

**Luton & South Bedfordshire Joint Committee**

**23 July 2010**

**Agenda Item No. 10**

<b>AUTHOR</b>	<b>Lachlan Robertson – Interim Head of the Joint Technical Unit</b>
<b>SUBJECT</b>	<b>Towards a Core Strategy Development Plan Document for the Luton and southern Bedfordshire Area.</b>
<b>PURPOSES</b>	<p>To inform the Joint Committee of the content of a Joint Core Strategy that takes account of:</p> <ul style="list-style-type: none"><li>• the results of the Report of Consultation presented to the 23 October 2009 Joint Committee;</li><li>• further Consultation Responses since 23 October 2009;</li><li>• updated and additional baseline evidence produced since 23 October 2009;</li><li>• Coalition Government statements on the future of the Regional Spatial Strategy and the “Localism” agenda;</li><li>• the identification of locally generated housing need in the absence of Regional Spatial Strategy “targets”; and</li><li>• public funding of infrastructure and the general approach to national debt reduction.</li></ul>
<b>RECOMMENDATIONS</b>	<p>i) That the draft Core Strategy as presented in this report is agreed to be an appropriate basis for a final Core Strategy (Submission) Development Plan Document for consultation purposes.</p> <p>ii) That the Joint Committee’s requirements for any further investigative work and/or further public consultations, as may be identified and agreed at this meeting, be undertaken.</p> <p>iii) That a final Core Strategy (Submission) Development Plan Document together with the associated Sustainability Appraisal be presented to the next meeting of the Joint Committee for approval.</p>

<b>REASON FOR RECOMMENDATIONS</b>	<b>To enable the Joint Technical Unit to publish the draft Core Strategy and associated technical material and thereby progress preparation of the Core Strategy to the next stage.</b>
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## 1. BACKGROUND

1.1 This report presents the basis for a Luton and South Bedfordshire Core Strategy that could be taken onto the next stage of the statutory process for delivering a Local Development Framework for this area. A Draft Core Strategy (Appendix A), has been circulated separately to the agenda for reference purposes.

1.2 Following the Luton and southern Bedfordshire Core Strategy Preferred Options consultation during Spring and Summer of last year, the Joint Committee considered the Report of Consultation at its 23 October 2009 meeting (Agenda items 5 and 6). This provided a full listing of the individual consultation responses together with the response of the Joint Technical Unit in turn. The Joint Committee resolved the following as stated in its minutes:

**“RESOLVED that the suggested responses and the actions proposed relating to representations received, be approved.”**

1.3 It is also recommended that Agenda item 8 of the 24 July 2009 meeting of the Joint Committee be also referred to. That report set out some of the important changes to the form and content of the Core Strategy that were considered to be appropriate at the time. These remain relevant for the further development of the Core Strategy namely:

- to provide a simpler, “Plainer English” presentation of the Core Strategy;
- to identify the Specific Strategic Site Allocations and the associated new Green Belt boundary arising;
- to set out the major infrastructure items that must be provided;
- to set out a phased approach to releasing land in the form of a Delivery Strategy; and
- to clearly set out an approach to Contingency Planning.

1.4 Since that time, the Joint Technical Unit have been preparing a formal Pre-Submission Core Strategy that can be the subject of final consultation and then presented to the Secretary of State for Examination and consequent adoption as planning policy for the area. That effort has been informed by the following events.

1. The agreed responses within the Report of Consultation have been acted upon.
2. Account has been taken of further responses received since that Report.

3. The new and/or updated technical studies, providing additional evidence to support the Core Strategy, have been taken into account.
4. The new Coalition Government approach to policy planning has been reflected in the content of the Core Strategy; particularly the revocation and eventual abolition of the Regional Spatial Strategies (RSSs). As a consequence there has been a re-evaluation of housing requirements in the Luton and southern Bedfordshire area in the absence of the RSSs.
5. Luton Gateway's Infrastructure Delivery Plan and Funding Study (January 2010) was to have been incorporated into the Core Strategy in the form of an Infrastructure Schedule. However, this work, inevitably, has also been influenced by recent Coalition Government statements on the new "localism" and on the state of public finances. This has implications for the delivery of public funded infrastructure. Therefore only a broad outline of the Infrastructure Schedule can be given at this time. A revised Infrastructure Schedule will be available for the next Joint Committee meeting.

