

Luton HMA and Site Selection Assessment Report

Critical Assessment of Site Selection

On behalf of **North Herts District Council**



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Appendix A Initial site assessments

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1 Introduction

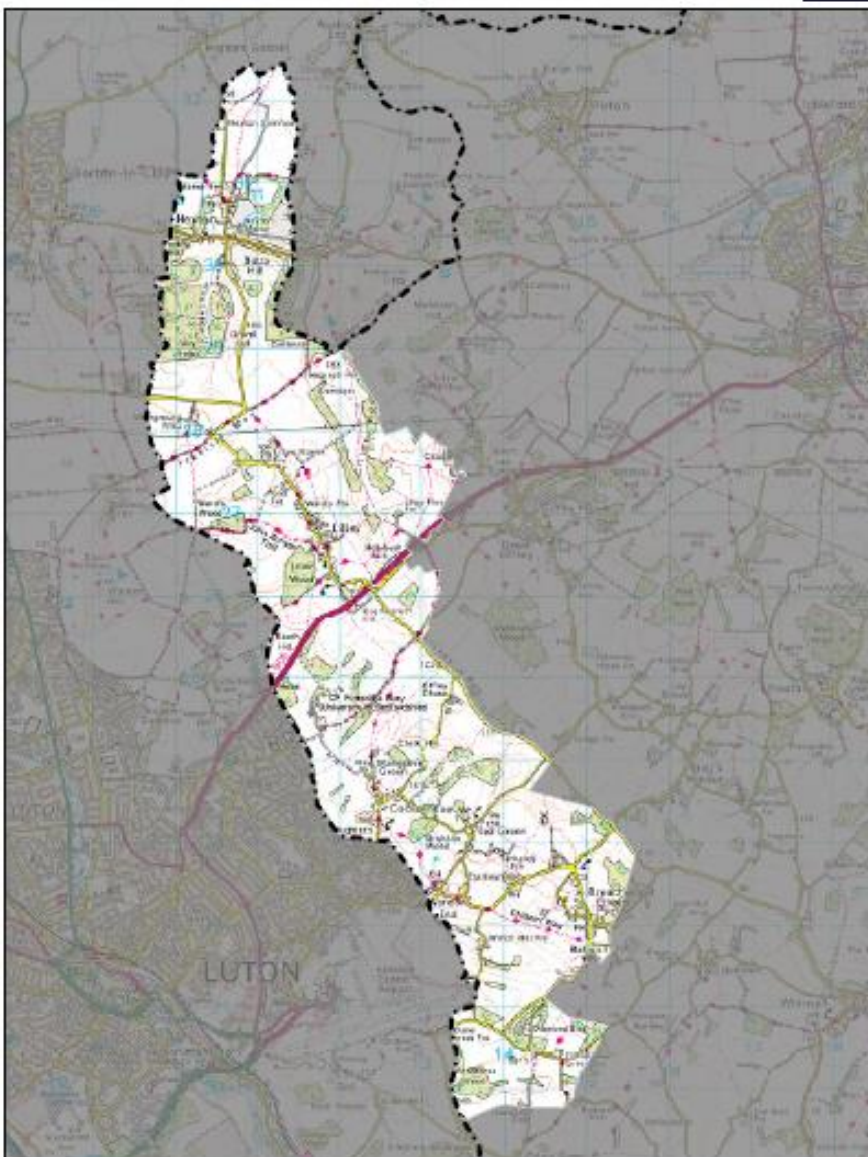
- 1.1.1 PBA has been commissioned by North Herts District Council to produce a critique of the Council's selection of three potential site allocations in the west of the local authority area, over other potential sites, which would provide a strategic urban extension to the Luton urban area, to help meet Luton's housing need.
- 1.1.2 The Council consulted upon a Preferred Options Local Plan document in 2014, which set out that the housing allocations could potentially deliver a total of 2,100 homes within the Luton HMA area.
- 1.1.3 The identified draft allocated sites in North Herts, to the East of Luton include:
- EL1 - Wandon Park Site;
 - EL2 - Wandon Park extension Site; and
 - EL3 - Land west of Cockernhoe Site.
- 1.1.4 This report explores whether the Council has undertaken the right approach in selecting these sites and whether the approach has been undertaken in a robust way. The report structure is set out below:
- **Section 2** sets out the background to Luton's housing need requirements beyond the Luton boundary and how this has been addressed so far within North Herts;
 - **Section 3** provides the method for how PBA have undertaken this study;
 - **Section 4** identifies the area considered by this report;
 - **Section 5** assesses the North Herts evidence base relating to Green Belt and landscape;
 - **Section 6** pulls together site assessment work undertaken by the Council for land within the area of search, which would meet Luton's housing need within North Herts. This work also includes further Green Belt and landscape assessments of sites, undertaken by PBA; and
 - **Section 7** sets out PBA's conclusions and recommendations to the Council.

2 Background

2.1 Luton Strategic Housing Market Assessment 2013

- 2.1.1 The Luton and Central Bedfordshire Strategic Housing Market Assessment (SHMA) was completed in 2013 and identifies an Objectively Assessed Need (OAN) of 43,300 dwellings, across the two local authority areas, over the 20 year plan period 2011-2031. Of these, 17,800 homes are attributed to Luton. The Luton HMA extends significantly into the Central Bedfordshire administrative area, and also encompasses a small area of the western part of North Herts. The HMA also extends into Aylesbury Vale, though neither of these local authorities border the Luton urban area. **Figure 2.1** shows the extent of Luton HMA area within North Herts local authority area.

Figure 2.1: HMA area in North Herts District



Source: North Herts District Council

- 2.1.2 The land availability work, undertaken by Luton Borough Council as part of the preparation of the Pre-Submission Local Plan, indicated that the borough had a maximum capacity of around 6,000 homes. This is a considerable way from the full OAN of 17,800, leaving a shortfall in

supply of around 11,800. As such, Luton and the neighbouring authorities were required to work together under the NPPF Duty to Cooperate in order to address the significant unmet need from Luton in areas outside the borough.

- 2.1.3 Following the Luton SHMA and SHLAA work, North Herts and the other neighbouring authorities, notably Central Bedfordshire, engaged in negotiations in order to address the significant identified unmet need from Luton, with the aim of establishing an appropriate distribution for the areas bordering the Luton urban area. Nonetheless, the conclusions of this work were pre-empted by Central Bedfordshire, who published their Proposed Submission Draft Plan in advance of any conclusions regarding housing distribution to within Central Beds, to meet Luton's requirement.
- 2.1.4 Central Bedfordshire's plan made provision for 5,400 of the unmet need and was challenged by Luton Borough Council on the grounds of the authority failing in its duty to cooperate. Following the rejection of this challenge (December 2014), Luton appealed the decision which was subsequently dismissed (May 2015). Consequently, an unmet need of more than 5,000 dwellings remains.
- 2.1.5 The final number of homes to be attributed to each of Luton's neighbouring local authorities, including North Herts, has not been confirmed.

2.2 North Herts Local Plan Preferred Options 2014

- 2.2.1 In order to contribute to the Luton shortfall, the North Herts Local Plan Preferred Options document (2014) identified three potential development sites in the west of the local authority area, adjacent to the Luton urban area. It is anticipated that the three sites combined would be able to deliver approximately 2,100 units over the plan period. These dwellings would go towards meeting the unmet need of Luton rather than the need identified for North Herts.
- 2.2.2 The identified sites and potential yields for each site, as set out in the draft Local Plan, is set out below:
- EL1 - Wandon Park – 1,050 dwellings;
 - EL2 - Wandon Park Extension Site – 350 dwellings; and
 - EL3 - Land west of Cockernhoe Site – 700 dwellings.

Luton Borough Council response to the Local Plan consultation

- 2.2.3 Luton Borough Council (LBC) broadly welcomed the Draft Local Plan Preferred Options identifying the proposed East of Luton allocation at Cockernhoe as an indication of North Herts' commitment to contribute towards the provision to meet the housing needs of the Luton HMA.
- 2.2.4 LBC stated that they would reserve judgement on potentially higher OAN until the revised SHMA was published. Therefore indicating that the level of housing expected to be delivered within North Herts may increase, although no quantum of development was suggested.
- 2.2.5 LBC also stated that it would have liked to have seen the identification of a link road connecting the East of Luton urban extension to the A505 in order to serve the substantial development proposed and better link the proposed development to the existing urban area. Luton Borough Council also raised concerns about the impact of the level of proposed development on the existing highways infrastructure and call for further transport modelling in order to establish the implications of the proposed development on the already congested east Luton corridor, and to identify viable links to the town centre.

2.3 Revised Luton Strategic Housing Market Assessment 2015

- 2.3.1 In Summer 2015, Luton and Central Bedfordshire completed a Strategic Housing Market Assessment (SHMA) update, which provides updated and agreed housing market area geography between commissioning authorities. The revised SHMA identified a higher Objectively Assessed Need (OAN) figure of 44,700. However, the increase in need is attributed to Central Bedfordshire, rather than Luton. Nonetheless, this could have implications for North Herts, as another neighbouring district to Luton, as Central Bedfordshire may seek to meet its own higher housing need through the 5,400 dwelling currently identified to contribute towards meeting the Luton need, thus reducing the supply addressing the Luton shortfall. Consequently, North Herts may be approached to consider providing more land to address this higher housing need figure for the whole Luton and Central Bedfordshire area. In the same year, North Herts and Stevenage SHMA update provides OAN for North Herts on a consistent basis with Central Beds and Luton update.

2.4 Growth study for Luton HMA

- 2.4.1 North Herts are working in partnership with Luton and Central Beds Councils to produce a growth study for the HMA area, to identify potential locations for future development to meet the need for the HMA. However, the Council have confirmed that it has not progressed and it is therefore unlikely to be completed within the next 6-12 months. Therefore the Council are seeking to progress the Local Plan in advance of the Governments' 2017 deadline.

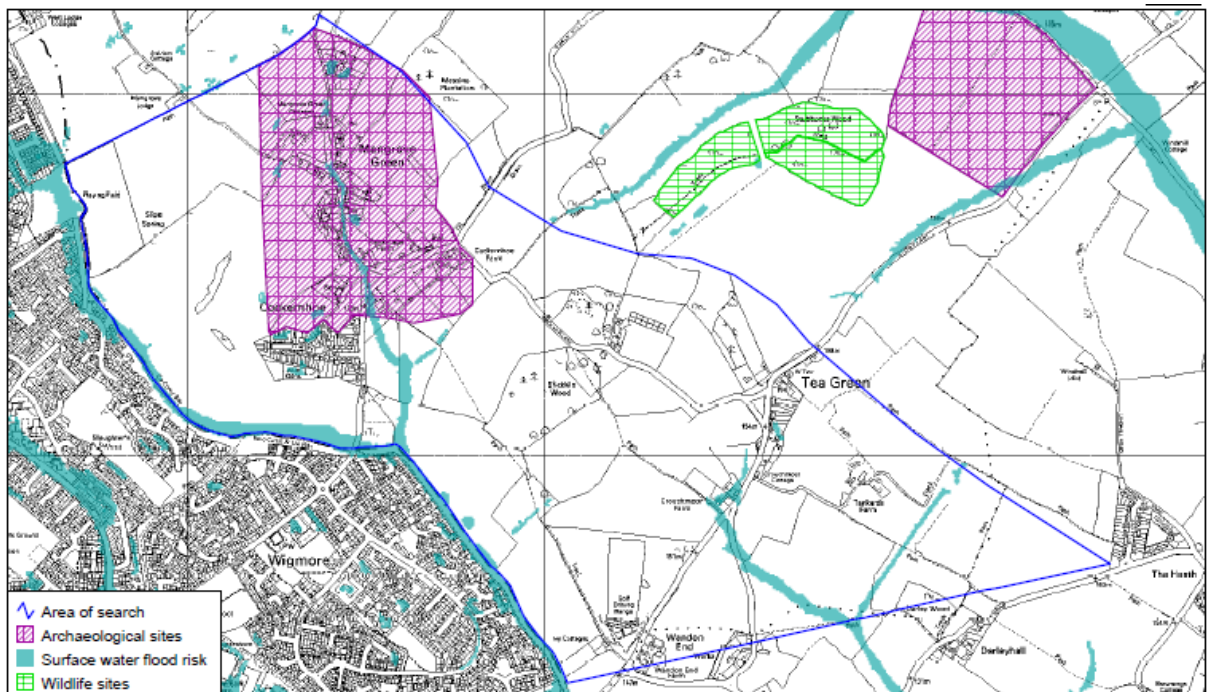
3 Method

- 3.1.1 The work undertaken has been an examination of the appropriateness of the proposed development locations proposed in the Preferred Options Local Plan consultation document (2014), to help the Council confirm for themselves that all options have been explored properly. This is also to inform the Council of any future work that could be completed to ensure the publication version of the Local Plan is robust.
- 3.1.2 It is not part of the remit for this work to consider the nature of the Housing Market Area, the scale of housing that has been identified as needed in the HMA, or which the various local authorities believe can be provided within their areas. The work is confined to relook at sites within the capacity of the HMA area within North Herts Council.
- 3.1.3 The work has been undertaken essentially as two parts. First, all of the relevant documentation (as far as is known) prepared by the Council or by consultants acting for the Council has been examined. This material has provided information on why the area in which the Council has sought to find development land has been identified, the constraints to development present in the area, the process by which the Council has arrived at its proposals, and proposals coming forward in addition to those the Council has selected. This material has included work by others on the assessment of landscape character and sensitivity, and the contribution of parts of the area to the purposes of including land in Green Belt.
- 3.1.4 Second, the area has been examined, as a desk exercise using maps and aerial photographs, and on the ground on foot by a landscape architect and spatial planner. This groundwork has had particular regard to the relationship of the study area to Luton and to the wider area, to the character of the landscape, and to the contribution of the area to the Green Belt within which it lies.
- 3.1.5 The investigation of the proposed development land has been undertaken as a comparative exercise, having regard to the type of scrutiny that the Local Plan will be subjected to. That is, the questions the report seeks to answer are:
- Has the Council identified the right area of search?
 - Does Green Belt purposes or landscape character provide a limit to development?
 - Are the sites proposed as allocations appropriate according to the relevant tests?
 - Is there land that it would be as good as or better to use to contribute to the development requirement than the land the Council is proposing to allocate?
- 3.1.6 Without in anyway offering any views of the appropriateness of different levels of growth, the report is mindful that for a variety of reasons the scale of housing provision to be made could increase as the preparation of the Local Plan progresses.
- 3.1.7 The study has looked at the proposed sites and sites proposed by others but not included in the plan, but the area generally, with some specific apparently potential sites examined as part of the investigation.
- 3.1.8 The investigation has led to conclusions on the Council's approach to the task, to the nature of the area generally, and on the merits and defensibility of the Council's proposals. In addition recommendations are provided for matters that the Council might consider in order to make its Local Plan preparations more robust and to help ensure that the development that takes place performs very well.

