Land off Luton Road, Toddington

GREEN BELT STATEMENT

Representations to the Central Bedfordshire Local Plan 2015 - 2035: Draft Local Plan on behalf of Woods Hardwick Planning
August 2017
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GREEN BELT STATEMENT
Land off Luton Road, Toddington
1. INTRODUCTION

1.1 Scope

1.1.1 This Green Belt Statement has been prepared by James Blake Associates on behalf of Wood Hardwick Ltd. to support its representations on the Central Bedfordshire Draft Local Plan consultation. The Draft Local Plan was endorsed for publication by the Executive Committee of Central Bedfordshire Council on 20 June 2017 and made available for public consultation from 4 July for an 8 week period.

1.1.2 This Statement concerns an area of land to the east of Luton Road in Toddington (CBC Ref NLP138 and NLP294), which is 1.46ha in area. Its location is shown on Figure 1.

1.1.3 This document and supporting photographs provide a further detailed assessment of the Site and its contribution to the purposes of the Green Belt set out in the National Planning Policy Framework (NPPF). The assessment was undertaken by a Chartered Landscape Architect.

1.1.4 The Statement has been prepared with reference to the National Planning Policy Framework, the Central Bedfordshire and Luton Green Belt Study of 2016 and the Central Bedfordshire Draft Local Plan.

1.2 Background

1.2.1 The site’s boundaries and context are shown in Figure 2. The area is broadly rectangular in shape and comprises grassland, shrubs, trees and a property within its curtilage used as a plant hire business. The majority of vegetation is concentrated on the northern, eastern and southern boundaries with the gardens of private dwellings to the west. There is a public Recreation Ground beyond the northern boundary, with fenced floodlit tennis courts and a Multi-use Games Area. Toddington Doctors Surgery is directly to the south of the site. The eastern boundary is defined by an off-site area of private woodland.

1.2.2 The built-up area of Toddington is to the west of the site, with open countryside to the east.

1.2.3 The site slopes gently downwards to the east, towards the valley of the River Flit. The valley side slopes more steeply downwards towards the river beyond the site’s eastern boundary. The landform rises again beyond the river, with the other side of the valley side facing the site.

1.2.4 The site is overlooked by upstairs windows of houses on the eastern side of Luton Road which are adjacent to the site.

1.2.5 The land is privately owned and is enclosed by a mix of fencing along its northern, southern and western boundaries.

1.2.6 There are no public rights of way within the site, although there are several Public Rights of Way to the east of the site. The Icknield Way Trail runs along the valley floor beyond the block of woodland that borders the site with a footpath and bridleway on the higher land further to the east.

1.2.7 The area is incorporated in to the Green Belt.
2. GREEN BELT REVIEW

2.1 Introduction

2.1.1 Green Belt is covered by Paragraphs 79-92 of the National Planning Policy Framework (NPPF). The fundamental aim of Green Belt is to prevent urban sprawl by keeping land permanently open. The essential characteristics are ‘openness and permanence’. Openness in Green Belt terms is generally considered to be an absence of development; however, the definition is not narrowly limited and may also include a number of other factors particular to the site such as the nature and extent of development within the existing Green Belt.

2.1.2 The Study recognises that, with Central Bedfordshire defined in the National Planning Policy Framework (described above).

2.1.3 Green Belt boundaries should only be changed in exceptional circumstances.

2.2 Purposes of Green Belt

2.2.1 The purposes of Green Belt are set out in paragraph 80 of the NPPF. They are:

- To check the unrestricted sprawl of large built-up areas.
- To prevent neighbouring towns from merging into one another.
- To assist in safeguarding the countryside from encroachment.
- To preserve the setting and special character of historic towns.

2.2.2 The fifth purpose under paragraph 80 of the NPPF is “to assist in urban regeneration by encouraging the recycling of derelict and other urban land”.

2.2.3 Paragraph 83 states that Green Belt boundaries should be defined in a way that will ensure that they are likely to endure beyond the plan period. According to paragraph 85, they must be defined clearly, using readily recognizable permanent physical features.

2.2.4 Paragraph 84 states that ‘when drawing up or reviewing Green Belt boundaries, local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences of sustainable development on channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the Green Belt boundary’.

