

THE HITCHIN SOCIETY

RESPONSE TO THE SOUTH BEDFORDSHIRE AND LUTON CORE STRATEGY PREFERRED OPTIONS CONSULTATION



Landscape East of Luton



Cockernhoe Village Green

Overall response

The Hitchin Society objects in the strongest possible terms to the proposal in the Core Strategy Preferred Options document for an urban extension into North Hertfordshire.

We also object to the arrogant assumptions throughout the document that North Hertfordshire District Council will progress various associated schemes on your behalf, giving the impression that NHDC is in agreement with you, whereas in fact, as the Joint Committee must be well aware, our District and County Councils have both expressed their total opposition to such a development plan. It is disingenuous for the Committee to pretend otherwise to those who read the documents.

The reasons for our objection are as follows:

Scale of development

We note that the scale of development proposed for Site L, East of Luton, is variously quoted in your documents as 7,000 homes and 5,500 homes. We note also that the shape and extent of Site L varies between different documents. We find it unacceptable that persons reading the main consultation will be led to believe that the lower figure is proposed when in fact the substantially (27%) higher figure has clearly been considered and 'signed off' in supplementary documents. If you cannot be clear about the size of the development or its geographical extent, how can any faith be placed in this consultation?

Comparative population densities

Hertfordshire is already by far the most densely populated county in the East of England, and has almost twice as many residents per square kilometre as Bedfordshire; in addition (depending on a forthcoming decision by the Secretary of State), North Herts. may well have to absorb even more housing from a new development West of Stevenage. Under these circumstances, a development to the East of Luton (Site L), also within our area, would be quite inequitable. This would constitute as much of a constraint for Hitchin and North Herts. as the proximity of an existing urban extension to the South East of Leighton Buzzard.

Lack of transparency

The Bedfordshire and Luton Policy 2(a) advocates joint working for the production of Local Development Documents among Luton BC, South Beds DC, North Herts DC and Aylesbury Vale DC. But it is evident in this consultation that no account has been taken of development plans by Hertfordshire County Council, or North Herts District Council. Why not? Your adopted policy requires it, but you have chosen to proceed alone. We find this quite unacceptable and probably grounds for rejection of any findings in relation to Site L.

Indeed, all the data produced by the Joint Committee seems to avoid, whenever possible, mentioning North Herts., and on the maps it is presented as completely featureless. Hitchin is hardly cited at all, despite the fact that the effect of this proposal on our town, in terms of increased traffic flow, congestion and loss of amenity, would be very considerable. We are extremely unhappy that you should give so little attention to the problems which will be caused on our side of the county boundary and that you have concentrated exclusively on the perceived benefits for Luton and South Bedfordshire.

Also, your documents state that there are sites to the south and west of Luton that have been discounted, but no details are given and it is clear from the Preliminary Sustainability Assessment that they have not been assessed. We would question why there is no mention of any of these alternatives in your documentation and we would insist that all available options should be considered. The current consultation is thus flawed and for you to proceed on the basis of any outcome from this consultation could be construed as maladministration. For

example, we understand that a site or sites to the West of Luton have actually been proposed for development and would constitute a perfectly viable alternative to the Site L, East of Luton option.

Water

These comments relate to issues contained within the technical evidence study on the Water Cycle Strategy as they affect the Site L, East of Luton option..

Timing

We note that the Water Cycle Strategy report rightly observes that LDF documents submitted without evidence of a strategic approach to the provision of infrastructure, now including the water services infrastructure, risk being judged unsound. We note also that the Water Cycle Strategy process usually comprises a phase 1 outline study to assist in selection of preferred options and possible constraints, with a Phase 2 detailed study then providing the Water Services Infrastructure for preferred options. And yet you then state in section 2.4 that due to the timescale available for this Phase 1 Water Cycle Strategy, a pared down scope has been agreed to focus on identifying any potential 'showstoppers' and significant differentiators between the identified sites, with more detailed analysis and detailed infrastructure optioneering being undertaken within the detailed Phase 2 Water Cycle Strategy, once preferred sites have been selected.

Given that the phase 1 Water Cycle Strategy study was delivered to the JTU in August 2008, we can see no reason why its scope needed to have been pared down. We regard the assessment, particularly of Site L (East of Luton), as inadequate for reasons set out below and believe that a thorough phase 1 study would have revealed one or more 'showstoppers' for this site. It is not acceptable to present cheeseparing initial studies, as it is clear that, by the time that the phase 2 studies are undertaken, other irrevocable decisions will have been taken.

Scope

All the figures in the report show Site L as lying outside the area for which data was gathered (see, for example, Figs 4.1, 4.2, 4.3 and 4.7) and yet the report makes unqualified assertions about this site. It is therefore clear that at this critical stage of site selection, inference rather than evidence has been used in respect of Site L. We regard the conclusions drawn about Site L as, at best, unfounded and in some cases incorrect.