4 Identifying an area of search

- 4.1.1 This section looks to critique the area of search the Council has identified to find land which is suitable to help deliver some of Luton's housing need. In doing so, PBA has undertaken an independent assessment to identify the area of search for land which is potentially suitable for housing development, and comparing with the Council's method of identifying an area of search.
- 4.1.2 The Council produced a document 'Housing and Settlement Hierarchy Background Paper' (HSHBP), in November 2014. This document sets out the method and reasons for the Council's selection of the three allocated sites of a total 2,100 homes included within the Preferred Options Local Plan consultation document (2014) at pages 11 to 27. It also sets out the reasons why other sites were excluded from the site selection process, including identifying an area of search. The area of search identified by the Council, after excluding designations and constraints, is shown in **Figure 4.1** below:

Figure 4.1 Council's area of search (blue line) for sites to deliver Luton's housing need



Source: Housing and Settlement Hierarchy Background Paper (Nov 2014)

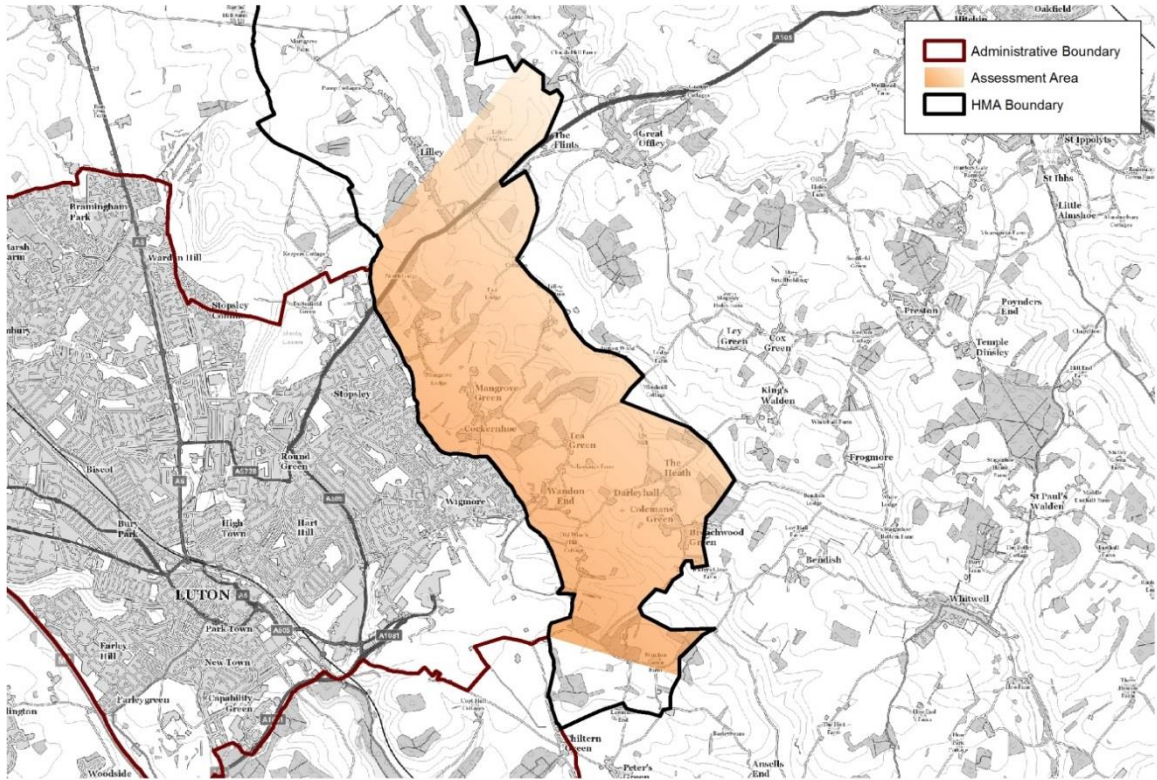
4.2 Identifying an area of search

- 4.2.1 As set out in **Figure 2.1**, a strip of land to the west of Luton, within North Herts local authority area, is within the Housing Market Area (HMA). The HMAs undertaken for Luton and Central Bedfordshire Councils jointly and the North Herts study contains the same extent of Luton HMA area within North Herts land. This is shown again in **Figure 4.2** below.
- 4.2.2 **Figure 4.2** also shows the extent of North Herts District Council land, within the Luton HMA, which relates to the Luton local authority boundary. This is the area PBA recommend as the starting point for identifying the area of search, and subsequently critiquing the selection of sites to meet Luton's housing need. This approach is in line with the Council's starting point for selecting and area of search to meet Luton's housing need, as set out in the HSHBP.
- 4.2.3 This area of land is adjacent Luton built up area and includes the villages of Cockernhoe, Mangrove Green, Lilley and Tea Garden. Any areas not adjacent to the Luton built up area or

linking to sites adjacent to the Luton built up area are considered as unsuitable, as these areas would not link into existing Luton communities.

4.2.4 Therefore PBA have used the area **Figure 4.2** as a starting point for selecting the area of search.

Figure 4.2 Initial PBA area of search for sites to meet Luton's housing need

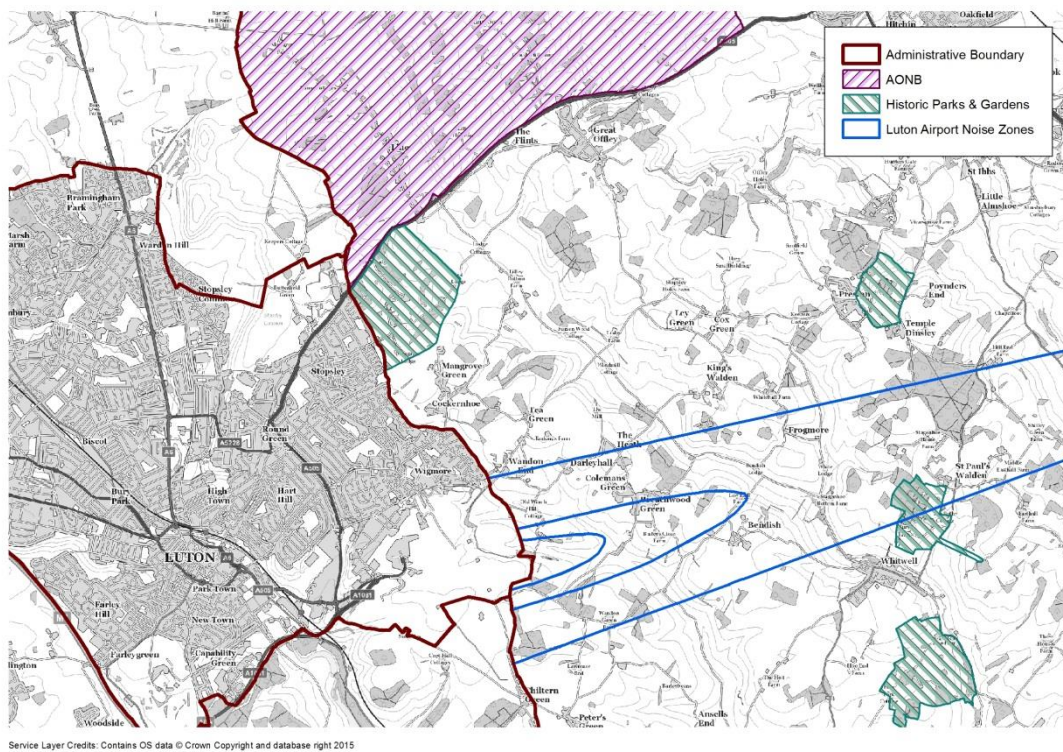


4.3 Constraints to development

Major constraints

4.3.1 Some types of policy designation, and the presence of some types of environmental asset, are assumed to preclude any prospect of development taking place. **Figure 4.3** shows the major constraints to development within the area of Luton's fringe within North Herts district. With this area there are three major constraints. The northern part lies with the Chilterns Area of Outstanding Natural Beauty, and a large area is a designated historic parks and gardens (Putteridge Bury), whilst the south of the area is affected by the Luton Airport aircraft noise zone.

Figure 4.3 Major constraints East of Luton



4.3.2 PBA would suggest that these three designations are major constraints to strategic development and therefore their areas should be excluded from further study. This analysis mirrors the explanation provided within HSHBP.

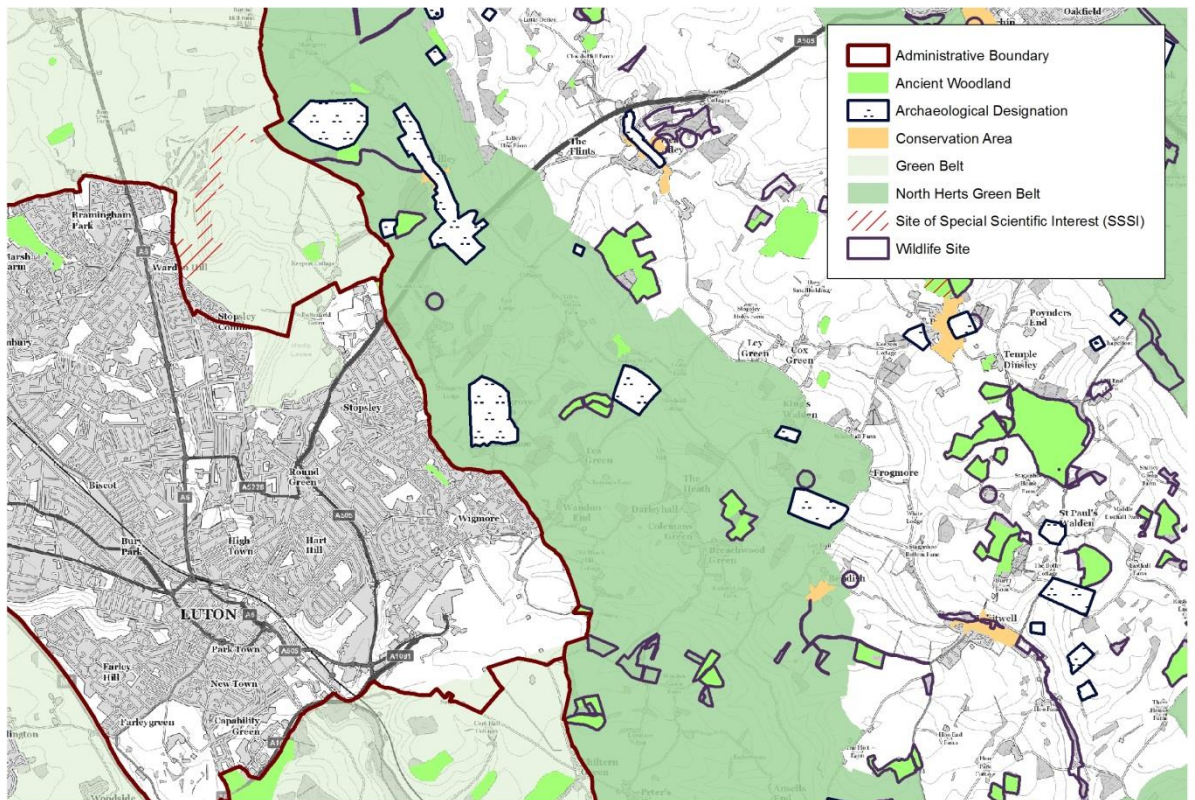
Other constraints

4.3.3 **Figure 4.4** shows the other constraints and designations. These include Ancient Woodland, Conservation Areas; wildlife sites and archaeological designations. The majority of these designations are smaller areas of land and therefore would not preclude sites from being assessed for strategic development to meet Luton's need.

4.3.4 All of the area is within the Green Belt, and this is dealt with in **Section 5**.

4.3.5 The presence of these designations inform the commentary PBA has provided on site specific assessments in **section 6** of this report.

Figure 4.4 Map – Other constraints and designations East of Luton

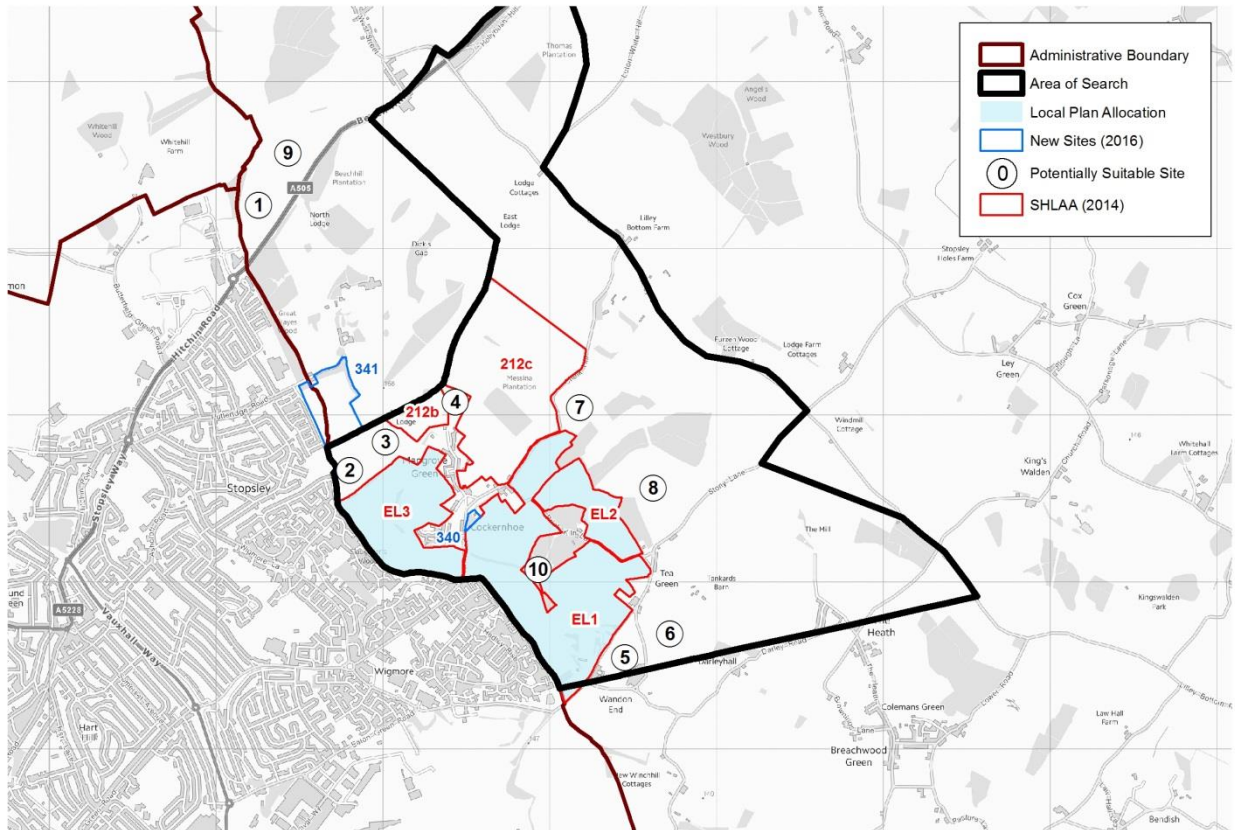


4.4 Refined area of search

4.4.1 **Figure 4.5** shows the refined area of search after taking out the major constraints and land outside the Luton HMA area. This leaves a relatively limited area of land which has the potential to deliver housing to meet Luton housing need. This is in line within the HSHBP (Map 3).

4.4.2 The refined area of search, at this stage, does not include an analysis of the area against Green Belt purposes and landscape character assessment. This further analysis is provided within **section 5**, and with the purpose of providing advice on refining the area of search further.

