

**The Chilterns  
Conservation Board**

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Chairman:	Cllr Ian Reay
Vice Chairman:	Helen Tufts
Chief Officer:	Sue Holden

**Statement from the Chilterns Conservation Board  
North Herts Local Plan Examination 2018**

**MATTER 10 – LUTON & COCKERNHOE**

**7<sup>th</sup> February 2018**



## Examination statement from the Chilterns Conservation Board

### Introduction

1. The Chilterns Conservation Board is grateful for the opportunity to participate at the North Herts Local Plan examination.
2. The Chilterns Conservation Board (CCB) is a statutory body established in 2004 under the provisions of the Countryside and Rights of Way Act 2000 to promote the conservation and enhancement of the Chilterns Area of Outstanding Natural Beauty (AONB) and increase the understanding and enjoyment by the public of the special qualities of the AONB. Further information about the Board and our role is set out in Appendix 1.
3. An Area of Outstanding Natural Beauty is an outstanding landscape whose distinctive character and natural beauty are so precious that it is in the nation's interest to safeguard them. The Chilterns AONB was designated in 1965 for the natural beauty of its landscape and its natural and cultural heritage.
4. Our representation addresses the Inspector's question 10.26 of Matter 10 on the housing allocations and the settlement boundaries: the Towns - Luton (Cockernhoe):  
**“Are all of the proposed housing allocations justified and appropriate in terms of the likely impacts of the development?”**
5. The Chilterns Conservation Board considers that the allocation of sites EL1, EL2 & EL3 East of Luton for a new neighbourhood of 2,100 homes is neither justified nor appropriate because of:
  - i) **the likely impacts of the development on the setting of the Chilterns AONB**
  - ii) **the implications for the boundary review of the Chilterns Area of Outstanding Natural Beauty since this land is within an area of land proposed to be included in the AONB in Chilterns AONB boundary variations**
  - ii) **the SEA has not adequately assessed the cumulative impacts of this development together with growth of Luton to north and west, Luton airport expansion, new road proposals and employment parks.**
6. The Chilterns Conservation Board seeks amendments to remove the allocations of sites EL1, EL2 & EL3 East of Luton to allow for the AONB boundary review process to be undertaken and for further assessment of cumulative impacts of development.

## 1) Likely impacts on the setting of the Chilterns AONB

7. The AONB boundary wraps around Luton's northern eastern and western built-up area boundaries (see map in Appendix 2). Although the large greenfield area for EL1, EL2 & EL3 east of Luton is outside the Area of Outstanding Natural Beauty, it is within the setting of the Chilterns AONB.
8. The setting of the AONB is the area within which development and land management proposals, by virtue of their nature, size, scale, siting, materials or design could be considered to have an impact, either positive or negative, on the natural beauty and special qualities of the Chilterns AONB. The legal duty on local authorities set out in section 85 of the Countryside and Rights of Way Act 2000 to have regard to the purpose of conserving and enhancing the natural beauty of AONB does not just apply within the AONB; the only consideration is whether land in the AONB is affected, not where the effect originates. The instruction in the NPPF paragraph 115 to give 'great weight' to conserving landscape and scenic beauty applies regardless of whether a development is inside the AONB or on land outside but affecting it. The NPPG also draws attention to proposals 'which might have an impact on the setting of AONBs'. The statutory [Chilterns AONB Management Plan: A Framework for Action 2014-2019](#) addresses the setting of the AONB in its vision and policies<sup>1</sup>.
9. The Chilterns Conservation Board has produced a Position Statement entitled [Development Affecting the Setting of the Chilterns AONB](#)<sup>2</sup> with more information on the Setting on the AONB. It explains that examples of adverse impacts from development in the setting of the AONB include:
  - Blocking or interference of views out of the AONB particularly from public viewpoints or rights of way;
  - Blocking or interference of views of the AONB from public viewpoints or rights of way outside the AONB;
  - Breaking the skyline, particularly when this is associated with developments that have a vertical emphasis and/or movement (viaducts, chimneys, plumes or rotors for example);
  - The visual intrusion caused by the introduction of new transport corridors, in particular roads and railways;
  - Loss of tranquillity through the introduction of lighting, noise, or traffic movement;

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<sup>1</sup> Chilterns AONB Management Plan 2014-2019: A Framework for Action, Chilterns Conservation Board (2014) see: [http://www.chilternsaonb.org/conservation/management\\_plan.html](http://www.chilternsaonb.org/conservation/management_plan.html) see in particular in particular: the third bullet point of the Vision; Key Issue 24 and Policies L4, L5 and L7 in the landscape chapter; Policies B1 and B2 in the biodiversity chapter; Key Issues 3, 5 and 8 and Policies HE3, HE4, HE5 and HE7 in the historic environment chapter, and paragraph 2 in the introduction, Key Issues 2 and 8 and Policies D8, D9, D12 and D13 in the development chapter

<sup>2</sup> Position Statement on Development Affecting the Setting of the Chilterns AONB (2011), Chilterns Conservation Board available at <http://www.chilternsaonb.org/conservation-board/planning-development/position-statements.html>

- Introduction of significant or abrupt changes to landscape character particularly where they are originally of a similar character to the AONB;
- Change of use of land that is of sufficient scale to cause harm to landscape character;
- Loss of biodiversity, particularly in connection with those habitats or species of importance in the AONB;
- Loss of features of historic interest, particularly if these are contiguous with the AONB;
- Reduction in public access and detrimental impacts on the character and appearance of rural roads and lanes, and
- Increase in air or water pollution.

