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# Green Belt Review

## Luton Borough Council

### Critical Friend Assessment

#### Purpose, Context and Limitations

1. Luton Borough Council officers have investigated whether or not the designated Green Belt boundary is appropriate and fit for purpose. The study report will form part of the evidence base for the Local Plan Review.
2. Planning Officer's Society Enterprises (POSe) has been instructed to
  - review the final draft study report and the comments received from neighbouring authorities;
  - determine if the approach is sound or not, giving reasons why;
  - provide advice on what may be required to make the study sound.
3. The Luton/Dunstable/Houghton Regis conurbation is encircled by the South 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).
4. The detailed boundaries have remained materially unaltered since initial approval in Local Plans. The current detailed green belt boundaries around Luton are therefore defined within the Luton Local Plan 2011.
5. Luton's housing need has been estimated as 18,000 new households. However, it is further estimated that only 6,000 additional households can be accommodated within the built up areas of the Borough.
6. A Joint Committee for Luton and southern Bedfordshire was established 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 was also 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. New boundaries were defined in accordance with advice in PPG2 and shown on the Core Strategy submission Proposal Map Amendments.
7. Revisions to the Green Belt boundaries, necessary to accommodate the growth needed and address the exceptional circumstances in the area, were identified.

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.

8. The Core Strategy was submitted to the Secretary of State for inspection in March 2011 but was subsequently withdrawn in September 2011.
9. The assessor has been provided access to the (final) draft study report and has selectively researched the Council's 'policy' web-pages to understand the context for the study. The comments of neighbouring authorities (Central Beds, Aylesbury Vale and Dacorum) have also been shared with the assessor. There has not been the opportunity to hold a workshop with the officers to explore initial findings and thereby expose any misconceptions. A draft of this assessment report has been shared with officers and their comments in response have influenced the final version.
10. The assessor has not had the opportunity to visit any of the parcels of Green Belt under consideration and, in consequence, does not offer any comment on the specific case for each parcel.

#### **National Planning Policy Framework**

11. Green Belt policies in the National Planning Policy Framework (NPPF, March 2012) continue to provide the high level of protection for Green Belts established in earlier national, regional and local planning policies. Essential characteristics of Green Belts are their openness and their permanence.
12. The five purposes of Green Belts (paragraph 80, NPPF) 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 and other urban land.
13. "Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy" (Paragraph 83). This paragraph goes on to say 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.
14. The 'exceptional circumstances' mentioned in paragraph 83 are not explicitly described. However, subsequent paragraphs do provide some guidance on this matter.

15. 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. (Paragraph 84)
16. Paragraph 85 sets out what local planning authorities should do when defining green belt boundaries. This includes: ensuring that identified requirements for sustainable development will be met; not including land where there is no need to keep it permanently open; and using physical features that are readily recognisable and likely to be permanent. LPAs should satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period.
17. A review might, “where necessary” identify areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period. (85)
18. Paragraph 86 explains that, if it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.

#### **Examination Experience**

19. Few Local Plan documents submitted for Examination since the publication of the NPPF have involved a review of Green Belt boundaries. The assessor is not aware of any such Plans being judged unsound on green belt review grounds.
20. Recently published Local Plans documents containing development land allocations on former green belt land include ... West Lancashire (adopted) and Bath & NE Somerset (submission stage). A green belt review has been published in support of the Gloucester/Cheltenham/Tewksbury joint core strategy but that strategy has not yet reached the Submission stage. Broxbourne Council undertook a Green Belt review in 2008 in support of its Core Strategy (examined in 2011; not adopted).
21. Green belt reviews in York and Cambridge were undertaken primarily to protect the historic setting of each city and are not relevant to this assessment.
22. In his report following Examination of the Winchester and South Downs joint Local Plan (adopted 2013), the Inspector ruled out the designation of a green belt around Winchester.

#### **Assessment of draft Report**

23. The report provides an excellent summary of the sequence of Green Belt designation decisions in both Luton and across the sub-region. It demonstrates a good awareness of the Green Belt status of land immediately beyond to the Borough boundary.

