



The Greensand Trust

Proposed Local Landscape Designations for Luton

Final Report – Produced by the Greensand Trust on behalf of Luton Borough Council
June 2014



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1. Introduction

Luton Borough Council is producing a “Local Plan Review” in 2014 which will replace the previous Local Plan (2001-2011). It is estimated that the town will require new dwellings (and associated infrastructure and employment land) for approximately 50,000 new residents in the period to 2031 (figures provided by Luton Borough Council Local Plans Team).

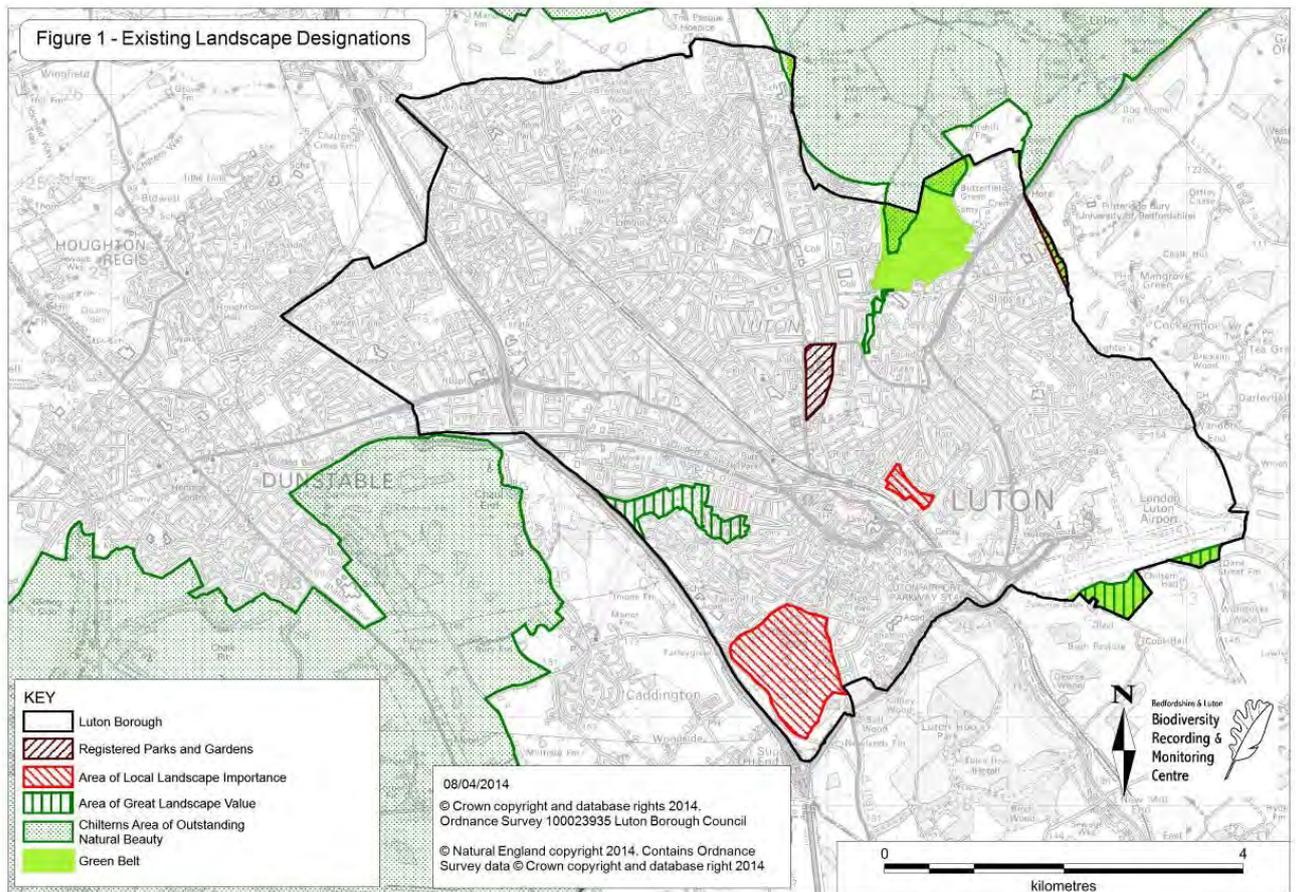
There is a need to plan for this growth, and to ensure that it does not have an adverse effect on Luton’s environment, including its landscape. Luton is situated in the gap carved through the chalk hills by the River Lea, and the influence of the chalk geology is significant, providing the setting for the town. The Luton Local Plan (2011-2031) is intended to provide the blueprint for growth in a sustainable context.