10. The Chilterns Conservation Board considers that many of these impact apply here. The proposed major expansion of Luton is likely to affect the Chilterns AONB and public enjoyment of the AONB.

The development proposed under EL1, EL2 & EL3 would be:

- of a scale out of character with the area
- harm landscape character
- cause settlement coalescence<sup>3</sup>
- change the character of rural lanes valuable as a recreational resource and route to the AONB
- increase traffic and air pollution through the AONB
- reduce tranquillity
- reduce dark skies
- increase water abstraction to serve the development; and
- fragment green corridors and habitats.

11. The duty to cooperate and the unmet needs of neighbouring Luton are not a reason to harm the AONB or its setting. There is no requirement for the unmet needs of Luton to be met on sites contiguous to Luton; they could be anywhere within the Housing Market Area. There appears to be a lack of consideration of alternatives not affecting the AONB.

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<sup>3</sup> We agree with the SA that the plans would 'engulf' Cockernhoe and its character changed from a 'rural settlement to an enclave in an urban area'.

12. The quality and character of this landscape is particularly special.

Photographs of EL1













Photographs of EL3





The eastern edge of Luton is remarkably unspoilt. It is not an area with urban fringe uses or landscape detractors. In EL1, the hedge on the right in the photograph below the right sharply divides farmland from the suburban housing estate off Hedley Rise.



13. The scale of growth proposed, a strategic housing allocation, is not appropriate. The Council's own landscape studies (2009, 2011) and the SA/SEA for the Local Plan consider the area is only suitable for small-scale housing. This point is noted and left unresolved in the SOCG between the Council and Natural England<sup>4</sup>:

“The SA/SEA (and associated landscape assessment) however state that the allocations can only accommodate small scale development, with respect to non-AONB landscapes of high value.”

14. The Supplementary Report by LUC<sup>5</sup> commissioned by the Council on the landscape of this area recommended the area directly east of Luton (now covered by to a large extent by proposed allocations EL1, EL2 and E3) was potentially suitable for some 'small-scale

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<sup>4</sup> Statement of Common Ground <https://www.north-herts.gov.uk/sites/northherts-cms/files/ED52%20SoCG%20between%20NHDC%20and%20%20Natural%20England%20Nov%202017%20redacted%20copy.pdf>

<sup>5</sup> Environmental Sensitivity Assessment South Bedfordshire Growth Area – Supplementary Report relating to portions of land in adjoining Council Areas affected by the Delivery of Growth (Land Use Consultants December 2008)

development". Small-scale was not defined and this was explored subsequently in the Council's work by the Landscape Partnership<sup>6</sup> (July 2009) who recommended that small-scale here might mean:

"some relatively small areas of infill/expansion to the perimeter of the existing settlements e.g. at Cockernhoe and Mangrove Green or some small pockets of developments close to the existing urban edge. In the case of the latter there would be a need to ensure that coalescence with existing settlements is avoided"

The Landscape Partnership report recommended against strategic-scale growth and its associated infrastructure.

15. In terms of character The Landscape Partnership report sub-divides the area into three landscape types as part of the Cockernhoe plateau, Cockernhoe Slopes and Tea Green Plateau (see box).

#### The Council's report by The Landscape Partnership<sup>4</sup>

##### Describes Cockerhoe Plateau's sensitivity as:

"The rural character strongly contrasts with Luton. The area is open to public view from a number of minor roads and rights of way which are well used by the public.

Development would affect the existing distinctive rural settlements and lead to issues of coalescence. Overall this considered to be an area of medium-high sensitivity. There is potential scope for some small scale development as part of the existing village framework of Cockernhoe and Mangrove on small land parcels closely associated with the villages. The site lies adjacent to part of the Grade II Registered Parkland of Putteridge Bury.

##### Notes for Cockerhoe Slopes that:

"The rural character strongly contrasts with Luton. The area is open to public view from public footpaths along County boundary and east of Land Parcel from Wadlow End Farm and Cockernhoe. The area is relatively well contained from wider views; however development would significantly reduce the amenity of existing residents. Any development near Cockernhoe would lead to concern over coalescence with Luton. Overall this considered to be an area of medium-high sensitivity. The northern extent lies adjacent to part of the Grade II Registered Parkland of Putteridge Bury."

##### Describes Tea Green Plateau's sensitivity as:

"The rural character is separate from and strongly contrasts with Luton. The area is open to public view from a number of minor roads and rights of way which are well used by the public. Development would affect the existing distinctive rural settlements and lead to issues of coalescence. The area is relatively visually open and exposed from local and more distant views with little enclosure in terms of topography or vegetation. Overall this considered to be an area of medium-high sensitivity."

