally valued landscapes are recognised by designation, such as National Parks and Areas of Outstanding Natural Beauty (‘AONB’) which have particular planning policies applied to them. Nationally valued townscapes are typically those covered by a Conservation Area or similar designation.

M8 The magnitude of change is the scale, extent and duration of change to a landscape arising from the proposed development and was assessed using the criteria in Table LE2.

M9 Landscape/townscape effects were assessed in terms of the interaction between the magnitude of the change brought about by the development and the quality, value & sensitivity of the landscape resource affected. The landscape/townscape effects can be either beneficial or adverse.

M10 In this way, landscapes of the highest sensitivity and quality, when subjected to a high magnitude of change from the proposed development, are likely to give rise to ‘substantial’ landscape effects which can be either adverse or beneficial. Conversely, landscapes of low sensitivity and quality, when subjected to a low magnitude of change from the proposed development, are likely to give rise to only ‘slight’ or neutral landscape effects. Beneficial landscape effects may arise from such things as the creation of new landscape features, changes to management practices and improved public access. For the purpose of this appraisal the landscape effects have been assessed at completion of the development.

VISUAL EFFECTS

M11 Visual effects are concerned with people’s views of the landscape/townscape and the change that will occur. Like landscape effects, viewers or receptors are categorised by their sensitivity. For example, views from private dwellings are generally of a higher sensitivity than those from places of work.

M12 In describing the content of a view the following terms are used:-

- No view - no views of the development;
- Glimpse - a fleeting or distant view of the development, often in the context of wider views of the landscape;
- Partial - a clear view of part of the development only;
- Filtered - views to the development which are partially screened, usually by intervening vegetation - the degree of filtering may change with the seasons;
- Open - a clear view to the development.

M13 The sensitivity of the receptor was assessed using the criteria in Table VE1.

M14 The magnitude of change is the degree in which the view(s) may be altered as a result of the proposed development and will generally decrease with distance from its source, until a point is reached where there is no discernible change. The magnitude of change in regard to the views was assessed using the criteria in Table VE2.
Visual effects were then assessed in terms of the interaction between the magnitude of the change brought about by the development and also the sensitivity of the visual receptor affected.

Photographs were taken with a digital camera with a lens that approximates to 50mm, to give a similar depth of view to the human eye. In some cases images have been joined together to form a panorama. The prevailing weather and atmospheric conditions, and any effects on visibility are noted.

Unless specific slab levels of buildings have been specified, the appraisal has assumed that slab levels will be within 750mm of existing ground level.

MITIGATION AND RESIDUAL EFFECTS

Mitigation measures are described as those measures, including any process or activity, designed to avoid, reduce and compensate for adverse landscape and/or visual effects of the proposed development.

In situations where proposed mitigation measures are likely to change over time, as with planting to screen a development, it is important to make a distinction between any likely effects that will arise in the short-time and those that will occur in the long-term or ‘residual effects’ once mitigation measures have established. In this assessment, the visual effects of the development have been considered at completion of the entire project and once any landscape mitigation has had an opportunity to establish.

Mitigation measures can have a residual, positive impact on the effects arising from a development, whereas the short-term impact may be adverse.

ASSESSMENT OF EFFECTS

The appraisal concisely considers and describes the main landscape and visual effects resulting from the proposed development. The narrative text demonstrates the reasoning behind judgements concerning the landscape and visual effects of the proposals. Where appropriate the text is supported by tables which summarise the sensitivity of the views/landscape, the magnitude of change and describe any resulting effects.

CUMULATIVE EFFECTS

Cumulative effects are ‘the additional changes caused by a proposed development in conjunction with other similar developments or as the combined effect of a set of developments, taken together.’

In carrying out landscape appraisal it is for the author to form a judgement on whether or not it is necessary to consider any planned developments and to form a judgement on how these could potentially affect a project.

ZONE OF THEORETICAL VISIBILITY (ZTV)

A ZTV map can help to determine the potential visibility of the site and identify those locations where development at the site is likely to be most visible from the surrounding area. Where a ZTV is considered appropriate for a proposed development the following methodology is used.