Groundwater

The quality and protection of groundwater is rightly identified as critical on the Chalk uplands surrounding Luton. Fig 4.7 shows groundwater Source Protection Zones (SPZ) within the study area and clearly shows a Total Catchment SPZ flanking Site L. Had the study extended to include Site L and the potential bypass beyond it, we believe that it would have shown this SPZ as extending over all of Site L and the bypass and, because of the proximity of groundwater supply boreholes in Lilley Bottom, we believe that at least part of Site L and the bypass will be covered by an Outer Protection SPZ for these boreholes.

And yet paragraph 4.6.3 states that 'Besides Site M, no sites are located on a groundwater recharge zone'. We believe this statement to be wrong.

Table 4.5 lists Site L as having good potential for infiltration of long term storage, but how can this be said when no data has actually been gathered for the site and when, in our belief, the presence of SPZs may limit the infiltration that is acceptable? At the very least, complex pollution protection arrangements may be required upstream of any infiltration SUDS (Sustainable Drainage Systems), certainly in respect of any highway proposals. We doubt that the capital and in-perpetuity maintenance costs of such devices have been allowed for in the economic analysis of this site.

In fact, paragraph 4.6.6 makes clear that no consultations have been held with the Environment Agency on groundwater infiltration and risks to groundwater. Given the emphasis that the Agency and Three Valleys Water place on the security, quality and availability of chalk groundwater, we believe that the absence of such consultations renders the study invalid.

This point is brought home in section 6 where paragraph 6.3.4 identifies ‘a great deal of pressure on water resources in Luton and S Beds and indeed on the whole of the surrounding area. Climate change is likely to further reduce supply and perhaps increase demand’; on Fig 6.1 the whole of the Three Valleys area is marked as ‘serious water stress’ (which is analogous to being over-abstracted); Fig 6.2 shows the whole of the Upper Lee area as over-abstracted; paragraph 6.3.12 identifies that the River Mimram (Lilley Bottom catchment) is closed to further abstractions. Any diminution in infiltration, and a development of the size proposed for Site L would cause substantial diminution, will be significantly deleterious to the groundwater supply aquifer and it should be clear that, on water supply grounds alone, Site L should be rejected.

Groundwater recharge from rainfall is critical to the well-being of all the residents of North Hertfordshire and many of those in Luton. The area receives about 22 inches (550mm) of rainfall a year, but given evapo-transpiration losses, only about 7 inches (175mm) is effective in recharging the aquifer. Climate change projections over the next 40 years indicate a reduction in total rainfall of some 10% (2 ins., 50mm). But this will mean a reduction in effective rainfall of 30% (from 7 ins. to 5 ins., 175 to 125mm) and potentially more, as warmer weather and more intense rainfall are likely to reduce effective infiltration even further. This alone will impose intolerable stresses on an already over-abstracted area, without the further reductions in infiltration and increase in demand that would come from a development of 7,000 homes. In the longer term, 2050-2099, recent research by the University of East Anglia/Tyndall Centre indicates that southern England will experience 30 droughts, each lasting more than a year, in 50 years.

We believe that the points we have made in this section about the vulnerability of groundwater and of groundwater recharge are a ‘showstopper’ for Site L and would have been recognised as such had the study been undertaken properly.

Three Valley Water’s draft Water Resources Management Plan 2008

We believe that the Water Cycle Strategy report chooses complacent and somewhat misleading abstracts from Three Valleys Water’s (TVW) draft Water Resources Management Plan (dWRMP). Paragraph 6.5.3, for example, says that the dWRMP allows for slightly higher population increase forecasts for the TVW area than those stated in the RSS, which means that anticipated growth has been adequately accounted for within TVW’s strategic planning. In fact, the dWRMP says that growth will be higher in the N & E of the area where water resources are scarcest. This brings into question the statement in 6.5.11 that there is a water surplus of supply over demand in TVW’s Northern Water Resource Zone and therefore no new water resources expected to be required within the planning period (to 2035). We cannot identify this statement within the dWRMP and it seems to contradict statements, such as that above, in sections 3 and 4 of the dWRMP.

Paragraph 6.5.4 says that there are sufficient water resources and no significant constraints to prevent TVW from supplying its area, but this is only true if sufficient water can be moved around TVW’s water grid to supply those areas, such as North Herts, where water is scarcest. The costs of the necessary further enhancements to the water grid to supply growth around Luton should be borne by the developers, not by the existing customers and should therefore be included in the economic calculations for each site. We doubt this has been done.

We would also point out that your myopic view that Site L has nothing to do with the rest of North Herts is particularly untrue for water supply. Major developments are proposed for the West and North of Stevenage as well as some 2,000 other new homes within North Hertfordshire, and all will depend on a water resource that is already over-abstracted.