24. The map “1<sup>st</sup> Green Belt map” could usefully show the Borough boundary in such a way that the 6 parcels are more clearly indicated. Showing the boundary would also indicate that those parts of the built up area that already breach the Green Belt lie outside Luton Borough and are, therefore, matters for other authorities to review. It might show the areas beyond the Borough boundary being considered for the expansion of Luton in the emerging Plans of neighbouring authorities.
25. **Methodology.** This section of the report raises a number of unanswered questions. Why has there been a distinction between a Strategic and Local Assessment?
26. Why is there no reference to ‘satisfying housing’ in the discussion of the “need to review the extent of the Green Belt in Luton”? This matter offers, if not the only, certainly the most convincing exceptional justification, required by government policy, for reviewing the Green Belt.
27. Merely referring to the 5 purposes of Green Belt and then providing a list of the beneficial uses of Green Belt gives a false impression that the review is driven by the latter not the former.
28. The whole of this section needs to be amplified ... explaining not only the considerations to be applied but the sequence of their consideration and an explanation as to why each is relevant to the review.
29. **Results of Study.** The description of studies undertaken and decisions made by authorities adjoining the Borough boundary could be captured in a section of the report separate from the section revealing the review results. In this way, the Results of Study section can be used exclusively to explain how all the considerations (5 purposes and relationship with Green Belt and other designations beyond the Borough boundary) have been applied to the review of each parcel.
30. The evaluation of each Green Belt parcel is provided in a narrative form only with greatest emphasis given to a description of the uses and amenity value of each. Using this approach runs the risk of implying that that the study has been driven more by an assessment of sustainability, landscape and ecological issues than the five purposes of the Green Belt. Whilst I have no reason to question the judgment lying behind each narrative, the emphasis given to descriptive material is less than convincing as a piece of technical work.
31. I recommend that, using a table and/or standard headings, the report is revised to give greater emphasis to the five purposes than to other matters. A useful source of inspiration is the Amec report produced for the Tewkesbury/Gloucester/Cheltenham Joint Core Strategy. <http://www.gct-jcs.org/Documents/EvidenceBase/JCSGBReviewFinalSept2011.pdf>. See especially Chapters 4 and 5. The Amec study is of a very different scale to that required in Luton; it is, however, commended as ‘good practice’ for the discipline of its approach.
32. A word of warning. I understand that the use of a red-amber-green traffic lights system (paragraph 5.2.3) in the Amec study report unhelpfully raised fears and expectations that ‘green’ land was certain to be allocated for development. If you do use ‘traffic lights’, I would recommend the use of red-amber-yellow colours.

## **Conclusion and Recommendations**

33. I have no reason to doubt that a 'sound' approach has been adopted in undertaking the review. However, the way in which the study has been described in the draft report could raise doubts about this in the mind of an Examining Inspector. The following recommendations may help address this risk.
34. The methodology section of the draft report should be revised to demonstrate with greater clarity and discipline the way in which the review has been undertaken in regard to the 5 purposes of Green Belt.
35. The results section should be revised to give greater emphasis to the review against the 5 purposes of Green Belt.
36. The description of Green Belt designations across the Borough boundary might usefully be separated from the review of the six Green Belt parcels.
37. In introducing the six parcels, the report might explicitly confirm the scope for adding land to the Green Belt.

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November 2013

## Purpose of Study

The purpose of this study is to ensure that the designated Green Belt boundary to be included in the Luton Local Plan Review 2011 – 2013 is appropriate and fit for purpose.

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).



Historically, Structure Plans and Regional plans have 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 which themselves are now abolished by Government. The housing need of Luton, of approximately 18,000 new households but capacity to only accommodate 6,000 households, provides the exceptional circumstances required by the current national Green Belt policy in the NPPF to review existing green belt boundaries. As the Council, and a neighbouring authority, Central Bedfordshire Council, are currently in the process of reviewing their respective Local Plans, it is an appropriate time to undertake a Green Belt review in Luton.

## **National Planning Policy Framework (NPPF)**

Green Belt Policies in the NPPF (March 27 2012) replaced Planning Policy Guidance 2: Green Belts but nonetheless the NPPF retains the high level of protection provided by PPG2.

Protection of Green Belts around urban areas is included in the core land-use planning principles included in the NPPF which should underpin plan-making and decision taking (17).

Essential characteristics of Green Belts are their openness and their permanence.