2.2.5 Since the introduction of the National Planning Policy Framework in 2012, there has been some clarification of its interpretation through planning case law. Planning Inspectors have judged that any redrawing of the boundaries of the Green Belt will need to take into account the consequences of doing so for sustainable development (such as the pattern of development and the implications for additional travel) and that the fact alone that a new Local Plan is being developed doesn’t count as ‘exceptional circumstances’.

2.3 Central Bedfordshire and Luton Green Belt Study (November 2016)

2.3.1 This study was commissioned to form part of the evidence base for the draft Central Bedfordshire Local Plan 2015-35. Its aim is to test how effectively the Green Belt in Central Bedfordshire and Luton is fulfilling the purposes of Green Belt as defined in the National Planning Policy Framework (described above).

2.3.2 40% of Central Bedfordshire is Green Belt - a total of 28,214 ha. The Study recognises that, with Central Bedfordshire Council’s preferred spatial strategy of sustainable balanced growth, it is likely to be necessary to release some parcels of the Green Belt for development. The study aims to show which parcels are currently making the weakest contribution to the purposes of the Green Belt. However, it explicitly states that it does not advise on the suitability of land for development.

2.3.3 The 1.48ha site is part of a much larger parcel of land (reference T2) that was assessed for how well it supported the main purposes of Green Belt. The assessment of the parcel found that it made a ‘weak/no contribution’ to preserving the setting and special character of historic towns, a ‘weak/no contribution’ to preventing neighbouring towns from merging into one another and a ‘strong’ contribution to assisting in the safeguarding of the countryside from encroachment.

2.4 Central Bedfordshire Draft Local Plan

2.4.1 The draft Local Plan for Central Bedfordshire was endorsed for publication on 20th June 2017, with an eight-week period of public consultation commencing on 4th July 2017.

2.4.2 The new Local Plan will replace a complicated system with different planning documents and saved policies for different parts of Central Bedfordshire, dating back to the time before the creation of the Unitary Authority of Central Bedfordshire from Mid-Bedfordshire and South Bedfordshire District Councils in April 2009. Toddington is in the area currently covered by the South Local Development Plan, which was adopted in January 2004.

2.4.3 It is proposed that in addition to the existing commitment of 23,185 dwellings, there should be 20,000 - 30,000 further dwellings allocated in the Local Plan, of which 7,000 dwellings are a contribution towards Luton Borough’s unmet need to be delivered in the part of Central Bedfordshire near to Luton.

2.4.4 The draft Local Plan recognises the need to strike a balance between removing sites from the Green Belt in order to meet housing pressure while maintaining local character. A sustainability appraisal which was carried out by CBC as part of the preparation for the Draft Plan found that preventing entirely any growth in housing and employment uses within the Green Belt would be likely to have negative effect on the needs and health of communities in parts of Central Bedfordshire and Luton Borough.

2.4.5 Paragraph 7.6.5 states that new housing developments in the Green Belt will either be on strategic sites closely related to Luton’s urban edge or in the form of ‘highly sustainable extensions of a more moderate scale to large towns and villages that are inset into Green Belt, where there is a good level of services and connectivity and where sites are available that would not detrimentally impact on the openness of the Green Belt’. The draft plan gives a figure of 2000 homes to be constructed in these limited-scale extensions to large towns and villages in the Green Belt during the life-span of the Local Plan.

2.4.6 In the Settlement Hierarchy within the Draft Local Plan, Toddington is classed as a Minor Service Centre.

2.4.7 It is stated in paragraph 9.2.6 that, as the conclusion has been reached that the scale of the growth that will be necessary over the next twenty years will only be able to be met in a way that is sustainable by a limited release of Green Belt land, this constitutes the ‘exceptional circumstances’ required by the National Planning Policy Framework.

2.4.8 Policy SP1 sets down the principles to be applied in releasing Green Belt land for development. It states that the guiding principle will be the creation of sustainable patterns of development (in accordance with paragraph 84 of the NPPF). The most sustainable locations for development will be chosen unless this sustainability benefit is outweighed by the effect on...
the overall integrity and performance of the wider Green Belt. Decisions will be guided by the Central Bedfordshire and Luton Green Belt Study and a future Stage 3 Green Belt study to be carried out for Central Bedfordshire.

2.4.9 Policy SP1 also states that the Council will favourably consider any development proposals that will actively improve the character and quality of the Green Belt by providing access to open countryside, the protection of bio-diversity and opportunities for quiet recreation.