Water saving

Paragraph 6.8.10 says 'If we continue to rely solely on traditional infrastructure approaches new development will inevitably result in increased demand for water. Achieving high standards of water efficiency in new homes under the Code for Sustainable Homes; through measures such as increased metering; water efficient appliances and other forms of demand management, can help to reduce consumption. In order to make significant progress towards the sustainability ideal of water neutral development, however, a behavioural step change is required in the way we think of, use and dispose of water. Without application of new technologies and more sustainable behaviours, the demand for water is likely to increase in the existing customer base as well as due to new development. This is not sustainable in the long run, and particularly in water stressed areas it is critical that planning authorities encourage and incentivise the uptake of water efficiency measures and water re-use systems through planning policy and conditions.' Paragraph 6.8.11 continues 'it is crucial that measures are taken to reduce consumption in existing housing stock. The cost benefit of such measures needs to be considered and their effectiveness investigated in more detail.'

In fact, there is no evidence of lasting constraint – meter users make savings initially then get used to the cost and lapse back towards higher usage – or of effective encouragement. Planned sites must not be predicated on wished-for (pipe-dream) user behaviours. 6.8.11 confirms that there is no certainty in these measures. Most users will be happy to try to reduce usage to save water in the general interest, but not in order to have 7,000 new homes visited on them!

Water treatment and the foul network

Table 5.2 shows again that Site L and its proximity were, wrongly, not included in the study area. There is no mention of the waste water treatment works at Breachwood Green or Whitwell which currently serve Lilley Bottom/Mimram valley and associated villages.

We note with interest that Luton East Hyde works is shown as having an estimated 'headroom' of 7,070 unallocated dwellings (Table 5.4) – almost exactly in line with the figure for Site L and 10% less than that needed for Site M, the only other site that would drain to East Hyde. Table 5.5 does not have a 'most likely location for treatment' associated with Site M and indicates that Site M had already been discounted at least before the end of the Water Cycle Strategy study. This is unacceptable when, whilst not a preferred site, Site M is presented as remaining one of the sites for consideration in the consultation.

In Table 5.8 the overall foul system risk level for Site L due to constraints is Medium and the overall costs level for foul sewerage is High. But there is also the note 'TBA – further investigation is required'. In our experience further investigations rarely reduce risk or costs outcomes and we would wish to be assured that the economic assessment of Site L has properly taken these costs and risks into account.

In fact, the whole of section 5 makes it clear that, unlike Anglian Water, no direct discussions have been had with Thames Water, data having been taken from previous studies. We find this approach to issues relevant to Site L to be cavalier and arbitrary, and not conducive to good decision making.

Overall water conclusions

The Hitchin Society is of the opinion that Site L has not been properly considered in the Water Cycle Strategy. The site lies outside the area for which data was gathered. Conclusions

drawn about this site are therefore arbitrary and in some important areas believed to be wrong. We doubt that the serious risks to groundwater, the cost of water supply and the major uncertainties about foul drainage and treatment have been adequately taken into account in the economic assessment of the site. Properly considered, these would lessen the apparent attractiveness of Site L for development.

Transport

These comments relate to issues contained within Section 5 of the Public Consultation Questionnaire issued by the Joint Technical Committee, with particular reference to the proposed development East of Luton.

Core Strategy and infrastructure studies

The proposals concerning Accessibility and Transport as set out in the Core Strategy document appear to be based principally on an assessment of current and future travel needs of people living in Luton and South Bedfordshire. This may be a justifiable constraint on the scope of any study if development proposals were to be limited to the specific area of Luton and South Bedfordshire, but as the preferred policy of the two local authorities is for expansion beyond this specific area, the approach can only be seen as lacking in rigour and credibility.

It is understood from the Core Strategy document that the two local authorities wish to include a strategic direction of growth which lies mainly in North Hertfordshire District, and it is this development that is referred to as East of Luton. The Core Strategy makes assumptions about North Hertfordshire District Council's ability and willingness to incorporate additional transport infrastructure into their own emerging Local Development Framework (LDF) to service East of Luton. As Hertfordshire County Council is the highway authority for the area in question, the implication is that the County Council is also able and willing to undertake infrastructure work to meet the requirements of Luton Borough Council and South Bedfordshire District Council. Such a superficial and untested assumption cannot provide a secure basis for meeting the transportation needs of 5,500 additional households proposed for the area East of Luton.

It is clear from the Core Strategy and the consultation questionnaire that no technical feasibility study or any form of environmental impact assessment has been made of the transportation infrastructure proposals related to the development East of Luton. In the absence of such studies, it must be concluded that the proposals are purely indicative in nature and do not have the technical standing appropriate for inclusion in any meaningful process of public consultation.