The five purposes of Green Belts (paragraph 80) which were also in PPG2 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 and other urban land.

Paragraph 81 requires local planning authorities to plan positively to enhance the beneficial uses of the Green Belt, which include access, outdoor sport, recreation, landscapes, visual amenity, biodiversity, and improvement of damaged land.

Paragraph 82 sets out the exceptional circumstances for establishing a new green belt.

Paragraph 83 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.

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 (84).

Paragraph 85 sets out what local planning authorities should do when defining green belt boundaries. This includes: ensuring that identified requirements for sustainable development will be met; not including land where there is no need to keep it permanently open; and using physical features that are readily recognisable and likely to be permanent to define the boundaries clearly.



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

Local Green Spaces can be designated by local communities in neighbourhood plans to protect areas of local importance. Within Local Green Spaces development management should be consistent with policy for Green Belts (78).

### **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 Green Belt policy review is a necessary part of that. The exceptional circumstances required for Green Belt review exist because of the high need for homes in Luton but an inability to accommodate the majority of this need.

## Methodology

### Strategic Assessment of Green Belt

The first part of the assessment seeks to identify if there is a need to review the extent of the Green Belt in Luton, removing land from the Green Belt to provide land for development. The Green Belt in Luton will be assessed for

- consistency with the Green Belt in adjoining Local Authority areas
- consistency with Development Plans of the adjoining areas
- impact of any Development Plans proposals or changes in the Green Belt in neighbouring areas on the permanence and quality of the Luton Green Belt.

### Local Assessment of Green Belt

The second part of the assessment is to identify whether the detailed boundaries on the Luton Local Plan Proposals Map are still appropriate for defining the Green Belt so the areas are truly functioning as Green Belt. Any new physical features created in the landscape which would represent more appropriate boundaries will be identified. Any areas previously removed from the Green Belt will be assessed to see if they should be re-included.

The review of boundaries will follow 3 simple principles:

- The requirement for exceptional circumstances in order to revise a boundary.
- If there is green space at the edge of the built-up area and it meets any of the purposes of Green Belt, it should be considered for inclusion in the Green Belt.
- Any amendments to the Green Belt boundary should follow a physical feature on the ground that creates a strong and logical boundary that is readily recognisable and likely to be permanent.

The success of the Luton Green Belt in meeting the 5 purposes of a Green Belt (as stated in the NPPF) will be assessed.

The beneficial uses of areas of Green Belt referred to in the NPPF will be assessed. These are: access; outdoor sport and recreation; retention and enhancement of landscapes; visual amenity, biodiversity or improvement to damaged and derelict land. Additionally it will be recorded where other Local Plan designations coincide with land in the Green Belt, for example Chilterns AONB, County Wildlife Sites.

The Luton Green Belt as shown on the Proposals Map is split into 6 distinct areas of land: Warden Hill, Stopsley Common, Oaket Wood, Putteridge, Dane Street and Someries. Each location will be assessed.

## Results of Study

Assessment of development plans affecting the green belt in areas immediately outside the Luton Borough Council boundary:-

### Central Bedfordshire Council

The extent and boundaries of the South Bedfordshire Green Belt within the southern part of Central Bedfordshire (former South Beds District Council area) were defined in the South Bedfordshire Local Plan Review (2004).

Central Bedfordshire Council is currently producing a Development Strategy for the whole Central Bedfordshire area and have produced a Green Belt Technical Paper (June 2012) as part of this work.

[http://www.centralbedfordshire.gov.uk/Images/G%20Belt%20Tech%20Paper%20with%20Cover%20v2\\_tcm6-32104.pdf](http://www.centralbedfordshire.gov.uk/Images/G%20Belt%20Tech%20Paper%20with%20Cover%20v2_tcm6-32104.pdf)

The Technical Paper recognises that the Exceptional Circumstances for the review of the Green Belt which were set out in the Regional Plans remain when reassessed against local evidence. Existing urban areas will not be able to accommodate all the development needed.

Central Bedfordshire Council has assessed its options for growth against all aspects including Green Belt and new boundaries have been set out within the draft Development Strategy policies and identified on the Proposals Maps (INSERT MAPS IN APPENDIX AND/OR INCLUDE FOLLOWING LINK).

