



LUTON GREEN BELT STUDY



PREPARED FOR LUTON BOROUGH COUNCIL

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1. EXECUTIVE SUMMARY

Luton Borough Council instructed David Hares Landscape Architecture to undertake a stage 1 Green Belt review of the Green Belt land within Luton Borough to support the preparation of the Council's Local Plan. The study has focussed on whether the Green Belt land within the borough continues to meet the Green Belt purposes defined in the National Planning Policy Framework for Green Belts. A total of 6 existing Green Belt areas were considered, as well as 5 other areas of open land within the borough boundary. Sites were surveyed and analysed in relation to the 5 defined purposes of Green Belt, using a structured analysis system which assessed the level of contribution which sites made to each of those purposes. An overall score was then determined based on these separate levels of contribution. This process guided recommendations on the suitability of land for inclusion within the Luton Green Belt in the future. The results of the stage 1 review were that:

All 6 existing Green Belt areas (a total of 136HA) were found to still meet Green Belt purposes.

Other areas were considered but were not found to meet the purposes.

During the review certain anomalies in the Green Belt boundary were found (such as the treatment of proposed road corridors).

As the NPPF identifies the need to create robust permanent boundaries with a clear physical boundary on the ground, adjustments to these boundaries have been proposed. It is recommended that these changes are taken forward in the draft Local Plan.

The issue of major changes to the Green Belt boundary abutting the borough will need to be dealt with as part of further discussions with neighbouring authorities. This could potentially be part of a stage 2 study if there were to be agreement between the respective authorities to undertake such a study. Given the likely level of unmet housing need in Luton over the plan period and the scale of potential development proposals on the edge of Luton, we recommend that a further stage 2 study will be required to take account of strategic planning policies / development allocations for meeting Luton's unmet housing needs. This will require co-operation and coordination across boundaries, due to the shortfall of suitable land within the borough.

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1. BACKGROUND TO THE STUDY

1.1 Introduction

This study is part of a review of the Luton Green Belt, which is being prepared as part of the evidence base for the Luton Borough Local Plan. It builds on work undertaken by Luton Borough Council's planning policy team in the preparation of their draft Luton Green Belt Study ⁱ.

1.2 Brief

The brief for the study was to undertake a succinct review of the Green Belt boundary in Luton Borough, building on the Luton Borough Council Draft Green Belt Study. It also included a requirement to incorporate advice the council had obtained from the Planning Officers Society as well as comments from neighbouring local authorities.

The brief envisaged that the study would be undertaken in two stages:-

Stage one being a local review and assessment of the Green Belt boundary in Luton Borough based on the five purposes of Green Belt contained in the National Planning and Policy Framework (NPPF)

Stage two of the Green Belt review would follow on at a later date ideally undertaken jointly with neighbouring authorities. It would assess the boundary of the Green Belt in the light of the national Green Belt purposes and other aspects of the NPPF such as sustainability, permanence of the boundary and the need for safeguarded land to meet the long term development needs of Luton and the neighbouring local authorities and their development strategies.

This report covers stage one, a local review and assessment of the Green Belt boundary in Luton Borough. The study also documents other environmental designations that exist within the vicinity of the areas of Green Belt being reviewed; which are beneficial uses of the Green Belt, in order to provide a broader planning context which reflects the NPPF guidance on taking into account the beneficial uses of areas of Green Belt. However, these beneficial uses were only assessed in terms of helping determine the quality of the countryside and not in determining the extent the Green Belt is serving the national purposes.

1.3 Context

Historically, Structure Plans and Regional plans provided a framework for considering changes to the broad extent of Green Belt boundaries. However, in the past decade structure plans have been replaced by regional plans and regional plans have now been abolished by Government. Green Belt boundaries can now only be altered in exceptional circumstances through the local plan process. In reviewing Green Belt boundaries in local plans, local authorities need to consider their long term permanence in the light of future development requirements.

As Luton Borough Council (LBC) is now preparing a draft Local Plan, it is an opportune time to undertake a review of the Green Belt boundary in the Borough. Moreover, the housing need of Luton, of approximately 18,000 new households but with a capacity to only accommodate approximately 6,000 households in the Borough, provides the exceptional circumstances required by the current NPPF Green Belt policy to review existing Green Belt boundaries.

Luton Borough Council wishes to work with neighbouring authorities to strategically review the Green Belt to ensure suitable land is available to accommodate the objectively assessed development needs of the Borough. Luton Borough Council is currently preparing a joint Luton and Central Bedfordshire Strategic Housing Market Assessment (SHMA) with Central Bedfordshire. The preparation of the SHMA is being overseen by a joint SHMA Steering Group of nine local authorities (Luton BC, Central Bedfordshire, North Hertfordshire DC, Aylesbury Vale DC, Dacorum BC, Stevenage BC, Milton Keynes, Bedford BC, St Albans City and District). At the time of the preparation of this stage 1 Green Belt Review study, an

objectively assessed housing need target has not yet been finally determined for Luton BC, therefore a stage 2 assessment has been recommended in order to fully consider the strategic cross boundary Green Belt matters once a growth strategy is emerging for Luton and its neighbours.

1.4 Green Belt Reviews

A Green Belt Review needs to be based on the primary national purposes and function of the Green Belt. These are set out in the NPPF. Additional factors may also affect the function and value of the Green Belt such as openness, permanence and appropriate beneficial land use.

A variety of approaches have been used for Green Belt reviews. In many cases these have covered large and complex study areas, and included strategic housing needs. The Dacorum, St. Alban's and Welwyn Hatfield studyⁱⁱ developed a suitable methodology for a strategic assessment of the Green Belt across several local authority areas. Elements of this study and other strategic Green Belt studies have been used in devising the methodology for the more focussed Luton study.

The nature of the brief is to specifically look at Green Belt areas within the boundary of Luton Borough Council. These are limited by the manner in which the town has expanded to cover much of the borough, leaving only a few residual areas of undeveloped land abutting the boundary. The Green Belt Review Study consequently has been devised to meet the specific requirements of Luton Borough.

1.5 A Luton Green Belt Study

In 2013 Luton Borough Council decided to undertake a Luton Green Belt Studyⁱ. The purpose of the study was to ensure that the designated Green Belt boundary to be included in the Luton Local Plan was appropriate and fit for purpose. The study would need to demonstrate that a robust methodology had been used so that it was considered sound. A draft of the stage 1 study would be circulated to neighbouring councils for comment, before consideration of the wider stage 2 Green Belt Study.

All Green Belt areas in the borough would need to be reviewed in the light of the National Planning Policy Framework (NPPF). Specifically assessment should be made against the five national purposes of Green Belts and encompass all aspects of the NPPF. The study should additionally consider the scope for adding land into the Green Belt.

1.6 The Scope and Area of the Study

The Luton/Dunstable/Houghton Regis conurbation is encircled by the southern Bedfordshire Green Belt on all sides apart from to the east and south-east of Luton where the North Hertfordshire Green Belt completes the ring (an extension of the Metropolitan Green Belt). The detailed Green Belt boundaries in Luton have remained materially unaltered since initial approval in Local Plans. The current detailed boundary is defined within the Luton Local Plan 2006.

Geographically, Luton has grown to a point where almost the whole of the land within the borough boundary has been developed. The construction of the M1 motorway in 1959 has encouraged expansion to the west of the town, to the point where it has all but merged with Dunstable. The designation of the Chilterns AONB which lies to the north east and south west of the town has also helped to control the growth of the town, in addition to Green Belt policies.

The study has been restricted to Luton Borough, which has meant that the focus has been on a relatively small number of residual areas of Green Belt land which have remained undeveloped within the borough boundary. Strategically it is the adjoining authorities of Central Bedfordshire and North Hertfordshire District, which control all of the Green Belt abutting the borough.

The first stage of the study is specifically focussed only on Green Belt land within Luton Borough. This is because of uncertainty over the different stages of development strategy preparation within adjacent local authorities. Central Bedfordshire have proposed reviewing the Green Belt in a Pre-submission Development Strategy with the possibility of

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removing Green Belt status on Luton's northern edge but is yet to be confirmed at an examination in public. An inspector will require clear Green Belt review evidence in confirming changes to the Green Belt boundary north of Luton, Houghton Regis North or around any other allocations proposed in the Green Belt. North Hertfordshire's development strategy is not known at the time of preparing this study. A second stage study should therefore, be undertaken to consider the wider strategic issues spanning across the Luton Borough boundaries in liaison with the adjoining local authorities of Central Bedfordshire District Council and North Hertfordshire District Council, as well as the nearby authorities of Dacorum Borough Council and Aylesbury Vale District Council which are located within the Luton Housing Market Area. Major changes to the Green Belt boundary will therefore have to be considered at the strategic level in co-operation with the adjoining local authorities.

The study assesses the suitability of land within Luton to meet Green Belt purposes. It does not take account of any need to release Green Belt for new sustainable urban extensions, or other forms of development. These matters will be separately covered within the second stage of the project, which will consider strategic cross boundary issues. The Draft Luton Local Plan has recently gone out for public consultation. The issues of permanence, safeguarding land from Green Belt and complying with local plan strategy with regard to sustainability and meeting housing and economic development need in the Borough will be dealt with in the second stage of the Green Belt Study.

2. GREEN BELT POLICY HISTORY

2.1 Policy History

The Green Belt concept was developed in the 1930s and 1940s, but emerged in the post-war County Development Plans. The South Bedfordshire Green Belt was proposed and adopted by the former Bedfordshire County Council ⁱⁱⁱ in 1960 to deal with the extreme pressures for development and outward expansion of Luton, Dunstable and Houghton Regis, and prevent the coalescence of settlements within that area. Although Green Belt policies were applied to the area, the Green Belt was not statutorily designated until 1980 when it was formalised in the Bedfordshire County Structure Plan. Minor changes to the Green Belt policies were made in subsequent reviews of the Structure Plan, the most recent being the Bedfordshire Structure Plan 2011 which was adopted in 1997. The Green Belt Policies were not saved beyond September 2007, having been superseded by policies in the Regional Spatial Strategy.

While the broad extent of the Green Belt in Luton and Bedfordshire was fixed by the regional and structure plans, Local Plans were responsible for establishing detailed Green Belt boundaries around settlements. The detailed boundaries have remained materially unaltered since initial approval in Local Plans. The current detailed Green Belt boundaries in Luton are therefore defined within the Luton Local Plan 2006, the South Bedfordshire Local Plan (2004) and the North Hertfordshire District Plan (1996).

An area of Green Belt was established to the east of Luton in Hertfordshire in the Hertfordshire County Structure Plan Alterations No.2, 1984. Policies dealt with general coverage (precise boundaries to be defined in the North Hertfordshire District Plan), and development management policies. Detailed boundaries were established in the North Hertfordshire District Local Plan No. 2, adopted on 20 July 1993. The current detailed Green Belt boundary is defined in the North Hertfordshire District Local Plan No 2 with alterations (April 1996).

2.2 Planning Policy Guidance 2: Green Belts

National policy on planning and Green Belts was set out in Planning Policy Guidance (PPG) in the 1990s until this was replaced by Planning Policy Statements (PPS) in the last decade but these have now also been replaced and consolidated within the National Planning Policy Framework (discussed later in report) in March 2012.

Historically, PPG2 Green Belt policy (1988) therefore, provided the national planning guidance for Green Belts which was maintained but updated in 1995 and 2001. The guidance has been instrumental in shaping the Green Belts as they exist today being the national policy under which Local Plan Green Belt policies were written and boundaries defined. The high level of protection and safeguarding of Green Belt land and presumption against inappropriate development that were present in PPG2 are maintained in the new Green Belt guidance in the NPPF^{iv}.

2.3 Regional Plans

The Milton Keynes and South Midlands Sub Regional Study (MKSMSRS) 2005 recognised the exceptional circumstances in the area and that a review of the Green Belt around Luton, Dunstable and Houghton Regis was required. Bedfordshire and Luton Policy 2(a): Luton/Dunstable/Houghton Regis and Leighton Linlade, identified the need to review the Green Belt to accommodate sustainable mixed-use urban extensions to support the continued regeneration of the existing urban areas. Paragraph 83 of the MKSMRS stated it was essential to release development capacity within towns such as Luton. The MKSMRS described an area of search extending from the east to the north and north west of the conurbation and facilitated a review of the boundaries and general extent of the North Hertfordshire Green Belt.