Figure 4.5 Refined PBA area of search



4.4.3 **Figure 4.5** also maps sites which are located within the strategic area of search, through the following sources:

- Five SHLAA 2014 sites - three of these sites are allocated in the Draft Preferred Options Local Plan consultation document (2014);
- Two new sites promoted to the Council since the Local Plan consultation in 2014; and
- Ten parcels of land which were not promoted to the Council, but which PBA have identified within the refined area of study. Sites 1 and 9 were also included to check the quality of the AONB in this location, adjacent the built up area of Luton.

4.4.4 The Council has assessed the availability and suitability of the five SHLAA sites and concluded that the three sites subsequently presented as draft allocations, were the best sites to deliver housing for Luton. However, the Council has not assessed the suitability of the other two sources of sites: those sites promoted to the Council since the Local Plan consultation; and land not previously promoted to the Council but identified for consideration by PBA.

4.4.5 Therefore PBA have pulled together and inputted into an initial assessment of the suitability of the sites in all three categories above, and the findings are presented in **section 6** and **Appendix A** of this report. However, before looking at specific sites, PBA have looked at the Green Belt and landscape assessments undertaken by the Council, at a strategic level, to provide a critique of this work, as well as potentially inform a further refined area of search. This further analysis is provided within **section 5** below.

5 Green Belt and landscape assessments

5.1.1 This section provides a critique of the work completed by the Council to date, on assessing the Green Belt and landscape character within the area of search, to help deliver housing delivery to meet Luton's housing need. This section also provides broad findings of PBA's further assessment of the Green Belt and landscape character on a strategic level within this section.

5.2 Green Belt assessment critique

5.2.1 Part 1 of the Green Belt Review (NHDC; 2014) considered the contribution that Green Belt land makes to four of the five Green Belt purposes from the NPPF, and provides part of the Council's Evidence Base.

5.2.2 The Framework establishes five purposes for including land within the Green Belt. These are:

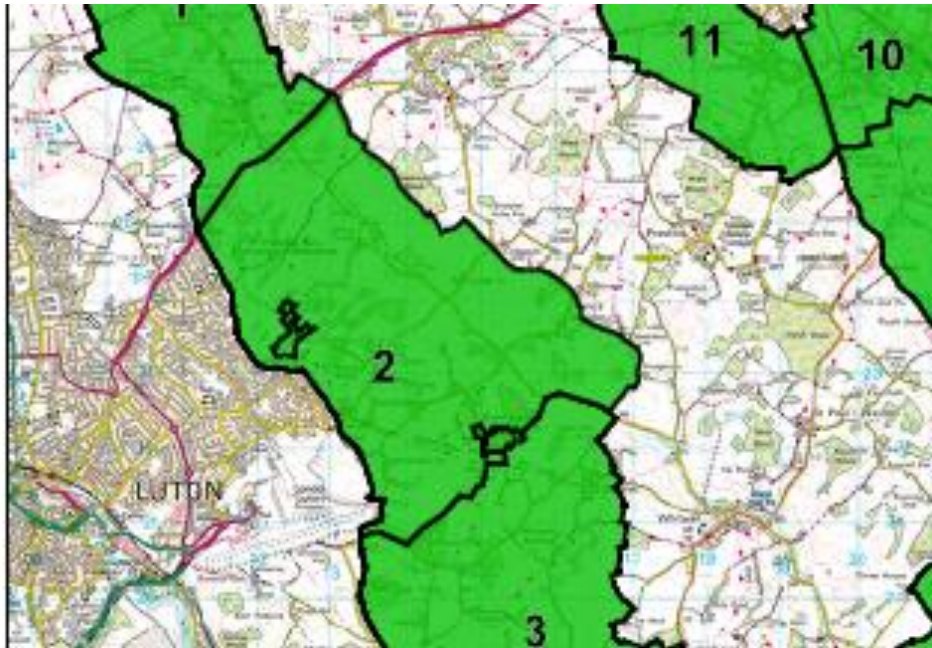
- To check the unrestricted sprawl of large built-up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and spatial character of historic towns
- To assist in urban regeneration, by encouraging the recycling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

5.2.3 The Framework does not give numbers to the five purposes, but this has been done for convenience in this report. Neither does the Framework attach any hierarchy to the purposes so that they are assumed to all be of equal importance, and this is the approach followed in this review.

5.2.4 The methodology used is set out and, overall, appears to be sound, although we do have doubts about the use of a numerically based 'scoring' system as it implies a more scientific approach than is appropriate within the context of the very generalised nature of the purposes which can be open to varied interpretation and application; the thresholds of the resulting scoring 'bands' also dictates the outcomes. The absence of a 'No contribution' assessment is also noted – for example, where a parcel makes no contribution to a purpose it still achieves a score of 1 which has an influence on the overall assessment score of that parcel, potentially meaning that a parcel may be assessed as making a higher contribution than should be the case.

5.2.5 The proposed allocations are located within Parcel 2 defined in the Review, as shown in **Figure 5.1**. This is a large parcel that extends south from the A505 along the eastern side of Luton to a lane running broadly south west/north east of Breachwood Green, and extending up the eastern valley side of Lilley Bottom. It may be argued that this parcel could have been subdivided along well defined internal features (lanes) to create two or three separate parcels; the assessment of the southern part, which is not contiguous with the Luton built up area, could be expected to produce different results.

Figure 5.1 Green Belt parcels around Luton boundary



Source: Green Belt Review Part 1 (Nov 2014) – North Herts District Council

5.2.6 Parcel 2 was assessed in the Review as follows:

Table 5.1 Council's Green Belt assessment of parcel 2

| Check unrestricted sprawl of large built-up areas | Prevent merging of neighbouring towns | Safeguard countryside from encroachment | Preserve setting and special character of historic towns | Overall evaluation | Overall contribution to Green Belt purposes |
|---|---|---|--|--|---|
| 3 - This area is Particularly important in preventing sprawl from Luton eastwards into North Hertfordshire. | 1 - Although located in the gap between Luton and Hitchin plays limited role in preventing merging due to location. | 3 - Prevents Cockernhoe/ Tea Green / Mangrove Green expanding into countryside. | 1 - No historic towns in this area. | Important in restricting growth of Luton eastwards into Lilley Bottom valley and preserving the villages of Cockernhoe and Breachwood Green. | 8 – Although significant for sprawl and countryside purposes it is limited for merging and historic towns so has moderate overall contribution. |

Source: Green Belt Review Part 1 (Nov 2014) – North Herts District Council

5.2.7 As may be seen the parcel is adjudged as making a significant contribution to preventing sprawl and safeguarding the countryside. The following observations on this assessment can be made:

- 'First' purpose – The eastern boundary of the built up area is generally well defined by a strong wide tree belt, in places supplemented by linear open space. This is an enduring boundary along a well-established landscape feature, which also makes a very important visual contribution to the containment of the built up area (hence reducing the sense of encroachment of the built up area into the countryside); and
- 'Third' purpose – whilst, as noted, designation constrains inappropriate development within/around the small settlements of Cockernhoe, Mangrove Green and Tea Green, it also safeguards the countryside from the encroachment of Luton beyond the existing well-defined edge. Overall the northern part of the parcel (which is the part considered for this study) has a well-defined principally rural character and is free of encroachment from inappropriate development (with perhaps the exception of the recent small residential development of the old allotment site on the southern edge of Cockernhoe).

5.2.8 It is agreed that the parcel (in the area adjoining Luton) makes these contributions to a high degree. The overall assessment that the parcel makes a 'moderate contribution' appears to be based on the premise that if land is found to make a significant contribution to only some of the purposes, then it 'performs' less well in overall terms (this is a downside of numerical scoring systems). Green Belt purposes are of the same importance (there is no 'weighting') and if only one purpose is of high importance then the parcel is therefore making an important contribution to the Green Belt. On the basis of our observations, this parcel makes a 'significant' contribution to Green Belt purposes.

5.2.9 However, it is noted that the assessment at a relatively strategic level there may still be capacity for smaller parcels to be released without significant harm to the overall purposes. Part 1b of the Review examined the contribution of potential development sites to Green Belt purposes. The assessment matrix included is reproduced below:

Table 5.2 Council's Green Belt assessment of draft allocated sites East of Luton

| Property description | | | | Attributes | Green Belt Assessment | | | | | |
|----------------------|--|----------------------|-------------|----------------------|--|--|---------------------------------|---|--|---|
| Ref | Address | Settlement or parish | Urban/rural | Primary proposed use | Sprawl | Towns merging | Safeguarding countryside | Preserve settling of historic towns | Score | Boundary Detail |
| 212a (EL3) | SW of Cockernhoe | Offley | rural | residential | 2 - development on 2 sides | 2 - Site abuts Cockernhoe and Mangrove Green. Site is more than 5km to Hitchin | 3 - outside settlement boundary | - Site not within or affecting setting of a conservation area | 8 - making a moderate contribution to Green Belt | Urban area boundaries and field boundaries are defensible Site adjoins residential development on the eastern edge of Luton and extends eastwards to Mangrove Green wrapping around the western side of Cockernhoe. |
| Ela (EL2) | East of Luton - North of Brick Kiln Lane | Offley | rural | residential | 3 - no development on any side of the site | 2 - Site abuts Cockernhoe and Tea Green. Site is more than 5km to Hitchin | 3 - outside settlement boundary | 1 - Site not within or affecting setting of a conservation area | 9 - making a moderate contribution to Green Belt | Chalk Hill, Brickkiln Lane and Stony Lane as well as existing settlements provide the boundaries. |
| E1b (EL1) | East of Luton - south of Brick Kiln Lane | Offley | rural | residential | 3 - development on 1 side | 2 - Site abuts Cockernhoe and Tea Green. Site is more than 5km to Hitchin | 3 - outside settlement boundary | 1 - Site not within or affecting setting of a conservation area | 9 - making a moderate contribution to Green Belt | Chalk Hill, Brickkiln Lane and Stony Lane as well as existing settlements provide the boundaries. |

Source: Green Belt Review Part 1b (Nov 2014) – North Herts District Council

5.2.10 Proposed allocation site EL3 is identified as 212a; proposed allocation site EL2 as Ela; and proposed allocation site EL 1 as ELb.

5.2.11 PBA's comments on this part of the assessment are as follows:

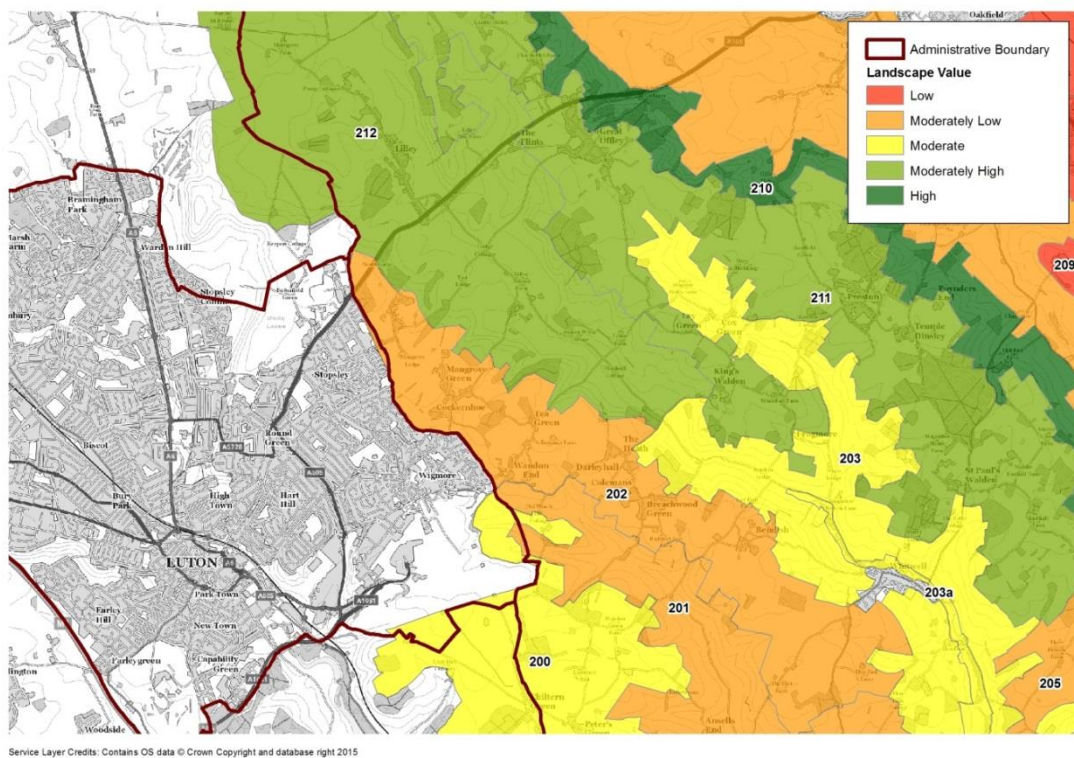
- The overall scores for allocation sites EL1 and EL2 are slightly lower (by one point) than the score recorded for Parcel 2 in the Part 1a assessment. This is a result of the slight contribution afforded to the second purpose (prevention of towns merging) in this assessment compared to the Part 1a assessment which recorded a limited contribution. This appears to be inconsistent as it would be expected that the larger parcel, which extends much further towards Hitchin, to attract the same (or a higher score) based on scale and proximity.
- The assessment criteria are somewhat simplistic. For example:
 - Part of the assessment criteria for 'openness' (provided in table 8) uses the basis of relationship to built-up areas as the basis for the assessment; for example, if a site is bounded on two sides by development it would be deemed to contribute less to openness. However, this is too simplistic; much depends upon the nature of the site and the boundaries of the adjoining development. The opposite could be said to be the case; if that site were to be largely free of development it may provide a very important perception of openness which is enhanced as result of its juxtaposition with development; or it may be that those adjoining built up edges are well contained by woodland for example such that the influence of the urban areas is contained. The south eastern part of parcel 212a (proposed allocation site EL3) is a case in point; even though there is a clear visual relationship between the edge of Luton and southern edge of Cockernhoe, there is a very clear sense of openness between the two due to the undeveloped open nature of the arable land that separates them;
 - The consideration of the second purpose (merger of towns – although this is not a purpose that is relevant to these particular proposed allocation sites) is based on measured distances between towns; such an assessment should also be based upon how the intervening land contributes to the purpose – towns that are separated by short distances may be perceived to be completely separate due to the nature of the intervening landscape; and
- The assessment of the third purpose (safeguarding the countryside) is based upon a simplistic consideration of the relationship of the site to the settlement edge; it should be informed by consideration of prevailing landscape character and particularly the existence or absence of inappropriate development.

5.2.12 The overall result of the Part 1b assessment is that the proposed allocation sites provide a 'moderate overall contribution to Green Belt purposes'. As noted in the earlier comments on the Part 1a assessment it is our view that the sites' fulfilment of Green Belt purposes is more significant than identified in the Review. It is therefore of critical importance that it can be demonstrated that other locations (outside North Herts) do not contribute to Green Belt purposes or fulfil them to a lesser degree, or that there are other strong influencing factors that mean that, on balance, this is the most appropriate location for Green Belt release.

5.3 Landscape assessment critique

5.3.1 The North Herts and Stevenage Landscape Character Assessment (Babtie; 2011) identifies landscape character areas (LCAs) and assessment of the landscape and visual sensitivity of these LCAs, as shown in **Figure 5.2**. It forms part of the evidence base and has no doubt been subject to scrutiny and consultation prior to informing the Local Plan. As such it is assumed that it may be considered to be robust. It is not within the scope of this brief to provide a detailed consideration of the methodology used in that assessment.