[http://www.centralbedfordshire.gov.uk/Images/Appendix%203%2014.06.12\\_tcm6-31981.pdf](http://www.centralbedfordshire.gov.uk/Images/Appendix%203%2014.06.12_tcm6-31981.pdf)

New boundaries have been set to provide sufficient land to accommodate growth beyond the Plan period so as to ensure longevity of the Green Belt and so further reviews would not be required. As part of a future review of the Development Strategy, Central Bedfordshire Council will consider the option of Compensatory Green Belt. It will identify and allocate suitable land that meets the 5 Green Belt criteria, in order to offset the loss of Green Belt. The Council will consider extending the existing Green Belt northwards.

Major changes to the green belt are proposed around Dunstable, Houghton Regis, Luton and around the proposed rail freight terminal at Sundon Quarry. Boundaries are to be redrawn around the outer edge of the proposed strategic allocations.

Strategic Objective 3.1 of The Development Strategy for Central Bedfordshire (Draft, June 2012) Strategic Objective includes that 'Other than in exceptional circumstances, the Green Belt within Central Bedfordshire will be respected and protected.'

## **North Hertfordshire District Council**

The green belt is defined in the North Hertfordshire District Local Plan No. 2 with Alterations (April 1996). The Green Belt Policies were saved in September 2007.

The Core Strategy Preferred Options (September 2007) includes consideration of the far west of the district adjoining Luton:-

Key Issue 13: growth of Luton

We will:

- a) make provision in the CS to allow the expansion of Luton into North Hertfordshire if there is a genuine need for that to occur; but
- b) we will leave the detail of how and where such growth occurs to be prepared in a Luton Area Action Plan, which will involve collaboration with neighbouring authorities.

The North Hertfordshire Landscape Study (Character, Sensitivity and Capacity) 2011 is background evidence for the development plan. A number of landscape areas bordering Luton have been assessed, and a judgement of whether different types of development could be accommodated in the areas has been provided. More detail for each area is provided below.

Area 200 Peters Green Plateau, is the area to the south of Luton airport and another small area immediately to the north east of the airport between Luton and Winch Hill (part of this area is within Central Bedfordshires area). The evaluation states that most forms of development would be unsuitable in this area, other than very small scale well designed development. One of the recommendation guidelines for Built development in this area is to contain and minimise the effect of Luton Airport and any associated development on the wider Character Area.

Area 201 Kimpton and Whiteway Bottom extends from the eastern edge of Luton to a point west of Kimpton. The assessment evaluates that most forms of development would be unsuitable in this area, but some small scale well designed development may be possible.

Area 202 Breachwood Green Ridge landscape area extends from northeast of Luton (Putteridge Bury College) to Hoo End Farm (north of Kimpton) so occupies land east of Luton between Putteridge in the north and Wigmore in the south. In landscape character terms the assessment evaluates the capacity to accommodate large urban extensions and new settlements of over 5 hectares as low to moderate and smaller urban extensions less than 5 hectares as moderate. Conservation and enhancement of the registered parkland at Putteridge Bury is given as one of the built development guidelines for this area.

Area 212 Lilley Bottom Area extends from the Chilterns scarp at Hexton to Kings Walden in the south, and covers an area neighbouring Luton east of Warden Hill and north of Stopsley Common. Capacity to accommodate most forms of development including large and smaller urban extensions is stated as low apart from very small scale development.

The Strategic Housing Land Availability Assessment December 2012 includes a strategic site East of Luton of 1400 dwellings. The site occupies land between Wigmore in Luton and the villages of Cockernhoe and Tea Green (INSERT MAP HERE OR APPENDIX). This corresponds with Area 202 of the North Hertfordshire Landscape Study (Character, Sensitivity and Capacity) 2011.

### **Recommendations**

Central Bedfordshire Council and North Hertfordshire District Council are proposing to or are potentially considering releasing land from Green Belt within their areas on the edge of Luton in order to provide for development needs. Any such areas released from Green Belt could be expected to provide for some of Lutons housing need. There is not an exceptional reason to alter the extent / boundaries of green belt within Luton i.e. remove land from green belt to accommodate development, as the majority of Lutons need will be firstly met within the developed urban area and in the adjacent neighbouring authority areas on the edge of Luton if required.