Policy SS7: Green Belt of the East of England Plan 2008 stated 'The broad extent of Green Belt in the East of England is appropriate, and should be maintained.' It went on to say

however that strategic reviews of Green Belt boundaries were needed to meet regional development needs in various places including Luton, Dunstable and Houghton Regis.¹

2.4 Luton and southern Central Bedfordshire Joint Core Strategy

In order to deliver the East of England Plan and MKSMSRS, Luton and Central Bedfordshire authorities jointly set up the Joint Committee for Luton and southern Central Bedfordshire to prepare a Joint Core Strategy. The core strategy submission proposed revisions to Green Belt boundaries in Central Bedfordshire to the North of Luton and North of Houghton Regis. It recommended that the Green Belt boundary to the east of London Luton Airport in North Hertfordshire be revised as part of the North Hertfordshire Local Development Framework to accommodate an employment area. A further possible amendment of the Green Belt was to be considered at Sundon Quarry to accommodate a rail freight interchange. The new boundaries were set in accordance with advice in PPG2 and shown on the Core Strategy submission Proposal Map Amendments.

In chapter 5 of the Joint Core Strategy, Green Belt Matters, Policy CS4 dealt with the revision of Green Belt boundaries necessary to accommodate the growth needed to address the exceptional circumstances in the area. Compensatory additions to the Green Belt were to be considered in the northern part of Central Bedfordshire to maintain the overall extent of the Green Belt.

The land proposed to be removed from the Green Belt was to accommodate development requirements to 2026 and a contingency requirement beyond 2026.

The Core Strategy was submitted to the Secretary of State for inspection in March 2011 but was subsequently withdrawn in September 2011.

2.5 Luton Local Plan

The Green Belt Boundary in Luton was consolidated in the Borough of Luton Local Plan 1997. In the Luton Local Plan 2001-2011 (adopted March 2006) the Green Belt boundary remained unchanged. Green Belt Policy ENV3 was not saved in 2009 as it was duplicated by PPG2 and Regional Planning Policy at that time. The supporting text of the Local Plan policy refers to the MKSMSRS 2005 and the principle of reviewing the Green Belt boundary. The Green Belt boundary remains as shown on the Luton Local Plan 2001-2011 proposals map. Following the withdrawal of the Joint Core Strategy, Luton Borough Council commenced work on preparation of a new Local Plan for Luton and the Green Belt policy review is a necessary part of this.

2.6 Current status of Luton and Neighbouring Local Plans

The current situation with regard to the preparation and adoption of the Luton and neighbouring authorities' plans is shown on table 1 below.

Borough/ District	Current situation	Proposed adoption date
Luton BC	Consulting on its Draft Local Plan June 2014	Summer 2015
Central Beds	Pre Submission in preparation	Not known
North Herts DC	In preparation	Not known
Dacorum BC	Core Strategy adopted 2013	Preparing Site Allocations and Early Review
Aylesbury Vale DC	Vale of Aylesbury Plan withdrawn (5 th Feb 2014)	AVDC early stages of preparing new Plan. Adoption anticipated 2016

Table 1: current plan making status

2.7 National Policy: The National Planning Policy Framework (NPPF)

Protection of Green Belts around urban areas is included in the core land-use planning principles within the NPPF (Para 17). Green Belt Policies in the NPPF replaced Planning Policy Guidance 2: Green Belts but retain the high level of protection provided by PPG2.

The NPPF states that the fundamental aim of the Green Belt is to prevent urban sprawl, keeping land permanently open with the essential characteristics of Green Belt being their openness and permanence.(Para 79)^{iv}.

The NPPF sets out the five national purposes for Green Belts:-

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

The NPPF requires local planning authorities to plan positively to enhance the beneficial uses of the Green Belt once Green Belt boundaries are defined which include access, outdoor sport, recreation, landscapes, visual amenity biodiversity and improvement of damaged land. (Para 81)^{iv}

The NPPF states that Green Belt boundaries should only be altered in 'exceptional circumstances', through the preparation or review of the Local Plan. As part of any review, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.(Para 83)

The NPPF requires that a Local Plan Review should be satisfied that the Green Belt boundaries will not need to be altered at the end of the development plan period and that the boundaries are clear using readily recognisable physical features that are permanent.

In reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development, and the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary (Para 84).

The NPPF also says that when undertaking a review of Green Belt boundaries local planning authorities should:

“Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development; and not include land which is unnecessary to keep permanently open. Moreover, areas of safeguarded land between the urban area and the Green Belt should be identified where necessary

in order to meet longer term development needs of the Borough stretching beyond the plan period.”(Para 85)^{iv}

Paragraphs 89 and 90 of the NPPF lists types of development which may be acceptable in the Green Belt.

In a House of Commons debate 6 September, 2012,^v the Government encouraged councils to review local designations to promote growth:

‘We encourage councils to use the flexibilities set out in the NPPF to tailor the extent of Green Belt land in their areas to reflect local circumstances.....we will support local councils to move quickly through the process by prioritising their Local Plan examinations’

In March 2014 the Government published new web-based Planning Practice Guidance to accompany and give further detail about the policies in the NPPF. This guidance makes clear that unmet housing need in a particular area is unlikely to meet the ‘very special circumstances’ test to justify Green Belt development:^{vi}

“unmet housing need (including traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the very special circumstances’

justifying inappropriate development on a site within the Green Belt.”^{vi}

In summary current Green Belt policy and guidance has not materially changed since PPG2 was first published in the 1980’s. The exceptional circumstances as set out in Para 83 of the NPPF exist in Luton and require a review of the Green Belt areas as part of the evidence of the Luton Borough Local Plan. This Stage 1 study will assess if Green Belt areas currently meet Green Belt purposes set out in the NPPF, however, it will not reach conclusions on specific sites available for release. It will provide evidence for the Local Plan and the following Stage 2 strategic cross-boundary Green Belt study to be prepared with all the neighbouring authorities.

The recently published Luton and Central Bedfordshire SHMA Refresh (2014) figures demonstrate the high housing need issue in Luton which is even more acute now than at the time of the MKSMSRS. The logic employed in the Green Belt review of the MKSMSRS remains equally applicable to the current situation. A strategic Stage 2 Green Belt study prepared in cooperation with all the neighbouring authorities will follow to assess where housing need can be accommodated and Green Belt boundaries reviewed.

Planning Policy Guidance linked to the NPPF confirms that Green Belt is a constraint and that local authorities have a duty to cooperate in reviewing Green Belt boundaries.

3. METHODOLOGY

3.1 Scope

Various Green Belt reviews have been undertaken over the years but few since the adoption of the NPPF. It is not within the scope of the brief to do a comprehensive review of current work on Green Belt studies however relevant work has been used in the development of the methodology used for this study of the Green Belt in Luton.

This study has been undertaken to meet the specific requirements of Luton Borough Council to assess the Green Belt boundary in two stages. This stage 1 report deals specifically with Luton Green Belt areas and relevant local development issues assessing them against the 5 key purposes of Green Belt.

A second stage report which is planned to take place later will need to look at the wider strategic issues in liaison with neighbouring authorities. The stage 2 report of the Luton Green Belt will also be assessed in the light of the national Green Belt purposes but include other aspects of the NPPF such as sustainability, permanence of the boundary and need for safeguarded land to meet the long term development needs of all the local authorities. Stage 1 may therefore be provisional subject to any strategic cross boundary issues pending in stage 2.

3.2 Assessment criteria linked to Green Belt Purposes

The national Green Belt purposes have been assessed in the context of how they are expressed in national policy set out in the various sections of the NPPF.

This assessment is therefore based primarily on the criteria which relate to the five national Green Belt purposes set out in the NPPF which 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 special character of historic towns,
- To assist in urban regeneration by encouraging the recycling of derelict urban land.

In addition to the main 5 national purposes, beneficial uses of Green Belt areas are referred to in the NPPF. These are access, outdoor sport and recreation; retention and enhancement of landscapes, visual amenity, biodiversity or improvement to damaged and derelict land. We have only considered these beneficial uses in terms of the value of the countryside which is safeguarded under Green Belt purpose three above.

Previous studies and work assessing the effectiveness of Green Belt Policy undertaken for the Countryside Agency (Bartlett)^{viii} found that it was difficult to assess the five purposes of Green Belt separately as they overlap. Each purpose is not discrete and definition of the terms and how they are interpreted is important. In some cases the factors which contribute to an area meeting one Green Belt purpose, also mean that it will meet another. To help inform the study; definitions of terms have been included at Appendix 1.

The diagram at figure 1 illustrates how we have sought to refine our understanding of the NPPF purposes by focusing on particular criteria in relation to each of the defined reasons for Green Belt designation.

This has helped to avoid duplication when assessing particular criteria such as 'openness' which might otherwise have been considered under a number of the different purposes. Interpretation of the national purposes into measurable assessment criteria (relevant to Luton BC) has been undertaken and set out in the matrix at Table 1.

In terms of the fifth Green Belt purpose (*to assist in urban regeneration by encouraging the recycling of derelict and other urban land*) this purpose is considered to be more difficult to assess than the other four purposes because the relationship between the Green Belt and recycling of urban land can be influenced by a range of factors including local plan policies, brown field land availability and the land/ development market. It is considered

that the Green Belt areas in Luton are highly likely to have contributed to this purpose as well as the other four. It is however almost impossible and impractical to appraise each parcel against its role in assisting urban regeneration in this specific context. Therefore the fifth purpose of the green belt is considered comprehensively across the borough and all green belt parcels are considered to perform equally well against this purpose.

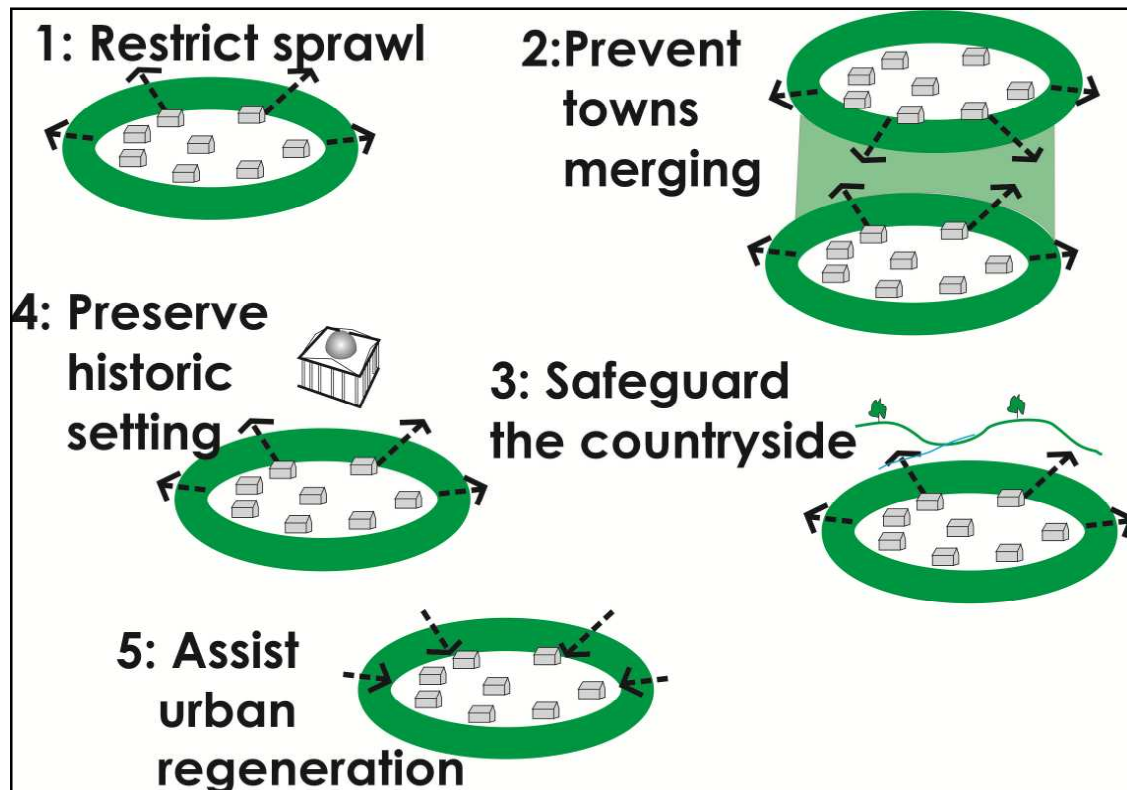


Figure 1 diagram showing how the 5 different purposes have been interpreted, for the identification of key criteria for assessment.