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<sup>6</sup> Response to Environmental Sensitivity Study prepared to inform the selection of Potential Growth Areas around Luton & Response to the emerging Luton and South Bedfordshire Core Strategy for North Hertfordshire District Council, 2009, The Landscape Partnership, CG15



16. All three land parcels are assessed in the Council's TLP Study as of **Medium- high overall sensitivity**. The **overall capacity** is assessed as **Low-medium**. It is unclear then why this land being allocated in the North Herts Local Plan. The concerns with landscape sensitivity and coalescence of settlements are still valid.
17. The Landscape Partnership's findings are echoed in the Council's North Herts Landscape Study 2011 (examination document CG16, pages 44-48). The proposed SP19 allocation falls within the 202 Breachwood Green Ridge Landscape Character Area, and the study identifies landscape character sensitivities including (with the Chilterns Conservation Board's comments in **bold**):
- a historic settlement pattern of dispersed villages, hamlets and scattered farmsteads which would be sensitive to unsympathetic development out of scale with the villages  
**The Board's view is that the strategic housing site SP19 of 2,100 homes would be out of scale with the existing small hamlets and villages (Mangrove Green, Tea Green and Cockernhoe) and bring about coalescence with Luton.**
  - village greens and other important open spaces which would be sensitive to development on or adjacent to them  
**Unclear that the impacts on the village greens and important open spaces has been assessed**
  - strong cultural pattern of narrow and twisting minor lanes and historic woodlands would be vulnerable to improvements to/ upgrading of the roads  
**These rural lanes would be likely to be under pressure to 'improve' their capacity and harm their character**
  - areas of surviving acid/ neutral grassland at Mangrove Green and Tea Green are vulnerable to further loss  
**Unclear that the acid grassland has been identified and protected**
  - remnant mature trees in hedgerows and within fields would be sensitive to further removal  
**There are mature trees in the SP19 development area**
18. The North Herts Landscape Study (CG16) goes on to examine the capacity of LCA 202 to accommodate development and concludes that large urban extensions and new settlements (>5ha) *"would not be entirely appropriate within this Character Area, due to its strong cultural pattern of minor lanes and historic woodlands. It would be of an inappropriate scale and would be likely to result in the coalescence of Luton and the villages and hamlets within Breachwood Green Ridge. Visual impacts could also be high, due to the elevated position of the Character Area on a ridgeline plateau, particularly if near the plateau edge. Increased housing development would be likely to be affect the existing narrow, twisting lanes, which could erode the character of the landscape.*

*Extensive development could also disrupt the rights of way network and could reduce accessibility to the countryside.”*

The Board agrees and it is unclear why the Council would proceed with the allocation contrary to this advice.

19. This greenfield land with medium-high sensitivity is not the **land with the least environmental or amenity value** in the district. Paragraph 110 of the NPPF sets out that:

*“In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment. Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework.”*

20. It certainly does appear to satisfy the tests of the National Planning Policy Framework in establishing a **valued landscape** (NPPF paragraph 109 *protecting and enhancing valued landscapes*). It is a well-used recreation resource; The Landscape Partnership study (2009) notes that in this area the settlements and local road pattern are highly sensitive to change, and the area appears to be highly valued for informal recreation. The area is described as an important green lung close to Luton, with minor roads ideal of walking, cycling and horse riding.

21. In 2013 the Chilterns Conservation Board responded to NHDC on the housing options growth levels study 2011-2031:

*“None of the sites listed above are within the AONB. However, several of them are within the setting of the AONB and should the Council take them forward then full consideration should be given to the likely impacts on the AONB and its enjoyment.*

*All of the sites listed above are considered to be within sensitive landscapes. The Board would therefore suggest that full landscape character and visual impact assessments should be undertaken to feed into the preparation of any future allocations should this be considered by the Council. The area to the south of the A505 is high quality, sensitive landscape that may well be worthy of designation as part of the Chilterns AONB should a review of the AONB boundary ever take place in the future and this should be taken account of if allocations are being considered.”*

The Board also explained more specifically on this site *‘The possible strategic site to the east of Luton is outside the Chilterns AONB. However, full account should be taken of the likely effects of development in this area on the AONB and its setting. Furthermore, full account should be taken of the likely implications on the Mimram Valley to the east. The larger extent of the site takes the developable area to the edge of the valley and this may have wider landscape impacts on the valley as a result. A full landscape character and visual impact assessment should be undertaken prior to any allocation taking place. The area to the immediate east of this site is high quality landscape that may well be worthy of designation as part of the Chilterns AONB should a review of the AONB boundary ever take place in the future’.*

22. The full LVIA's we called for prior to allocation taking place have not been carried out as part of the local plan preparation process. The evidence base is therefore missing important elements, and the allocation is not justified. The LVIA's that accompany the two planning applications are neither independent nor strategic. Draft local plan Policy SP19 sets out at criterion (g) that

“(g) Built development contained within the Breachwood Ridge and avoiding adverse impacts on the wider landscape of the Lilley Valley or the Chilterns AONB as informed by detailed landscape assessments;”

Since the planning applications are already in for EL1 & EL2 (17/00830/1) and EL3 (16/02014/1) it is unclear when this safeguard of detailed landscape assessments will take place, particularly assessment which addresses the impacts comprehensively and cumulatively.



## **2) The implications for the boundary review of the Chilterns Area of Outstanding Natural Beauty since this land is within an area of land proposed to be included in the AONB in Chilterns AONB boundary variations**