Travel beyond the Luton area

The accessibility and transport proposals take no account of travel implications beyond the boundary between Hertfordshire on the one hand, and Luton and South Bedfordshire on the other. This represents a fundamental flaw in the planning carried out by the two local authorities proposing development East of Luton, which appears to have been conducted as if Luton and South Bedfordshire were an isolated entity, and that the travel implications of any easterly expansion of Luton would have no impact beyond the boundaries of these two local authorities.

The reality is that the transportation implications of developments featured in the proposed Core Strategy, including the Luton Northern Bypass, the Luton Eastern Bypass and the housing development East of Luton, all seem to be predicated on a policy of 'predict and provide', an approach that was abandoned by central government in the early '90s as economically and environmentally unsound. These road proposals will all have serious

implications for traffic loadings, congestion and ultimately pressure for further road building beyond the boundaries of Luton and South Bedfordshire. In particular, the A505 east-west route is of pivotal importance to the proposals forming the basis of the Core Strategy, and will inevitably become more highly loaded with traffic due to:

- Additional traffic making use of journey opportunities offered by a new Northern Bypass. At present demand is suppressed by congestion within Luton, but a bypass will open up opportunities for longer distance commuting by car, and an increased use of the A505 as a cross-over linking the M1 and the A1(M).
- A new Eastern Bypass will also deliver additional traffic onto the A505, particularly car based travel to and from London Luton Airport which will become easier and more reliable with such a bypass. This will lead to effects that are the reverse of what should be a commitment to an increased use of public transport for access to the airport; this is particularly important given the plans of London Luton Airport for a substantial expansion of passenger throughput on a year by year basis.
- The consequence of providing 5,500 additional dwellings in the area East of Luton will also generate increased volumes of traffic. Many of the new residents will not have employment within Luton (or accessible from the guided busway), and will become car-based commuters to locations such as Stevenage, Hitchin, Letchworth and beyond, adding to traffic on the A505.

Impact of travel on North Hertfordshire

The impact of additional traffic on the A505 east of Luton will be felt by North Hertfordshire, and in particular by Hitchin. There is no bypass to Hitchin and the A505 passes through the town as a succession of narrow streets including Upper Tilehouse Street, Old Park Road, Bedford Road, Fishponds Road and Nightingale Road. Upper Tilehouse Street in particular is already severely congested at peak times, with stationary traffic backed up on roads feeding into it such as Pirton Road (B655). Other stretches of the A505 within the built-up area of Hitchin are also congested at peak times, including the Bedford Road-Paynes Park one-way system, and Cambridge Road with its low and severely restricted bridge underneath the railway close to Hitchin station.

Traffic conditions within Hitchin are likely to deteriorate further with the commitment in the East of England Plan to build 9,600 dwellings west of the A1(M) at Stevenage. This will result in a substantial increase in traffic on the A602 road within Hitchin, which already operates at or beyond capacity with standing traffic at peak times in feeder roads such as London Road (B656). The A602 joins the A505 at the Upper Tilehouse Street/ Old Park Road roundabout, and any increase in traffic on the A505 as a consequence of the Luton and South Bedfordshire Core Strategy will result in severe congestion at this point.

In contrast with proposals for bypasses both to the north and the east of Luton, there are no plans for any bypass provision for Hitchin. This is not surprising, as there are no routes available either to the north of Hitchin or to the south that are likely to be considered as environmentally acceptable. Any proposal for the construction of a bypass around Hitchin to accommodate traffic arising from developments at Luton and Stevenage would be highly unpopular and would undoubtedly be subject to very strong and cogent objections. These would include objections based on the increase in traffic that a new road inevitably generates, leading to still further increases in emissions of greenhouse gases and objections based on the likelihood of pressure for housing development up to the line of any bypass.

East-west road and rail links

The key role of the A505 road is emphasised by the complete absence from the rail network of any east-west links within this area. Although there are bus services on the Luton - Hitchin - Stevenage route using the A505, these inevitably have only a limited attraction to commuters with access to a private vehicle. As the only rail services in this area are radial to London, a consequence of additional housing East of Luton is that car-based commuting will increase on the only east-west route that is available, and that is the A505 through Hitchin.

It is noted that Network Rail is now starting further feasibility studies to consider options for an east-west rail link, either through the re-opening of previously used lines or through new build. It remains a matter of conjecture whether any such scheme will eventually receive the necessary support and funding, and in any case, a route through Luton would appear to be one of the less obvious choices. Even if such a route were eventually to be built, travel to the centre of Luton in order to transfer at Luton station to an east-west rail service, would suggest that any such rail connection would have, at best, a marginal effect on the commuting options for people living in an East of Luton development.

The consequences are that east-west commuting journeys originating in East of Luton are far more likely to be car-based, adding to traffic volumes on the A505, and increasing congestion in Hitchin and more generally North Hertfordshire.