Figure 5.2 Landscape assessment areas around Luton boundary



Source: North Herts and Stevenage Landscape Character Assessment (2011)

- 5.3.2 The proposed allocation sites fall within LCA 202 – Breachwood Green Ridge. This is an extensive character area extending from just within the AONB north of the A505 and Putteridge Bury to south of Whitwell (a distance of around 7.5km), separating two arms of the Whitwell valley (Lilley Bottom and Whiteway Bottom) which converge at Whitwell, with a reasonably consistent width of 1-1.5km.
- 5.3.3 The Assessment concluded that the LCA had the following sensitivities:
- Landscape Character Sensitivity – Moderate;
 - Visual Sensitivity – Moderate; and
 - Landscape Value (derived from the above) – Moderate to Low.
- 5.3.4 The Assessment then considered the capacity of the LCA to accommodate development. In terms of urban extensions it concluded it had low to moderate capacity for large urban extensions/new settlements (over 5ha.) and moderate capacity for small urban extensions.
- 5.3.5 Whilst the assessment identifies the main characteristics of this LCA our judgement, based on a detailed visit to the area, is that the area possesses considerable local variations in character which an assessment at this scale does not identify. It is also noted that judgements that are based on a numerical scoring approach can often over-ride informed professional judgement (effectively applying a scientific approach to a subject that requires significant subjective interpretation and judgement).
- 5.3.6 The proposed allocation sites form the immediate and slightly more distant hinterland of the adjoining edge of Luton. The ridge, which is broad extending south east through Mangrove Green and Tea Green to The Heath is of fundamental importance to the containment of the built up area from the wider countryside of the Lilley Valley beyond – an open, distinctive and

largely undeveloped chalk valley from and across which are extensive views to the Breachwood Ridge (a landscape that The Landscape Partnership¹ state *'is as good if not better than the landscape which lies to the north within the AONB'* (para 6.7). The judgement that the area is of moderate visual sensitivity seems to ignore the fact that the high sensitivity of the eastern parts of this part of the character area (where the ridge is open to view from and across Lilley Bottom where there is, in our view, high visual sensitivity). The assessment also does not:

- Reflect the local contribution that much of the allocation area makes to the immediate setting of the eastern edge of the town;
- Identify the contribution to the context and setting of the small settlements of Cockernhoe and Mangrove Green (which are both key characteristics of this part of the LCA but which are not identified as such under 'Key Characteristics');
- Identify the remarkable sense of remoteness from the town that exists only a short distance from the edge of the built up area (although it does mention that tranquillity improves further from the town but aircraft noise is an issue);
- Refer to the Putteridge Bury Historic Park and Garden designation which should influence judgements regarding Landscape Value; and.
- Substantiate the judgement that the LCA possesses a Low to Moderate capacity for large urban extensions (which the allocation would be).

5.3.7 A very distinctive characteristic of the proposed allocation area is the clear edge and containment that it provides to the built up area with productive farmland extending right up to the edge of the town. The west facing slopes of Whiteway Bottom defines the immediate setting of the built up area; they fall within the visual 'envelope' of the adjoining part of the town. As the land rises up to and onto the ridge, topography and vegetation cover comes into play such that the land becomes removed from the influence of the built up area.

5.3.8 The overriding conclusion from the consideration of this assessment is that, whilst the North Herts and Stevenage Landscape Character Assessment undoubtedly provides useful background and baseline information, the allocation process should be supported by a finer grained assessment to inform the consideration of the area's suitability and capacity to accommodate the level and type of development proposed, the principal opportunities and constraints, and the key characteristics and thresholds to be respected/safeguarded (for example through green infrastructure). This would help to inform the definition of well-considered allocation boundaries and ultimately to inform the preparation of Development Briefs.

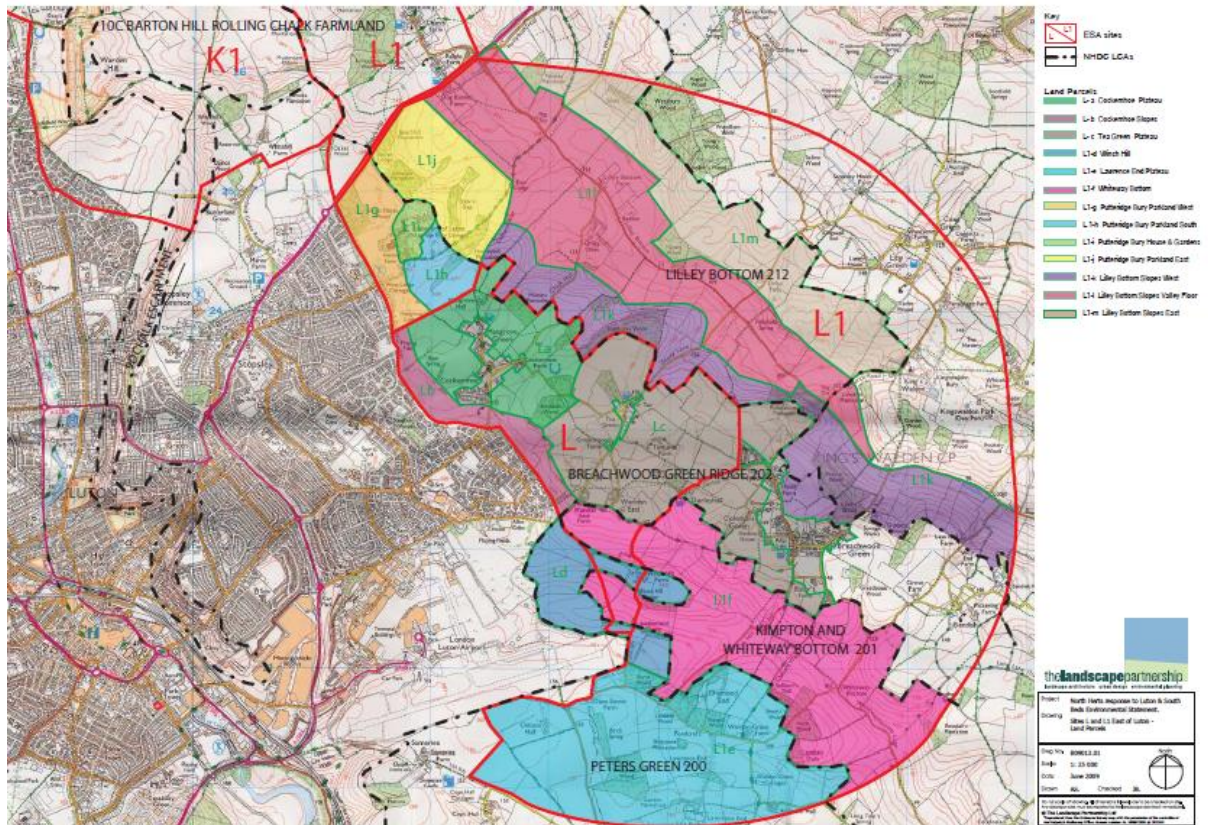
5.3.9 Interestingly the Council had already commissioned The Landscape Partnership (TLP) in 2009 (i.e. before the publication of the Babbie study in 2011) to undertake a detailed assessment of the area to inform their response to the emerging Luton and South Bedfordshire Core Strategy and related environmental sensitivity work. This work included a more detailed analysis of parcels of the land adjoining the north eastern periphery of Luton, as shown on the plan below.

¹ 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 (The Landscape Partnership; 2009)

Figure 5.3 Sites L and L1 West of Luton – Land Parcels



Source: North Herts response to Luton & South Beds Environmental States, Landscape Partnership (2009)

The proposed allocation sites are located within area L (as defined in the Environmental Sensitivity Study undertaken by Bedfordshire County Council). The area has been broken down further into smaller parcels in the TLP study, three of which are the locations of the proposed allocation sites. The findings of the work in relation to the proposed allocation sites may be summarised as follows:

Table 5.3 Landscape capacity

| TLP Parcel | Allocation sites within parcel | Landscape Sensitivity | Overall landscape capacity |
|-------------------------|--------------------------------|-----------------------|---|
| La – Cockernhoe Plateau | EL1; EL2; EL3 | Medium-High | Low-Medium Low/Medium for small scale residential development; Low for Medium and Large scale residential) |
| Lb – Cockernhoe Slopes | EL1; EL3 | Medium-High | Low-Medium Low/Medium for small scale residential development; Low for Medium and Large scale residential) |

| | | | |
|------------------------|----------|-------------|--|
| Lc – Tea Green Plateau | EL1; EL2 | Medium-High | Low-Medium Low/Medium capacity for small scale residential development; Low capacity for Medium and Large scale residential) |
|------------------------|----------|-------------|--|

Source: North Herts response to Luton & South Beds Environmental States, Landscape Partnership (2009)

5.3.10 It is therefore clear that the area is sensitive and has a consistent Low capacity for medium (100-500 units) to large scale (over 500 units) residential development – the 2100 homes proposed for the allocation sites is clearly 'large scale'. The summary Sensitivity / Capacity table included on page 23 of the TLP report does not reflect this Low capacity, referring to the parcels as Low-Medium capacity (which is only applicable to small scale development of below 100 units), which is misleading.

Limits to development – the Breachwood Green Ridge

5.3.11 The broad area within which the proposed allocation sites are located is characterised by the broad Breachwood Green ridge which separates an upper tributary of the Whiteway Bottom valley, which runs south east from the edge of Luton airport, from the valley of Lilley Bottom running north west/south east on the north eastern side of the ridge. The western flank of the tributary valley has been developed with the Luton built up area extending down the western valley side to the valley floor where the edge (and Green Belt boundary) is defined by a strong belt of vegetation; the eastern valley side, which is undeveloped except for the hamlets of Cockernhoe and Mangrove Green, steepens as it extends southwards south of Cockernhoe. The distinction between the urban area and countryside is very pronounced with productive agricultural uses extending right up to the urban boundary with some areas having a surprising sense of rurality and remoteness despite the close proximity of Luton.

5.3.12 The topography of the ridge is varied; it is broad in the northern part where it extends southwards from Putteridge Bury through Mangrove Green and Cockernhoe and becomes more complex around Tea Green due to the influence of the of dry valleys cutting back into the ridge. There are significant areas of woodland, particularly on the eastern side of the ridge/upper side of Lilley Bottom east and south east of Cockernhoe and these are distinctive characteristic elements of the wider valley landscape. Within the Whiteway valley there are also significant belts of woodland/tree belts which provide enclosure and subdivision. To the north is the Registered Historic Park & Garden of Putteridge Bury, the outer boundary of which is defined by a brick wall.

5.3.13 The most important aspect of the ridge is the containment that it provides to the urban area from the unspoilt and strongly rural landscape of the Lilley Bottom valley and landscape rising beyond. Its close relationship to the landscape to the north of the A505, which is part of the Chilterns AONB, is an indication of the high scenic quality and sensitivity of this area. It is this characteristic which is a fundamental constraint to the accommodation of development within the Breachwood Green ridge area. If development extends too far onto the ridge or beyond significant enclosing tree belts or woodlands which form clear landscape thresholds, very significant adverse landscape and visual effects, including effects of associated lighting, will almost undoubtedly arise. This would also give rise to the perception of sprawl and significant encroachment into unspoilt open countryside, which Green Belt designation seeks to prevent.

5.3.14 **Figure 5.4** below shows the ridge line identified by the Council in the HSHBP compared to PBA's analysis of the location of the ridge (a band of land rather than a ridge line).

5.3.15 Whilst it is not within the remit of this study to comment on the methodology used in the TLP study we note that there appears to be an inconsistency which would have implications for scoring. The TLP assessment criteria include an evaluation of topography. We find inconsistency in the consideration of this criteria (for example, why is parcel La deemed to be 'Plateau away from edge' – and therefore less visually sensitive - when parcel Lc, which also

extends up to the steep slopes of Lilley Bottom, is considered to be 'Elevated landforms, plateau edge, ridges and prominent slopes on valley sides'?). Essentially both parcels are at part of the same plateau landscape, and extend up to the steep slopes of the Lilley Bottom valley and therefore should attract the same high sensitivity 'score'.

- 5.3.16 It is our view that this area has very significant landscape and visual constraints and that the adverse effects of medium to large scale development (which is what is being proposed) will have a fundamental effect on the character of the area. This is reflected in the TLP study which identifies it as having a Low capacity for medium /large scale development (note – there is no 'No capacity' category). Their assessment (in relation to a much larger allocation - 5,500 homes - than is being proposed now) concludes that:

'There would be likely to be a significant adverse impact arising from such a development. This would include impacts on the landscape character and the visual and recreational resource. There would also be significant impacts on the local villages' (para. 6.6).

- 5.3.17 We consider that similar effects are likely to arise as a result of the proposed allocations within this area of acknowledged Medium/High Sensitivity.
- 5.3.18 We recommend that, to inform the development capacity and the boundaries of any allocations more detailed analysis of the area at site level should be undertaken to define those areas within the parcels that may be less sensitive to change. However, that said, our view is consistent with TLP's findings in that this area has a Low capacity for medium to large scale development. In this context it raises the question of whether there may be areas around other parts of Luton's periphery (i.e. outside North Herts) that are less sensitive and which have a greater capacity to accommodate significant growth.
- 5.3.19 In PBA's view, relying upon the published assessment exposes the Council to criticism that the allocation process has not been informed by sufficient detailed consideration of the intrinsic characteristics and sensitivities of the area.