The process is in two stages, and for each, a digital terrain model (‘DTM’) using Key TERRA-FIRMA computer software is produced and mapped onto an OS map. The DTM is based on Ordnance Survey Landform Profile tiles, providing a digital record of existing landform across the UK, based on a 10 metre grid. There is the potential for minor
discrepancies between the DTM and the actual landform where there are topographic features that are too small to be picked up by the 10 metre grid. A judgement will be made to determine the extent of the study area based on the specific site and the nature of the proposed change, and the reasons for the choice will be set out in the report. The proposed development is introduced into the model as either a representative spot height, or a series of heights, or a detailed 3D model of the development, and a viewer height of 1.7m is used. This is the first stage, or ‘bare earth’ ZTV which illustrates the theoretical visibility of a proposed development based on topography alone and does not take account of any landscape features such as buildings, woodland or settlements.

M26 The second stage is to produce a ‘with obstructions’ ZTV with the same base as the ‘bare earth’ ZTV, but which gives a more accurate representation of what is ‘on the ground’. Different heights are assigned to significant features such as buildings and woodland thus refining the model to aid further analysis. This data is derived from OS Maps and aerial photographs, and verified during the fieldwork, with any significant discrepancies in the data being noted and the map adjusted accordingly. Fieldwork is confined to accessible parts of the site, public rights of way, the highway network and other publically accessible areas.

M27 The model is based on available data and fieldwork and therefore may not take into account all development or woodland throughout the study area, nor the effect of smaller scale planting or hedgerows. It also does not take into account areas of recent or continuous topographic change from, for instance, mining operations.
Table LE1

<table>
<thead>
<tr>
<th>Description of the Landscape/Townscape</th>
<th>Landscape / Townscape Quality</th>
<th>Sensitivity</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Very High</td>
<td>Landscape Quality: A landscape very attractive landscape which may be nationally recognised/designated for its scenic beauty, e.g. National Park or Area of Outstanding National Beauty.</td>
<td>Sensitivity: A landscape/townscape with a very low ability to accommodate change because such change would lead to a significant loss of valuable features or elements, resulting in a significant loss of character and quality. Development of the type proposed would be discordant and prominent.</td>
<td>Value: Very high quality landscape or townscape with statutory designation for landscape/townscape quality, e.g. National Park, conservation area or registered park or garden.</td>
</tr>
<tr>
<td>High</td>
<td>Landscape Quality: A landscape, usually combining varied topography, historic features and few visual detractors. A landscape known and cherished by many people from across the region, e.g. County landscape site such as a Special Landscape Area.</td>
<td>Sensitivity: A landscape/townscape with limited ability to accommodate change because such change would lead to some loss of valuable features or elements, resulting in a significant loss of character and quality. Development of the type proposed would likely be discordant with the character of the landscape/townscape.</td>
<td>Value: High quality landscape or lower quality landscape or with un-fettered public access, e.g. commons, public park or designated landscape.</td>
</tr>
<tr>
<td>Medium</td>
<td>Landscape Quality: Non-designated landscape area, generally pleasant but with no distinctive features, often displaying relatively ordinary characteristics.</td>
<td>Sensitivity: A landscape/townscape with reasonable ability to accommodate change. Change would lead to a limited loss of some features or elements, resulting in some loss of character and quality. Development of the type proposed would not be especially discordant.</td>
<td>Value: A landscape of local value which may have limited public access. No recognised statutory designation for landscape/townscape quality.</td>
</tr>
<tr>
<td>Low</td>
<td>Landscape / Townscape Quality: Unattractive or degraded landscape/townscape, affected by numerous detracting elements, e.g. industrial areas, infrastructure routes and un-restored mineral extractions.</td>
<td>Sensitivity: A landscape/townscape with good ability to accommodate change. Change would not lead to a significant loss of features or elements, and there would be no significant loss of character or quality. Development of the type proposed would not be discordant with the landscape/townscape in which it is set.</td>
<td>Value: Landscape generally of poor quality with no public access, no designations or recognised cultural significance.</td>
</tr>
</tbody>
</table>