Transport infrastructure within East of Luton

Considering in more detail the specific implications of a large-scale housing development East of Luton, it would appear that transport links to the area would be provided by a new Eastern Bypass running approximately north-south through the development and by a possible extension to the Luton guided busway, also apparently on a north-south alignment.

It would seem that such essentially orbital traffic routes would form the main communications links rather than direct radial routes into the centre of Luton. It is far from clear that such an arrangement would be satisfactory for residents in the new development with access to a car who would be expected to commute to the centre of Luton via a new Park & Ride facility on the A505. The reality is that once a journey is started by use of a private car, it is all too likely to be completed by private car.

A key feature of the public transport proposals for East of Luton is an extension of the guided bus system currently under construction and linking Dunstable with Luton station, and with unguided and on-highway sections to London Luton Airport and to Houghton Regis. It remains unclear whether any extension into East of Luton would be a guided system with its own dedicated trackway, or whether it would be an on-highway extension of bus services. Whatever form it might take, until the first stage of the guided busway is brought into service and its impact on bus usage can be assessed, there must remain some uncertainty about the degree of modal shift from private car to public transport that can be achieved by this specific form of transport.

If the public transport offer available within East of Luton consists of on-highway bus services, albeit marketed as part of the guided-busway system between Luton station and Dunstable, there is no reason to assume that the modal shift to public transport usage would be any higher than achieved elsewhere by conventional bus services. Caution should therefore be exercised in the claims made for sustainable transport within the proposed East of Luton development, and in all probability this would be a car-dependent development making little or no contribution to sustainability in the transport field.

The underlying suggestion that a guided bus system, even where operating on reserved trackways, can achieve the modal shift achieved by electrified Light Rail systems remains at best unproved, and indeed lacking in credibility given that the vehicles providing the service

are, for all practical purposes, on-road diesel-powered buses. On this basis, no special advantage in terms of sustainability can be claimed for the public transport proposals for East of Luton.

Topography of East of Luton

The distinct topographical features of the area East of Luton do not appear to have been taken into account in proposing housing development for this site. Although the land immediately adjoining the existing built-up area of Luton is a continuation of the plateau already occupied by the eastern outskirts of Luton, the dry valley of Lilley Bottom runs north-south through the area proposed for development. This valley has steep sides towards both the east and the west, and these are unlikely to be suitable for the provision of a radial road system linking directly with the centre of Luton. Indeed, the proposed area of search now appears to extend to the east of the valley towards Great Offley, and it is not clear how such housing areas would be integrated in transport terms with the rest of the development, and with Luton itself.

As the Core Strategy suggests, an Eastern Bypass and an extension of the guided bus system is likely to be restricted to the high ground closer to Luton, leaving much of the area proposed for development relatively poorly served by transport links. It may, of course, be that plans would emerge for some form of spine road along the Lilley Bottom Valley, but such a large-scale and hard feature in a landscape of exceptional quality and interest would be subject to intense opposition, and it is hardly credible that such an environmentally damaging proposal would now be made.

Overall transport conclusions

It is therefore considered that an urban extension to the East of Luton would create very negative environmental and transportation effects extending far beyond the proposed area of development. There is no evidence that the proposed development would achieve the measure of sustainability that would now be required for a major housing development, and on account of its location and topography, the site proposed for development is particularly unsuited to the large-scale housing development proposed in the Core Strategy.

Landscape, archaeology and biodiversity

These comments relate to issues contained within Section 12 of the Public Consultation Questionnaire issued by the Joint Technical Committee. Great concern is felt that the Joint Committee of Luton Borough council and South Bedfordshire District Council has failed to take into account the exceptional landscape and other characteristics of the area of Hertfordshire to the east of Luton in selecting this area as a preferred location for urban development.

1. Landscape issues

The area of North Hertfordshire to the east of Luton provides some of the finest landscapes in Hertfordshire, with long, uninterrupted views across unspoilt, rolling chalk countryside. The characteristics of this area are very similar to the adjoining area within Hertfordshire to the north of the A505 road which has the status of an Area of Outstanding Natural Beauty (AONB). It is understood that when the detached area of the Chilterns AONB between Dunstable and Hitchin was established as a result of the National Parks and Access to the Countryside Act of 1949, an arbitrary decision was made to use the alignment of the A505 road as the southern boundary of the AONB. While this might have been done to provide a well-defined boundary to the AONB, the reality is that there is little, if any, difference in the quality of the scenery either side of the A505 road.

Indeed, it is now understood that the area of search for housing development has been extended to the north of the A505 and therefore is encroaching on what is undisputedly landscape of AONB quality.