**Luton Green Belt**  
**Warden Hill Green Belt**



In terms of the Green Belt purposes, this area contributes toward checking unrestricted sprawl, it assists in safeguarding the countryside from encroachment, it helps preserve the setting of the Drays Ditches Scheduled Ancient Monument and assists in urban regeneration by encouraging the recycling of other urban land in Luton.

The area of land has two main uses, as a riding stables and paddocks and as car parking for a golf course. Both of these uses are appropriate for green belt and encourage beneficial uses within the adjoining green belt namely horse riding and golf. The area is within the Chilterns AONB and it provides excellent footpath and bridleway access for the urban population to access the countryside for recreation. The site also allows access to the Galley and Warden Hills Site of Special Scientific Interest (SSSI). The urban edge at this location is well defined, with good quality transition from urban to countryside. The countryside, particularly Galley and Warden Hills SSSI provides visual amenity for Luton residents.

The existing boundary of the Green Belt at this location extends to the line of the Luton east circular road north proposal shown on the Local Plan Proposals Map. In the absence of the road proposal the legitimate boundary of the Green Belt would run along the fences to the rear of the houses in Turnpike Drive and the fence of the Cardinal Newman School.

There is no exceptional reason why any land should be removed from the Green Belt at this location. The area conforms and coordinates well with the adjoining wider area of green belt in Central Bedfordshire. It provides a useful function in containing the golf course car park and riding stables buildings enabling enhanced use of the adjoining green belt. There is no development proposed in the adjoining area of Green Belt.

**Recommendation for Warden Hill Green Belt Boundary**

Extend the Green Belt to the property boundaries of Turnpike Drive and fence of Cardinal Newman School. Do not change the boundary if there is still a possibility of the road proposal at this location.



## Stopsley Common Green Belt



This area serves the Green Belt purposes by checking unrestricted sprawl, safeguarding the countryside from encroachment and assisting in urban regeneration, by encouraging the recycling of derelict and other urban land. Strip lynchets on Bradgers Hill are preserved by it, as is the setting of Butterfield Green. The area separates the built areas of Bushmead and Stopsley preventing their coalescence.

The area has many uses including outdoor recreation: walking, cycling, riding, and sports. There are many sports pitches associated with the Luton Regional Sports Centre. There are sites of nature conservation importance at Bradgers Hill and Oosey Hill, which are both County Wildlife Sites. There are also two areas of woodland which are designated in the Luton Local Plan 2001-2011 as Other Sites of Nature Conservation Interest. Some of the land is farm land, both arable and grazing. There is a small number of houses at Butterfield Green and other scattered houses and farm buildings. Two large areas within this green belt are part of the

Chilterns AONB. The area of green belt provides an excellent resource for the residents of Luton providing an interesting and varied landscape in which to enjoy the outdoors in a variety of ways. The area also provides visual amenity.

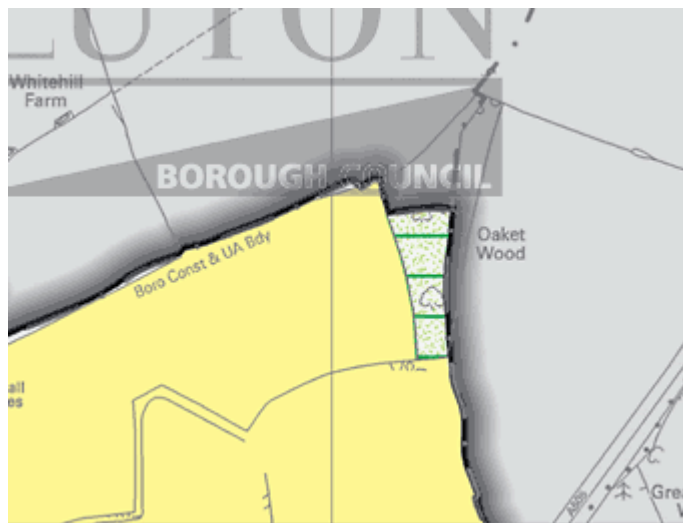
There are potential revisions to the boundary of the Green Belt at this location that need to be considered, particularly relating to the road proposal shown on the existing Local Plan Proposals Map. Part of it is washed over by the Green Belt but for the remaining part within the green belt, the road proposal line defines the extent of the green belt. 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 in the adjoining Bushmead residential area. In addition, the existing Local Plan proposal map shows an area of potential green space, off Bushmead Road. This area should also be included in the green belt if it is to remain free from development. The other potential revision to the Green belt boundary concerns the new Inspire Luton Sports Village building which has been built at the junction of Hitchin Road and Butterfield Green Road. The other sports centre (Regional Sports Centre) within the Green Belt at this location mainly facilitates outdoor recreation on the many outdoor sports pitches so is shown within the Green Belt. The new sports centre is mainly for indoor sports. A new revised boundary should be drawn around the area of the new buildings perimeter boundary. The permanent boundary of the new sports centre is currently unclear with a soil bund and temporary fence on the outside edge appearing to mark a temporary boundary. This will require further investigation prior to defining the new boundary on the Proposals Map.