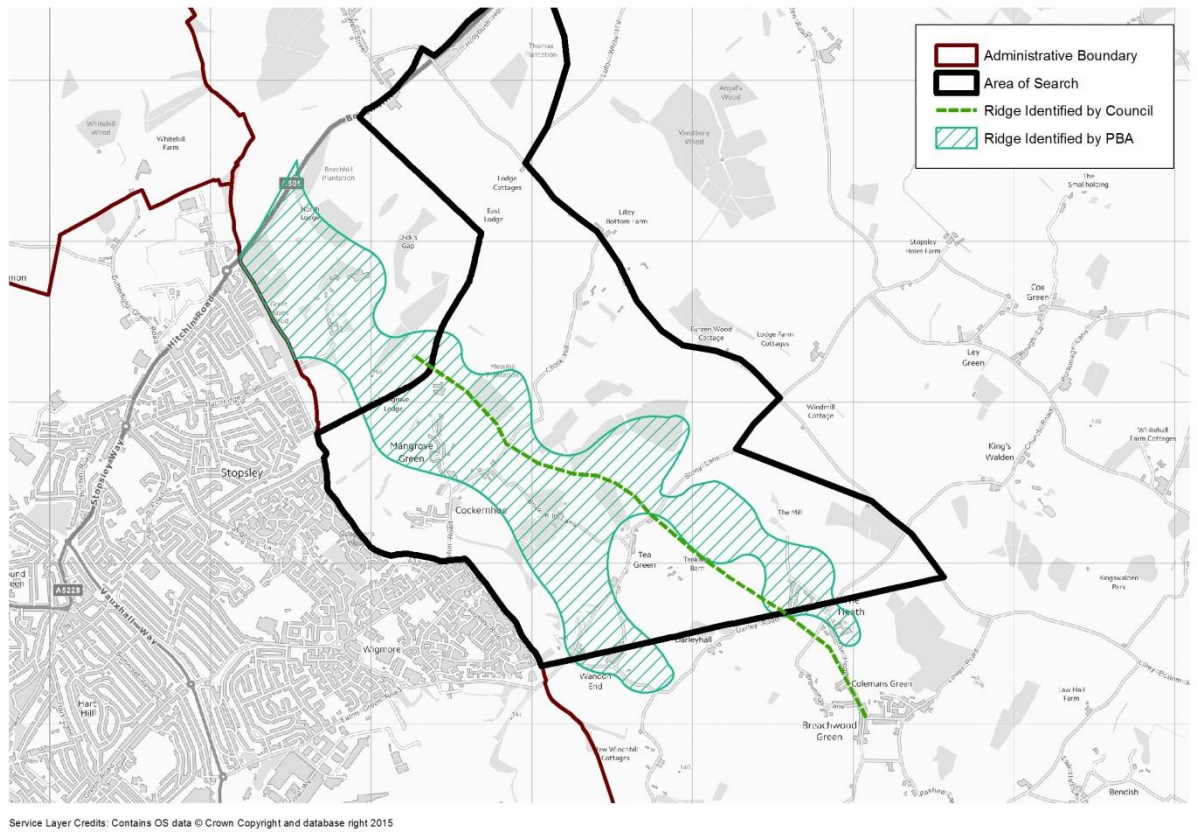
Limits to development – the Breachwood Green Ridge

- 5.3.20 The broad area within which the proposed allocation sites are located is characterised by the broad Breachwood Green ridge which separates an upper tributary of the Whiteway Bottom valley, which runs south east from the edge of Luton airport, from the valley of Lilley Bottom running north west/south east on the north eastern side of the ridge. The western flank of the tributary valley has been developed with the Luton built up area extending down the western valley side to the valley floor where the edge (and Green Belt boundary) is defined by strong belt of vegetation; the eastern valley side, which is undeveloped except for the hamlets of Cockernhoe and Mangrove Green, steepens as it extends southwards south of Cockernhoe. The distinction between the urban area and countryside is very pronounced with productive agricultural uses extending right up to the urban boundary with some areas having a surprising sense of rurality and remoteness despite the close proximity of Luton.
- 5.3.21 The topography of the ridge is varied; it is broad in the northern part where it extends southwards from Putteridge Bury through Mangrove Green and Cockernhoe and becomes more complex around Tea Green due to the influence of the of dry valleys cutting back into the ridge. There are significant areas of woodland, particularly on the eastern side of the ridge/upper side of Lilley Bottom east and south east of Cockernhoe and these are distinctive characteristic elements of the wider valley landscape. Within the Whiteway valley there are also significant belts of woodland/tree belts which provide enclosure and subdivision. To the north is the Registered Historic Park & Garden of Putteridge Bury, the outer boundary of which is defined by a brick wall.
- 5.3.22 The most important aspect of the ridge is the containment that it provides to the urban area from the unspoilt and strongly rural landscape of the Lilley Bottom valley and landscape rising beyond. Its close relationship to the landscape to the north of the A505, which is part of the Chilterns AONB, is an indication of the high scenic quality and sensitivity of this area. It is this

characteristic which is a fundamental constraint to the accommodation of development within the Breachwood Green ridge area. If development extends too far onto the ridge or beyond significant enclosing tree belts or woodlands which form clear landscape thresholds, very significant adverse landscape and visual effects, including effects of associated lighting, will almost undoubtedly arise. This would also give rise to the perception of sprawl and significant encroachment into unspoilt open countryside, which Green Belt designation seeks to prevent.

- 5.3.23 **Figure 5.4** below shows ridge line identified by the Council in the HSHBP compared to PBA's analysis of the location of the ridge (a band of land rather than a ridge line). This emphasises the need to complete a more detailed landscape assessment, which can inform a refined area which identifies the more sensitive areas to development, beyond the Breachwood Ridge.

Figure 5.4 Breachwood Ridge should guide limit of development to Luton's growth

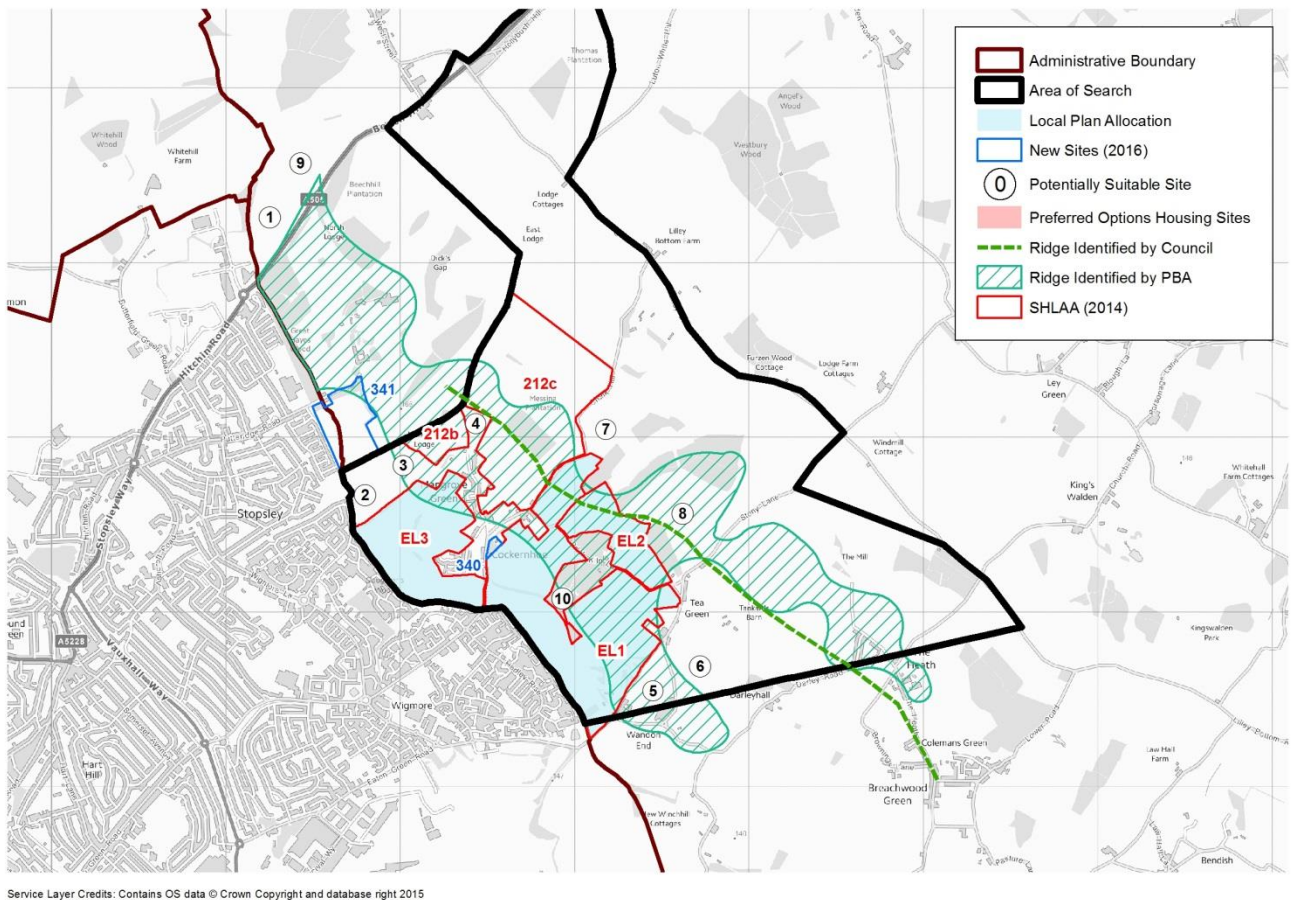


5.3.24 The proposed allocation sites and other potential sites and land have been considered in this context in **section 6**.

6 Assessment of Potential Sites around East of Luton

- 6.1.1 This section looks at how the Council has selected the allocated sites over other sites within North Herts, which could perhaps help to deliver Luton's housing need. As a starting point, PBA has undertaken an independent assessment of both the area of search (**section 4**); and any limitations set by Green Belt and/or landscape character constraints (**section 5**). Then PBA have looked at all sites within this area, in terms of assessments undertaken by the Council as well as PBA undertaking extra assessments (particularly Green Belt and landscape assessments) where the Council have not assessed those sites. It must be noted that the PBA assessments are broad assessments and the Council should seek to undertake more detailed assessments to inform a robust evidence base and Local Plan. However, the PBA assessments provide conclusions on which areas and sites could be assessed.
- 6.1.2 **Figure 6.1** maps the sites which are located within the strategic area of search, along with the Broadwood Ridge (Council 'line' and PBA 'area'), which PBA have assessed, where the Council have not assessed those sites. This includes:
- Five SHLAA 2014 sites - three of these sites are allocated in the Draft Preferred Options Local Plan consultation document (2014);
 - Two new sites promoted to the Council since the Local Plan consultation in 2014. Site 341 is located within the Historic Parks and Garden but adjacent the built up area of Luton and next to the area of search. Although outside the area of search, as the site was promoted since the Local Plan (2014) consultation, PBA considered it appropriate to consider this site; and
 - Ten parcels of land which were not promoted to the Council but PBA identify as potentially suitable sites for development to deliver Luton's need. Sites 1 and 9 are outside the area of search and within the AONB. As land adjacent/close to the urban edge of Luton, PBA considered it appropriate to consider these sites.

Figure 6.1 Sites within area of search; Broadwood Ridge; and sites with potential



6.1.3 The Council have assessed the suitability of the five SHLAA sites and concluded that three sites, subsequently allocations in the draft Local Plan, were the best sites to deliver housing for Luton. However, the Council have not assessed the latter two sources of sites: those promoted to the Council since the Local Plan consultation; and areas/land not promoted to the Council. It will unclear to any participant in the Local Plan process therefore if these additional sites are suitable for housing development, or whether these sites are more suitable than parts of the draft allocations. The Council have confirmed that the SHLAA update is ongoing to support the publication version of the Local Plan, and PBA would recommend these sites are included within any SHLAA update work.

6.1.4 PBA have commenced an initial suitability assessment within the sections below for each type of site, to identify which sites are potentially suitable for housing development and to identify whether sites which have not been assessed by the Council are in fact suitable. This has not been the remit of the original Brief, and therefore the assessment is not fully comprehensive. However, it does provide the Council with an initial look at other sites within the area of search. Where sites are potentially suitable and availability is unknown, the Council should contact the landowners direct to check availability of land in these locations.

6.1.5 The PBA assessments for each source of site identified in the bullet points in **para 6.1.2** are set out in Tables 1 – 4 in **Appendix A**.

6.2 Draft Local Plan allocations

6.2.1 The North Herts Local Plan (Preferred Options) identifies and allocates three large greenfield sites to deliver 2,100 dwellings combined, to deliver Luton's housing need. The three sites are located to the south and east of Cockerhoe and abut the northern development boundary of the Luton urban area.

6.2.2 The identified sites are:

- EL1 - Wandon Park – 1,050 dwellings
- EL2 - Wandon Park Extension Site – 350 dwellings
- EL3 - Land west of Cockernhoe Site – 700 dwellings

6.2.3 It is assumed that the Council have undertaken a full robust assessment of suitability and achievability for these sites. **Table 1 in Appendix A** provides a summary of the Council's assessment of the site from various sources. This table also provides further Green Belt and landscape character assessment of these sites undertaken by PBA.

6.2.4 PBA agree that both sites EL1 and EL3 are shown to be potentially suitable, although some parts of EL1 is not deemed suitable for development. Development of EL2 would result in likely landscape and visual effects impacts. Although with EL2 and parts of EL1 there does appear to be scope for part of these sites to provide open space/green infrastructure relating to the development needs of site EL1.

6.2.5 If the Council remain with these site allocations, it is recommended that the Council undertake a detailed landscape and Green Belt assessment of these sites to inform future Green Belt boundary and development boundary.

6.3 Sites promoted to SHLAA

6.3.1 Five sites were promoted to the 2013 and 2014 SHLAAs in the area of study. Of these five, three have been allocated for housing delivery in the Preferred Options Local Plan and their suitability for residential development is considered in the section above and Table 1.

6.3.2 The remaining two sites promoted to the SHLAA lie to the north and west of the allocated sites, and the village of Cockerhoe. These sites are:

- 212b – Land north east of Luton – 6 ha (no dwelling capacity indicated)
- 212c – Land north east of Luton – 62 ha (potential for 600 units)

6.3.3 **Table 2 (Appendix A)** details the assessment of these sites from the SHLAA, as well as further Green Belt and landscape character assessment of these sites undertaken by PBA. These sites were not assessed as part of the Sustainability Appraisal, produced by the Council to inform the Local Plan.

6.3.4 PBA concludes that site 212b is not suitable for housing development. However, there does appear to be scope for the site to provide open space/green infrastructure relating to the development needs of site EL3. There is scope to provide housing development within the southern part of site 212c, although the remainder of the site to the north is unsuitable. The southern part of the site is not part of the draft Local Plan allocations, although it has been noted that the site is no longer being promoted by the landowners, as at November 2014.

6.3.5 It is recommended that the Council reassess the suitability of the southern part of site 212c, and recommence discussions with the landowners. This site has the potential to provide development to meet the needs of Luton.

6.4 Other sites promoted to the Local Plan

6.4.1 Since the publication of the Preferred Options Local Plan (2014), two further sites to the east of Luton have been promoted to the Council as part of the public consultation. The sites are:

- 340 – Dancote, Cockernhoe Green

- 341 – Land east of Selsey Drive

6.4.2 The availability, suitability and achievability of these sites have not been tested by the Council. As such, the site assessments shown in **Table 3** in **Appendix A** has been drawn from Council documents, site visits undertaken by PBA staff, and further Green Belt and landscape character assessment of these sites undertaken by PBA.

6.4.3 Site 340 does not have the capacity to provide strategic housing and may only have the capacity to provide a single dwelling. Although site 341 is within an area designated as Historic Park and Garden it could form a separate small development, although its location within Park and Garden would require a separate cultural heritage assessment.

6.4.4 It is recommended that the Council undertake a high level cultural heritage assessment of site 341, to conclude to whether the site is suitable, or not, for development.

6.5 Sites not promoted to the Council

6.5.1 The HSHBP sets out that where sites have not been promoted for development, the suitability of those site have not been assessed. In order to provide an initial assessment of all potential options for urban extensions to the east of Luton, PBA has identified an additional 10 parcels of land adjacent or close to the urban edge of Luton. The availability of these sites is, as yet, unknown, as they have not been promoted to the Council over the course of the preparation of the Local Plan. There is no evidence that the Council has approached these landowners of the ten additional parcels identified above.

6.5.2 PBA's initial assessments of these sites are detailed in **Table 4** in **Appendix A**. PBA conclude the following for each site:

- Sites 1 and 9: development is likely to constitute 'major development' within the AONB and therefore unlikely to be compatible with the national landscape designation;
- Sites 2 and 3: land could be contemplated as an extension of proposed allocation site EL3, if it is established that development would not give rise to unacceptable farm to the setting of Putteridge Bury. Alternatively, the land could be used within an allocation as a buffer and devoted to open space/green infrastructure.
- Site 4: Small site would not contribute to strategic housing development and would need to be assessed separately.
- Sites 5, 6, 7, 8 and 10: These sites are not deemed suitable for development due to potential unacceptable impacts on Green Belt purposes and/or landscape character impacts.