Table 1: Understanding and Interpretation of Green Belt Purposes

no	Purposes	Comment
1	To check the unrestricted sprawl of large built up areas	The key reason for this purpose is to check the outward spread of the town; hence the position and character of the boundary, and its permanence are most relevant.
2	To prevent neighbouring towns merging into one another	Preventing towns merging is the main reason for Green Belt, but when towns are some distance apart it is difficult to see this particular threat. Openness is therefore a key measure of the nature of the countryside between towns at threat of merging, as is perception that the area is countryside
3	To assist in safeguarding the countryside from encroachment	This purpose is effectively a countryside protection policy, but with the highest level of government support. In order to meet this, the assessment has focussed on the overall value of the countryside. Beneficial uses and related designations contribute to and are reflected in the value of the countryside protected from encroachment.
4	To preserve the setting and special character of historic towns	This purpose generally protects the context to historic towns and includes conservation areas. It is also felt important to take account of the setting of other historic assets such as historic parks and ancient monuments.
5	To assist in urban	In many ways this overall purpose is covered by the previous

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regeneration, by encouraging the recycling of derelict and other urban land	purposes and is not easy to assess for separate parcels of land. As most areas in the study would fulfil the criteria for assessing this specific purpose it has not been separately screened in this study. This issue will be covered in various policies of the draft Local Plan.
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Table 2 considers how the purposes and criteria have been developed and applied as part of the specific survey needs for the Luton Green Belt.

Table 2 GreenBelt Assessment criteria

Green Belt purpose	LutonGreen Belt issue	Criteria used in assessment	Survey pro forma assessment
To check the unrestricted sprawl of large built up area: (primarily Luton)	<p>What role does the area play in preventing non compact development</p> <p>Would Luton spread outwards if the Green Belt did not exist here.Is there Green Belt beyond the borough boundary</p>	<p>Is there a robust permanent Green Belt/ development boundary.</p> <p>Is the land abutting or in close proximity to the built up area.</p> <p>Is the land contiguous with other Green Belt beyond the borough boundary</p>	<p>Proximity / relationship to built-up area</p> <p>Proximity / relationship to Green Belt (including other authorities)</p> <p>Robustness of defining boundary features</p> <p>Permanence of boundary</p>
<p>To prevent neighbouring towns merging into one another:</p> <p>Luton and London</p> <p>Luton and Dunstable</p> <p>Luton and Hitchin</p> <p>Luton and Houghton Regis</p> <p>Harpenden and surrounding settlements</p>	<p>Is there a neighbouring settlement nearby. What role does the area play in preventing Luton merging with adjoining towns (beyond the borough boundary) or London.</p> <p>What is the perception of the Green Belt in terms of openness</p> <p>What is the distance& width of the Green Belt from adjoining towns</p>	<p>What is the nature of the countryside between the towns, rural or semi- rural?</p> <p>Is there visibility between built up areas or do woodland trees or dense field boundaries prevent this.</p> <p>What is the density of existing buildings in the area</p> <p>Is the area part of a wider open area liable to merge</p>	<p>Existing buildings within land unit</p> <p>Area adds to coherence of Green Belt</p> <p>Perception of being Green Belt / countryside</p> <p>Inter-visibility across the Green Belt</p> <p>Distance across Green Belt at narrowest point</p> <p>Density of field boundaries</p>
To assist in safeguarding the countryside from encroachment	<p>What is the nature and the function of the area and is it vulnerable to encroachment.</p> <p>What is the nature of the boundary between the countryside and built up area.</p> <p>Is the site in an AONB or other designation.</p>	<p>Is there a landscape designation</p> <p>Is there a wildlife habitat designation or value</p> <p>Is there a rural land use</p> <p>Is the land tranquil</p> <p>Is there public access or recreational use</p> <p>What are functions of land.</p>	<p>Landscape (AONB) or other designation</p> <p>Ecological/ habitat designation</p> <p>'Ruralness' of land use</p> <p>Tranquillity</p> <p>Public access</p> <p>Recreational facilities</p>
To preserve the setting and special character of historic towns	<p>Are there historic towns settlements or features or Conservation areas</p> <p>What is the nature of the setting of the historic town or feature</p>	<p>Is the land part of the setting of a historic settlement or conservation area</p> <p>Are there detractors from the historic setting</p>	<p>Contribution to setting of historic settlement and cultural heritage</p> <p>Inter-visibility with historic town or conservation area</p> <p>Detractors from setting</p>
To assist in urban regeneration by encouraging the recycling of derelict and urban land	Luton has land which needs to be recycled	Is there any derelict land within the study area	Existence of derelict or brownfield land areas around the perimeter of the borough

3.3 Assessment Methodology

The first stage of the Green Belt study reviews the current detailed boundaries of existing areas of Green Belt from the Luton Local Plan Proposals Map. Areas were assessed to consider if they met functional criteria as Green Belt. Boundaries were also checked on the ground to ensure that they follow discernible physical features. Site surveys of the area and a review of the use and function of the area were recorded using a standard pro-forma. Undeveloped areas previously excluded from the Green Belt were also assessed, as were the beneficial uses of Green Belt referred to in the NPPF to determine the quality of the countryside. Local plan designations where they coincide with Green Belt areas were also recorded. The evaluation of each area used a standard analysis sheet to assess the scale of contribution to Green Belt purposes.

The results of the assessment are recorded in a matrix with a traffic light system as follows.

Green	indicates a high/ significant contribution to Green Belt purposes
Yellow	indicates a medium contribution to Green Belt purposes
Red	indicates a low / limited contribution to Green Belt purposes

In each case the survey and analysis is based on the structured and consistent professional judgement of two experienced professionals working together in accordance with a written protocol.

Further details of the methodology and protocol are included at Appendix 2

3.4 Analysis sheets

The analysis sheets have been produced to reflect the scale of contribution the various areas have or could make towards Green Belt purposes as defined in the NPPF. They have been identified as making a high, medium or low contribution. Whilst the assessment has identified overall levels of contribution towards particular purposes, in the final analysis further professional judgement needs to be made using other criteria such as use, function, openness, sustainability and permanence to assess the overall importance of Green Belt areas and whether boundary changes are recommended.

The following section sets out the findings and our recommendations for Green Belt boundary changes. Inclusion of land within the Green Belt will be recommended if it provides a medium or higher level of contribution to the overall Green Belt purpose, and the land is situated adjoining other Green Belt land.

4. FINDINGS

4.1 Identification and Analysis of Green Belt Areas in Luton

There are six existing areas of Green Belt in Luton Borough. These are sites 1-6 :-

Site 1 Warden Hill

Site 2 Stopsley

Site 3 Oaket Wood

Site 4 Putteridge

Site 5 Dane Street

Site 6 Sommeries

A further 5 areas of undeveloped land within Luton and close to the Borough boundary were also considered as possible areas for Green Belt designation and analysed against the Green Belt criteria . These are sites 7 to 11:-

Site 7 Stockwood Park

Site 8 Winsdon Hill and Dallow Downs

Site 9 Lewsey Park

Site 10 Bramingham Wood

Site 11 Bramingham Park

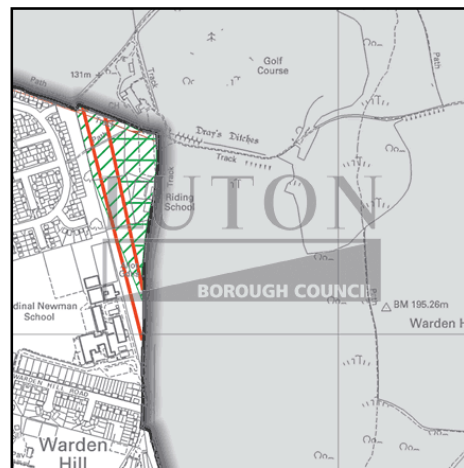
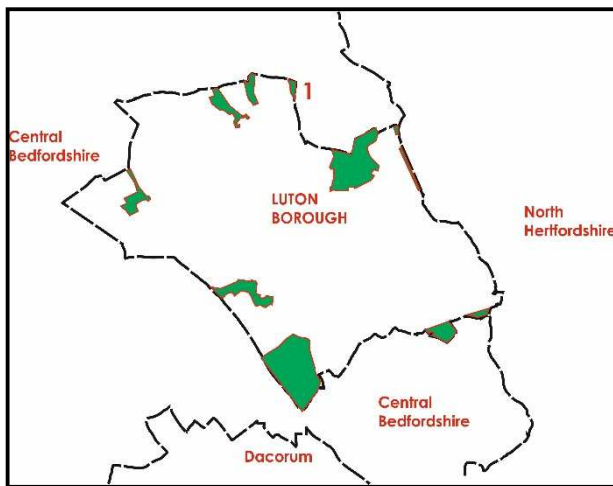


Figure 2 Location of study sites

Site 1: Warden Hill

Description

This site consists of a small triangular shaped area of land abutting the borough boundary to the north east of Luton. It includes land which is subject to AONB designation, and part has been reserved for the proposed Luton East Circular Road (North). The current Green Belt boundary follows the outer edge of the safeguarded road boundary; however this is currently undefined on the ground. The fringes of the area have been allowed to develop scrub, although the central area is grazed by horses, and a riding stables area occupies part of the site. A strip of un-grazed land runs beside the rear garden boundaries of the housing which backs onto the site from Turnpike Drive, and along the eastern boundary of the Cardinal Newman School. The borough boundary follows field boundary hedges situated on the eastern and northern boundaries between the area and South Beds golf course. A car park (for the golf course) is situated in the north eastern corner of the area. A scheduled earthwork, Drays Ditches runs along the northern boundary and has recently been cleared of scrub.



KEY	
	Adjoining Borough
	Existing Green Belt
	AONB

Location

Current extent of Green Belt



Panorama 1A: view south east towards stables.



Panorama 1B: view south west along footpath towards housing.

Designations

					Comment
Green Belt	Existing		Potential		
Landscape	AONB	AGLV			Boundary does not follow housing boundary
Biodiversity	SSSI	County site CWS	District Site DWS		
Cultural heritage	SAM	HMR	Reg Park/garden	Cons Area	Highly sensitive buried pre-historic landscape

Site 1 Analysis

Summary of site survey findings	High	Medium	Low	Reasoning
Restricting sprawl				Due to much of the existing boundary being very poorly defined
Preventing towns merging				Some distance to adjoining town, no immediate threat
Safeguarding countryside from encroachment				High value countryside due to environmental designations
Preserve setting of historic settlement				Not appropriate

Overall level of contribution to meeting Green Belt criteria	High	High/medium	Medium	Low
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Planning context of site

Part of the area is within the Chilterns AONB, and is partially covered by Green Belt.

The site provides access to and setting for the Galley and Warden Hills SSSI and Scheduled Ancient Monument (SAM) and is a county wildlife site (CWS).

This area includes a section of land which has been reserved for the construction of the Luton East Circular Road (North), a link road, which is not currently allocated funding.

Green Belt Assessment

The urban edge of Luton at this location is well defined with good quality transition from urban to countryside.

The Green Belt boundary currently runs north south along the line of the proposed road.

Recommendations

The site makes a medium to high contribution to Green Belt purposes and therefore meets the criteria for designation as Green Belt. However the existing Green Belt boundary is not clearly defined on the ground, as a result of the road proposal. We would therefore recommend that the Green Belt boundary is adjusted to fit tight against the existing housing and school boundaries. In the event that the road proposals come forward, this would then be built across Green Belt land.

Site 2: Stopsley Common

Description

This site consists of a total of four separate land units, 2A, recreation fields, 2B chalk scrub and grassland, 2C areas of lower lying farmland below the escarpment and 2D farmland around Butterfield Green. The subdivisions of this area are marked on the plan below at Figure 3.



Figure 3 showing subdivisions of Stopsley Common area.

Land unit 2A consists of an extensive area of sports fields, which were, until recently, part of the Regional Sports Centre. The Regional Sports Centre is in the process of being demolished and covered with soil and remains, as Green Belt. This building has recently been replaced by the Inspire: Luton Sports Village, which is positioned on the eastern corner of the area.