Notwithstanding the revision of the boundary around the new sports centre there is no reason why land should be removed from the green belt at this location for development. 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. The area is a rich resource for the residents of Luton and should be maintained.

### **Recommendation for Stopsley Common Green Belt Boundary**

Extend the Green Belt to the property boundaries of the adjoining Bushmead and incorporate the undeveloped area shown as 'proposed green space' on the existing Proposals Map. Do not change the boundary if there is a chance that the road proposal will occur. Revise the boundary around the new sports centre removing this now developed land from the Green Belt. Further work is required to establish the exact boundary as it is currently unclear.

## Oaket Wood Green Belt



Oaket Wood is a small piece of woodland which is bounded by the Butterfield Business Park on the Luton side, and green belt countryside to the north (Central Bedfordshire) and eastern side (North Hertfordshire). Land was previously removed from the green belt in Luton to allow for the new business park and cemetery extension. The Chilterns AONB extends up to the wood on the eastern side.

This small area of woodland performs the functions of a green belt by providing a restriction to development, assisting in safeguarding the countryside from encroachment and assists with urban regeneration by encouraging more efficient use and recycling of urban land.

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. It benefits the Business Park by providing an attractive feature whilst retaining and enhancing the surrounding landscapes by screening the Business Park. Oaket Wood is also a County Wildlife site

There are no revisions needed to the boundary. There are no development proposals for the neighbouring land in Central Bedfordshire or North Hertfordshire. The wood is a feature that is likely to be permanent and fits well with the wider Green Belt in the neighbouring areas.