23. **The EL1, EL2 & EL3 sites falls within land proposed by the Chilterns Conservation Board for inclusion in the Chilterns AONB.** The Chilterns Conservation Board submitted an application to Natural England in 2013 to review the boundaries in four areas, including North Hertfordshire (see Appendix 3 for extract). The area to the east of Luton is a potential candidate for extension of the AONB based on criteria published by Natural England in March 2011 and relating to landscape quality, scenic quality and relative wildness, relative tranquillity and cultural heritage<sup>7</sup>.
24. In September 2010 the North Herts DC cabinet passed a resolution to support consideration of the area as AONB. A map was produced by North Herts DC showing the potential AONB boundary review land, which includes all of EL1, EL2 & EL3 (see map in Appendix 4 to this statement).
25. The area has a clear affinity with the rest of the Chilterns. It contains clearly recognisable Chilterns features such as chalk streams and associated dry valleys and small settlements, with isolated farms and dwellings with red brick and flint as dominant building materials. The woodland cover is good, with much of it being Ancient Woodland.
26. Allocating this land for a major urban expansion of Luton will have the effect of prejudicing this AONB boundary review application. Once allocated for housing, there is no prospect that the land would become part of the nationally protected landscape. Since that application was made first (2013) and is still pending, decisions should not be made that would undermine the application until the process has run its course and the outcome is known.
27. It is interesting that Land Use Consultants in their ESA Supplementary Report for the Council made the mistake of recording the land east of Luton (L1) in Lilley Bottom as in the Chilterns AONB. This is an easy mistake to make as the quality of this landscape is so high. The subsequent report for the Council by The Landscape Partnership (2009) corrects this as follows: "The LUC report considers the area is within the Chilterns AONB. This is only true of the area north of the A505. LUC include the village of Lilley and surrounding area to the north of the A505 as being part of L1. It is considered by TLP that the area south of the A505 is of equal quality and sensitivity to that north of the A505 which is within the AONB." This comment, volunteered by The Landscape Partnership, reinforces our case that this land is equally outstanding in landscape terms and should be in the Chilterns AONB.

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<sup>7</sup> Guidance for assessing landscapes for designation as National Park or AONB, Natural England, March 2011.

28. The Government's new 25 Year Environment Plan (Jan 2018)<sup>8</sup> sets out clearly the value and importance designated landscapes. It states that designation of National Parks and AONB "has been among the outstanding environmental achievements of the past 100 years. They provide a patchwork of stunning, and protected, landscapes." Referring back to the 1947 Hobhouse Report which led to the birth of protected landscapes, DEFRA commits to commissioning a 21<sup>st</sup> Century 'Hobhouse' Review:

"Now, 70 years on, the Government will commission a review for the 21st Century. This will consider coverage of designations, how designated areas deliver their responsibilities, how designated areas are financed, and whether there is scope for expansion."

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<sup>8</sup> A Green Future: Our 25 Year Plan to Improve the Environment, HM Government, January 2018

### **3) The SEA has not adequately assessed the cumulative impacts of this development together with growth of Luton to north and west, Luton airport expansion, new road proposals and employment parks.**

29. The allocation of SP19 is likely to increase pressure for new major strategic roads east of Luton which would be likely to include routes through the AONB. The long term, cross-boundary and cumulative effects on the Chilterns AONB have not been satisfactorily addressed in the Sustainability Appraisal (examination document LP4). This cumulative assessment should include the local plan proposals of neighbouring authorities including the strategic growth of Luton to the west and north, the Luton airport passenger numbers expansion<sup>9</sup>, proposals for a new eastern relief road for Luton and employment park along the eastern boundary of Luton.
30. The Chilterns Conservation Board has published a guide on [Cumulative Impacts of Development on the Chilterns AONB](#)<sup>10</sup> in November 2017 to assist local authorities, developers and stakeholders more easily take account of cross-boundary proposals and identify cumulative effects, which is a legal requirement<sup>11</sup>.
31. The cumulative impacts work in the Local Plan's draft SA (LP4) fails to identify Luton as a cluster (page 53) where multiple changes are planned. The inter-plan cumulative effects section regarding Luton (pages 70-74) fails to refer to landscape or the Chilterns AONB. It only mentions traffic and air pollution.

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<sup>9</sup> Luton Airport recently published a vision for a very significant expansion of passenger numbers <https://www.llal.org.uk/Documents/vision2020-2050.pdf> . This involves increasing from the permitted level of 18 million passengers a year to 32 to 36 million passengers a year (current volumes are 15mppa). As well as the environmental impacts (noise, traffic, waste, air pollution etc) this growth would entail many more airport workers and housing needed for them.

<sup>10</sup> Position Statement on [Cumulative Impacts of Development on the Chilterns AONB](#), Chilterns Conservation Board, November 2017

<sup>11</sup>The SEA Directive on the assessment of the effects of certain plans and programmes on the environment legally requires the consideration of 'likely future without the implementation of the plan' and 'cumulative impacts'. The Habitats Directive requires consideration of 'in combination' impacts.



## Conclusion

32. National policy in the NPPF is clear that “Plans should allocate land with the least environmental or amenity value” (para 110) and that “Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty” (para 115). The proposed allocations are within the setting of the AONB and full consideration should be given to the likely impacts on the AONB and its enjoyment.
33. The area to the south of the A505 is high quality, sensitive landscape that the Council’s own landscape consultants and SEA recommend as suitable for only small-scale growth.
34. The land falls within the area proposed for an expansion of the Chilterns AONB and this boundary review process should be allowed to take place before development decisions are made.
35. The Chilterns Conservation Board is grateful for the opportunity to make these representations at the Examination.



**The Chilterns Area of Outstanding Natural Beauty**

The Chilterns AONB was designated in 1965 for the natural beauty of its landscape and its natural and cultural heritage. In particular, it was designated to protect its special qualities which include the steep chalk escarpment with areas of flower-rich downland, woodlands, commons, tranquil valleys, the network of ancient routes, villages with their brick and flint houses, chalk streams and a rich historic environment of hillforts and chalk figures.

**Chilterns Conservation Board**

The Chilterns Conservation Board is a statutory independent corporate body set up by Parliamentary Order in 2004 under the provisions of Section 86 of the Countryside and Rights of Way (CRoW) Act 2000.