In order to understand the full implications of the damage that would be caused to the landscape by large-scale housing development East of Luton, a number of separate landscape areas need to be considered:

- The plateau landscape to the east of the existing settlement boundary of Luton.
- The dry valley of Lilley Bottom including the east-facing and west-facing slopes.
- The area to the east of the Lilley Bottom Valley included in the area of search
- The area to the north of the A505 road adjoining the village of Lilley.

a) Plateau landscape to the east of Luton

This is a long and relatively narrow plateau rising somewhat above the eastern edge of the built-up area of Luton, and typically about 1km in width from east to west. The area is gently rolling chalk upland with a typical plateau ridge landscape. It is mainly arable with scattered dwellings and small settlements such as Mangrove Green, Cockernhoe and Tea Green. These represent hamlets, consisting of houses clustered around village greens formed at junctions of minor roads. Indeed, this network of minor roads is an important feature of the character of the area, providing a strong cultural pattern, serving wayside dwellings and individual farmsteads.

The agricultural landscape shows evidence of pre-18th century enclosures, although the parish of Offley was not enclosed until 1807. Woodland is an important feature of this area, with woods such as Stubbocks Wood and Darley Wood, as well as various plantations within the area proposed for development. The ancient woodlands consist of oak, hornbeam, ash and beech, with the ground flora dominated by bluebells in spring. The Dormouse is reported as present in some of the woods.

A very significant part of the plateau area consists of Putteridge Bury Park, a historic park entered in the Register of Parks and Gardens of special historic interest in England. This register is maintained by English Heritage under powers provided under the Historic Buildings and Ancient Monuments Act 1953 and other legislation. Putteridge Bury Park is an important feature of the area, including its enclosing brick wall, and is completely incompatible with the urban development proposed for this area.

The area is well served by a network of footpaths and other rights of way, providing good public access for recreation and appreciation of the countryside. This access is understood to be highly valued by many residents of Luton. The area is classed as Green Belt land, and is a Landscape Conservation Area. The strategy for the area is one of restoring and improving features of the landscape, including the historic parkland at Putteridge Bury.

b) Lilley Bottom Valley

This area consists of a long, essentially dry, valley running north-south through the proposed area of development. The valley is some 2km wide west of Great Offley, reducing to around 0.5km wide near King's Walden. The area is characterised by its gently undulating arable landscape with sloping valley sides, and with longer panoramic views available from the higher ground to the east and west. The peaceful rural character of the valley represents typical Chiltern countryside, although its scale and openness are relatively unusual.

There are woodlands and plantations on the upper valley sides which include ash, beech and hazel woods; the nationally scarce great pignut occurs at one location, while buzzards have been successfully re-established in the area. The valley has no discernable water course, although there are ponds in the villages.

The valley is also appreciated for its network of public footpaths including part of the Chiltern Way Extension, a long distance footpath through the Chilterns. The strategy for conserving and restoring the landscape includes conserving the ancient woodlands, restoring hedgerows

along historic field boundaries and protecting the narrow and often sunken lanes with their distinctive hedge banks. The whole of this area is Green Belt land and a Landscape Conservation Area, and as such is totally unsuited to any form of urban development.

c) East of the Lilley Bottom Valley

The area of proposed housing development extends to the east of the Lilley Bottom Valley, and it is therefore necessary to consider the character of the landscape of the higher ground towards Great Offley. This is characterised as a gently rolling upland plateau, with a field pattern crossed by old, winding and sunken lanes. There are scattered settlements and individual farmsteads, with the occasional larger village.

The area is arable with extensive woodland cover. It is noted that Hertfordshire contains a high proportion of the UK's national oak and hornbeam woodlands, and these are afforded protection by being listed in Annex 1 of the EU Habitats Directive. The agricultural landscape consists of a mixture of 18th century and later enclosures, although with pre-18th century irregular enclosures.

As in other parts of the area of search described above, the whole of this area is Green Belt land and a Landscape Conservation Area with a current strategy which includes promoting the management of ancient woodland and restoring hedgerows. The pattern of narrow winding lanes and hedge banks is also to be protected and preserved. This area is therefore also totally inappropriate for any large-scale housing development.

d) North of the A505 adjoining the village of Lilley

This area is a northerly continuation of the Lilley Bottom Valley, although with steeper hillsides especially to the west, and with the valley bottom occupied by the linear settlement of Lilley. The landscape characteristics of this area are similar to those described under (b) above, except that the land north of the A505 road is also designated as an Area of Outstanding Natural Beauty (AONB). As such, the area should be eliminated from the area of search to be consistent with the policies of Luton Borough Council and South Bedfordshire District Council.

Landscape assessment work carried out for Joint Committee

A detailed report was prepared for the Luton and South Bedfordshire Joint Technical Unit by Land Use Consultants, entitled "Environmental Sensitivity Assessment - South Bedfordshire Growth areas" and dated December 2008.