## **2. INCORPORATION OF THE 23 OCTOBER 2009 REPORT OF CONSULTATION**

- 2.1 Many of the comments, as set out in the Report of Consultation (RoC), about the presentation, clarity and deliverability of the Preferred Options document were anticipated as set out in paragraph 1.3 above. The Pre-Submission version of the Core Strategy has been changed accordingly.
- 2.2 In broad terms it is considered that the Preferred Strategy approach is sound when taking the RoC into account. It is the other events reported here below that have a greater impact on its content.

## **3. FURTHER RESPONSES RECEIVED AFTER THE 23 OCTOBER 2009**

- 3.1 Agenda Item 7 has set out the detail of additional responses received, including errors in the RoC that have been discovered and then corrected. The responses in total add significantly to the objections received concerning one of the preferred directions of growth; at East of Luton.
- 3.2 As reported in agenda item 7, Luton Borough Council resolved unanimously on the 3 November 2009 not to support the housing element of the East of Luton preferred direction of growth. As this represents one of the constituent authorities of the Joint Committee this is a significant material consideration that Members will wish to take into account.
- 3.3 In addition, there have been a significant number of letters and petitions both for and against the development promoted to the West of Luton (known as "Bushwood") by a private company, Luton & Central Beds Economic & Development Partnership Ltd. This proposal was not considered appropriate for inclusion within the Preferred Options Core Strategy Document published last year, but given the intensive public interest that this proposal has had in the subsequent year, it is appropriate to consider the proposal in more detail. To that end, a commentary on the proposal as submitted to the Joint Committee and as assessed by the Joint Technical Unit is included as Appendix B of this report.

#### **4. UPDATED AND ADDITIONAL TECHNICAL STUDIES**

- 4.1 Agenda item 9 has set out a summary of the content of, either studies that were required to be updated since October last year (such as the Strategic Land Availability Assessment), or were additional (such as the Employment and Market Study).
- 4.2 The Employment Land and Market Assessment Study allows the Core Strategy to include detailed requirements for employment land allocations. It also justifies the approach taken to the provision of additional employment land suitable to take advantage of economic enhancements allied to London Luton Airport.
- 4.3 The Strategic Housing Land Availability Assessment allows for updated figures to be included for housing supply based on an up to date assessment of the sub-region.
- 4.4 The Strategic Housing Market Assessment provides appropriate justification for the proposed requirement for Affordable Housing as a policy within the Core Strategy.
- 4.5 Other studies provide general support to the Core Strategy and for future DPDs.

#### **5. POLICY OF THE NEW COALITION GOVERNMENT AND LOCALLY GENERATED HOUSING REQUIREMENTS**

- 5.1 The new Coalition Government has signalled its intention to abolish the Regional Spatial Strategies. A Statement from the Secretary of State advises local planning authorities that this intention is a material consideration in planning decisions. Therefore, it can be assumed that the Core Strategy need no longer be based solely upon the RSS and associated regional targets. This has two significant consequences for the delivery of a Core Strategy in this area:
  - 1. An evidence based, local assessment of the requirement for housing and employment will need to be made.
  - 2. The “areas of search” identified in the Bedford and Luton Policy 2(a) of the Milton Keynes & South Midlands Sub-Regional Strategy no longer apply. Given that one of these areas included the land to the East and South-East of Luton (which is outside of the administrative area of the Joint Committee) it can be reasonably assumed that it is no longer necessary to consider that direction of growth as a prerequisite to the Core Strategy.
- 5.2 Prior to the election of the Coalition Government there was a signalled intention to alter the plan-making system in England afresh to reflect the new “localism” agenda laid out in the Conservative party’s green paper 14 entitled, “Open Source Planning.” This advocated a greater role for local self determinism on planning policy development. Such a change will require primary legislation which may take some time to implement. In the meantime, policy making requires the continued use of the current Local Development Framework system. It is considered that there is sufficient time to prepare a Core Strategy such that it will continue to be an important part of encouraging new sustainable development and to contribute to economic development.