The Board has two statutory purposes under section 87 of the CRoW Act:

- a) To conserve and enhance the natural beauty of the AONB; and
- b) To increase the understanding and enjoyment by the public of the special qualities of the AONB.

In fulfilling these roles, if it appears that there is a conflict between those purposes, Conservation Boards are to attach greater weight to (a). The Board also has a duty to seek to foster the economic and social well-being of local communities within the AONB.

Like all public bodies, including ministers of the Crown, local authorities and parish councils, the Chilterns Conservation Board is subject to Section 85 of the CRoW Act which states under "General duty of public bodies etc"

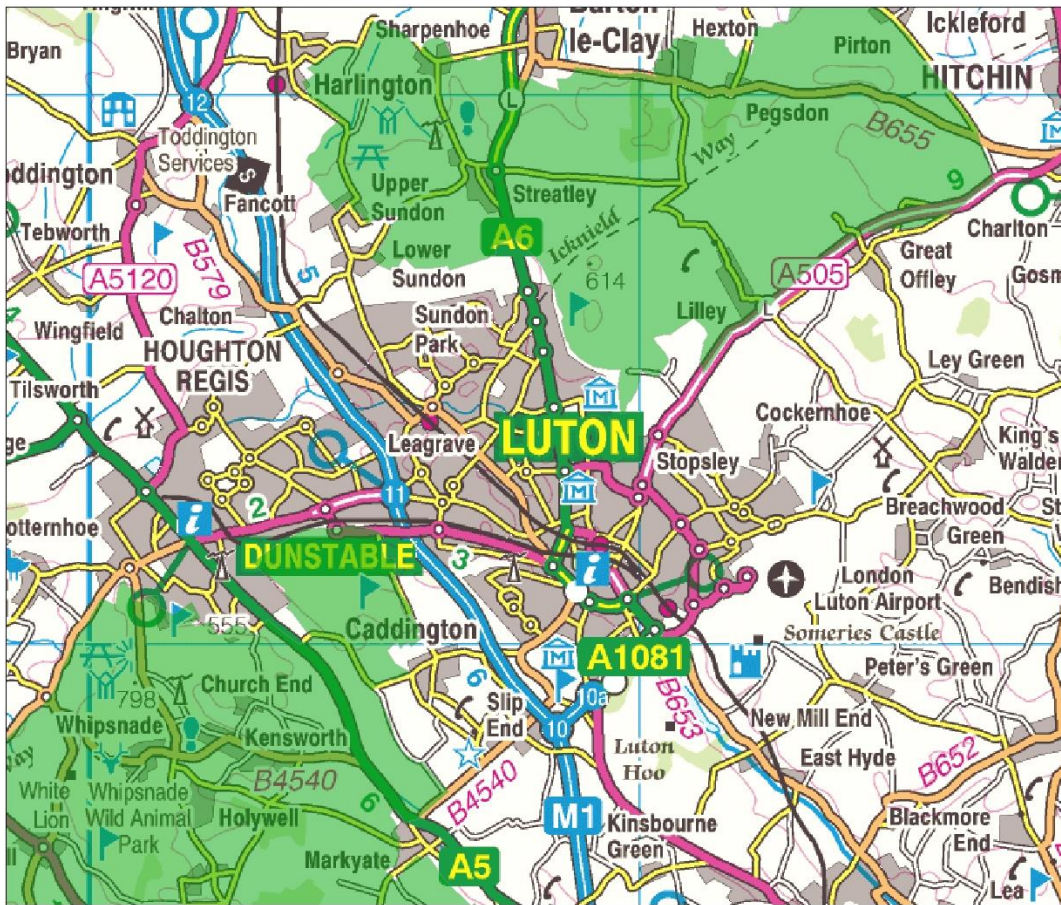
"(1) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty."

**List of Organisations providing Nominees to the Chilterns AONB Conservation Board**

The Chilterns Conservation Board has 27 board members, all drawn from local communities:

- Buckinghamshire, Hertfordshire and Oxfordshire County Councils
- Central Bedfordshire and Luton Borough Councils (unitary authorities)
- Aylesbury Vale, Chiltern, North Hertfordshire, South Buckinghamshire, South Oxfordshire, Three Rivers and Wycombe District Councils
- Dacorum Borough Council
- The Central Bedfordshire, Buckinghamshire, Hertfordshire and Oxfordshire Parish Councils (6 elected in total), and
- DEFRA (8 in total).

**Appendix 2: Map of AONB boundary around Luton**



Chilterns AONB boundary around Luton

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**Appendix 3: Extract from Chilterns Conservation Board 2013 Application to Natural England for a Review of the AONB Boundary**