Concerning the land East of Luton now proposed for urban development, the report divides the area into two parts. The first part corresponds broadly to the area described in (a) above, the plateau landscape to the east of the existing settlement boundary of Luton. This is designated as area "L", and is given an overall sensitivity assessment by the consultants of Grade 2. The second part corresponds to the rest of the area of search and is designated as area "L1". It is given an overall sensitivity assessment of Grade 1, *i.e.* the highest level of environmental sensitivity.

The report by the consultants gives the following Overall Sensitivity Judgements for the areas L and L1:

Area L - sensitivity rating Grade 2

Rating Justification (Consultants' wording)

"This landscape has a strong and distinctive character forming a rural context to the villages east of Luton, a strong wooded setting to the eastern edge of Luton and the setting of the Lilley Valley. Constraints to development relate to the rural character of

the landscape. However some small scale development may be appropriate provided sufficient mitigation is implemented.”

Mitigation (Consultants’ wording)

“• Avoid tall or large scale developments which would impinge on the distinctive chalk valley landscape around the Lilley Bottom Valley.

- Ensure development is well related to the existing settlement edge and does not extend onto the steeper valley side slopes to the east;
- Repair and extension of hedgerows along field boundaries to contribute to screening and visual connection of areas of woodland;
- Provide additional screening of (any new) settlement edge to Luton through increased tree cover and creation of new or extended areas of woodland;
- Conserve the network of narrow sunken lanes and associated hedge banks, verges and hedges;
- Promote the creation of buffer zones between intensive arable farmland/new development and semi-natural wildlife habitats;
- Conserve rural settlement pattern around village green and road junctions.”

Comments relating to this objection

The above mitigation measures may go some way towards reducing the environmental damage caused by small-scale and localised housing development. They are, however, completely irrelevant to mitigating the environmental damage that would be caused by locating an urban expansion of 5,500 dwellings, the East of Luton Bypass and a guided busway in this area.

Area L1 - sensitivity rating Grade 1

Rating Justification (Consultants’ wording)

“This is a high quality chalk landscape defined by the sloping valley sides of the Lilley Bottom Valley within The Chilterns AONB. It is a quiet, rural chalk landscape and an area of strong character and high quality. There are significant constraints such that it is not considered appropriate for development to take place.”

Mitigation (Consultants’ wording)

“Given the high sensitivity of this landscape, development is not recommended.”

Comments relating to this objection

Housing development on the proposed scale is completely inappropriate to this area and mitigation measures are not possible. As recognised by the consultants engaged by the Luton and South Bedfordshire local authorities, urban development of this highly sensitive landscape area would be highly damaging to the natural and historic environment, and should not be considered further.

2. Archaeology and historic landscape

Any area of countryside forming part of the chalk ridge of the Chiltern Hills, and the associated dip-slope valleys, is likely to be of considerable importance to the archaeological record of early human settlement in Britain. Not only did the chalk ridge present opportunities for long-distance trackways of great antiquity, but the area would also have been of particular importance to hunting and early farming activities. This is confirmed by the number of sites identified on maps prepared for North Hertfordshire District Council, with Archaeological Areas being shown within the area of the proposed development as follows:

<i>Archaeological Area</i>	<i>Location</i>
AA166	Mangrove Green
AA 145	South of Lilley
AA230	Between Wandon End and Tea Green
AA232	Darley Hall
AA220	South of Stoney Lane
AA178	South of Lodge Farm
AA275	North of Stubbocks wood
AA162	South of Luton White Hill, Great Offley
AA232	Winch Hill Farm and land to the east

This is also confirmed by the findings of Land Use Consultants engaged by the Luton and South Bedfordshire Joint Technical Unit. Their report dated December 2008 states that for area “L”:

(Consultants’ wording)

“An extensive programme of survey and archaeological trial-trenching was undertaken during 2007, which identified significant archaeology over an extensive area. The full report for this area has yet to be received but the archaeology found is likely to be considered of national importance and would therefore be a material constraint to development. These include Iron Age and Roman sites.”

For areas including area “L1” the consultants state that:

(Consultants’ wording)

“These are very large areas and it is expected that there would be a range of archaeological sensitivity. A detailed assessment of this sensitivity should include the potential for archaeological remains to be present throughout the area, using data from known sites and with consideration of soils and topography. It is also recommended that modelling of the archaeological potential is also used to help inform the study, alongside targeted field assessment.”

The Consultants also report on sensitivity mapping in the following terms:

(Consultants’ wording)

“This will need to be progressed, but it was felt premature to undertake this prior to the report on the land east of Luton has been received. Given the extent and significance of the resource, it is expected that extensive areas will be judged to be of High Sensitivity.”

It is therefore concluded that the area designated for large-scale housing development and major road building is of very considerable archaeological sensitivity, and that substantial parts of the area under consideration are unlikely to be ever suited to major urban development. At the very least, very significant costs and delays will be incurred while a full investigation is made of the archaeological significance of the area, and much uncertainty will remain about whether and when specific sites could be released for housing and other development.