- 5.3 Recent guidance issued by the Secretary of State (statement of S/S dated 6 June 2010) has re-affirmed the need to continue to make plans in accordance with the remaining LDF system.
- 5.4 The Joint Technical Unit, in association with specialist staff drawn from both Authorities, have considered the evidence of population change, household formation and the consequential need for housing in particular. The basis of the calculations is that provision is made as from 2011, the start date of the Plan, and not from the previous baseline of 2001. This reflects the fact that the revocation of the RSS starts immediately. Technical Notes on the subject of Housing and Employment numbers have been prepared and are attached at Appendix C.
- 5.5 There is no single established method of identifying what might be an appropriate and justifiable "local" level of required housing development. However, it would be reasonable to consider basing such a level on the anticipated "natural growth" of the population. This would serve the purpose of accepting that the existing population generates a future need and also satisfying the call that housing provision should be sufficient to allow local families to stay and be employed in the local area.
- 5.6 From the methodology set out in the Technical Note, this generates a need for some 15,500 homes from the Luton and Southern Bedfordshire area in the period 2011 to 2021 and indicates perhaps a need for some 7,500 in the period between 2021 and 2026. Together this is over ten thousand dwellings less than the equivalent number set out in the Preferred Option Core Strategy Document last year.
- 5.7 Taking the two consequences together, it is reasonable to conclude that there is neither a requirement nor a prerequisite for housing development East of Luton in terms of satisfying a need for a Strategic Urban Extension of the previously intended scale.
- 5.8 Therefore, the Joint Technical Unit has considered the implications for the distribution of housing development and has recommended the following distribution. Notes are provided to explain the detail.

		Number of Homes within 15 year Plan Period		Outside Plan Period <sup>1</sup>
		2011/ 12 – 2020/ 21	2021/ 22 - 2025/ 26	After 2026
Total	Luton and southern Central Bedfordshire Area	15,900	7,250	N/A
By Specific Area	Urban Area of Luton	5,907	2,100	N/A
	Urban Areas of Dunstable, Houghton Regis & Leighton - Linslade	4,055	1,000	N/A
	North of Houghton Regis	3,150	2,000	1,850
	North of Luton	300	1500	1800
	East of Leighton- Linslade	2,100	400	N/A
	Rural Areas	388	250	N/A

- 5.9 Note 1: The total amount of housing planned is 23,150, made up of 15,900 in the first ten years, then 7,250 in the following five years. The last column shows either land that is potentially available post 2026 or as a contingency.
- 5.10 Note 2: The JTU have looked closely at the capacity of the Luton urban area for further housing and considered that a total of 7,800 is achievable. It is possible that more can be achieved if, during the course of the Plan, regular urban capacity investigations take place.
- 5.11 Note 3: The Houghton Regis (North) strategic site allocation is a lynchpin of the Core Strategy. It is a site that will be clearly defined and associated with the A5 – M1 (J11a) and Woodside Link road schemes. However, the site has a capacity of up to 7,000 dwellings and not all of the site is likely (for practical reasons) to be built out by 2026. Hence, part of the housing potential lies outside of the Plan period and would be considered in any future review of the Plan. It also has the possibility of being a useful contingency.
- 5.12 Note 4: The North of Luton strategic site allocation is dependent upon the construction of the Luton Northern By-pass, across the railway, across to the A6 and with the potential for continuing across to the A505. However, it is estimated that this would cost at least £400 Million. It is therefore prudent to say that the site allocation may not be much deliverable in the first part of the Plan period and therefore a limited allocation only is proposed in the last years of the Plan. As at HR(North), there is potential for up to 4000 dwellings in that area. Hence, part of the housing potential lies outside of the Plan period and would be considered in any future review of the Plan. It also has the possibility of being a useful contingency.