Only a very small part of the landscape of the Borough of Luton is protected by ‘Area of Outstanding Natural Beauty’ (AONB) status, despite the steep chalk valley sides continuing into the town at both Dallow Downs and Bradgers Hill. Other key areas protected through local landscape designations. Dallow Downs and Winsdon Hill, an area north of Stockingstone Road and two small areas south of Luton Airport were designated as ‘Area of Great Landscape Value’ (AGLV) in the previous Local Plan, with Stockwood Park and part of Hart Hill being designated as ‘Area of Local Landscape Importance’ (ALLI). The AONB, AGLVs and ALLIs are illustrated in **Figure 1**. The relevant policies in the Local Plan (2001-2011) were ‘saved’ in order to continue this protection, but will be replaced by the new Local Plan (see **Appendix 1** for saved policies). It is noted that the AONB boundaries are not always based on landscape character but some instead use administrative boundaries. Previous Local Plan policy has not provided total clarity on how local designations have been arrived at and how ALLI and AGLV differed. Therefore there is a need to create a new, rigorous basis for landscape protection within the Local Plan Review.

As part of a wider Landscape Character Assessment of Luton (*Luton Borough Landscape Character Assessment, The Greensand Trust, 2014*), the principle of creating a new local landscape designation was embedded and applied to sites and areas felt to potentially merit some form of landscape designation. This report summarises that specific area of work.

Local Landscape Designations help protect areas of scenic quality from inappropriate development, where they are not otherwise protected. However, their application needs to be rigorous, thorough and consistent. Historically their application (nationally) has been subjectively based. The basis is not always well documented, nomenclature is varied and a quantitative, criteria-based scoring system is often lacking.

Additionally, such designations raise profile and awareness of local landscape, can be seen as an accolade, help focus policies and objectives and act as a tool for management (Review of Local Landscape Designations, Chris Blandford Associates, on behalf of the Countryside Agency, 2006). With specific regard to Luton, it is also hoped that they will help clarify the relationship with the AONB. **Noting the point above regarding some AONB boundaries, it is also recommended that this report be used in any subsequent AONB boundary review.**



2. Identifying Potential Areas

Areas that were thought to be potentially meriting designation were identified through extensive fieldwork carried out as part of the wider Landscape Character Assessment in 2012-13. As part of this process other areas/sites were considered, but not put forward as it was instinctively known that they would not meet the minimum score. In combination with those areas previously designated as AGLV or ALLI, this resulted in a 'long list' of 'candidate' areas (see Table 1 below).

Some sites were left out because they were felt to have other equal or greater levels of designation. Wardown Park is an example of this. However, with hindsight this is seen as inconsistent, and any future assessment of this type should include *all* possible sites, regardless of other designations, as part of any initial process.

While a new single designation was initially considered in order to simplify the system, it was felt a significant number of sites/areas would potentially merit designation. It was also felt that the range and quality of sites potentially meriting designation would vary, and that it would be helpful to have more than one type of local landscape designation. It was acknowledged that greater clarity is required in explaining the differences between the different types of designation. Therefore the approach that has been used has been to score the candidate sites using a criteria-based scoring system (see Section 3 below) to ascertain (a) whether the site/area meets the standard for designation of some kind, and (b) whether it merits a higher level of designation. It was agreed that the name "Area of Local landscape Value" (ALLV) would be used for those that met a minimum threshold score,

and that “Area of Great landscape Value” (AGLV) would be used for the best areas/sites that met a higher threshold score.

3. Developing a Criteria-Based Scoring System

In terms of creating a process for selecting and justifying these ALLVs, research was carried out and included analysis of work done in the Surrey Hills, Edinburgh and South Norfolk. The CBA Review mentioned above also provided a valuable source of guidance, and all pointed towards a rigorous, quantifiable, criteria-based scoring system.

A list of criteria was developed, largely from good practice and applied exercises elsewhere. The criteria include naturalness, geology, landform, integrity, size, tranquillity, recreational use / community value, importance to setting of the town and the AONB, ecological and historic heritage factors and value of designation. A scoring system was created, based on ‘High/Medium/Low’ and converted to numerical values.