AREA OF OUTSTANDING NATURAL BEAUTY

## The Case for Reviewing the Boundary of the AONB







AREA OF OUTSTANDING NATURAL BEAUTY

## **The Case for Reviewing the Boundary of the Chilterns AONB**

### **Summary**

1. The core of the Chiltern Hills is designated as an Area of Outstanding Natural Beauty. It covers only half of the area commonly accepted to be The Chilterns. That part of the Chilterns not currently designated lies on the dip slope of the Chilterns escarpment which falls south eastwards to the Thames Valley and the Colne Valley, a tributary of the Thames. The Chiltern Hills National Character Area (110) covers most of the wider Chilterns, the area also covered by The Chiltern Society.
2. A review of the AONB boundary provides a welcome opportunity to reconsider whether more of the Chiltern Hills should be designated as AONB.
3. The Chilterns Conservation Board requests that Natural England consider reviewing the boundary of the Chilterns AONB in four areas covering a total of 331 sq.kms (Map 1);
  - North Hertfordshire - an area to the south of Hitchin and east of Luton. (Area1- 92 sq.kms)
  - South Buckinghamshire - the area between the River Thames, Slough and Chalfont Common (Area 2 – 81 sq.kms)
  - Thames Valley – the area bordered to the north by the Thames and between Cookham (north of Maidenhead) and Caversham (north of Reading) (Area 3 – 78 sq.kms)
  - Eastern Area – the area between Chesham, Amersham, Berkhamsted and Hemel Hempstead (Area 4 – 80 sq.kms)
4. It is the view of the Conservation Board and relevant partners that these areas are worthy of consideration for designation as part of the Area of Outstanding Natural Beauty as they meet the criteria for designation, including the primary justifications of landscape quality. They also are important as they: link local towns and surrounding countryside; provide extensive opportunities for recreation and environmental education, and contain significant numbers of designated sites and areas of environmental and cultural heritage.
5. In selecting areas to be, potentially, considered for designation as AONB the Board and its partners are confident they meet the criteria given in the guidance issued by Natural England in March 2011, in particular that weight must be given to:

- Landscape Quality
  - Scenic Quality
  - Relative wildness
  - Relative tranquillity
  - Natural heritage features
  - Cultural heritage
6. The Board is aware that recreational opportunities are not a reason for designation of an AONB. However, the Conservation Board does have a statutory purpose to promote enjoyment and understanding of its special qualities. The reality is that the importance and popularity of the Chilterns for recreation is considerable. It is already one of the most visited protected landscapes in Europe with 55 million visits per annum. All four of the proposed areas are in themselves important for their recreational opportunities and are an integral part of the wider access networks and appeal of the Chiltern Hills. For example, both the Chiltern Way and Chiltern Cycleway link the AONB and the proposed areas.
7. It is proposing these four areas the requirements set out in the letter from Natural England of 20<sup>th</sup> June 2013 have been given considerable weight.
- Ecological connectivity
  - Climate Change
  - Public Engagement with nature
  - Public benefits from a healthy natural environment.

### **Landscape Character**

8. Areas 1, 3 and 4 fall within the Chilterns National Character Area and Area 2 lies in the Thames Valley NCA. All four exhibit the typical landscape character of the Chiltern Hills - a chalk escarpment facing north-west with a dip slope to the south east running into the Thames Valley. The four areas proposed for possible inclusion in the AONB fall in the transition zone of dip slope to the Thames Valley (including the River Colne). This is an area where the boundary is currently convoluted and long thought to have excluded areas that should have been included at the time of the last boundary review in 1984-1990.
9. It is notable that they are all encompassed by the area covered by The Chiltern Society.
10. Area 2, in South Bucks, although not in NCA 110, is the original ancient designation of Chiltern Hundred and culturally is very much part of the Chilterns including the renowned Burnham Beeches National Nature Reserve. It represents the transition between the Chilterns escarpment and the Thames Valley.
11. The Thames is currently the boundary for a considerable part of the AONB but only includes one side of the river and the river valley. Inclusion of Area 3 will ensure that a more comprehensive landscape approach can be countenanced.

### **Evidence Base**

12. The Board, and its partners, have based the case on the evidence provided by the following data sets:

- Natural Character Area Profiles
  - Landscape Character Assessments for; Buckinghamshire; Hertfordshire; Wokingham Borough; and the Royal Borough of Windsor and Maidenhead
  - Geology and soils maps
  - Historic Landscape Characterisation
  - Woodland including Ancient Woodland
  - Common land
  - SSSIs, NNRs and SACs
  - Registered Parks and Gardens
  - Conservation Areas
  - Listed Buildings (Grade I and Grade II\*)
  - Scheduled Ancient Monuments
  - National Trust Property
  - Public Rights of Way, National Trails and promoted routes
  - Open Access Land
  - Priority Habitats
13. To support the four proposed areas the Board and its partners have compiled the same supporting evidence base for each.
14. The Board is conscious that, whilst all 4 areas exhibit, strongly, various typical characteristics of the Chilterns, they are also distinct in many ways. Whilst the Board requests that the merits of including all four areas as a group are taken into account, it wishes them to be considered on their individual merits too.

### **The Boundary**

15. The Board notes the advice in page 10, of the Guidance for assessing landscapes for designation as National Park or AONB - March 2011, where Natural England states that, "It is not necessary to identify a precise 'hard' boundary for an area in relation to which the technical criteria are considered at the initial stage." This accords with our own view of the process as it would be both impractical and undesirable to do so at this formative stage.
16. Accordingly, the Board has deliberately not identified a precise boundary for each area. Whilst a potential AONB extension has been identified with a possible boundary, usually in line with the boundary of the landscape character area units, a more in depth assessment is needed to determine the most appropriate boundary should the Chilterns be selected as an AONB for further boundary review work.

## **Area 1 – North Hertfordshire**

**Total Area – 92km<sup>2</sup>**

Currently the southern boundary of the AONB follows the A505, a dual carriageway which runs north eastwards in a more or less straight line from Luton to Hitchin. This road does not follow any natural feature and must be considered an arbitrary boundary. The natural landform and landscape character runs across the line of the road from north to south following the dip slope of the Chiltern escarpment towards the River Colne, a tributary of the Thames.