- 5.13 Note 5: The East of Leighton – Linslade strategic site allocation has the best potential to deliver the housing needs of Central Bedfordshire early.
- 5.14 Note 6: The suggested housing proposed in the villages offers the opportunity for local people to determine what housing they require and where to sustain their interests. No allocations are made in the Core Strategy: that will be for later development plan documents and driven by local determination.
- 5.15 In respect of the Employment land allocations, the Preferred Options Core Strategy Document envisaged an additional 160 hectares of employment land to be allocated. Notwithstanding the reduction in overall housing provision in the Core Strategy presented today, further work on this subject has been undertaken by the JTU. This concluded that the Core Strategy should be focussed on encouraging employment provision to a higher level. Therefore, in this revised Core Strategy, it is proposed that 134 hectares of employment land be allocated: proportionally more per household than before. In addition, the Plan includes (as in the case for housing) additional land for contingency purposes.
- 5.16 There are commensurate changes to the strategic infrastructure provision in the remainder of the Core Strategy. Appendix A includes details of these changes since the Preferred Options document was published last year.
- 5.17 However, national policy is still emerging from the new Coalition Government and a verbal report will be given at the meeting if new significant issues emerge.

## **6. THE INFRASTRUCTURE FUNDING STUDY/ PUBLIC SPENDING CONSTRAINTS**

- 6.1 In order to ensure that the appropriate infrastructure was identified and put in place at the right time for the delivery of the Core Strategy, *Luton Gateway*, this area's Local Delivery Vehicle commissioned a Study and Model for assessing the cost of that infrastructure. This was produced by EDAW/AECOM under the direct advice of the Joint Technical Unit and with the emerging Core Strategy of that time in mind.
- 6.2 This Study was completed in January 2010 and one of the purposes of the Study was to provide the Joint Technical Unit with an Infrastructure Schedule of projects that are associated with the delivery of the Preferred Options Core Strategy. However, given that the Study is not aligned with the reduction in the overall scale of development, a further "run" of the Infrastructure Model that underpins the Study is required.
- 6.4 Nevertheless, the Study has been the source of information that has allowed the JTU to construct an appropriate Infrastructure Schedule and this is included in the Delivery Strategy section of the document in Appendix A.
- 6.5 In addition, the Model also allows the JTU to consider changes as they occur. These changes might be:
- Alterations to the cost of infrastructure projects as more information becomes known.
  - Additions or subtractions from the list of infrastructure projects as they are deemed to be necessary.
  - Changes to the position or number of Strategic Urban Extensions.

- Changes to the overall number or size of housing or employment areas that need to be delivered.

6.10 At the time of writing, the Coalition Government's immediate public spending constraints are still emerging. This will impact on every aspect of the Core Strategy in that it adds an extra layer of uncertainty to whether or not particular proposals can be supported or delivered. However, this is a matter that concerns the "risk" to the Core Strategy rather than one that undermines its underlying soundness. Therefore a Risk Analysis that takes public spending constraints into account will need to be written to accompany the Core Strategy. Whilst this will not be part of the Plan itself, it will, if kept updated, be a useful document to use as part of the Annual Monitoring Report on the progress made to deliver the Core Strategy.

## 7. COMMENTARY ON THE DRAFT CORE STRATEGY DOCUMENT (CONTAINED IN APPENDIX A)

7.1 **Appearance.** The look of the Plan has been changed to be easier on the eye of the reader. Whilst the appendix shows only a mock-up of the plan as it will look in its final form, the main changes from previous documents are: larger text size, shorter paragraphs, generous margins and widely spaced lines. Every page, header, paragraph and footnote is numbered. Each policy has a simple reference number and is listed at the front of the Plan for ease of use.