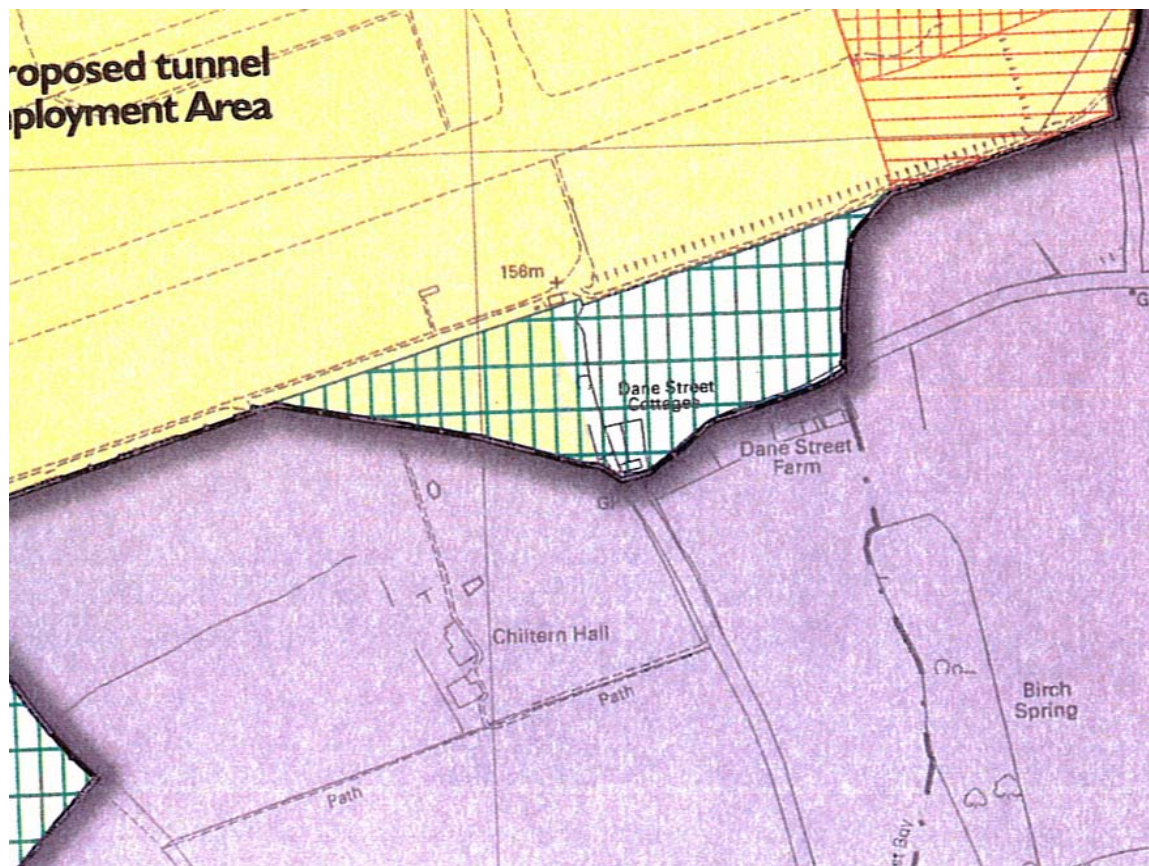
### **Recommendation**

No changes or revision to green belt at Oaket Wood





## Dane Street Green Belt, south of Luton Airport



This small area of green belt, together with the wider green belt it is part of, performs the purpose of checking unrestricted sprawl and assisting in safeguarding the countryside from encroachment. Part of the area is unused with natural vegetation growing, and the other part is arable farmland. There is access to the area but as it is on the edge of the airport the footpaths only lead to the airport perimeter fence. Part of the site is shown within the London Luton Airport Action Area in the Luton Local Plan, though is outside the airports fence. The area is shown as Area of Great Landscape Value in Luton Local Plan.

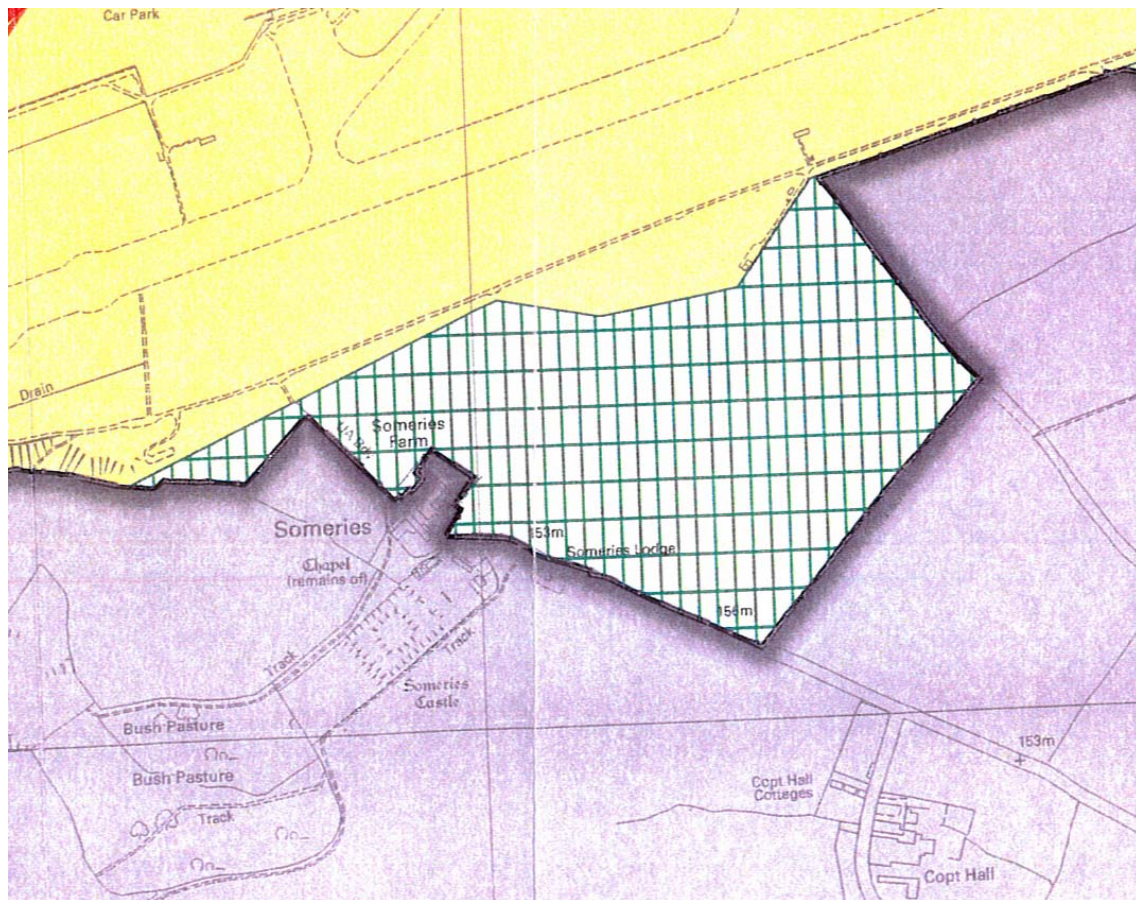
The airport fence represents a permanent and well defined boundary for the green belt. No revision to the boundary is necessary. There are no development proposals for the adjoining areas of Green Belt in North Hertfordshire and Central Bedfordshire. The piece of Green Belt located within Luton's boundary fits well with the neighbouring green belt.