Despite the A505 being a major road it sits down in the landscape and does not unduly affect longer views. The area put forward for consideration lies to the south of this road. There is no discernible difference in the landscape on either side of the road. This is borne out by a series of considerations including the: geology; soils; landscape character, and Historic Landscape Characterisation.

The area falls between the growing towns of Luton and Hitchin and forms part of the setting of both. All of the proposed area lies within Hertfordshire; in fact all of it lies within North Hertfordshire district.

### **Landscape Quality**

A relatively large area is owned by three estates which have maintained, what could be called, a traditional approach to estate management. In addition to extensive areas of mixed farmland there is a good network of field boundaries and woodland. Shooting for game birds remains a high priority for each landowner. There are relatively large areas of land in stewardship including HLS.

The extent of the area proposed for consideration as AONB is based on the boundary of the landscape character units.

### **Scenic Quality**

This is one of the most unspoilt parts of Hertfordshire and, whilst adjacent to Hitchin and Luton, there are no large towns or villages within the area under consideration. It is typified by a well-managed area of lowland mixed farming and woodland and a network of ancient lanes. Running through the heart of the area is the Mimram Valley, which in the southern part of the area includes the River Mimram (chalk stream flow is erratic and often doesn't flow the full length of the valley) . This is a typical chalk stream and has working watercress beds at Whitwell.

Many of the villages and houses display architectural features and styles showing their origin as estate holdings.

### **Relative Wildness**

This has been a well-managed area for centuries largely due to the dominance by traditionally managed estates, including the Bowes-Lyon family (the Queen's mother's family). There is a notable absence of discordant features and activity giving a sense of getting away from it into an area of farmland still relatively rich in wildlife .It has a timeless quality which is rare in this part of the county.

## **Relative Tranquillity**

In the busy south east and east of England all such assessments are based on relative perception. Compared to surrounding areas this is a haven of peace and tranquillity. It has no large settlements or busy roads. There is an extensive network footpaths, bridleways, cycleways and promoted routes allowing those who are seeking the quiet enjoyment of the countryside plenty of opportunities.

Luton airport lies to the west of the area and this inevitably disturbs that sense of tranquillity. That affects all of the existing AONB as it lies under the flight paths and holding stacks for Luton and Heathrow airports.

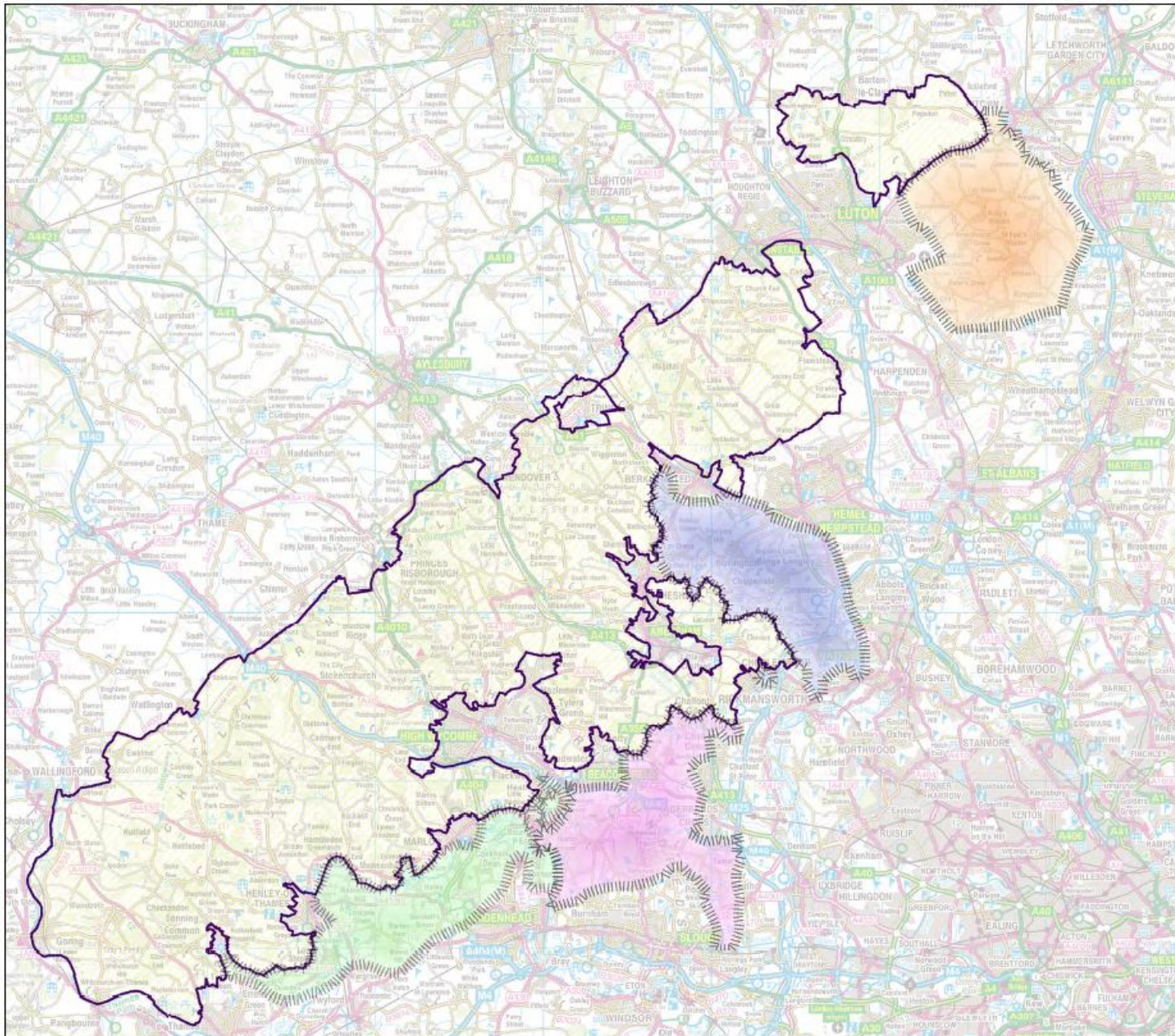
## **Cultural Heritage**





The area is notable for a number of extensive registered parks and gardens. Close to the boundary of the proposed area is the Grade 1 Luton Hoo mansion and its Capability Brown landscape.