7.2 **Policies.** The number of policies have been kept to a minimum and located in generously sized and highlighted text boxes. In addition, there is substantial use of footnotes for cross-references, links to other policies or links to the Sustainable Community Strategies. This allows the main text to remain uncluttered.

7.3 **Layout.** There are thirteen main chapters with five appendices. Appendix 1 contains a mock-up of the Key Diagram as it will look, but the intention is that it will be easier to read and use than previous versions. In the final Plan it is expected that this will be in a fold-out format.

7.5 **Content – Chapter 1: Introduction.** This chapter sets out the background the plan and is in language suitable for the interested lay-person to understand. The new Coalition Government's implemented and proposed changes to the planning system have had, inevitably, to be reflected in this chapter and it is considerably different from the Preferred Options Document published before. It is also likely that this chapter will need substantial revision right through to the Examination period.

7.6 **Chapter 2: Issues and Trends:** It is advised that local authorities should keep unnecessary information out of the Core Strategy and at first glance this may appear to be a chapter only of dry facts. However, the reason for having a Plan is contained in this chapter and it was felt that it was important to highlight the relevant background material. The chapter could become an Appendix if the Joint Committee consider this to be helpful to the overall readability of the Plan.

7.7 **Chapter 3: Vision and Objectives.** The Vision is a "re-engineered" version of the two Sustainable Community Strategies of both constituent Councils. However, whilst the SCSs are becoming elderly, nevertheless, their visions remain appropriate as a setting for the Core Strategy.



The Vision here emphasises the variety contained in this diverse rural and urban area and identifies the future that is expected the Plan will help bring about. Although the Vision is broadly unchanged from the preferred Options Document, Members may wish to re-affirm their support for its principles.

- 7.8 There are **nine Objectives** that are drawn from the Vision and these set out the outcomes that the Plan is expected to achieve. These will be a main source of information for monitoring the progress of the plan and the degree to which the Plan achieves sustainable development.
- 7.9 **Chapter 4: The Development Strategy:** The main part of this chapter sets out how new development will be distributed across the area. As a result of the announcement of the intended abolition of the RSS, this chapter explains how the new development is distributed according to the local requirements for development as opposed to a regional requirement. This chapter essentially highlights the fact that the East of Luton direction of growth for housing as set out in the Preferred Options document is no longer required. It retains the identification of land to the south-east of Luton for major employment purposes.
- 7.10 **Chapter 5: The Infrastructure Delivery Strategy.** This chapter shows the direct link between the requirements for infrastructure and the provision of housing and employment areas. It shows (using a housing trajectory diagram) how the housing delivery is expected to proceed for the first ten years of the plan and then roughly where further development can be expected in the following five years of the Plan. An infrastructure schedule lists the main infrastructure projects that are required for the first ten years and a general indication of what is required for the following five years is stated. The Plan is split in this way to reflect a pragmatic approach to the fact that beyond ten years, the future is too uncertain: especially in the current financial climate.
- 7.11 This chapter also includes two important policies for funding the infrastructure. One policy sets out a requirement for creating a strategic infrastructure fund or similar arrangement to ensure that the appropriate funds are gathered and used for the purpose of supporting the new development across the Plan area. Another policy sets out the basis for developer contributions and paves the way for a Supplementary Planning Document to set out the detail of how that is done in practice. It also introduces the concept of the Infrastructure Impact Assessment such that larger schemes are required to show how their proposals impact on facilities in area and how that impact can be dealt with.
- 7.12 **Chapter 6: Green Belt Matters.** This chapter is the mechanism for identifying a new Green Belt boundary to accommodate the urban expansions into that area necessary to allow the Plan to proceed. It provides for a new defensible boundary for the future.
- 7.13 **Chapter 7: Linking Places.** One of the key elements of this Core Strategy concerns how people and goods can move through the area efficiently. It could be said to define the character of this Core Strategy. It sets out the key transport challenges that affect the area, shows how this plan is linked to other strategies to address those challenges and sets out a number of policies that seek to improve connectivity in all its forms.