6.5.3 It is recommended that the availability, suitability and achievability of sites 2, 3 and 4 are assessed by the Council and looked at within the wider provision of land to meet Luton's housing need. The Council will also need to approach the landowners and discuss the potential for these sites to be made available for development and an urban extension.

6.6 Summary

6.6.1 The majority of the land identified by the Council does appear to be suitable and available for development. However, on closer inspection of the Council's assessment of the three allocations, PBA can conclude that there are some areas of these sites which may not be suitable due to landscape character impact and/or Green Belt impacts, and therefore the Council need to undertake more detailed landscape and Green Belt assessment work to assess appropriate and robust revised Green Belt and new built up boundaries.

6.6.2 There are a number of other sites, as outlined above, that PBA have provided an initial assessment on suitability but the availability of such sites is unknown. It is recommended that

the Council approach landowners for these sites to see if the sites could be potentially available to consider as part of the urban extension to Luton.

- 6.6.3 Once the detailed suitability and availability of all of these sites is confirmed, the Council will then be in a position to identify a boundary for land which is suitable to deliver an element of Luton's housing need.

7 Conclusion

- 7.1.1 This report has examined the choices made by North Herts District Council of land to identify in its Local Plan to provide for residential development to assist in meeting the need for housing which is arising from a combination of population change and economic development projected to take place within Luton, but which cannot be accommodated within the area administered by Luton Borough Council.
- 7.1.2 It is important to note that the report is undertaken in a particular context and has been undertaken within a particular remit. It does not therefore comment on:
- The identification of the Housing Market Area(s), the assessment of the level of housing need for the HMA, or the interaction between North Herts District Council and other local authorities and the process by which the Duty to Cooperate has been addressed; and
 - Whether if Luton is to be expanded, development on the part of its fringe within North Herts is an appropriate way of addressing the need in comparison with the potential role of other parts of Luton's fringe.
- 7.1.3 That said, it is a striking feature of where the Council has got to that the scale of housing development in North Herts District to contribute to Luton's needs is presented as an 'offer', and is based on the capacity of sites put forward by promoters driven by ownerships primarily. This is a fundamentally different approach from one of determining the level of provision as part of a strategic and cooperative (though inevitably iterative) approach with all parties involved, and then seeking the best ways to make that provision having regard to all relevant considerations. The next step based on this position, and on an understanding of how the fringe of Luton performs, together with proper aspirations for what is wanted in place making terms, might then have been to establish the framework of an urban extension of Luton with an integrated structure for development, green infrastructure and connectivity set out, and into which the respective landowners and developers could work up their proposals.
- 7.1.4 The approach the Council has followed is set out for instance in the 'Housing and Settlement Hierarchy Background Paper', and it is an approach that leaves the Local Plan process open to the investigation and promotion of other sites by developers who may or may not have come forward yet, and in particular to future claims by Luton Borough Council and others no doubt, that North Herts should do more.
- 7.1.5 This report addresses this context and these potential consequences in two ways:
- It seeks to demonstrate through an overview of setting, environmental constraints, landscape character and Green Belt considerations, given that there are natural limits to the amount of development that can be accommodated in an acceptable form as the expansion of Luton; and
 - It notes that within the acceptable limits of the expansion of Luton in this direction there may be other land that according to the criteria used could be developed that may not have been adequately investigated and for which clear reasons have not been why the land is not included in the Local Plan.
- 7.1.6 The conclusions in relation to the specific proposals for the Local Plan are as follows.
- 7.1.7 PBA was asked as part of the Council's brief, to comment on the use of its settlement appraisal work in selecting the location of the provision to be made. It seems quite clear that development intended to address needs arising in Luton should be met as far as possible at Luton where there can be a functional relationship, and where in general terms development can promote the greatest accessibility through links to services and facilities, in line with paragraph 84 of the NPPF.

- 7.1.8 Once the 'at Luton' principle is accepted as set out above, land that is not on the urban edge is less favoured in the findings of this report than land that is, and the allocated sites are all close to the existing urban edge. How links are actually to be made is commented on below.
- 7.1.9 Land that is not on the edge of Luton now could be on the edge of Luton in the future as it grows through the allocation of sites in the Local Plan, and so sites detached from the urban edge have to be considered both under current circumstances and in the event of currently proposed development taking place. The significance of any findings in the latter terms would become particularly pertinent if the scale of housing provision required was to grow.
- 7.1.10 There is on this fringe of Luton, having regard to land form and landscape considerations, environmental constraints and the purposes of Green Belt, an area of land in which it is generally reasonable to seek to meet development needs, and beyond that (Breachwood Ridge), land where it is not. Although the limits to development require further detailed landscape character assessment work. This has been explained at **section 5** of this report, and is a critical conclusion of the investigation.
- 7.1.11 For land to be included as part of the development strategy in a Local Plan that is likely to be capable of adoption, it should meet the tests set out in the Framework (at para. 47) of being suitable, available and deliverable, with some qualification of these tests according to the timing of the requirement of the land in the implementation trajectory. The work by PBA has had particular regard to the test of suitability and hence to important constraints, and to landscape and Green Belt considerations, noting that the principle of change to the Green Belt in the area around Luton is already accepted by both local authorities as a necessary part of the North Herts Local Plan.
- 7.1.12 On this basis the sites that are proposed for allocation are presumed to be available and large areas of this land have been found to be suitable, subject to more detailed landscape assessments and specific points made about how the boundaries of development within the land being promoted and on how the form of the development needs to be responsive to the landscape context and to the overall pattern of development to arise.
- 7.1.13 An aspect of the Council's work that must be developed is need for the Council to work with landowners who currently have not made potentially suitable land available for development. The Council need to be comfortable that they have done enough to bring these sites forward. The update of the SHLAA is ongoing to support the publication version of the Local Plan and any SHLAA update will provide the Council the opportunity to consider these sites.
- 7.1.14 Sites identified in the Local Plan and relied upon as part of the supply have to be suitable and available. Sites that have been put forward by promoters are assumed to be available because they are being promoted by those with an interest in the land. The Council has considered the suitability of these sites. However, there are sites that from this examination also appear capable of being considered suitable and the Council has not established whether these are available. This is a gap in the plan preparation process, and leaves the Council vulnerable to somebody coming forward at any time and saying that one of these sites is available. This is particularly so given that the level of housing to be provided is the sum of the capacity (as proposed by the developers) of the identified sites rather than a target within which sites and a capacity are to be found. The Council needs to seek to establish the availability of any such sites by identifying the owners of the land and asking the question directly.
- 7.1.15 Specific locations identified in this report that the Council needs to satisfy itself on and if it does not wish them to come forward, to provide clear reasons for their rejection (noting that this report finds them likely to be seen as 'suitable') are provided in **section 6**.
- 7.1.16 One of the findings from undertaking this work for the Council has been to note how strong the boundary to Luton is 'on the ground' in sections of the area considered, which may well make connections to the urban edge difficult to achieve and for development to be read as part of the town and to meet place making objectives. It has been noted too that there may well be

issues in seeking to make appropriate transport connections, though this aspect is certainly outside the scope of this study.

- 7.1.17 On the level of investigation undertaken so far, these issues probably apply to all of the edge of Luton being examined in North Herts, and so don't really lead to conclusion on the relative merits of sites, but do point to the need for more work to be done in order to get the best possible development.
- 7.1.18 What the Council has done so far for the Local Plan, and having regard to the unmet need for housing arising from changes taking place within Luton's administrative area, might be characterised as necessary but not sufficient. There is some backfilling that is recommended and there is more work in going forward that it is recommended that the Council undertake.
- 7.1.19 An important recommendation therefore is that the Council designs and undertakes a piece of more detailed landscape investigation which will allow it to:
- Justify and establish through the spatial strategy in the Local Plan the natural 'edge' to this side of Luton within which any expansion of Luton should be contained (and to which future delineation of the changed Green Belt boundary will have to have regard);
 - Set out the role of existing environmental assets, landform and planting in creating the structure of the area, and how this leads into the green infrastructure network within which develop should take place and to which development should contribute; and
 - Negotiate with the promoters of individual development proposals about how their schemes fit the context and contribute to placemaking.

Appendix A Initial site assessments

Green text - SHLAA (2014);

Purple text - Local Plan 'Site Selection Matrix' (Nov 2014);

Red text - Sustainability Update (ORS Nov 2014)

Black text – Further PBA assessment

Table 1 Preferred Options Local Plan allocations (2014)

| Ref | Site | Description | Council's Green Belt Assessment | Council's Landscape Assessment | Other Constraints/ Designations |
|-----|-------------|---|--|--|--|
| EL1 | Wandon Park | Large greenfield site lying outside but adjacent to the development limit of Luton urban area. The site is Grade 3 agricultural land. | Green Belt Review says site makes a moderate contribution, within a wider area which makes a moderate contribution to green belt purposes. | Landscape assessment says medium - high sensitivity. A site of this size and scale in this location is likely to have a significant impact on the landscape character and on local villages. Site is close to AONB. | <p>Infrastructure costs for major urban extensions may be significant.</p> <p>Known risk of surface water flooding. Significant on-site infrastructure required and ecology study.</p> <p>Site includes part of Mangrove Green and Cockernhoe archaeological area. Site also close to Putteridge Bury, a designated Historic Park and Garden. It is also 100m from Stubbocks Wood wildlife site. [Closest edge of site is at least 700m from nearest edge of Historic Park and Garden. Stubbocks Wood Wildlife Site is over 300m of EL1 on Brick Kiln Lane.]</p> <p>Site likely to include some contamination from previous landfill use and is partly located in Source Protection Zone 3.</p> <p>Constraints on use of SuDS</p> <p>The site is very close to Luton noise contours. [Southern edge of EL1 adjoins the noise zone.]</p> <p>Development of this large greenfield site will inevitably involve increased light, air and noise pollution.</p> |

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| | | | | | <p>The site is a long distance from the Luton town centre and the topography is undulating, which would be a discouragement to walking or cycling into the town.</p> <p>The site lies within the Green Belt.</p> <p>The western part of the site is partially covered by an archaeological designation</p> <p>There is a small patch of deciduous woodland in the far southeast of the site.</p> <p>Grade 3 agricultural land.</p> <p>There is a listed building at the site's eastern boundary with Crouchmoor Farm, Tea Green and also at the northwestern boundary at Chalk Hill.</p> |
| <p>EL1 – PBA conclusion</p> | <p>The site extends south eastwards from the eastern side of Cockernhoe, around Brickkiln Wood, to Stony Lane running north eastwards between the edge of Luton up to Tea Green.</p> <p>The site is shows considerable variations in character and views; there are three distinct character sub areas:</p> <p>Whiteway Bottom/Luton fringe – this comprises the arable fields that form the eastern valley side and which are contained on the eastern side by linear belts of woodland/trees and south western edge of Brickkiln Wood, which is followed by the Chiltern Way. Whilst being essentially rural with productive arable land, the area is orientated west back towards the urban area such that it falls within its visual influence. The urban boundary (also the Green Belt boundary) is very well defined and substantially softened by a strong linear belt of vegetation which assimilates the edge and partially screens development beyond. There is no development within this sub area.</p> <p>Cockernhoe eastern fringe – comprises the land between the eastern edge of the hamlet and western side of Brickkiln Wood, bounded on the north eastern side by Brick Kiln Lane contiguous with the boundary of the proposed allocation. This is a relatively discreet parcel of land under arable and pasture, with horse paddocks along the western side; it has a very shallow valley landform, being a small tributary valley of Whiteway Bottom, which slopes generally south west from the lane towards Luton. It is has an unremarkable character with defunct hedges and variable fences. It is contained by the settlement to the west and associated vegetation, notably the tree belt along the southern side of Cockernhoe Green, and Brickkiln Wood which forms a prominent backdrop and skyline feature to the east. The boundary along the lane to the north is a managed hedge. There are visual connections to the urban area on the edge of the town from much of the area.</p> <p>Chiltern Way to Tea Green - this area lies beyond the distinct threshold provided by Brickkiln Wood and the tree belt along the upper edge of Whiteway Bottom. The area has a strong rural character with development limited to the golf centre, Crouchmoor Farm and the cluster of properties at Tea Green and has a remarkable sense of separation from Luton; it feels and is perceived as being unspoilt open countryside, although the golf centre is a local character anomaly. The land is principally in arable use and is elevated being set on the top of a spur of the Breachwood Green ridge, falling gently away towards Stony Lane and Tea Green. The land is visually exposed in local and mid distance views from the open arable landscape to the east and north east.</p> <p>Principal landscape/visual constraints identified are:</p> | | | | |

- Topography along Whiteway Bottom
- Local character and setting of the linear settlement of Cockernhoe, and the small rural settlement of Tea Green
- Narrow lanes of rural character
- Distinctive tree belts and woodland
- Pronounced rural character, even close to the edge of Luton
- The particular rural and remote character, and visually exposed nature of the Chiltern Way to Tea Green parcel

In Green Belt terms the land along the edge of the town makes an immediate and substantial contribution to preventing sprawl and safeguarding the countryside from encroachment – the distinction between town and country being particularly strong with productive farming extending right up to the urban edge, and an absence of encroachment by development. The land further away from the town also fulfils these purposes with the absence of development and lack of encroachment also being particularly evident.