2.4.10 Any development in the Green Belt will be expected to maintain the character of the Green Belt and not undermine its purposes.

2.4.11 Policy SP4 deals with the issue of coalescence between settlements. It states that new developments in the countryside must avoid reducing open land that contributes to the form and character of existing settlements. The planning authority will have regard to maintaining the individual identity of towns and villages and will resist any extensions to built-up areas that might lead to coalescence between settlements.

Site Allocations within the Draft Local Plan for Central Bedfordshire

2.4.12 The site was submitted for consideration for allocation in the new Central Bedfordshire Local Plan as two separate adjacent sites when the call for sites was made in April 2016 (Sites NLP138 and NLP 294).

2.4.13 The assessment of the site NLP138 (the larger section of the site closest to town centre) found that the site passed stage 1a but failed stage 1b of the assessment process. This assesses whether the site a logical extension to the settlement. The site assessment report found that ‘the site is located on the eastern side of Luton Road, separated from the main settlement by the Recreation Ground. As such, it is considered, even if developed as part of NLP 294, that it would not form a logical extension to Toddington’.

2.4.14 This assessment contradicts that for Site NLP 294. This is the smaller section of the site which is further away from the village centre than Site NLP138. However, this site passed the section which assesses whether the site is a logical extension to the settlement. The assessment report stated that ‘the site is located on the eastern side of Luton Road, separated from the main settlement by the Recreation Ground. It is relatively well related to the surrounding development’.

2.4.15 This Statement agrees with the assessment for Site NLP 294 and contests that for Site NLP 138. If site NLP 294 is relatively well related to the settlement, logic dictates that the plot of land adjacent to it which is closer to the centre of Toddington must also be given the same ‘G’ rating in the assessment and should pass this part of the site assessment process.

2.4.16 Having passed all of the other sections of the site allocations assessment (sections 1a, 1b, 1c and 1d) Site NLP 294 failed the site allocation process because it is in the Green Belt.

2.4.17 The assessment method used specifies that there are three ways in which potential development in the Green Belt can progress to the next stage in the assessment process:

- If it meets all three of the criteria specified for permissible development in the Green Belt (adjoining a settlement with key local services, in a settlement with a mainline station or a junction to an A road or motorway and contributing over one hundred homes to the Luton Housing Market Area).
- If it has been allocated in a draft Neighbourhood Plan.
- If it is in a parcel of land that has been identified as having a weak contribution to the Green Belt in the Central Bedfordshire and Luton Green Belt Study.

2.4.18 As the scale of the proposed development is under one hundred homes and there is not a Neighbourhood Plan for Toddington, it is not able to progress to the next stage of consideration on these grounds.

2.4.19 The reason for the site has been unable to reach the next stage in the Local Plan allocation process is that it was considered as a small part of a much larger parcel of land that, as a whole, was not found to make a weak contribution to the Green Belt of Central Bedfordshire (see Figure 4). However, it will be argued that, looked at on its own, the 1.46ha site east of Luton Road in Toddington does not contribute significantly to the purposes, openness and permanence of the Green Belt and would be a suitable site to deliver the sort of small to medium scale extension to an inset large town or village in the Green Belt that is identified in the Draft Local Plan as a suitable place for residential development.
Figure 2: Extract of Green Belt Parcels (Green Belt Review 2016).

Not to scale @ A3

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3. ANALYSIS OF LAND OFF LUTON ROAD, TODDINGTON

3.1 Introduction

3.1.1 The following section provides a detailed analysis of the site and assesses it against the various planning criteria for the establishment of Green Belt as described above. In summary, these criteria are:

- To check the unrestricted sprawl of large built-up areas.
- To prevent neighbouring towns from merging into one another.
- To assist in the safeguarding of the countryside from encroachment. This involves maintaining the openness of the Green Belt and ensuring that it has physical boundaries which are likely to endure throughout and beyond the lifetime of the Plan.
- To preserve the setting and special character of historic towns.
- To ensure that the development site is compliant with Policy SP01 of the Draft Local Plan for Central Bedfordshire in being in a sustainable location for development.

3.2 Analysis against Green Belt purposes

3.2.1 The Central Bedfordshire and Luton Green Belt Study found that the whole of Parcel T2 was categorised as 'weak/no contribution' as ‘the parcel is not adjacent to the large built-up area’.