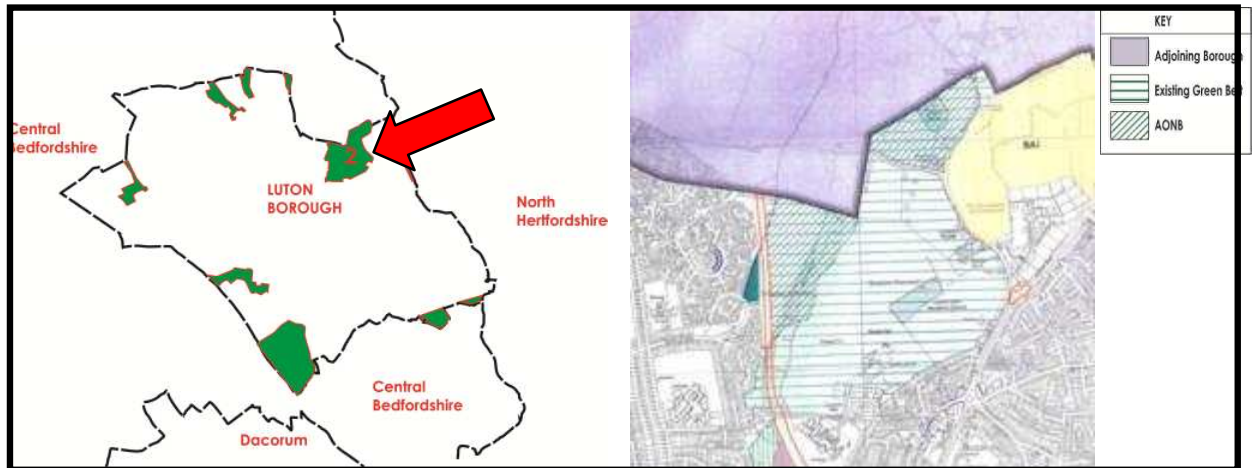
Land unit 2B is primarily an area of steep chalk escarpment which contains botanically diverse chalk grassland and scrub. It includes land which is designated AONB, as well as a County Wildlife Site. There are also medieval earthworks, (strip lynchets at Bradgers Hill). The area is a popular recreation area for the adjoining housing and contains various footpaths and trails. This unit includes an area which has been identified as part of the route for the Luton East Circular Road (North). An area of amenity land adjoining the built up area of Luton (Bushmead road to the Belfry) has also been left un-grazed and been included within this unit.

Land Unit 2C is agricultural land which is situated below the escarpment and fringes the suburbs of Bushmead and is subject to arable cropping.

Land Unit 2D is agricultural land around Butterfield Green consisting of arable, pasture and horse paddocks next to Manor Farm which dates from the 14th century. The Swedish

LUTON STAGE 1 GREEN BELT STUDY

houses are located next to the farmland on Butterfield Green road. Upshot wood is located on the borough boundary to the north.



Location

Current extent of Green Belt



Panorama 2A: view east towards new Inspire Sports Village building across playing fields.



Photo2B: view north west across escarpment and over proposed route of road towards housing.



Panorama 2C: view north across arable land in unit 2C towards the borough boundary.

Designations					Comment
Green Belt	Existing		Potential		
Landscape	AONB	LLA			AONB boundary does not seem to follow clear boundary on the ground.
Biodiversity	SSSI*	County site	District site		CWS extended recently and new DWSBradgers hill and Oosey hill potential SSSI
Cultural heritage	SAM*	HMR	Reg Park/ garden#	Cons Area	Strip Lynchets. Potential SAM Existing QE2 playing field designation Stopsley Common

*see Planning context – potential designations

Site 2 Analysis

Summary of site survey findings	High	Medium	Low	
Restricting sprawl				Definition of the boundary is confused by the omission of the road corridor in part, otherwise it is well defined
Preventing towns merging				Some distance to adjoining town .
Safeguarding countryside from encroachment				Much of the countryside here is high value, multi functional countryside
Preserve setting of historic settlement				Not applicable

Overall level of contribution to meeting Green Belt criteria	High	High/ medium	Medium	Low
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Planning context of site

The area is mostly covered by Green Belt designation with the exception of a strip of land running north south which covers the protected route of the Luton East Circular Road (North). This western part of the site at Bradgers Hill and Oosey Hill covered in chalk grassland and scrub woodland are designated County Wildlife Sites, the boundaries of which have recently been extended to include additional areas; on the scarp; on the plateau of the common and on the slopes in the Bushmead area (Natural England are currently considering designation of an area of this habitat as an SSSI). The wood in the recreational area and associated meadows to the north east is now a District Wildlife Site but Upshot Wood on the boundary did not meet the criteria and no longer has biodiversity designation. There are also strip lynchets at Bradgers Hill (currently being considered by English Heritage for Scheduled Ancient Monument designation). Two large areas of the

site are part of the Chilterns AONB although the majority of the area does not have other landscape or environmental designations.

Green Belt Assessment

The site makes a medium contribution to Green Belt purposes and therefore meets the criteria for designation as Green Belt. However, the existing Green Belt boundary is not clearly defined on the ground at one point, as a result of the Luton East Circular Road (North) proposal. On the Luton Plan Proposals Map, part of the protected road area is covered by Green Belt designation and areas to the north are not. If the road proposal is not going to be implemented then the Green Belt should be extended to include the land up to the rear of the properties along Turnpike Drive in the adjoining Bushmead residential area.

The Green Belt should also extend over the potential area of green space off Bushmead road to protect it from development and ensure the Green Belt is strong and well defined.

The eastern section of the site categorised as 2D Farmland to the west of Butterfield Green Road although covered by Green Belt designation does not have any other landscape or environmental designations. This area as well as The Inspire Luton Sports Village building, and carpark, sports pitches and informal recreational areas should remain covered as Green Belt. Although both these areas should be considered for further analysis in the stage 2 study.

The Stopsley Common area of Green Belt forms an important strategic gap separating communities in north Luton Bushmead, Icknield and Stopsley, however, with regard to Green Belt criteria, it does not represent a gap between 'towns' as specified in the NPPF.

There are no proposals for development within the adjoining Green Belt within Central Bedfordshire and the area provides a logical and consistent continuance of the adjoining Green Belt.

Recommendations

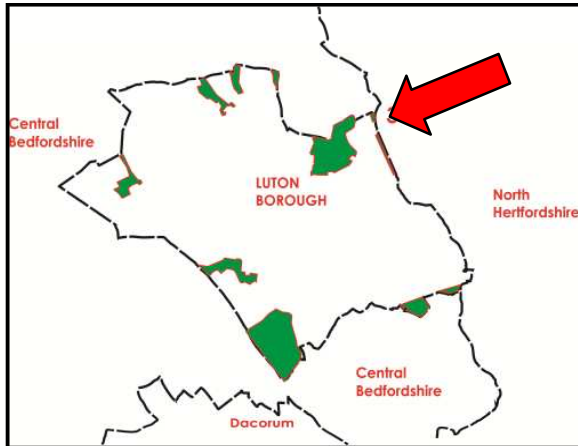
As the area makes a medium contribution to Green Belt purposes it meets the criteria for designation and should remain designated as Green Belt. However a more detailed study and analysis of land to the west of Butterfield Green road including Land Unit 2D is recommended in the Stage 2 Green Belt study.

In addition, the existing Green Belt boundary is not clearly defined on the ground, as a result of the Luton East Circular (North) road proposal. We would therefore recommend that the Green Belt boundary is adjusted to fit tight against the existing housing boundary in the Bushmead residential area. In the event that the road proposals come forward, it would be built across Green Belt land.

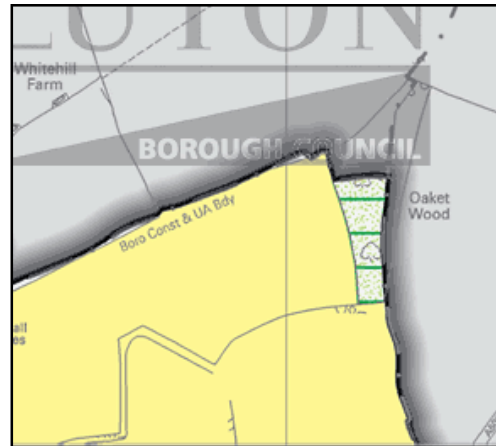
Site 3: Oaket Wood

Description

This site consists of a small piece of established woodland located on the north east corner of Luton Borough. Oaket wood straddles the borough boundary and was once part of larger woodland. In Luton there is now only a small remnant area of 0.8 ha bordering the Butterfield Business Park in the west and arable land to the north in Central Bedfordshire District and to the east in North Hertfordshire District. Land immediately adjacent to the western edge of the wood is currently being developed for business development and is temporarily covered with soil heaps and informal parking. The wood contains mature trees and ancient woodland indicators and in part is classified as a County Wildlife Site. The whole wood is situated in the Green Belt and is bordered on the eastern side by the Chilterns AONB.



Location



Current extent of Green Belt



West boundary of Oaket wood along Borough and AONB boundary.



View of eastern edge of Oaket wood from Butterfield Business Park.

Designations					Comment
Green Belt	Existing		Potential		
Landscape	AONB	LLA			AONB boundary runs along eastern edge of wood
Biodiversity	SSSI	County site	District site		
Cultural heritage	SAM	HMR	Reg Park/ garden	Cons Area	

Site 3 Oaket Wood: Analysis

Summary of site survey findings	High	Medium	Low	Reason for value
Restricting sprawl				Wood is a clear robust boundary
Preventing towns merging				Wood is part of the wider Green Belt with a long distance between Luton and Hitchin
Safeguarding countryside from encroachment				Wood is intrinsic part of rural character of surrounding high value countryside & adjoining AONB
Preserve setting of historic settlement				Not relevant

Overall level of contribution to meeting Green Belt criteria	High	High/ medium	Medium	Low
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Planning context of site

The whole of Oaket wood including the area in Luton Borough is classified as Green Belt. Part is identified as a County Wildlife Site. Land to the west of the site was previously removed from the Green Belt by Luton Borough Council to allow for the new Butterfield Business Park and cemetery extension.

The arable land adjoining the wood to the east lies within the Chilterns AONB.

Green Belt Assessment.

Oaket Wood makes a medium contribution to the purposes of the Green Belt. The site meets the criteria for designation as Green Belt, and the existing Green Belt boundary is clearly defined by the edge of the wood.

The site is part of the wider Green Belt countryside stretching to the north in Central Bedfordshire and east in North Hertfordshire. Oaket Wood forms a distinct and solid barrier to the edge of the Green Belt.

The wood presents a buffer and visual barrier between open countryside (and part of the Chilterns AONB) in North Hertfordshire and Central Bedfordshire and the Butterfield Business Park. Although some land designated as BA1 Business Park is open and in temporary operational use, it is phased for development forming part of the overall scheme and will remain safeguarded for future development. There are no development proposals for the neighbouring land in Central Bedfordshire District or North Hertfordshire District.

The wood is a feature that is likely to be permanent and fits well with the wider open Green Belt in neighbouring areas.

Recommendations

As the site makes a medium contribution to Green Belt purposes and meets the criteria for designation, there are no proposed revisions to the boundary.

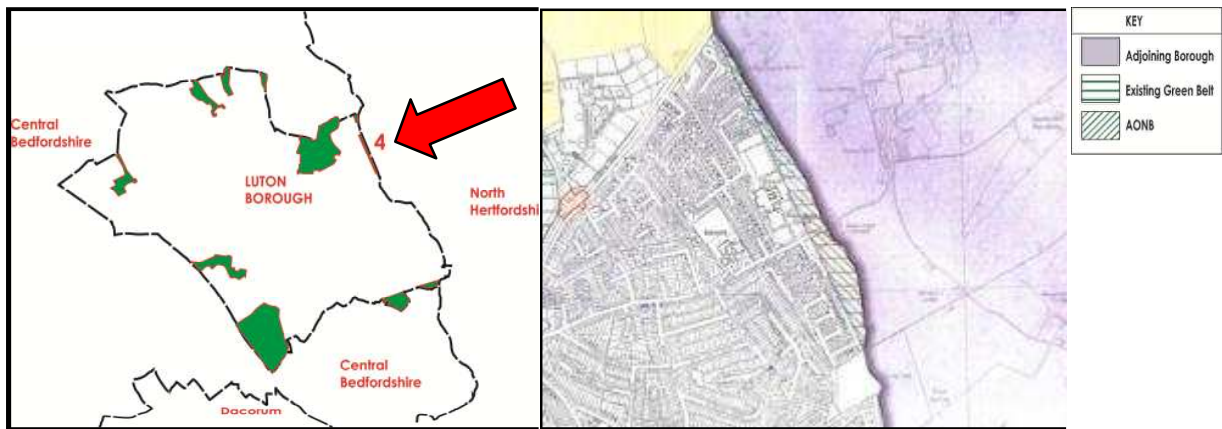
Site 4: Putteridge

Description

This site consists of a narrow strip of woodland located between the Luton Borough boundary, Putteridge School and Recreation Centre, Selsey Drive and residential properties on Edgewood Drive, Wren Close and Jaywood. The Great Hayes wood is at the northern end of the site over the borough boundary. The belt of woodland extends southwards along the borough boundary tapering into a tree belt and hedgerow bordered by the Putteridge Bury Estate brick wall running alongside Selsey Drive.