Further detail on the scoring is in Appendix 2, but it is useful to clarify/highlight some elements here:

- Criteria 4 makes reference to somewhere being a “significant enough area” to designate. It was felt that to set a specific minimum size would be somewhat arbitrary, and would also be unnecessarily biased against long, narrow sites that can have considerable landscape importance (e.g. steep chalk valley sides) yet relatively small area;
- Criteria 9 – tranquillity. This uses a scale of 4 (highly tranquil), 3 (moderately tranquil) and 1 (low tranquillity). This was found to be normal practice within other scoring systems, to give greater emphasis to tranquillity, and has therefore been retained. Tranquillity was assessed in the Luton context, accepting that very few areas were capable of being highly tranquil in this highly urban context. Wherever possible tranquillity was assessed from a range of points across an area or site.
- Criteria 11 – importance to the setting of the AONB. In other scoring systems looked at this criteria usually has a maximum score and no other, effectively turning it into a “yes/no” question. In Luton the scenario is more subtle, with some sites/areas being directly adjacent to the AONB, and therefore potentially of very high importance to its setting, while others are not but are still within visual distance and have a moderate importance to the setting. Therefore some judgements have been made to allocate a score of 1 or 2, depending upon the level of importance, if not considered “high”;
- Criteria 18 relating to incongruous features and detractors has negative scores, depending on the severity of the detractor, the most severe being minus three.

A minimum score for any candidate area to reach in order to be considered for putting forward as a potential ALLV was set at 35/55, based on the need to satisfy the criteria to a high level. The minimum score for a site to be considered for the higher level AGLV designation was 45/55, to reflect the higher standard required

4. Applying the Scoring System

Each area was scored against these criteria. **Appendix 2** includes a brief description for each candidate area, a map showing its boundaries, illustrative photographs and the full score sheets with commentary. The results are summarised in **Table 1** below:

Table 1: Summary of Scoring

| | Candidate Area | Score | Should it be proposed for ALLV designation? | Should it be proposed for AGLV designation? |
|---|----------------------------------|-------|---|---|
| a | Stopsley Common | 48 | Yes | Yes |
| b | Dallow Corridor | 47 | Yes | Yes |
| c | Stockwood Park | 45 | Yes | Yes |
| d | Hart Hill | 37 | Yes | No |
| e | Somerles Farm & Dane Street Farm | 37 | Yes | No |
| f | Turnpike Drive | 38 | Yes | No |
| g | Bradgers Hill Corridor | 53 | Yes | Yes |
| h | Lower Lea Valley | 36 | Yes | No |
| i | Vauxhall Way | 26 | No | No |
| j | Lewsey Park | 39 | Yes | No |
| k | Wigmore Rural | 36 | Yes | No |
| l | Upper Lea Valley | 38 | Yes | No |
| m | Vauxhall Ridge | 26 | No | No |
| n | Putteridge Edge | 37 | Yes | No |
| o | Bramingham Wood Corridor | 45 | Yes | Yes |
| p | Bramingham Park | 46 | Yes | Yes |

5. Ratifying the Process

To provide additional robustness to the process and add additional local knowledge, a draft report was provided to a group of professional stakeholders, including landscape professionals. A workshop was subsequently held in June 2014 to analyse the report and its recommendations in detail, identifying specific areas of contention. The workshop attendees were:

- Alison Myers – Central Bedfordshire Council Landscape Officer
- Steve Halton – Bedfordshire CPRE (Ecology & Community Lead)
- Dr Trevor Tween – Luton Borough Council Ecologist/Landscape Lead

In addition, Julia Scott BA CMLI (Central Bedfordshire Landscape Officer) also provided feedback.

Following ratification through the workshop any outstanding amendments were made and the report was finalised.

6. The Formal Designation Process

Fourteen of the sixteen Candidate Areas scored enough points to be put forward as ALLVs. Of these six scored enough points to be put forward for the higher level designation of AGLV (and are therefore not considered as ALLV). These are listed below in **Table 2** and illustrated individually in **Figures 3a to 3p** (contained within **Appendix 2**, and collectively in **Figure 4** below. These remain subject to formal designation through the Local Plan process. In the interim period they should be referred to as “Proposed Areas of Great Landscape Value” and “Proposed Areas of Local Landscape Value”.

Table 2: Proposed ALLVs and AGLVs

| Proposed Areas of Local Landscape Value (ALLV) | Proposed Areas of Great Landscape Value (AGLV) |
|---|---|
| Hart Hill | Stopsley Common |
| Someris Farm & Dane Street Farm | Dallow Corridor |
| Turnpike Drive | Stockwood Park |
| Lower Lea Valley | Bradgers Hill Corridor |
| Lewsey Park | Bramingham Wood Corridor |
| Wigmore Rural | Bramingham Park |
| Upper Lea Valley | |
| Putteridge Edge | |

The process of designating through the Local Plan will provide for:

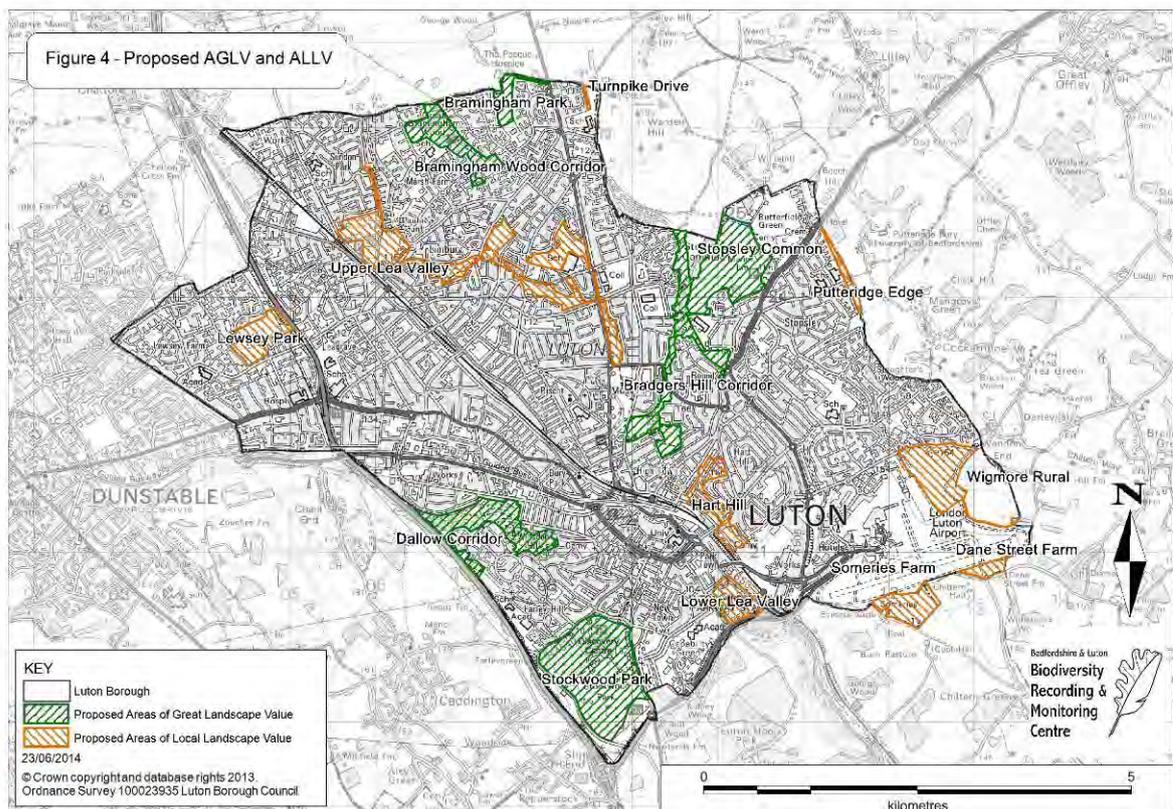
- Scrutiny and notification of the proposals.
- Consideration of proposed ALLVs within the context of an integrated strategy for social, economic and environmental development.

- Clarification of the need for ALLVs in specific locations and to consider whether an ALLV would duplicate the function of other designated areas or provide a supporting role in protecting landscape setting.
- Formal de-designation of existing AGLV and ALLI as appropriate.

In the interim this study should constitute a material consideration in planning decisions.

When used to inform planning and other decisions it is recommended that this report and the areas proposed for designation are not used in isolation, and should be considered alongside other important evidence covering other elements of green infrastructure.

The areas identified within this report as meriting designation, whether as AGLV or ALLV, have also been used to create a revised 'green infrastructure' layer for the landscape 'theme' (alongside landscape opportunity areas identified in the Luton Landscape Character Assessment 2014). This will be integrated with other green infrastructure layers for Luton, including a revised accessible greenspace layer, to update the proposed green infrastructure network for Luton first illustrated in the "Luton and Southern Bedfordshire Green Infrastructure Plan" (2010).



References

Review of Local Landscape Designations (Chris Blandford Associates, on behalf of the Countryside Agency, 2006).

Luton Borough Landscape Character Assessment (The Greensand Trust, 2014)

Luton and Southern Bedfordshire Green Infrastructure Plan (The Greensand Trust, 2010)

Bibliography

Caerphilly County Borough Council: Development of Criteria for Special Landscape Area Designation for South-East Wales Local Authorities (2007)

Review of Local Landscape Designations – City of Edinburgh Council (LUC, 2010)

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Alison Myers, Landscape Officer, Central Bedfordshire Council

Julia Scott, Landscape Officer, Central Bedfordshire Council

Steve Halton, CPRE Bedfordshire

Jackie Collins & Jacqueline Veater (formerly of LBC)