3.2.2 It is agreed that the site does not fulfil the purposes of preventing sprawl.

3.2.3 The Green Belt Study found that the whole of land parcel T2 made a weak/no contribution to this Green Belt purpose as ‘the parcel does not form a significant part of any settlement gaps’.

3.2.4 It is agreed that the site off Luton Road in Toddington does not fulfil the purpose of preventing coalescence between settlements.

3.2.5 The Central Bedfordshire and Luton Green Belt Study concluded that land parcel T2 made a weak/no contribution to preserving the setting and special character of historic towns as ‘the parcel has no relationship with any historic towns’.

3.2.6 It is agreed that the site does not fulfil the purpose of preserving the setting and character of a historic town.

3.2.7 As the photographs in Figure 3 and Figure 6 show, the site is visually more closely associated with the urban area of Toddington than it is with the rural Green Belt to the east and south-east. It is visually separated from the open countryside by the block of woodland that forms much of the western boundary of the site (see Figure 3 View B). Views from the Green Belt to the east and south-east are mostly screened by the woodland block and the native tree and shrub planting around the eastern section of Toddington Surgery and along the southern boundary of the site.

3.2.8 The only place where there is a visual connection between the site and the open countryside of the Green Belt is the section of the eastern boundary of the site to the south of the end of the woodland block. As Figure 5 shows, there are some long-range views into the southern section of the site from the east. The photograph in Figure 6 Viewpoint 11 shows the view from Bridleway BW43, which runs east-west along towards the top of the valley side on the opposite side of the River Flit. There are also more limited views of the site through the same ‘gap’ in the boundary planting from Public Footpath FP52 and the Icknield Way, which are located along the valley floor close to the River Flit. This view is shown in Figure 6, Viewpoint 10. In order to maintain the openness of the Green Belt and minimise urbanising visual influences, it would be necessary to carry out mitigation tree and shrub planting between the edge of the woodland block and the southern boundary of the site in order to screen these views. This would create a visual barrier between the area of housing and the open countryside without making any significant difference to the medium and long-range views towards Toddington from the Green Belt to the east and south-east of the settlement.

3.2.9 The proposed development would not extend the village envelope much further to the east than is the case at the present. The Doctors Surgery plot immediately to the south of the site extends well into the Green Belt. Beyond the site’s (and the Green Belt’s) northern boundary, the flood-illit Multi-use Games Area on the Recreation Ground with it’s high metal fences is another urbanising influence on the Green Belt as its boundaries are currently drawn.

3.2.10 Were the Green Belt boundaries to be redrawn so as to exclude the site, the new boundaries could be defined by physical features which would help them to endure beyond the time-span of the Local Plan. These would be provided by the woodland block to the east and Toddington Doctors Surgery to the south. Existing vegetation along the site boundaries can be gapped up in order to provide additional screening.

3.2.11 The Green Belt Study states that Land Parcel T2 makes a strong contribution to safeguarding the countryside from encroachment. If considering the 1.46ha site east of Luton Road alone (which is at the western edge of the land parcel, closest to the built-up area), it is contended that a more realistic assessment is that it makes a relatively weak contribution.

3.2.12 The site fulfils the requirement for being a sustainable location for development as required in draft Central Bedfordshire Local Plan Policy SP1. It is an extension to a settlement classified as a Minor Service Centre in the Settlement Hierarchy that is inset within the Green Belt and has good transport links (being close to Junction 12 on the M1 and having a good bus service).

3.2.13 Being modest in scale (with 40 homes suggested in the call for allocations), the development of the site for housing would help to fill the short-term gap in the supply of new homes while the larger new towns and villages that form part of the draft Local Plan are being constructed.
Figure 3: Site Context. Not to scale @ A3
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Toddington Recreation Ground adjacent to the Site

Residential properties along Luton Road

View towards the Flit Valley from the Site

Toddington Market Place

St George of England Church and Toddington High Street

Approximate location of Site Views (see Figure 3)

6 | Land off Luton Road, Toddington
Figure 4: Site Photos A-C.
Date: 15th August 2017
Figure 4: Site Photos D-E.
Date: 15th August 2017

View D: View west from eastern site boundary

View E: View south from northern site boundary
Figure 5: Green Belt Analysis. Not to scale @ A3
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KEY
- Site Boundary: Land off Luton Road, Toddington

Landscape Analysis
- Watercourses
- Area of Significant Vegetation
- Enclosed Urban Edge
- PRoW Footpath
- PRoW Bridleway

Visual Analysis
- Visually Enclosed
- Open Views
- Glimpsed Views
- Representative Viewpoints - Refer to Photographs v01 to v12
Figure 6: Representative Views v01 to v03.
Date: 15th August 2017

v01: View north from Toddington Medical Centre

v02: View north east along Luton Road

v03: View east along proposed site access
Figure 6: Representative Views v04 to v06.