To the north-east of the site in North Hertfordshire District is Putteridge Bury, a Grade II listed building situated in a Registered Park and Garden of historic interest. The woodland belt as well as being Green Belt is classified as part of the historic parkland of Putteridge Bury.

The current Green Belt boundary follows the edge of the built up area and the wall of the Putteridge Bury Estate. The northern end of the site is designated a District Wildlife Site. The site is used for public access with many pathways through the woods.



Location

Current extent of Green Belt



Photo4A .view north along Selsey Drive and the Putteridge Estate boundary



Panorama 4B View north towards access to Putteridge Bury Estate

Designations					Comment
Green Belt	Existing		Potential		
Landscape	AONB	LLA			
Biodiversity	SSSI	County site	District site		
Cultural heritage	SAM	HMR	Reg Park/garden	Cons Area	Putteridge Bury registered Historic Park/garden

Site 4 Putteridge

Summary of site survey findings	High	Medium	Low	
Restricting sprawl				Strongly defined boundary woodland belt along urban and estate boundary
Preventing towns merging				A small part of the wider Green Belt swathe between Luton and Hitchin
Safeguarding countryside from encroachment				Important woodland belt providing an attractive boundary to Luton as high value countryside
Preserve setting of historic settlement				Not appropriate

Overall level of contribution to meeting Green Belt criteria	High	High/medium	Medium	Low
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Planning context of site

The whole site is currently designated as Green Belt and Registered as Historic Park and Garden, similar to the adjoining land in North Hertfordshire District.

The northern section of the area is part of a District Wildlife Site. Immediately to the south of the Green Belt at this location is the Wandon End Park County Wildlife Site, a narrow but imposing strip of hedgerow & woodland adjoining the borough boundary.

Green Belt Assessment

This belt of woodland acts as an attractive boundary to Luton and makes a substantial contribution to all of the purposes of the Green Belt.

The wall of the Putteridge Bury Estate between the woodland/ tree belt and the urban area provides a definitive and permanent Green Belt boundary. The unit also is part of the larger Putteridge Bury Estate which is an important historic parkland and a major open area in the wider Green Belt separating Luton from Hitchin.

There is no specific development proposal for the adjoining Green Belt area in North Hertfordshire District. However, North Hertfordshire's Housing Options consultations and a call for sites consultation in March and June 2013 identified potential sites east of Luton-1000 to 1400 dwellings (i.e. Brickkiln-Wanton Park planning application site) and north-east of Luton- a submission from the Crown estate wishing to propose development on three parcels of land north of the current Brickkiln-Wanton Park planning application site. The additional 3 parcels combined would have capacity for 2000 dwellings. Added to the Brickkiln and Wanton Park site, this would amount to 3000 to 3400 dwellings.

LUTON STAGE 1 GREEN BELT STUDY

Previously the North Hertfordshire Landscape Study (Character, Sensitivity and Capacity) 2011 identifies the Breachwood Green Ridge landscape Area 202 as occupying land from Putteridge Bury College to North Kimpton. The landscape character assessment evaluated the capacity of the area to accommodate an urban extension of less than 5 hectares as moderate, although conservation and enhancement of the registered parkland at Putteridge Bury is important.) In the SHLAA 2012 a strategic site East of Luton of 1400 dwellings was identified but located further south between the villages of Cockernhoe and Tea Green. This would not directly affect the status of Green Belt boundary at this site.

The area of Green Belt at Putteridge contributes to protecting against unrestricted sprawl, assisting in the safeguarding of the countryside from encroachment; preserving the setting of the grade II listed Putteridge Bury House and the registered historic park and gardens. Consideration was given to extending the Green Belt to include the County Wildlife Site hedgerow strip, however the scale and position of this adjoining / forming the borough boundary with neighbouring Green Belt was not felt to justify any change.

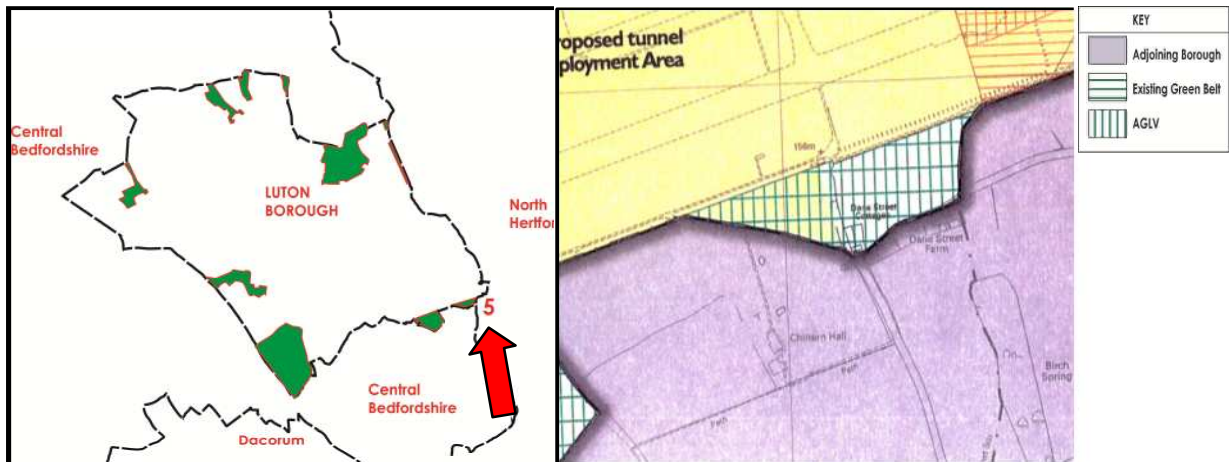
Recommendations

This area makes a medium contribution to Green Belt purposes and should remain as Green Belt as it meets all the criteria for Green Belt purposes and has a strong and permanent boundary.

Site 5: Dane Street

Description

This site consists of a small roughly rectangular shaped area of land abutting Luton airport and the southern boundary of the borough. The whole area is designated Green Belt and is shown as Area of Great Landscape Value (AGLV) in the Luton Local Plan. Part of the site is shown within the Luton Airport Action Area although it is located outside the airport fence. The current Green Belt boundary follows the southern boundary of the airport perimeter fence. The southern and western edge of the Green Belt area follows a minor road which marks the borough boundary before turning northwards to meet the airport fence. The site can be divided into two units with one area being arable land whilst the other is unused with natural grass vegetation. Dane Street Cottage is located in the southern part of the area. There is informal access across the area but footpaths only lead to the perimeter fence. It is a popular spot for recreational plane spotting.



Location

Current extent of Green Belt



Panorama 5A: view north east towards airport runway.



Photograph 5B: view north west across arable field to airport fence.

Designations

Comment

Green Belt	Existing		Potential		
Landscape	AON B	AGLV			
Biodiversity	SSSI	County site	District site		
Cultural heritage	SAM	HMR	Reg Park/ garden	Cons Area	

Site 5 Analysis

Summary of site survey findings	High	Medium	Low	
Restricting sprawl				
Preventing towns merging				Some distance to adjoining town, no immediate threat
Safeguarding countryside from encroachment				Countryside subject to AGLV designation, but not 'high value' and multifunctional.
Preserve setting of historic settlement				Not applicable

Overall level of contribution to meeting Green Belt criteria	High	High/ medium	Medium	Low
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Planning context of site

The whole area is currently designated as Green Belt and Area of Great Landscape Value similar to adjoining land in the neighbouring districts of Central Bedfordshire and North Hertfordshire. Part of the site is shown within the Luton Airport Action area in the Luton Local Plan.

Green Belt Assessment

This site in Luton Borough makes a medium contribution to Green Belt purposes and meets the criteria for designation as Green Belt. It is open and contiguous with a much larger area of rural Green Belt land in adjoining local authorities. The airport perimeter fence represents a permanent well defined Green Belt boundary. Both units of land within Luton Borough fit well with the neighbouring parcels of Green Belt land. There are no development proposals for adjoining areas of Green Belt in North Hertfordshire District and Central Bedfordshire District. This small area of Green Belt, together with the adjoining Green Belt land performs the purpose of checking urban sprawl and assisting in safeguarding the countryside from encroachment.

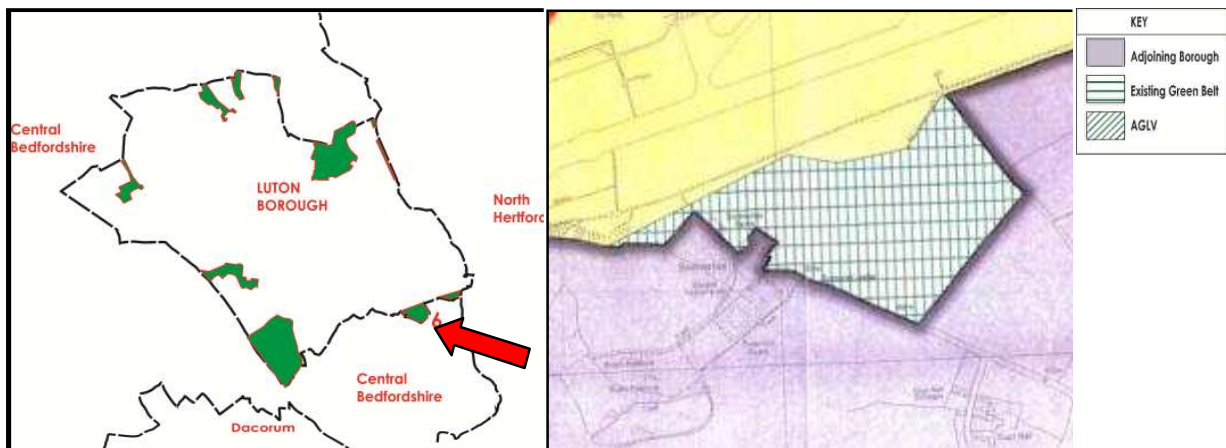
Recommendation

We recommend that the Green Belt boundary is unchanged in this area, as no revision is required.

Site 6: Sommeries

Description

This site is a roughly square shaped area of land abutting Luton Airport and the southern boundary of the borough. The whole area is designated Green Belt and is shown as Area of Great Landscape Value (AGLV) in the Luton Local Plan. The current Green Belt boundary follows the southern boundary of the airport perimeter fence. The south western edge of the Green Belt area follows a minor road which marks the borough boundary. The borough boundary then follows a footpath and field boundary north eastwards before turning north along a hedge line to meet the airport perimeter fence. The area is open arable land. Sommeries Castle Scheduled Ancient Monument lies immediately to the west of the site. However, it is separated from the arable field by an un-metalled road leading to Sommeries farm. The farm has been diversified with non-conforming Green Belt use but lies beyond the Luton Borough boundary.



Location

Current extent of Green Belt



Panorama 6A: view north east towards Luton Airport.



Panorama 6B: view east from road.

LUTON STAGE 1 GREEN BELT STUDY

Designations					Comment
Green Belt	Existing		Potential		
Landscape	AONB	AGLV			
Biodiversity	SSSI	County site	District site		
Cultural heritage	SAM	HMR	Reg Park/garden	Cons Area	Sommeries castle scheduled ancient monument close by

Site 6 Sommeries: Analysis

Summary of site survey findings	High	Medium	Low	Reason for value
Restricting sprawl				The airport fence is a clear boundary
Preventing towns merging				The unit is part of wider Green Belt area
Safeguarding countryside from encroachment				Adjoining non-conforming use prevented from expansion, AGLV designation.+
Preserve setting of historic settlement				Not applicable

Overall level of contribution to meeting Green Belt criteria	High	High/medium	Medium	Low
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Planning context of site

The whole area is currently designated as Green Belt and Area of GreatLandscape Value similar to adjoining land in the neighbouring district of Central Bedfordshire. The site is adjacent to the Luton Airport Action area identified in the Luton Local Plan.