### **Recommendation**

No changes or revisions to green belt at Dane Street



## Somerles Green Belt, south of Luton Airport



This area forms part of the wider Green Belt in Central Bedfordshire authorities area. It serves the green belt purposes of checking unrestricted sprawl, assisting in safeguarding the countryside from encroachment, preserving the setting of Somerles Castle Scheduled Ancient Monument, and assisting in focusing development in the urban area and recycling of previously developed land.

There is access to the green belt at this location with a footpath from Luton to Somerles Castle with further footpaths and minor roads beyond. The area is partly open arable farm land but also the start of a valley used for livestock grazing. The area is shown as an Area of Great Landscape Value in Luton Local Plan.

As with the area of green belt at Dane Street, the airport fence represents a permanent and well defined boundary for the green belt. No revision to the boundary is necessary. There are no development proposals known for the adjoining areas of Green Belt in Central Bedfordshire, and the green belt in Luton fits well into the wider green belt. There are no reasons to justify revising the green belt boundary.

### **Recommendation**

No changes or revisions to green belt at Somerles.

## **Conclusion**

The Green Belt in Luton encourages sustainable development within the developed area of Luton by directing development to the urban area and previously developed or derelict sites. It provides amenity for the large urban population both visually and by providing high quality outdoor recreation and greenspace which is lacking in Luton. It is coordinated and conforms with green belt outside the border in neighbouring authorities contributing to strategic Green Infrastructure. Green belt areas also coincide with other local plan designations within Luton such as AONB, SSSI, County Wildlife Site, SAM and Registered Parks and Gardens, providing habitat for wildlife and preserving the setting of historic sites and conserving the landscape.

The extent of the green belt in Luton does not need to be altered, though minor revisions to the boundary at Warden Hill and Stopsley should be considered in order to ensure a strong and logical boundary that is readily recognisable and likely to be permanent.

## Appendix 1

### **Background and Policy Review**

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<sup>1</sup> 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 green belt 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 around Luton are therefore defined within the Luton Local Plan 2011 and the Central Bedfordshire Local Plan 2011?

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).

### **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.

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<sup>1</sup> 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.



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.

## **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. The MKSMSRS 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.

Regional Planning is in the process of being abolished by the Government.

## **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 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 was also 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.

Chapter 5: Green Belt Matters and Policy CS4: Extent of the Green Belt dealt with review and revision of the Green Belt boundaries necessary to accommodate the growth needed and 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.

## Appendix 2

Insert:

CBC Development Strategy Green Belt Amendment North of Houghton Regis

CBC Development Strategy Green Belt Amendment North of Luton and Sundon Quarry

NHDC SHLAA Dec 2012 site east of Luton

Maps showing the possible revisions to the boundaries

Any photos considered appropriate