Date: 15th August 2017

v04: View south east along Luton Road

v05: View south across Toddington Recreation Ground

v06: View south from Toddington Recreation Ground

11 | Land off Luton Road, Toddington
v07: View south from Toddington Recreation Ground

v08: View south from Toddington Recreation Ground

v09: View north south along Luton Road

Figure 6: Representative Views v07 to v09.
Date: 15th August 2017
Figure 6: Representative Views v10 to v12.

Date: 15th August 2017

v10: View south west from PRoW FP52

v11: View south west from PRoW BW43

v12: View south west from junction of PRoW FP44 and BW43

Note: Site is not visible due to topography
Figure 6: Representative Views v13 to v14.
Date: 15th August 2017
4. REVISED GREEN BELT BOUNDARY

4.2.1 The analysis set out above confirms that the Site should not be included in the Green Belt in the emerging Central Bedfordshire Local Plan. This conclusion has informed a suggested revised boundary to the Green Belt, which is shown on Figure 7.

4.2.2 This proposes that both the development site and the curtilage of Toddington Doctor’s Surgery should be taken out of the Green Belt. The Green Belt Boundaries would therefore be the southern and eastern boundaries of the Surgery and the western boundary of the woodland block. The use of these physical features as boundaries will provide permanence and thus meet the requirements of the National Planning Policy Framework paragraph 85.

5. CONCLUSION

5.2.1 It is the assertion of this Green Belt Statement that there are very strong arguments that the 1.46ha plot of land to the east of Luton Road in Toddington should not be included in the Central Bedfordshire Green Belt and should therefore progress to the next stage of the Local Plan site allocation process.

5.2.2 This assertion is based on an analysis of the site, judging it against the same criteria as was used in the Central Bedfordshire and Luton Green Belt Study of November 2016 for larger parcels of land.

5.2.3 Since the draft Central Bedfordshire Local Plan’s spacial strategy states that around 2000 new homes will need to be delivered through small to medium scale developments which are extensions to large towns and villages that are inset in the Green Belt, there is a clear rationale to considering the contribution to the purposes of the Green Belt made by individual sites of this scale as well as the much larger land parcels assessed in the Green Belt Study.

5.2.4 After assessing the setting of the site in relation to Toddington and the open countryside to the east, the following conclusions were reached:

5.2.5 The whole of the site would make a logical extension to Toddington, being well-connected to the settlement. It is therefore suggested that the allocations assessment made on this matter for the section of the site further away from the village centre (NLP 294) was the correct one rather than the contradictory assessment of the closer section (NLP 138).

5.2.6 The site makes a weak or no contribution to preventing coalescence between settlements, to protecting the setting of a historic town and to preventing urban sprawl.

5.2.7 The site relates much more closely to the urban area of Toddington than it does to the open countryside to the east. It is screened from views from the open countryside by a large block of woodland on the eastern boundary and tree and shrub belts along the northern and southern boundaries (which form a permanent boundary features). To its immediate north and south are features that already form urbanising influences on the Green Belt. As a consequence, this particular site within the parcel only makes a relatively weak contribution to this Green Belt purpose.

5.2.8 The site scores very highly in terms of sustainability, being an extension to a Minor Service Centre with good transport links.

5.2.9 A new Green Belt boundary for the land east of Luton Road in Toddington is proposed, which meets the need for permanence expressed in the National Planning Policy Framework.
Figure 7: Green Belt Boundaries - Suggested Amendments

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- Site Boundary: Land off Luton Road, Toddington
- Existing Green Belt
- Existing development in the Green Belt
- Green Belt Parcel
(Central Bedfordshire and Luton Green Belt Study 2016)
- Area to be removed from Green Belt