Green Belt Assessment.

The site is open and contiguous with a much larger area of rural Green Belt land in adjoining local authorities.

The site is part of the wider Green Belt countryside stretching south in Central Bedfordshire District and east in North Hertfordshire District. The airport perimeter fence represents a permanent well defined Green Belt boundary. This small area of Green Belt, together with the adjoining Green Belt land performs the purpose of checking urban sprawl and assisting in safeguarding the countryside from encroachment

There are no development proposals for adjoining areas of Green Belt in North Hertfordshire District and Central Bedfordshire District.

Recommendations

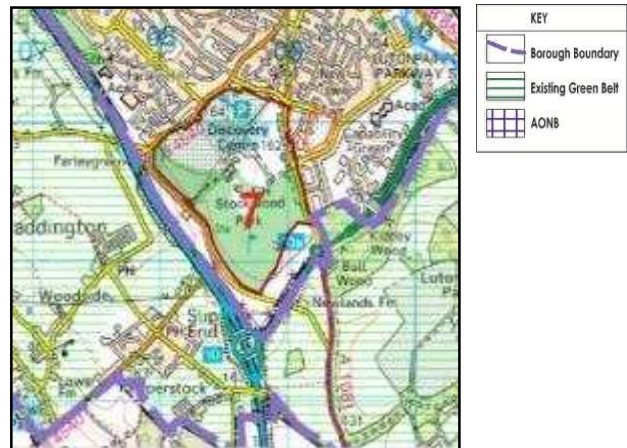
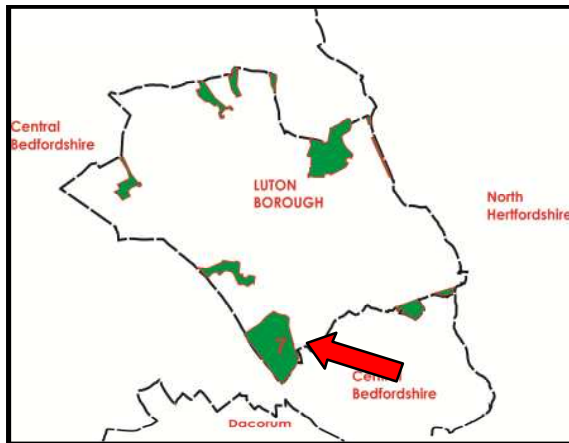
As the site makes a medium contribution to Green Belt purposes, it meets the criteria for designation as Green Belt. There are no proposed revisions to the Green Belt boundary.

Site 7: Stockwood Park

Description

Stockwood Park is part of the historic landscape of Stockwood House, a former 18th century mansion, which no longer survives. Adjacent to the park is a rugby club and the park includes a golf club, allotments and parts of the historic walled garden and stables which form the Stockwood Discovery Centre.

Sited close to Junction 10 and 10A, the area is adjacent to agricultural land adjoining the motorway spur road which is currently being upgraded with a grade separated junction. That land has been identified as a site for sports facilities and enabling development.



Location

Area situated close to borough boundary & M 1 motor way



Photo 7A: view north from Discovery Centre car park.



Photo 7B: view South east across golf course.

Designations					Comment
Green Belt	Existing		Potential		Area to be considered
Landscape	AONB	LLA			District park
Biodiversity	SSSI	County site	District site		
Cultural heritage	SAM	HMR	Reg Park/ garden	Cons Area	Former historic park and garden, listed stable block

Site 7 StockwoodPark: Analysis

Summary of site survey findings	High	Medium	Low	Reason for value
Restricting sprawl				The SA 1 policy area and motorway separate site from contiguous Green Belt
Preventing towns merging				The SA1 designation prevents this.
Safeguarding countryside from encroachment				The area provides important recreational functions
Preserve setting of historic settlement				Close to Luton south Conservation area

Overall level of contribution to meeting Green Belt criteria	High	High/ medium	Medium	Low
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Planning context of site

LUTON STAGE 1 GREEN BELT STUDY

Stockwood Park is designated as an Area of Local Landscape Importance, a County Wildlife Site and other site of nature conservation importance. The designation of land to the south of the park for the stadium under policy SA1 means that the area is no longer contiguous with the wider Green Belt, beyond the borough boundary.

Green Belt Assessment.

This site is open and makes a medium to low contribution to Green Belt purposes. It does meet certain Green Belt criteria however it is separated and no longer contiguous with a much larger area of rural Green Belt land in adjoining local authorities by the M1 motorway and the SA 1 policy designation area.

Recommendations

As the area does not fully meet Green Belt criteria, there are no exceptional circumstances to warrant adding this area to the Green Belt in Luton.

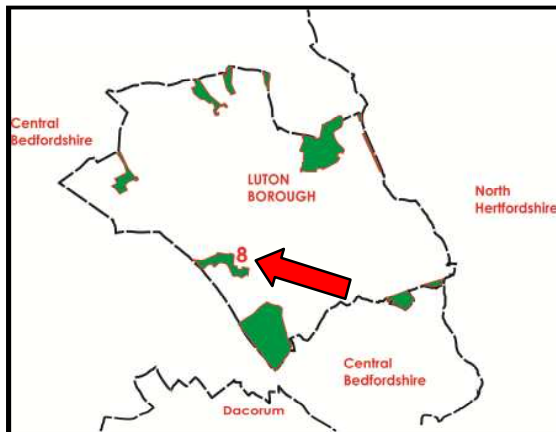
Site 8: Winsdon Hill and DallowDowns

Description

This site is a strip of steep chalk downlandescarpment which runsbroadly east west into the borough from the boundary with the motorway. The north and west facing land overlooks the town and predominantly industrial/commercial buildings below.

As a relic area of unimproved chalk downland situated to the north of the Farley Hill housing estate it is of both nature conservation and recreational value.

It is however separated from surrounding countryside to the west by the considerable boundary of the M1 motorway.



Location



KEY	
	Borough Boundary
	Existing Green Belt
	AONB

Area separated from Green Belt by M1



Panorama 8A: view east towards Luton airport from Winsdon Hill.



Panorama 8B: view north across Luton from DallowDown.

Site 8 Winsdon Hill and DallowDowns: Analysis**Designations**

	Existing		Potential		Comment
Green Belt	AONB	LLA			
Landscape	SSSI	County site	District site		
Biodiversity	SAM	HMR	Reg Park/ garden	Cons Area	

Site 8: Winsdon Hill and DallowDowns Analysis

Summary of site survey findings	High	Medium	Low	Reason for value
Restricting sprawl				Motorway and topography restricting spread of town
Preventing towns merging				Motorway and AONB beyond restrict this
Safeguarding countryside from encroachment				High wildlife and recreational values
Preserve setting of historic settlement				Part of the setting of the town

Overall level of contribution to meeting Green Belt criteria	High	High/ medium	Medium	Low
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Planning context of site

The whole area is currently designated as a County Wildlife Site. The motorway follows the borough boundary and separates the site from adjoining land in the neighbouring district of Central Bedfordshire, which is designated as Green Belt, and the Chilterns AONB lies approximately 1 Km further to the west.

GreenBelt Assessment.

This site in Luton Borough makes a medium contribution to Green Belt purposes. However it meetonly some of the criteria for designation as Green Belt as it is separated from the wider areasof rural Green Belt land in adjoining local authorities by the robust boundary of the motorway. Whilst Green Belt designation would be assisting in safeguarding the area from encroachment, and the area is a valuable wildlife and recreational area, with an important visual landscape function, the geographical position and robust nature of the motorway as a Green Belt boundary prevent their being a strong case or exceptional circumstance for addition of the area to the Green Belt.

There are no development proposals for adjoining areas of Green Belt in Central Bedfordshire District.

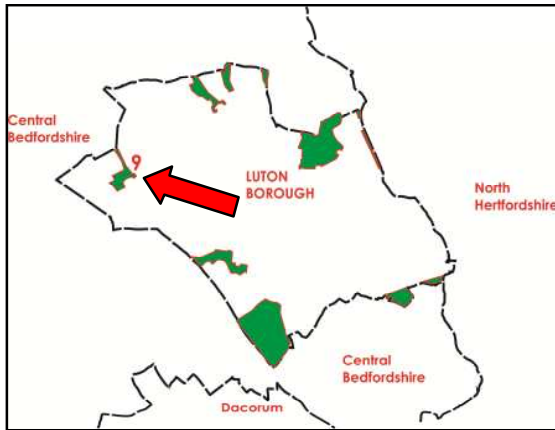
Recommendations

Whilst the site makes some contribution to Green Belt purposes the existing robust boundary mitigates against adding the area to the Green Belt. Consequently there are no proposed revisions to the boundary in this location.

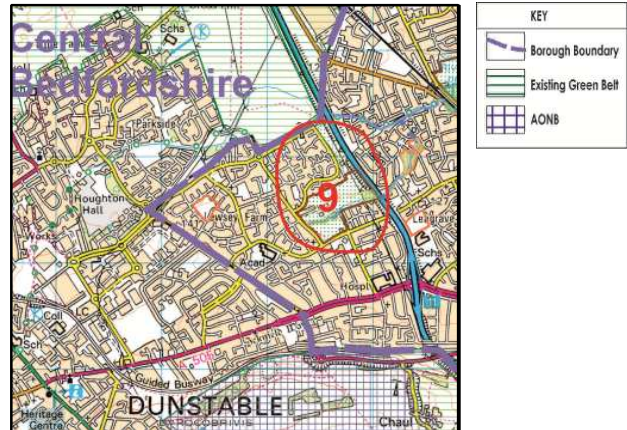
Site 9: Lewsey Park

Description

This area of open space is situated to the west of the motorway with residential areas to the west and south. It contains a newly refurbished indoor swimming pool, gym and squash facilities, and a range of other outdoor facilities. A narrower strip of land with an area of allotments and woodland link the park to the borough boundary in the north west, along the side of the motorway. Although roads run either side of this land, there is some contiguity with the wider countryside to the north, apart from an east-west cycle route which links under the motorway.



Location



Narrow link to Green Belt beside M1



Photo 9A : view NW over playing fields



Photo 9B: view towards Motorway across allotments

Designations

Comment

Designations	Existing		Potential		Comment
Green Belt	AONB	LLA	District Park		
Landscape	SSSI	County site	District site		
Biodiversity	SAM	HMR	Reg Park/ garden	Cons Area	
Cultural heritage					

Site 9 Lewsey Park : Analysis

Summary of site survey findings	High	Medium	Low	Reason for value
Restricting sprawl				Narrow link to Green Belt

LUTON STAGE 1 GREEN BELT STUDY

Preventing towns merging				Plans to develop GB beyond borough boundary
Safeguarding countryside from encroachment				High recreational value
Preserve setting of historic settlement				Not appropriate

Overall level of contribution to meeting Green Belt criteria	High	High/medium	Medium	Low
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Planning context of site

Part of the area is designated as a district wildlife site, and part is also a district park. The link to the borough boundary is classified as playing field, as is all of the park. The adjoining land in the neighbouring district of Central Bedfordshire, has effectively been removed from the Green Belt because of the planning permission for the North Houghton Regis urban extension for housing.

GreenBelt Assessment.

This site does not now meet criteria for designation as Green Belt as it will be separated from the wider areas of rural Green Belt land in the adjoining area of Green Belt in Central Bedfordshire District by the proposed DS60 housing allocation.

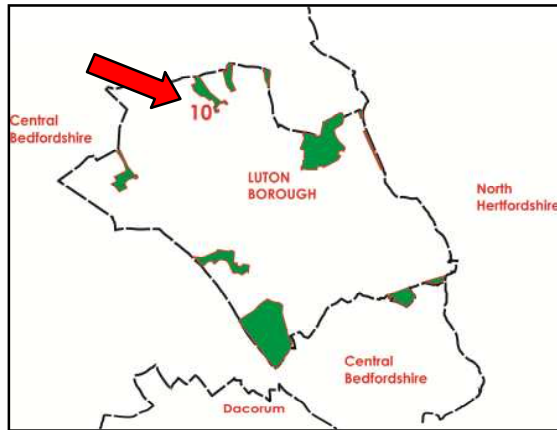
Recommendations

The site is no longer contiguous with other Green Belt land. Consequently there are no proposed revisions to the boundary in this location.