An important feature of the historic landscape is Putteridge Bury Park, registered as a historic park by English Heritage and recorded by North Hertfordshire District Council as Historic Park and Garden HG7. This occupies a substantial part of Area “L”, and represents an area that should on no account be designated for urban development of any kind.

A further aspect of the historic landscape within area “L” is the network of narrow and winding country lanes, with village greens formed where these lanes meet. The cluster of hamlets located around village greens is a feature of the historic environment of the plateau, and this would be irreversibly lost as a result of the proposed road building and housing development. No mitigation measures could realistically reduce the damage that would be caused.

3. Biodiversity issues

Although part of the area under consideration consists of intensively farmed arable land, there are also substantial areas of ancient woodlands and more recent plantations, hedgerows, grassland and mature gardens, all of which contribute to the biodiversity of the area.

Evidence of the importance of the area is provided by the number of Local Wildlife Sites within the proposed area of development, as shown in the table below. It is noted that the biodiversity assessment carried out by Land Use Consultants on behalf of the Luton and South Bedfordshire Joint Technical Unit show many of these Local Wildlife Sites as Grade 1 (the most sensitive) in their map of Biodiversity Sensitivity with respect to areas L and L1. Extensive parts of the area proposed for development are also shown as Grade 2, indicating that urbanisation of the area would carry a heavy penalty in terms of loss of biodiversity.

<i>Local Wildlife Sites</i>	<i>Location</i>
27/013	Stubbocks Wood
19/028	Westbury Wood, Judkin’s Wood, Young’s Wood, Angel’s Wood
27/002	Burnt Wood
27/001	Withstock’s Wood
27/005	Limekiln Wood
28/043	Sewett’s Wood

The biodiversity sensitivity of the area proposed for development is confirmed by the findings of Land Use Consultants working for the Luton and South Bedfordshire Joint Technical Unit. Their report dated December 2008 states that for Area “L”:

(Consultants’ wording)

“Isolated woods with occasional larger complexes of habitat and villages with mature gardens, hedges, grassland, ponds and scrub set within a matrix of intensively farmed arable gently down to Lilley Bottom.”

For Area “L1” the consultants’ report states that:

(Consultants’ wording)

“Open arable farmland of Lilley Bottom rises up to a north south ridge containing important ancient woodlands as well as some grassland and parkland with hedgerow networks. To the north a more complex mix of fields and woods links to important downland sites in Bedfordshire. To the south important ancient semi-natural broadleaved woodlands, mature hedgerows and lanes include both designated sites and protected species. With Unit L the whole area forms part of the Chilterns agricultural landscape which is known to be important for national priority farmland bird species.”

Based on the above assessment, there can be no doubt that major urban development within the area East of Luton would be highly damaging to the biodiversity of the area. This damage

would not be limited to just the area subject to development , but would impact on other parts of Bedfordshire and Hertfordshire through a loss of wildlife links.

Overall, the proposed large-scale housing and other development in the area of Hertfordshire to the east of Luton would have a profoundly negative impact on landscape, the historic environment and on biodiversity, and no amount of mitigation measures can have any realistic effect on the permanent and irreversible damage that would be caused.

Sustainability

Fig 1 (p 46) of the Preliminary Sustainability Assessment report clearly indicates that Site L is outside the area considered and therefore has not been considered by the consultants, thereby invalidating any conclusions drawn about the site. Furthermore the report states clearly that a strategic objective is that 'Luton and southern Bedfordshire will be known as the 'Green Growth Area' – a truly Sustainable Community. The principal conurbations of Luton, Dunstable and Houghton Regis will have a strong identity based on a number of interconnected communities'. Choosing a location in North Hertfordshire cannot by any stretch of the imagination be seen to fulfil that strategic objective.

It is noted also that the Preliminary Sustainability Assessment report recommends avoiding areas where groundwater is vulnerable. For the reasons given above under 'Water', from a water resource and quality aspect alone, it would be irresponsible to consider this site further.

Economics

Finally, we note that consultants from DTZ are of the opinion that, of the four preferred urban extension options, only the East of Luton site would bring in a profit of more than 15%; no doubt this prediction in part explains the Committee's enthusiasm for this perverse scheme. However, as this site in most cases lies outside the area that your expert technical advice covers, there must be greater uncertainty about many matters as identified above. Our belief is that the cost estimate for developing this site will inevitably rise and erode this rather fanciful rate of return.

In all, the Hitchin Society finds the East of Luton development plan utterly outrageous. It is very much to be hoped that the Joint Committee will have rapid second thoughts about such an inadequately assessed and ill thought through proposal, which ought to be withdrawn immediately.

5 June 2009



An area rich in footpaths