It is our opinion that there is capacity for development within the first two sub areas and this is supportable (subject to the implications of access). There are boundaries to these areas that would be appropriate for the creation of a new Green Belt boundary. The Chiltern Way to Tea Green parcel is much harder to justify as part of the development allocation due to its distinction from the urban area and the other two parcels and its strong rural character. Development in this location would form a very apparent encroachment into the countryside and is much harder to justify. Notwithstanding this this area may be able to providing supporting open space/green infrastructure which would also help to provide an outer buffer to the allocation; land in such uses could be retained within the Green Belt. Alternatively the Green Belt boundary could be drawn along Brick Kiln Lane/Stony Lane with this land being protected by a green infrastructure/open space designation.

| Ref | Site | Description | Council's Green Belt Assessment | Council's Landscape Assessment | Other Constraints/ Designations |
|-----|--|--|--|--|--|
| EL2 | Land east of Brickkiln Lane (Wandon Park Extension Site) | Large greenfield site lying outside but close to the development limit of Luton urban area. The site is Grade 3 agricultural land. | Green Belt Review says site makes a moderate contribution, within a wider area which makes a moderate contribution to green belt purposes. | Landscape assessment says medium - high sensitivity. A site of this size and scale in this location is likely to have a significant impact on the landscape character and on local villages. Site is close to AONB. | Infrastructure costs for major urban extensions may be significant. Known risk of surface water flooding. Significant on-site infrastructure required and ecology study. Site includes part of Mangrove Green and Cockernhoe archaeological area. Site also close to Putteridge Bury, a designated Historic Park and Garden. It is also 100m from Stubbocks Wood wildlife site. [Closest edge of site is at least 700m from nearest edge of Historic Park and Garden. Stubbocks Wood Wildlife Site abuts site EL2.] Site likely to include some contamination from previous landfill use and is partly located in Source Protection Zone 3. Constraints on use of SuDS |

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| | | | | | <p>The site is very close to Luton noise contours.</p> <p>Development of this large greenfield site will inevitably involve increased light, air and noise pollution.</p> <p>The site is a long distance from the Luton town centre and the topography is undulating, which would be a discouragement to walking or cycling into the town.</p> <p>The site lies within the Green Belt.</p> <p>Grade 3 agricultural land.</p> |
| <p>EL2 PBA conclusion</p> | <p>The site is essentially a north eastward extension of site EL1, to include land north of Brickkiln Lane.</p> <p>The site has a similar character being primarily arable farmland divided by managed hedges and bordered in places by blocks of woodland. The land is broadly level being situated towards the north eastern edge of the Breachwood Green ridge, although a dry valley cuts back into the southern valley side of Lilley Bottom to create a dip in the landform in the northern part of the parcel. The land benefits from containment provided by the woodland blocks on the north east side which sit along the upper edge of the Lilley Bottom valley, although this containment is not continuous as there are gaps between. Views are limited primarily to those available from the lane of Chalk Hill, which forms the north western allocation boundary, from Brick Kiln Lane which forms most of the boundary with site EL1, and from Tea Green at the south eastern corner. The site is free of development except for a pair of cottages on the north eastern edge of Brickkiln Wood which is excluded from the proposed allocation site.</p> <p>Principal landscape/visual constraints identified are:</p> <ul style="list-style-type: none"> - Relationship of the site to the upper side of Lilley Bottom valley/edge Breachwood Green ridge - Distinctive blocks of woodland which are essential to visual containment in an exposed location - The rural character of the site, the physical, visual and sense of separation from Luton (although this would reduce with development within site EL1) - The existing robust Green Belt boundary. - The contribution that the land in the north western part makes to the setting and northern approach into Cockernhoe - Local character and setting of the small rural settlement of Tea Green - Narrow lanes of rural character - Visibility of the site from these lanes. <p>The land contributes to Green Belt purposes, primarily in relation to restricting sprawl and preventing encroachment into the countryside, although land within site EL1 contributes to a greater degree due to its more immediate relationship with the edge of Luton. If site EL1 were to be allocated the level of contribution to these purposes would increase substantially. The allocation would only be justified in Green Belt terms if site EL1 were to be excluded from the Green Belt; the Green Belt boundary could then be defined beyond Brick Kiln Lane. Whilst blocks of woodland along the north eastern edge of the site would provide an alternative boundary there are lengths of this boundary which are less well defined; these would require structural woodland planting to reinforce them to create distinct enduring boundaries.</p> | | | | |

| | In our opinion this site extends into an area of landscape that is too close to the eastern edge of the Breachwood Green ridge and will consequently be at risk of challenge as a result of its likely landscape and visual effects. Although parts are set back and contained to some degree there is a very significant risk that development could be apparent from and across the Lilley Bottom valley extending the influence of the new built up edge of Luton up to a landscape that is a high sensitive to change; even if set back from the northern edge there is a real risk that influence of development and associated lighting would still extend beyond the containing threshold of the ridge (Brickkiln Lane is the important threshold in this respect). As with site EL1 there does appear to be scope for some of this site to provide open space/green infrastructure relating to the development needs of site EL1, effectively creating a buffer to that site; such uses would be appropriate within Green Belt and the Green Belt boundary could be defined along Brickkiln Lane, rather than extending further north to a boundary that is less clearly defined in places. | | | | |
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| Ref | Site | Description | Council's Green Belt Assessment | Council's Landscape Assessment | Other Constraints/ Designations |
| EL3 | Land West of Cockernhoe | Large greenfield site lying outside but adjacent to the development limit of Luton urban area. The site is Grade 3 agricultural land. | Green Belt Review says site makes a moderate contribution, within a wider area which makes a moderate contribution to green belt purposes. | Landscape assessment says medium - high sensitivity. [EL3 is less sensitive than EL1 and EL2.] A site of this size and scale in this location is likely to have a significant impact on the landscape character and on local villages. Site is close to AONB. | <p>Infrastructure costs for major urban extensions may be significant.</p> <p>Vehicle access needs further investigation. Sewage treatment - significant upgrades or new outflow sewer may be required. Known risk of surface water flooding in part.</p> <p>Constraints on use of SuDS.</p> <p>Site includes designated archaeological area</p> <p>Local road network to the east is sub-standard, development in this area will make this worse, and reduce accessibility for existing residents.</p> <p>Development of this large greenfield site will inevitably involve increased light, air and noise pollution.</p> <p>The site lies within the Green Belt.</p> <p>The eastern part of the site is covered by an archaeological designation.</p> <p>Grade 3 agricultural land.</p> |
| EL3 PBA conclusion | This site 'wraps' around the south and western sides of Cockernhoe and Mangrove Green. It is characterised by sloping arable land, partly broken by two clumps of trees which lay on old boundaries between fields now amalgamated, to essentially form one large 'L' shaped parcel. Although the site falls within the Breachwood Green Ridge LCA the south western part effectively forms the northern end of Whiteway Bottom valley, which extends and deepens as it progresses south through the south western part of site EL1. | | | | |

Owing to its topographical orientation to the south west all of it lies within the visual envelope of the eastern edge of Luton and there is intervisibility between the two areas. The existing urban is very well defined by a strong belt of woodland, supported along much of its length by linear open space on the urban boundary and this delineates the existing Green Belt boundary. The northern boundary of the eastern part of the 'L' abuts a small housing estate at Elmtree Avenue, recently expanded by new housing on an old allotment site, at the southern edge of Cockernhoe. This part of the site is only around 160m wide and the new houses form a significant encroachment on higher ground, although there is a clear break from the edge of the town provided by the intervening open arable land within the valley floor; this transition from town to countryside is immediate and remarkably distinct. The north eastern part of the site adjoins the outskirts of the smaller scale landscape around the two hamlets which are generally defined by hedges. The north western boundary is formed by a field boundary defined by reasonable but discontinuous tree line. There site is well separated from the edge of the AONB to the north by Putteridge Bury.

In visual terms the land is well contained from the wider area, particularly from the open countryside on and beyond the ridge to the north east from which existing development provides containment.

Principal landscape/visual constraints identified are:

- The clear physical separation provided between the urban edge and Cockernhoe and Mangrove Green and the perception that these remain surprisingly rural settlements, based around their respective greens, which belies their proximity to the edge of Luton
- Identifiable rural character despite its proximity to the edge of Luton
- The immediate relationship of the site to edges of the hamlets and potential effects on views from residential property
- The existing clear, strong Green Belt boundary.

It is our view that this proposed allocation is the most supportable of the three proposed sites in landscape terms. Whilst development will inevitably change its character, the influence of development will be limited and extend, in the main, to logical developed boundaries (the edges of the hamlets) and be kept well back from the more sensitive ridge and Lilley Bottom beyond. There are opportunities to re-define the Green Belt boundary along Luton Road and along Mangrove Road (or alternatively the western/southern boundaries of the settlement keeping them within the Green Belt to provide continued protection from inappropriate development which could erode their character). The north western boundary is less suitable as a Green Belt boundary due to its discontinuous nature (unless reinforced by structure planting). Another alternative that may have merit is an extension of the site across the land that separates the site from the south eastern boundary of Putteridge Bury; this is a clear boundary and the land could be used to accommodate open space/green infrastructure (linking with open space in the adjoining edge of the town) which could fulfil a buffering role between development within the proposed allocation land to the south and the Park & Garden to the north (refer also to consideration of 'sites' 2 and 3 in table 6.3 below).

Green text - SHLAA (2014);

Purple text - Local Plan 'Site Selection Matrix' (Nov 2014);

Red text - Sustainability Update (ORS Nov 2014)

Black text – Further PBA assessment

Table 2 Further sites assess in the SHLAA (2014)

| Ref | Site | Description | Green Belt Assessment | Landscape Assessment | Other Constraints/ Designations | PBA Conclusion |
|------|------------------------------|---|--|--|---|--|
| 212b | East of Luton (Crown Estate) | Greenfield site lying outside but close to the development limit of Luton urban area. The site lies to the north west of the village of Cockernhoe. | Green Belt Review says site makes a moderate contribution, within a wider area which makes a moderate contribution to green belt purposes. | Landscape assessment says medium - high sensitivity. [This appears to be inconsistent with the 2011 landscape assessment (Babtie)] | <p>Site lacks satisfactory access.</p> <p>Access poor.</p> <p>This parcel of land no longer being promoted by landowner (Nov 14)</p> <p>The site lies within the Green Belt.</p> <p>The site is partially covered by an archaeological designation.</p> <p>Grade 3 agricultural land.</p> | <p>Site (horse grazed pasture and arable) located on level land on top of ridge; northern boundary abuts boundary of Putteridge Bury Park & Garden. Three sides bounded by rights of way. Site not connected to site EL3 (212a) and would be northward extension of Mangrove Green, with development likely to be apparent from the green and from the Park and Garden. If developed would combine with EL3 to largely encompass Mangrove Green/Cockernhoe with development and extend into the buffer of open land retained between the village, EL3, and the Park and Garden with potential impact on setting.</p> <p>Site not considered suitable for inclusion in urban extension as a development area, although it could have a role to play in the provision of open space/green infrastructure (see also comments on sites 2/3 below in table 6.3 below.</p> |
| 212c | East of Luton (Crown | Large greenfield site lying outside but close to the development limit of Luton urban area. | Green Belt Review says site makes a moderate contribution, within a wider area which makes | Landscape assessment says medium - high | Existing road network inadequate to service development here. | Much of this site extends onto steeply sloping and exposed land which forms the southern valley side of Lilley Bottom. Development in this area would be highly |

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| | Estate) | The site lies to the north east of the village of Cockernhoe. | a moderate contribution to green belt purposes. This parcel of land no longer being promoted by landowner. | sensitivity. | <p>Large parts of site east of wooded ridge may not be suitable for development due to impact on Lilley Bottom valley.</p> <p>Access poor.</p> <p>This parcel of land no longer being promoted by landowner (Nov 14)</p> <p>The site lies within the Green Belt.</p> <p>The southern part of the site is covered by an archaeological designation.</p> <p>There is an area of deciduous woodland in the centre of the site.</p> <p>Grade 3 agricultural land.</p> <p>There is a listed building at the southeastern boundary at Chalk Hill.</p> | <p>visible and represent a clear intrusion into open countryside giving the impression of uncontained poorly located development (sprawl). Likely also to have significant adverse effect on views into and out of Park & Garden and its setting.</p> <p>Land between the eastern side of Mangrove Green and Messina Plantation is more contained and may offer some potential for development without significant landscape harm although, if the allocation sites were to proceed, this could lead to Mangrove Green / Cockernhoe being surrounded by development with resultant loss of character and setting. There would also be implications for the re-definition of the Green Belt boundary along enduring, clearly identifiable features.</p> |
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Table 3 PBA assessment of other sites promoted to the Council since 2014

Black text – Further PBA assessment

| Ref | Site | Description | Green Belt Assessment | Landscape Assessment | Constraints/ Designations | PBA Conclusion |
|-----|---------------------------|---|--|--|--|--|
| 340 | Dancote, Cockernhoe Green | Small site to the east of Cockernhoe. | <p>Site lies within garden of large house within Green Belt parcel 2.</p> <p>Makes small localised contribution to safeguarding countryside from encroachment Green Belt purposes but does ensure retention of openness.</p> | <p>Site not possible to view but appears (from Google) to comprise garden comprising lawn associated with detached house contained by mature trees.</p> | <p>The site lies within the Green Belt.</p> <p>The lies within an archaeological designation.</p> <p>Grade 3 agricultural land.</p> <p>The principal constraint is the contribution that the mature trees along the boundary make to the setting and undeveloped backdrop of southern side of The Green which is an important defining character of this part of the village.</p> <p>Access options limited by mature boundary vegetation.</p> | <p>This site has not been subject to any formal assessment of its suitability by the Council</p> <p>Small site located in a location that is prominent from The Green where the mature boundary trees forms a key part of the setting of this part of the village.</p> <p>Whilst in landscape terms it may be possible to accommodate a single dwelling within the garden, using the existing access, without harm to the setting of The Green, this would represent a reduction in openness of the Green Belt. However, site adjoins north western boundary of EL1 which, if removed from Green Belt, may lead to boundary being redrawn along Luton Road, therefore excluding site from designation. Otherwise any development would be subject to normal Green Belt considerations.</p> |
| 341 | Land East of Selsey Drive | Greenfield site lying outside but adjacent to the development limit of Luton urban area. The majority of the land is within NHDC's administrative boundaries, | Green Belt boundary well defined by road, historic wall and hedgerow/tree belt. Site contributes to prevention of sprawl and the boundary provides a clear constraint to the encroachment of | Gently sloping farmland with rural character; lying within Breachwood Green Ridge LCA; due to location within Putteridge Bury Park & Garden landscape value will be higher than stated in assessment. Parcel contained by developing | <p>The site lies within the boundary of a Historic Park.</p> <p>The site lies within the Green Belt.</p> <p>There is a thin strip of deciduous woodland along the northern boundary of the site.</p> | <p>This site has not been subject to any formal assessment of its suitability by the Council</p> <p>A reasonably discreet parcel of land which, together with land to south and north, defines eastern edge of Luton. Land rises gently to east and is contained by developing woodland. Site not</p> |

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| | | although the western boundary of the site is within Luton Borough. | development into the countryside (the site). | woodland belts along eastern and northern sides (where there is also a small group of houses at West Lodge Cottages), existing boundary wall and woodland along Selsey Drive, and hedgerow along southern boundary with farmland and playing field. Falls within south western part of Putteridge Bury Park & Garden although appears reasonably contained from wider parkland and environs of house due to structural planting. | Partially Grade 3 agricultural land. There is a cluster of three listed buildings lying just beyond the northern tip of the site. Part of Grade II Putteridge Bury Registered Park & Garden. Listed buildings within 100-150m of north east boundary. Park boundary wall and established tree belt along western boundary. | contiguous with proposed allocation EL3, and would therefore form separate small development. Location within Park & Garden is cultural heritage assessment would be required to determine significance of potential effects of development if to be considered for allocation. Existing Green Belt boundary very well defined along western boundary; potential alternative but inferior boundary lies along lane serving Calders Cottage/Mangrove Lodge to east and along Putteridge Road to north. |
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Table 4 Initial assessment of land not promoted to the Council but within area of search

| Ref | Site | Description | Green Belt Assessment | Landscape Assessment | Constraints/ Designations | Conclusion |
|-----|---|--|--|---|---|--|
| 1 | Land north of A505, east of business park at Great Marlings | Level triangular arable field north west of A505 Beech Hill. | Located within southern end of Parcel 1, assessed as making limited overall contribution to Green Belt purposes. Assists with containing Luton and preventing encroachment into open countryside. | An open level arable field located within the northern extremity of the Breachwood Green Ridge LCA (moderate landscape and visual sensitivity; moderate to low landscape value (although the site lying within the AONB may be regarded as being of high landscape value due to its location within the designated area). South eastern boundary defined by A505 dual carriageway; north west side by Oaket Wood which provides | The site lies within the Green Belt. Grade 3 agricultural land. Within southern edge of AONB. Lies directly north west of Putteridge Bury Registered Park & Garden; the undeveloped land contributes to its rural northern | This site has not been promoted to the Council for development and has not been subject to any formal assessment of its suitability by the Council. Development of this site is likely to constitute 'major development' within the AONB and is therefore unlikely to be compatible with the 'great weight' that is to be afforded to a landscape of national |