- 7.14 **Chapter 8: Making Places.** This chapter complements the previous chapter by dealing with the detail of what will be provided for those living in the areas that will have improved connectivity. It covers housing, social and community infrastructure and quality of design.
- 7.15 **Chapter 9: Economic Prosperity.** The Plan will not be meaningful without identifying what efforts will be made to bring greater economic prosperity to the area. It must have the ability to deliver much of the housing, transport and social improvements mentioned elsewhere in the Plan. To that end it identifies key economic prosperity drivers, identifies new strategic land allocations and provides policies for the regeneration of the existing urban areas.
- 7.16 **Chapter 10: Safeguarding Our Environment and Resources.** This chapter sets out how all the above can be achieved whilst recognising that there is a considerable importance in not only protecting valued areas but also using improved and new green infrastructure as a key driver of sustainable development in its own right.
- 7.17 **Chapter 11: Strategic Site Specific Allocations.** A previous Joint Committee Report highlighted the need to be specific about the location of the larger sites for development. This would allow the Plan to be more understandable and relevant to individual's real interest in the Plan: where development will occur. This chapter identifies the three strategic sites and sets out a framework that will allow them to be phased and monitored throughout the period of their construction. The three sites are:
- North of Houghton Regis: defined by the northern edge of Houghton Regis, the route of the proposed new A5 – M1 Bypass, the A5 and the M1.
  - North of Luton: defined by the northern edge of Luton, the route of the proposed new Luton Northern Bypass, the M1 and the A6.
  - East of Leighton – Linslade: defined by the eastern edge of the town, Shenley Hill, Stanbridge Road and a defined eastern edge.
- 7.18 The chapter also includes detailed proposals for the regeneration and development of Leighton – Linslade as it is associated with and linked to the town's SSSA.
- 7.19 **Chapter 12: The Four Towns.** This Chapter deals specifically with the main proposals of the Plan for the four main towns within the Plan:
- Luton: Includes a vision for the town centre and a Master Plan for its enhancement. It also includes action on specific parts of the wider town area.
  - Dunstable: Includes a vision for the town and specific policies for the regeneration of the town centre.
  - Houghton Regis: Includes a vision for the town and specific policies for the regeneration of the town.
  - Leighton – Linslade: Includes a vision for the town and supports the efforts of the Town Council to plan its future.
- 7.20 **Chapter 13: Rural Communities.** The last chapter is an important end-piece to the Plan as it deals with the greater part of the Plan area and covers a diverse landscape, many attractive villages and a significant number of people and businesses. Some development of housing, employment and associated facilities is proposed in principle, although no specific site allocations are made. These will be the subject of a separate Allocations Development Plan Document that is in preparation.

- 7.20 **Appendix 1: Key Diagram.** This diagram has been considerably re-vamped since its appearance in the Preferred Options Core Strategy Document last year. It is designed to be easier for the main elements of the plan to be located on the ground.
- 7.21 **Appendix 2: Proposals Map Amendments.** The existing development plans for the area comprise the Luton Local Plan 2001 – 2011 and the South Bedfordshire Local Plan Review 2004. Those Plans will remain relevant in the immediate future as the Core Strategy will supersede only some of their policies. Therefore there is a need to provide a more detailed set of Proposals Map amendments to suit. The maps are at a scale that allows the boundary of the SSSAs to be defined clearly as well as the new Green Belt boundary.
- 7.22 **Appendix 3: Saved Policies.** This section specifies in detail which of the policies within the Development Plan for the area (a collection of previous local plans, structure plans and minerals and waste plans) will be “saved”. In other words, they are kept and remain relevant for planning purposes until they are replaced by other Development Plan Documents in the future.
- 7.23 **Appendix 4: Monitoring Framework.** This will be an important technical section for the delivery of the Plan. It will set out how the main elements of the Plan will be monitored over the course of the Plan period to ensure that it remains on track. Plans inevitably need amending, possibly through five-yearly reviews, and it is the information gathered each year in the Annual Monitoring report which will determine if the plan is in need of adjustment or replacement in the light of the progress made.
- 7.24 **Appendix 5: Glossary.** A list of technical terms used in the plan with an explanation of their meaning. The JTU is happy to receive suggestions from Members or the general public for any additions that they would like to include.