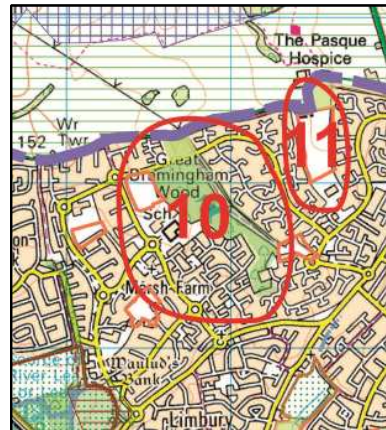
Site 10: Bramingham Wood

Description

Braminghamwood is part of an area of open land which is situated on the northern edge of the Borough and is surrounded by housing on three sides. The ancient woodland (Great Bramingham wood) is owned by the Woodland Trust, who permit public access and support a group of local volunteers to undertake coppicing in part of the wood which extends to 15.7Ha. The wood is situated to the south of Whitehorse vale. To the north is another smaller area of woodland (Little Bramingham wood) and open space which is contiguous with the borough boundary. The western part of the area consists of the Lea Manor Recreation centre, sports fields and other sports facilities which are shared with the Lea Manor school to the south.



Location



Narrow northern link to Green Belt



Panorama 10A: view south east towards Great Wood



Photo10B: view N E towards Little Wood, Borough boundary & former Green Belt beyond

Designations					Comment
Green Belt	Existing		Potential		
Landscape	AONB	LLA	Neighbourhood Park		Western section of playing fields
Biodiversity	SSSI	County site	District site		District site to north of Whitehorse Vale. County site is southerly woodland
Cultural heritage	SAM	HMR	Reg Park/garden	Cons Area	

Site 10: Bramingham Wood: Analysis

Summary of site survey findings	High	Medium	Low	Reason for value
Restricting sprawl				Link to green belt partially severed by road.
Preventing towns merging				Plans to develop GB beyond borough boundary
Safeguarding countryside from encroachment				High recreational and wildlife value
Preserve setting of historic settlement				Not appropriate

Overall level of contribution to meeting Green Belt criteria	High	High/medium	Medium	Low
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Planning context of site

Part of the area is designated as a County Wildlife Site, and part is also a neighbourhood park. The northern link to the borough boundary is classified as District Wildlife Site. The adjoining land in the neighbouring district of Central Bedfordshire, is likely to be proposed for an urban extension for housing in the draft Pre-Submission Development Strategy although

LUTON STAGE 1 GREEN BELT STUDY

this exclusion has not formally been made via the development plan, i.e. it has not been examined or adopted and there is no evidence of a full Green Belt review before or subsequent to the latest SHMA2014 Refresh^{vi}.

GreenBelt Assessment.

This site does not now meet criteria for designation as Green Belt as it will be separated from the wider areas of rural Green Belt land in the adjoining area of Green Belt in Central Bedfordshire District by the proposed DS61 urban extension housing allocation.

Recommendations

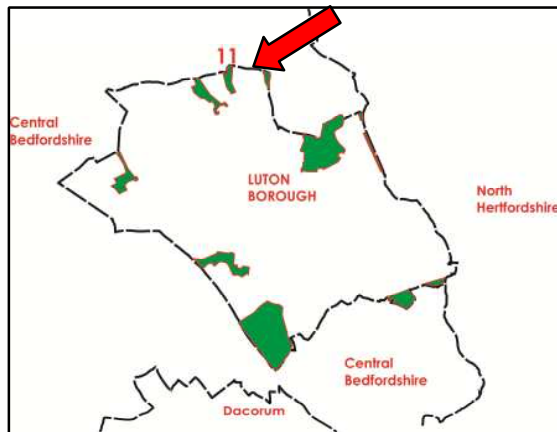
The site is no longer contiguous with other Green Belt land. Consequently there are no proposed revisions to the boundary in this location.

Site 11: Bramingham Park

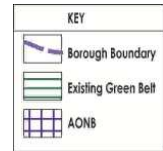
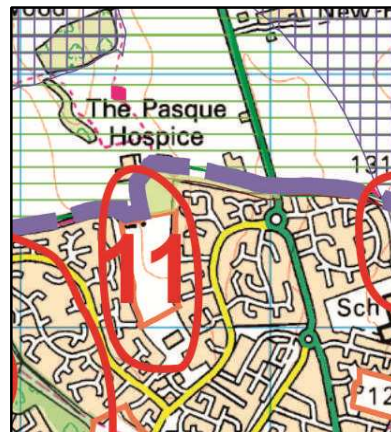
Description

Bramingham Park is part of an area of open land which is situated on the northern edge of the borough and is surrounded by housing on two sides. Bramingham Primary School is situated on the southern side of the park. The northern edge of the park is contiguous with the borough boundary, and links to the wider landscape, although this link is partially closed by the grounds of a hospice which is situated to the north west of the park. Hedgerows and grassland associated with the Hospice access road is designated as a District Wildlife Site.

The site is designated as a neighbourhood park.



Location



Narrow northern link to Green Belt



Panorama 11A: view north across park



Photo11B: view of play area in south of park

Designations					Comment
Green Belt	Existing		Potential		
Landscape	AONB	LLA	Neighbourhood Park		Southern section of park
Biodiversity	SSSI	County site	District site		
Cultural heritage	SAM	HMR	Reg Park/garden	Cons Area	

Site 11: Bramingham Park: Analysis

Summary of site survey findings	High	Medium	Low	Reason for value
Restricting sprawl				Link to green belt partially severed by hospice.
Preventing towns merging				Plans to develop GB beyond borough boundary
Safeguarding countryside from encroachment				High recreational value
Preserve setting of historic settlement				Not appropriate

Overall level of contribution to meeting Green Belt criteria	High	High/medium	Medium	Low
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Planning context of site

Part of the area is designated as a neighbourhood park. The adjoining land in the neighbouring district of Central Bedfordshire, is likely to be proposed for an urban extension for housing in the draft Pre-Submission Development Strategy although this exclusion has not formally been made via the development plan, i.e. it has not been examined or adopted

and there is no evidence of a full Green Belt review before or subsequent to the latest SHMA2014 Refresh^{vii}.

Green Belt Assessment.

This site does not now meet criteria for designation as Green Belt as it will be separated from the wider areas of rural Green Belt land in the adjoining area of Green Belt in Central Bedfordshire District by the proposed DS61 urban extension housing allocation.

Recommendations

The site is no longer contiguous with other Green Belt land. Consequently there are no proposed revisions to the boundary in this location.

4.2 Co-ordination of the Luton Green Belt with Adjoining Local Authorities

The residual areas of open land in Luton are only a very small component of the wider Green Belt which mostly lies in neighbouring local authorities. Adjoining local authorities therefore have control of much of the Green Belt which prevents the spread of Luton, and whether it merges with neighbouring towns. It is therefore imperative that the proposals for the Green Belt in Luton are co-ordinated with any proposals within the adjoining districts.

An initial meeting was held in Luton Town Hall at which the method and timetables for local Green Belt reviews were discussed with neighbouring authorities. The minutes of this meeting are at Appendix 5. This explained that, given the quantum of unmet housing needs in Luton, a two stage process would be needed to undertake a Green Belt review in Luton. The first stage of work would assess the contributions which Luton land made to Green Belt purposes, and a second stage in which wider cross boundary co-operation would be required in order to assess Green Belt boundaries in the light of housing demands, the need for safeguarding, and other strategic planning policy concerns.

4.3 Recommendations of the Stage 1 Green Belt Review

Having assessed the land within the Borough of Luton against the purposes within the NPPF, we would recommend the following changes to the Green Belt Boundary in Luton

Warden Hill

Extend the Green Belt across the safeguarded road corridor to the property boundaries of Turnpike Drive and the Cardinal Newman School in the Bushmead residential area.

Stopsley Common

Extend the Green Belt to the property boundaries of the adjoining Bushmead residential area and incorporate the undeveloped area shown as proposed green space on the existing Local Plan Proposals Map.

Undertake a more detailed study of the area west of Butterfield Green Road in Stage 2 of the Green Belt review.

No change or revisions are recommended to the Green Belt at Oaket Wood, Putteridge, Dane Street and Sommeries.

4.4 Conclusions

The existing Green Belt areas in Luton make substantial contributions to meeting Green Belt purposes, as defined by the NPPF.

They are important areas of open land which should permanently remain free of inappropriate development so that they continue to function as Green Belt.

The current Green Belt areas in Luton coordinate well with adjoining Green Belt areas in neighbouring local authorities contributing to strategic green infrastructure and creating a robust Green Belt around the urban conurbation of Luton, Dunstable and Houghton Regis.

It is recommended that minor changes are made to the current Green Belt areas in Luton to make the inner boundary more logical. Alignment to specific physical features on the ground will clearly define the boundary between the built up area and adjoining open spaces.

Green Belt areas also coincide with Local Plan designations within Luton such as AONB, SSSI, County Wildlife Sites, SAMs, and Registered Parks and Gardens providing relevant beneficial land uses such as wildlife habitats, agricultural and recreation areas. They also preserve important historic and archaeological features, protect the setting of historic sites and conserve the landscape character.

Green Belt areas in Luton not only meet national purposes but also serve important local purposes of defining the edge of the urban area and providing recreation and access land within the borough. Green Belt areas contribute to the amenity of the large urban population of Luton by providing high quality outdoor recreation and green space which is lacking in the town.

LUTON STAGE 1 GREEN BELT STUDY

Local Plan Green Belt policies should encourage sustainable development within the urban area of Luton by directing development to previously developed and derelict sites. However, this is subject to physical, economic, social, environmental and infrastructure capacity of the town. The location of new development is likely to require strategic cross boundary solutions given the scale of the evidence on the agreed Objective Housing Need (Draft SHMA 2014 Refreshⁱⁱⁱ) within the Luton and Central Bedfordshire Housing Market Area and the housing capacity within the town.

Green Belt and other policies in the draft Local Plan will also need to ensure the Borough fulfils the purposes and wider Green Belt criteria in the NPPF and meets its requirements for sustainable development and safeguarding appropriate land.

4.5 Stage 2 Green Belt Review with Adjoining Local Authorities

Luton Borough Council will review the current Draft Local Plan and consult over the summer of 2014 following the recent delivery of revised strategic housing market assessment (SHMA) figures.

This will necessitate further co-operation with neighbouring authorities (including those local authorities located in the Luton Housing Market Area such as Aylesbury Vale, Central Bedfordshire Council, North Hertfordshire DC, Dacorum BC, regarding the delivery of future housing to meet Luton's unmet needs. This co-operation will need to take account of the Green Belt reviews which are either being undertaken or are completed by neighbouring local authorities. (During the preparation of this report no details of other local authority Green Belt reviews were available) The stage 2 study would need to take account of the situation in neighbouring districts, which at the time of writing is still fluid. Consequently the stage 2 study might become an iterative process, in which further refinement of joint Green Belt policy areas is developed as plans move forwards.

5. APPENDIX 1: TERMINOLOGY

Settlement Policy Area: area defined as a built up area within the local plan

Built up area: area predominantly covered with buildings, and associated spaces such as gardens or parks.

Urban sprawl: a spreading urban area with no definite boundary or edge.

Encroachment: gradual advance or intrusion of built development

Merging: coalescence of built development or settlements

Green Belt: A planning designation and policy which is intended to prevent the spread of urban areas into countryside and merging with other distinctive settlements.

Urban fringe: The area at the edge of town where urban influences affect the countryside

Neighbouring Towns: towns with separate or distinctive identities which might be lost if development were to spread between them

Countryside: Areas which accommodate rural land uses such as agriculture, forestry and outdoor recreation.

Openness: land which is predominantly free from buildings and other forms of development, apart from those associated with agriculture.

Encroachment: The process by which one land use such as urban development spreads into the countryside

Historic Towns: Towns with a distinctive historic character

Historic Assets: Historic features such as historic parks, buildings or earthworks.

SAM: Scheduled Ancient Monument. Historic monument which has been subject to scheduling procedure in the past.

RPG: Registered Parks and Garden

HMR/ HER: Historic monument record or historic environment record. Records of historic assets normally maintained by a local authority.

SSSI: Site of Special Scientific Interest

CWS: County Wildlife Site

DWS: District Wildlife Site

CA: Conservation Area

AONB: Area of Outstanding Natural Beauty

AGLV: Area of Great Landscape Value

LLA : Local Landscape Area

Landscape character: A combination of topography, natural and man made patterns which together contribute to the appearance of the landscape.