Footnote:
1. A distinction has been drawn between landscape/townscape quality and sensitivity. Quality is a subjective judgement on perception and value of a landscape/townscape and may be informed by any national, regional or local designations for its quality. Sensitivity relates to the ability of that landscape/townscape to accommodate change.
Table LE 2 LANDSCAPE / TOWNSCAPE MAGNITUDE OF CHANGE

<table>
<thead>
<tr>
<th>Description of the Change predicted</th>
<th>High</th>
<th>Medium</th>
<th>Low</th>
<th>Negligible</th>
<th>Neutral</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total loss of or severe damage to key characteristics, features or elements</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Partial loss of or damage to key characteristics, features or elements</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Minor loss of or alteration to one or more key landscape/townscape characteristics, features or elements</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Very minor loss or alteration to one or more key landscape/townscape characteristics, features or elements</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No loss or alteration of key landscape/townscape characteristics, features or elements</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Table LE 3 LANDSCAPE / TOWNSCAPE EFFECTS

<table>
<thead>
<tr>
<th>Description of the Effect</th>
<th>Substantial</th>
<th>Moderate</th>
<th>Slight</th>
<th>Neutral</th>
</tr>
</thead>
<tbody>
<tr>
<td>Substantial</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Moderate</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Slight</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Neutral</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Footnote:
1. Each level (other than neutral) of change identified can be either regarded as “beneficial” or “adverse.”
### Table VE 1

#### VISUAL SENSITIVITY

<table>
<thead>
<tr>
<th>Description of the Receptor</th>
<th>High</th>
<th>Medium</th>
<th>Low</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residential properties with predominantly open views from windows, garden or curtilage. Views will normally be from ground and first floors and from two or more windows of rooms in use during the day.</td>
<td>Users of Public Rights of Way with predominantly open views in sensitive or unspoilt areas. Non-motorised users of minor or unclassified roads in the countryside. Visitors to recognised viewpoints or beauty spots. Users of outdoor recreational facilities with predominantly open views where the purpose of that recreation is enjoyment of the countryside - e.g. Country Parks, National Trust or other access land etc.</td>
<td>Residential properties with partial views from windows, garden or curtilage. Views will normally be from first floor windows only, or an oblique view from one ground floor window, or may be partially obscured by garden or other intervening vegetation. Users of Public Rights of Way with restricted views, in less sensitive areas or where there are significant existing intrusive features. Users of outdoor recreational facilities with restricted views or where the purpose of that recreation is incidental to the view e.g. sports fields. Schools and other institutional buildings, and their outdoor areas. Users of minor or unclassified roads in the countryside, whether motorised or not.</td>
<td>Users of main roads or passengers in public transport on main routes. Users of outdoor recreational facilities with restricted views and where the purpose of that recreation is unrelated to the view e.g. go-karting track. People in their place of work.</td>
</tr>
</tbody>
</table>
**Table VE 2**

VISUAL MAGNITUDE OF CHANGE

<table>
<thead>
<tr>
<th>High</th>
<th>Medium</th>
<th>Low</th>
<th>Negligible</th>
<th>Neutral</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dominating changes over all or most of the view(s).</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Major changes over a large proportion of the view(s).</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Major changes over a small proportion of the view(s).</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Minor changes over a small proportion of the view(s).</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No discernable change to the view(s).</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Table VE 3**

VISUAL EFFECTS

<table>
<thead>
<tr>
<th>Substantial</th>
<th>Moderate</th>
<th>Slight</th>
<th>Insignificant</th>
<th>Neutral</th>
</tr>
</thead>
<tbody>
<tr>
<td>The proposals would cause significant damage (or improvement) to a view from a sensitive receptor, or less damage (or improvement) to a view from a more sensitive receptor, and would be an obvious or dominant element in the view.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The proposals would cause some damage (or improvement) to a view from a sensitive receptor, or less damage (or improvement) to a view from a more sensitive receptor, and would be a readily discernible element in the view.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The proposals would cause limited damage (or improvement) to a view from a receptor of medium sensitivity, but would still be a noticeable element within the view, or greater damage (or improvement) to a view from a receptor of low sensitivity.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The proposals would not significantly change the view but would still be discernible.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No change in the view.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Footnote:
1. Each level (other than neutral) of change identified can be either regarded as ‘beneficial’ or ‘adverse’.