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| | | | | wooded backdrop in the partial to open views available from the A505. Western boundary with business park defined by hedgerow and trees which contains lower buildings within the business park but not the taller Hilton Hotel. North west boundary defined by variable hedgerow and mature trees located at break of slope on edge of Lilley Bottom valley. This edge is very apparent in views from and across the valley. | setting. Relationship to edge of ridge/valley side. | importance. Site forms intrinsic part of the undeveloped Breachwood Green ridge which helps to contain the urban area and its visual influence on the valley landscape beyond. Area also forms important part of the rural setting of Putteridge Bury which 'wraps' around all but the western side of the Park & Garden. North eastern boundary (with reinforcement) could form alternative Green Belt boundary. |
| 2 and 3 | Land between Hayling Drive and northern end of Mangrove Green | A private school playing field occupies site 2. Arable farmland extends across site 3. | Land lies within parcel 2 defined in the Green Belt Review, which has been assessed as making a moderate overall contribution to Green Belt purposes (principally due to contribution to the first and third purposes). The land does constrain the eastern expansion of Luton and safeguards the countryside from encroachment in the direction of Mangrove Green (the land in site 2 fulfils these purposes to a greater due to its immediate relationship with the urban area). No clear alternative Green Belt boundary to the north east. Removal | These two areas have been combined and assessed as a single site as they essentially comprise one landscape compartment located within the Breachwood Green Ridge LCA (moderate landscape and visual sensitivity; moderate to low landscape value). Land within site 2 is a featureless playing field contained by a steel palisade fence which is incongruous in this rural edge setting. The boundary with the urban area (the Green Belt boundary) is very well defined by strong belt of woodland which is separated from housing development by Hayling Drive and open space. To the south lies a belt of trees, which partially separates the site from proposed allocation site EL3 which lies beyond. | The site lies within the Green Belt. Grade 3 agricultural land. Rights of way. Immediate relationship with boundary of Registered Park & Garden where there is some intervisibility between the two areas. Potential of development joining Luton to Mangrove Green leading to loss of village identity (although proposed allocation EL3 would cause this). | This site has not been promoted to the Council for development and has not been subject to any formal assessment of its suitability by the Council. The allocation of this land could only be contemplated as an extension of proposed allocation site EL3 (rather than as a standalone development site), and then only if it can be established that development would not give rise to unacceptable harm to the setting of Putteridge Bury. Alternatively, its function as a buffer could be retained if the land were to be included in the allocation but devoted wholly to open space/green infrastructure (which would connect with the existing open space in the adjoining edge of Luton). Such uses could also be continued further through the |

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| | | | <p>from Green Belt would require creation of new boundary (such as by woodland planting).</p> | <p>The northern boundary of both sites is contiguous with the southern boundary of Putteridge Bury Park & Garden; the brick boundary wall to the park is present along the northern boundary of site 3. As such the land forms a valuable buffer of open land that separates EL3 from the park.</p> <p>Land within site 3 is in arable use and rises gently up to the broad ridge at the northern end of Mangrove Green where views begin to open out over Lilley Bottom to the east /north east and there are glimpses of development on the northern edge of the hamlet. The boundary with proposed allocation site EL3 is marked by a continuation of the tree belt from site 2. Within this area there is a sense of the separation provided by farmland from the urban edge of Luton, although its visual influence is usually apparent.</p> | | <p>inclusion of site 212b.</p> <p>Southern boundary of Putteridge Bury could provide alternative Green Belt boundary to north western boundary of EL3.</p> |
| 4 | Land at Paddock View, north of Mangrove Green | Complex of farmhouse (Mangrove Hall) and associated converted farm buildings (including grade II barn) and gardens, with rough grassland paddock between complex and northern edge of hamlet. | Land lies within parcel 2 defined in the Green Belt Review, which has been assessed as making a moderate overall contribution to Green Belt purposes (principally due to contribution to the first and third purposes). | Site located within Breachwood Green Ridge LCA (moderate landscape and visual sensitivity; moderate to low landscape value). The northern part of the site has a developed residential character due to extensive complex of converted outbuildings; whilst the southern part is an area of unmanaged land it contributes to the setting of the complex and its distinction from the hamlet. Both parts are readily apparent in immediate views from the Chiltern Way and the right of way which | <p>The site lies within the Green Belt.</p> <p>The site is covered by an archaeological designation.</p> <p>Grade 3 agricultural land.</p> <p>Listed buildings (grade II).</p> <p>Chiltern Way trail follows access road (Paddock View).</p> <p>Proximity to boundary of</p> | <p>This site has not been promoted to the Council for development and has not been subject to any formal assessment of its suitability by the Council.</p> <p>The setting and integrity of the complex is enhanced by its separation from development within the hamlet to the south.</p> <p>Site lies wholly within Green Belt and is unrelated to the three proposed allocation sites. As such</p> |

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| | | | | runs alongside the southern boundary of Putteridge Bury Park & Garden. | Putteridge Bury Park & Garden. Contributes to northern setting of Mangrove Green | any development would be subject to normal Green Belt considerations and the consideration of the impact on the setting of the complex and the listed buildings. |
| 5 | Land at Wandon End Farm | Level to gently sloping triangular arable field bounded by lanes, with Wandon End Farm in south western corner and farmhouse and group of farm buildings in business use in south east corner. | Land lies within parcel 2 defined in the Green Belt Review, which has been assessed as making a moderate overall contribution to Green Belt purposes (principally due to contribution to the first and third purposes). Principal contribution to Green Belt is prevention of encroachment into the countryside. | Site located within Breachwood Green Ridge LCA (moderate landscape and visual sensitivity; moderate to low landscape value). The site is located in quite an exposed location on the end of a local spur of the ridge on the edge of this LCA, bordering the Kimpton and Whiteway Bottom LCA; it is visually sensitive due to its elevation and exposure to views from most directions. | The site lies within the Green Belt. Luton airport noise contours cross the site. Grade 3 agricultural land. There are two listed buildings on the site. Predominantly rural character. Visually sensitive. Two grade II listed buildings. Crossed by right of way. | This site has not been promoted to the Council for development and has not been subject to any formal assessment of its suitability by the Council. Whilst the site borders the south eastern boundary of proposed allocation EL1, it is considered to be an unsuitable location for development in both landscape and Green Belt terms. Development would intrude into an area that has a sense of remoteness (despite the relationship to the airport flight path); would appear wholly unrelated to Luton and appear as a clear encroachment into open countryside. Whilst the site adjoins the south eastern edge of EL1, that shares similar characteristics and also feels remote such that ultimately it may be considered to be unsuitable for development or set aside for open space uses. If the land were to be deemed suitable, the adjoining lanes could be used to define the Green Belt boundary (assuming the release of EL1). |

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| 6 | Land east/north east of Wandon End | Open rolling arable farmland. | <p>Land lies within parcel 2 defined in the Green Belt Review, which has been assessed as making a moderate overall contribution to Green Belt purposes (principally due to contribution to the first and third purposes).</p> <p>Principal contribution to Green Belt is prevention of encroachment into the countryside.</p> | <p>This is an area of open arable farmland where development is limited to farmsteads and small cluster of dwellings at Darleyhall. Landcover is depleted due to loss of hedgerow, but with a block of woodland at Darleyhall. The area lies at the head of a dry valley that cuts back into the Breachwood Green Ridge LCA (as a consequence the area has an affinity with the Kimpton and Whiteway Bottom LCA). There is a strong rural character and sense of remoteness which belies the proximity of Luton, although aircraft traffic and noise is intrusive.</p> | <p>The site lies within the Green Belt.</p> <p>Luton airport noise contours cross the site.</p> <p>There are two small patches of deciduous woodland in the south east of the site and an area of traditional orchard in the south.</p> <p>Grade 3 agricultural land.</p> <p>There are four listed buildings on the site.</p> <p>Strong rural character.</p> <p>Visually sensitive.</p> <p>3 listed buildings at Tankards Farm and one at Crouchmoor Farm to north.</p> <p>Network of rights of way.</p> <p>Aircraft noise zone.</p> | <p>This site has not been promoted to the Council for development and has not been subject to any formal assessment of its suitability by the Council.</p> <p>Development would intrude into an area that has a strong sense of remoteness (despite the relationship to the airport flight path); would appear wholly unrelated to Luton and appear as a clear encroachment into visually exposed open countryside. The land is separated from the south eastern edge of EL1, and shares similar characteristics as the north eastern part of the proposed allocation which also feels remote such that ultimately it may be considered to be unsuitable for development or set aside for open space uses.</p> |
| 7 | Land south east of Chalk Hill | Sloping open arable land | <p>Land lies within parcel 2 defined in the Green Belt Review, which has been assessed as making a moderate overall contribution to Green Belt purposes (principally due to contribution to the first and third purposes).</p> <p>Principal contribution to</p> | <p>Land lies on the edge of the Lilley Bottom LCA, an area defined as possessing a moderate to high landscape and visual sensitivity; and being of moderate to high landscape value. The land forms part of the upper southern valley side of Lilley Bottom and is open and visually exposed in views from the unspoilt valley and over long distance from the northern valley</p> | <p>The site lies within the Green Belt.</p> <p>Grade 3 agricultural land.</p> <p>Strong rural character.</p> <p>Visually sensitive as very exposed.</p> | <p>This site has not been promoted to the Council for development and has not been subject to any formal assessment of its suitability by the Council.</p> <p>The land abuts the northern edge of proposed allocation EL2. The land is most unsuitable for development, being visually prominent and forming an integral</p> |

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| | | | Green Belt is prevention of encroachment into the countryside. | side and from the AONB to the north west. It is free of development and forms an intrinsic part of the valley slopes. | Topography Right of way | part of the landscape of Lilley Bottom. There is no clear defining feature that could form a revised Green Belt boundary to the north until Lilley Bottom road around 1km to the north of the boundary with EL3. |
| 8 | Land between Stony Lane and Stubbocks Wood | Open arable farmland | Land lies within parcel 2 defined in the Green Belt Review, which has been assessed as making a moderate overall contribution to Green Belt purposes (principally due to contribution to the first and third purposes). Principal contribution to Green Belt is prevention of encroachment into the countryside. | An area of arable farmland, with strong rural character, lying on top of a ridge spur north of Tea Green, on the edge of the Breachwood Green Ridge LCA (moderate landscape and visual sensitivity; moderate to low landscape value) where it meets the Lilley Bottom LCA. Large woods form the northern, north western and southern sides of the land, whilst the north eastern boundary is formed by land falling away to Stony Lane where it merges with the Lilley Bottom LCA. The woodland provides significant containment but the land is exposed to views from and beyond the valley to the north east and from the open ridge to the south east. | The site lies within the Green Belt. The northeastern edge of the site hosts an Ancient Woodland. The site is also largely covered by deciduous woodland. Grade 3 agricultural land. Strong rural character. Parts visually sensitive. Proximity to Tea Green | This site has not been promoted to the Council for development and has not been subject to any formal assessment of its suitability by the Council. The land adjoins part of the northern boundary of proposed allocation EL2 which is largely contained from the land by woodland. As such the land goes beyond this threshold and extends into land that relates, at least in part, to the landscape of Lilley Bottom. As such the land is unsuitable as a further extension of EL2 as development, would be visually prominent, extend into open countryside, and is likely to appear unrelated to any development that occurs as part of EL2 to the south. Adjoining woodland and Stony Lane could be used to define a new Green Belt boundary. |
| 9 | Land north of A505, east of site 1 | Undefined area of sloping farmland, primarily in arable | Located within southern end of Parcel 1, assessed as making limited overall contribution to Green | Site lies within the Lilley Bottom LCA, an area defined as possessing a moderate to high landscape and visual sensitivity; and of moderate to high landscape | The site lies within the Green Belt. The site is partially covered by | This site has not been promoted to the Council for development and has not been subject to any formal assessment of its suitability by the |

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| | | use | <p>Belt purposes.</p> <p>Principal contribution of this area is prevention of encroachment into the countryside.</p> <p>Although the land is separated from the urban edge by site 1, the land has a strong rural character that is free of development. As such it makes a significant contribution to the prevention of encroachment into the countryside.</p> | <p>value (the part lying within the AONB may be regarded as being of high landscape value due to its location within the designated area). The land falls steeply to the north east into the valley of Lilley Bottom. Whilst hedgerow structure has been depleted, this area has a strong rural character and falls within the southern part of the AONB. The land is open extending towards Lilley and is visually exposed in views from and across the valley. The large area of Lilleypark Wood provides some containment to the north.</p> | <p>an archaeological designation.</p> <p>The site lies within the AONB.</p> <p>Grade 3 agricultural land.</p> <p>High landscape and visual sensitivity. High landscape value (within southern edge of AONB).</p> <p>Lies directly north of Putteridge Bury Registered Park & Garden; the undeveloped land contributes to its rural northern setting.</p> <p>Rights of way.</p> <p>Steeply sloping topography of valley side.</p> | <p>Council.</p> <p>Development of this site is likely to constitute 'major development' within the AONB and is therefore unlikely to be compatible with the 'great weight' that is to be afforded to a landscape of national importance.</p> <p>The location is unsuitable for development which would be prominent and form a very significant incursion into a highly valued landscape removed and distinct from the urban area.</p> <p>This land also presents difficulties for re-defining an alternative Green Belt boundary; there is no well-defined feature that could form an alternative Green Belt boundary to the north until West Street, Lilley; this would result in an arbitrary 'protrusion' into the edge of the Green Belt.</p> |
| 10 | Brickkiln Wood, east of Cockernhoe | Plantation and deciduous woodland | <p>Land lies within parcel 2 defined in the Green Belt Review, which has been assessed as making a moderate overall contribution to Green Belt purposes (principally due to contribution to the first and third purposes).</p> <p>Principal contribution to Green Belt is prevention of encroachment into the</p> | <p>Large block of woodland within the Breachwood Green Ridge LCA (moderate landscape and visual sensitivity; moderate to low landscape value). It is crossed by Brick Kiln Lane. The western part of the wood south of the lane is a coniferous plantation. The woodland is a strong landscape feature on the edge of the ridge above Whiteway Bottom, within an area where woodlands form a mosaic and are a key characteristic along the ridge/upper valley slopes</p> | <p>The site lies within the Green Belt.</p> <p>Grade 3 agricultural land.</p> <p>Characteristic landscape feature.</p> <p>Potential ecological value; forms part of woodland mosaic.</p> <p>Contributes to containment of parts of proposed allocation</p> | <p>This site has not been promoted to the Council for development and has not been subject to any formal assessment of its suitability by the Council.</p> <p>A prominent landscape feature that is characteristic of the ridge and which provides significant contribution to containment of parts of proposed allocation sites. Unsuitable for development but may be developed as part of green infrastructure within proposed</p> |

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| | | | countryside. | of Lilley Bottom. The woodland connects to strong tree belts along the upper side of Whiteway Bottom. The woodland is encompassed (but excluded from) proposed allocations EL1 and EL2. | sites. | allocations. Provides enduring feature for redefinition of Green Belt boundary. |
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