PoGBAs : Potential Green Belt Areas

6. APPENDIX 2: METHODOLOGY AND PROTOCOL

Desk study identifying potential areas

Mapping of the Borough was used to identify potential Green Belt areas for the study. All substantial green open spaces and undeveloped land within Luton Borough were considered whether agricultural, recreational, amenity, waste or derelict land. Existing designated Green Belt areas were identified in addition to other open areas bordering the Luton Borough boundary. A total of 5 additional areas were considered as well as the 6 existing Green Belt areas. Each site or 'potential Green Belt area' (PoGBA) was recorded with a number and are shown on figure 2 below.

Site Survey

A survey pro forma was developed to enable recording of the salient features of each part of a potential Green Belt area (PoGBA). PoGBA's were subdivided into separate land units where there were significant changes in land use or character. This was necessary for the larger blocks of land, which were not homogenous in character or use. Field or other distinct boundaries were used for the subdivisions in these cases. The survey pro forma was completed as part of a site visit to record the professional judgements made on site. The completion of the pro forma was undertaken in a consistent and structured manner by two experienced surveyors in order to provide consistent results. Each feature of the site was assessed in relation to the assessment criteria which contribute to Green Belt purposes as described in Table 2 and the protocol.

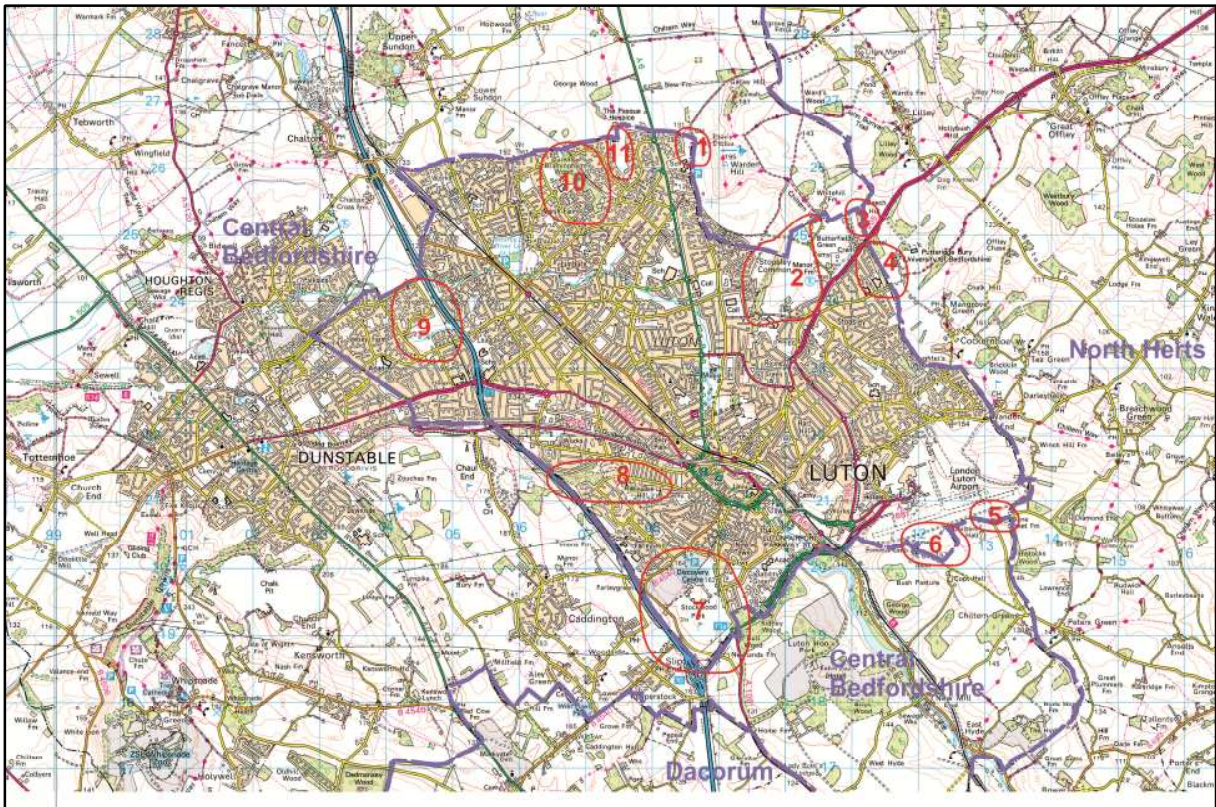


Figure 2 showing location of sites considered

Values were then attributed to the contribution which the individual land unit made towards Green Belt purposes. (Weighting of individual Green Belt purposes was not undertaken as the NPPF does not prioritise the purposes, nor is it appropriate to the local circumstances of Luton.)

LUTON STAGE 1 GREEN BELT STUDY

Judgement was made on the basis of a high, medium or low level of contribution to Green Belt purpose.

The results of the assessment are recorded in a matrix with a traffic light system as follows.

Green	indicates a high/ significant contribution to Green Belt purposes
Yellow	indicates a medium contribution to Green Belt purposes
Red	indicates a low/ limited contribution to Green Belt purposes

Analysis of areas against Green Belt purposes

The completed individual land unit survey pro-formas were then reviewed with GIS data which provided further details in relation to other designations and context. Information on the pro-formas, identified against the 5 Green Belt purposes, was used in combination with mapping to analyse and determine the most suitable areas for inclusion within the Green Belt. It also took account of other constraints such as safeguarding, existing consented sites and other proposals such as road corridors. These results are summarised in the analysis sheets for each of the PoGBA's.

7. APPENDIX 3: MINUTES OF JOINT NEIGHBOURING AUTHORITIES GREEN BELT MEETING

Luton Greenbelt Study-Meeting at Luton Town Hall 13th March 2014

Attending

Kevin Owen and Troy Hayes	Luton BC
Simon Andrews and Andrew Marsh	Central Bedfordshire DI
Richard Kelly and Helen Leach (Part)	North Hertfordshire DC
David Broadley	Aylesbury Vale DC
Lynnette Leeson & David Hares	David Hares Landscape Architecture

Apologies received from Laura Wood & John Chapman of Dacorum BC

Purpose of meeting: Co-operation regarding the definition & revision of the Luton Green Belt, and briefing on the current Luton Stage 1 Green Belt Review.

Kevin Owen Luton Borough; explained the background to the Green Belt Study, a preliminary report was issued in July 2013, circulated to neighbours, comments received, a review by the Planning Officer's Society (POS) undertaken. David Hares Landscape Consultants were briefed to revisit the preliminary report, taking account of comments made by other local authorities and the POS. The current position on the Luton Local Plan is that a draft was published for committee on 13th January. This is now in the public domain but requires further work on housing figures, now awaiting the SHMA report. An amended plan is unlikely to be sent out for consultation until June.

David Hares gave a PowerPoint presentation on the Green Belt Study. He described how the Green Belt review methodology had been developed to suit the Luton situation where the town had been built out to the Borough boundary and the remaining small pieces of Green Belt were residual areas adjoining the neighbouring authorities (Central Beds and North Herts). Explanation was given on how the Green Belt purposes in the NPPF were interpreted and the criteria chosen for analysis in the methodology. A survey pro-forma had been developed which focussed on the 5 NPPF purposes, and how these were not exclusive. Particular purposes had been identified for assessment both in the field and in an analysis sheet, and the levels of contribution towards the GB purposes had been classified as high medium and low. Interim findings for 6 sites showed they generally met Green Belt purposes. Other open sites, not previously designated as GB, were considered which were separated from neighbouring Green Belt areas by existing allocations and or the motorway. These sites although meeting some GB purposes, did not meet all the necessary criteria, and were unable to provide longer term contributions to the Green Belt.

Lynnette Leeson sought an update on Green Belt reviews being undertaken by neighbouring authorities:

David Broadley Aylesbury Vale: Currently preparing new Vale of Aylesbury Local Plan, to a period till 2031. AVDC are generally able to meet their needs outside greenbelt areas unless they expand settlements such as Wendover which is within Green Belt. They would need to review GB this year as they are working to have a new plan available in the next 2 years.

Richard Kelly North Hertfordshire; will need to review their timetable for their local Plan as they are unsure of how much of Luton's housing needs will be unmet and will need to be accommodated by adjoining local authorities. They are currently doing an internal Green Belt review, considering more strategic areas as they have a larger expanse of Green Belt. There is concern regarding consistency across boundaries

and in the scale of interpretation of Green Belt purposes. (notably purpose 4 setting of historic towns should it include historic assets as well?). The N Herts GBR will be finished shortly then be subject to internal review. (NB Luton GB Review will include local purpose re historic assets.)

Andrew Marsh Central Bedfordshire; previously prepared a Technical Paper on the Green Belt and have recently updated it to assess areas being considered for withdrawal from GB. The work continued on from that undertaken for the regional plan now defunct and the draft Joint Core Strategy now withdrawn. The work was undertaken in 2 parts, justifying exceptional circumstances for removal of Green Belt designation, and considering areas against GB purposes. The work did not specifically look at strategic GB issues, but considered specific sites based on the work of the joint technical unit set up as part of the Joint Core Strategy. Planned changes to the GB were proposed in the pre submission draft (published 7 years ago) and included removal of GB land to west of M1 expanding Houghton Regis, and between B5120 and A6.

Dacorum (via email) A joint strategic Green Belt Review is being undertaken by Dacorum, St. Albans and Welwyn Hatfield. A Stage 1 Report on Green Belt Purposes Assessment[#] was completed in November 2013 looking at strategic boundaries based on areas meeting national defined purposes. A Stage 2 report is now underway looking at all potential locations for housing based on a detailed investigation of land contributing least to Green Belt purposes identified in the stage 1 report.

Discussion on Possible Development proposals on Luton's boundary.

Central Bedfordshire An application to extensively develop current Green Belt designated land to the north of Houghton Regis and Luton has been referred to the Secretary of State who has recently declined to call it in. A judicial review is possible. The new GB boundary to be included in the draft plan would be defined by a northern link road, (which would be half developer funded.) The proposed road link to the A6 was not currently in the Highways roads programme, but the Western road was (2017). Central Beds did not expect the north eastern Luton link (A505 to A6) to be built in the future.

There was also awareness of a possible proposal coming forward from the Crown Estates for the Whitehill Farm area to be developed for housing (north of site 2) , but this would only be on the long list.

North Hertfordshire

The expansion of the proposed employment area next to Luton Airport into North Herts was not being actively pursued currently. However work was being considered on the provision of housing in the nearby villages of Tea Green and Cockernhoe where SLAA sites had been identified. Applications were likely to be received for housing development in this area before the Local Plan is completed.

Discussion on Future Cooperation

After discussion it was agreed to try and ensure consistency by sharing methodologies and preliminary study results. An additional local Luton purpose would be added to the analysis matrix to identify the importance of historic assets in addition to purpose 4 referring to the setting of historic towns

In principle it was accepted that there needed to be consistency in Green Belt reviews across all local authority boundaries. Compatibility of methodology used in Green Belt reviews is important. In the light of guidance in the NPPF, strategic cooperation is needed in defining any new long term boundaries for the Green Belt.

It was agreed that the draft Stage 1 Luton Green Belt Study would be circulated for comments during the week commencing 24th March. Any existing studies, internal notes and technical papers on Green Belt issues would also be circulated. Discussion on the need for a stage 2 joint strategic Green Belt review would be continued after the details of the SHMA report and housing figures are known in April 2014 (anticipated).

8. 3: REFERENCES

- i. LutonGreen Belt study draft; Luton Borough Council June 2013
- ii. The Purposes Assessment for Dacorum, St. Albans and Welwyn Hatfield
- iii. Bedfordshire County Council ceased to exist on 1 April 2009 when unitary councils were introduced across the whole of Bedfordshire, with Central Bedfordshire Council covering the former South and Mid Beds District Council areas.
- iv. National Planning Policy Framework March 20 12 DCLG
- v. House of Commons debate 6 September.2012 (cc29WS)
- vi. Planning Practice Guidance, Housing and economic land availability assessment, methodology-stage 5;Final evidence base, 6.March 2014
- vii. Strategic Housing Marketing Assessment 2014 Refresh.
- viii. Vision for a Sustainable, Multi-Functional Rural-Urban Fringe, Cheltenham, Countryside Agency, 2005