## 8. SUMMARY OF THE MAIN PROPOSALS OF THE CORE STRATEGY

- 8.1 These are the significant proposals of the Core Strategy and where relevant, the differences from the Preferred Option Consultation Document presented to the Joint Committee last year are highlighted.
- The East of Luton direction of growth for housing identified in the Preferred Options Document is deleted from the Plan.
  - The revocation of the Regional Spatial Strategy is acknowledged and the Plan now provides for housing development of 15,500 in the period 2011 to 2021 and suggests housing development of 7,500 in the period 2021 to 2026, subject to periodic review. This reflects the natural population growth prediction as set out in the technical note.
  - The provision of 134 hectares of employment land to emphasise the economic development element of the Plan.
  - Three Strategic Specific Site Allocations are made: at North of Houghton Regis, North of Luton and East of Leighton- Linslade.
  - No changes are made to the Employment requirement in those areas, though the proposed extension of the Century Park Employment Area remains in place as an important complement to London Luton Airport.

- An Infrastructure Schedule and Delivery Strategy has been added to the Plan which deals specifically with the critical and essential projects necessary to support the Plan in the period 2011 to 2021. General indications of the infrastructure only are given for the period 2021 to 2026 to reflect the uncertainty of planning over this long timescale.
- New strategic road links are specifically identified, though only a general indication of the route of the Luton Northern Bypass between the A6 and the A505 is given due to the lengthy timescale that will be involved in its provision.
- The East Luton Bypass is excluded from the Plan, though a corridor from Airport Way to the Century Park extension is protected in a manner that allows that access to form the first element of the Bypass if it is considered to be required in later reviews of the Plan.
- Contingency arrangements are identified to allow any future reviews of the Plan to be adjusted in the light of any difficulties in the delivery of strategic sites.

8.2 The Plan otherwise conforms with the Preferred Options and the subsequent changes and actions identified in the Report of Consultation presented to the Joint Committee last October.

## **9. FINANCIAL IMPLICATIONS**

9.1 There are no direct financial implications as a consequence of publishing the Pre-submission Core Strategy. However, approaches taken to the delivery of the development set out within it will be likely to have varying financial implications for Councils' services, such as Education and Social Services for example. Such potential implications have not yet been quantified in detail and as the Core Strategy is continually refined such financial implications will become increasingly clear.

## **10. LEGAL IMPLICATIONS**

10.1 The Pre-submission stage in the preparation of the Core Strategy is a statutory part of the plan-making process and there are associated legal implications for the Joint Committee. As the Core Strategy progresses through its statutory preparation stages its contents will assume increasing status as a material consideration in the determination of planning applications. This stage represents the first point at which its contents assume, to a degree, this status.

## **11. EQUALITIES IMPLICATIONS**

11.1 The Pre-submission Core Strategy is derived from the 'Preferred Options' document published for consultation in April 2009 on which an Equalities Impact Assessment was undertaken. None of the changes proposed in this Report are considered to significantly deviate from that assessment. All associated material has fed into the preparation of this Pre - submission of the emerging Core Strategy.

## **12. APPENDICES A, B and C**

Appendix A – Draft Pre-Submission Core Strategy (circulated separately to the agenda)

Appendix B – Summary of Alternative SSSA Proposal at West of Luton (a.k.a. Bushwood)

Appendix C – Technical notes on housing and employment provision