## **Support**

Support for consideration of the area as AONB is provided by a cabinet resolution (28/09/2010) of North Herts DC; Cllr Richard Thake, Herts CC; Cllr Ian Reay appointed to the Conservation Board by Herts CC and Liz Hamilton, chairman of the CPRE Hertfordshire.





-  Area 1: North Hertfordshire
-  Area 2: South Buckinghamshire
-  Area 3: Thames Valley
-  Area 4: Eastern Area

 Chiltern AONB

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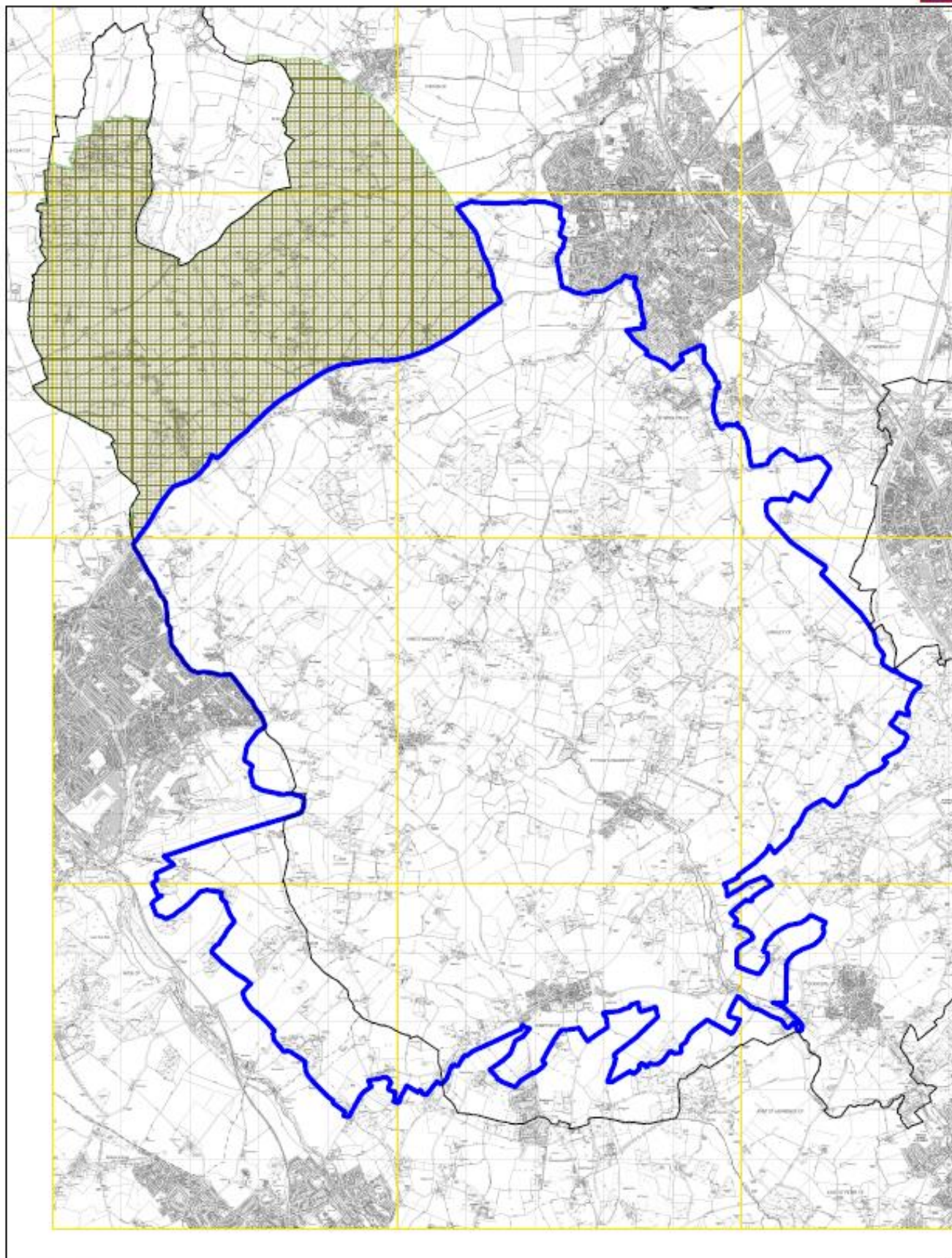
Potential Chiltern AONB Boundary Variations

Drawing 1: All Areas

**Appendix 4. Map of Proposed Chilterns AONB Boundary Review  
prepared by North Herts District Council in 2013**

Note the Proposed Chilterns AONB extension  
includes all of the land now proposed  
as a housing allocation under  
EL1, EL2 and EL3





Scale: 1:50,000  
Date: 04.10.13

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