

Luton and Southern Bedfordshire Joint Committee
Local Development Framework

Sustainability Appraisal Report for the Core Strategy Pre-Submission

October 2010

Main Report

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Glossary

AMR	Annual Monitoring Report
AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
BAP	Biodiversity Action Plan
CPRE	Campaign to Protect Rural England
DEFRA	Department for the Environment, Fisheries and Rural Affairs
DETR	Department of the Environment, Transport and the Regions
dph	Dwellings per Hectare
DPD	Development Plan Document
EA	Environment Agency
ESDP	European Spatial Development Perspective
EC	European Commission
EU	European Union
GB	Great Britain
GCSE	General Certificate of General Education
GI	Green Infrastructure
GIS	Geographical Information System
GP	General Practitioner
GSS	Green Space Strategy
Ha	Hectares
ISA	Integrated Sustainability Appraisal
JC	Joint Committee
LDD	Local Development Document
LDF	Local Development Framework
LDS	Local Development Scheme
LTP	Local Transport Plan
NAQS	National Air Quality Strategy
NOMIS	National Online Manpower Information Service (Office for National Statistics, UK)
NVQ	National Vocational Qualification
ODPM	Office of the Deputy Prime Minister
PDL	Previously Developed Land
PPG	Planning Policy Guidance
PPS	Planning Policy Statement
QoL	Quality of Life
RSL	Registered Social Landlord
RPG	Regional Planning Guidance
RSS	Regional Spatial Strategy
RTS	Regional Transport Strategy
SA	Sustainability Appraisal
SAC	Special Area for Conservation
SAMs	Scheduled Ancient Monuments
SPA	Special Protection Area
SCI	Statement of Community Involvement
SEA	Strategic Environmental Assessment
SFRA	Strategic Flood Risk Assessment
SPD	Supplementary Planning Document
SSSA	Strategic Site Specific Allocations
SSSI	Site of Special Scientific Interest
SUDS	Sustainable Urban Drainage Systems
UK	United Kingdom
UN	United Nations

1. Introduction

Purpose of the SA and the SA Report

- 1.1 The purpose of Sustainability Appraisal (SA) is to promote sustainable development through the integration of environmental, social and economic considerations in the preparation of Local Development Documents (LDDs). This requirement is set out in Section 39 (2) of the Planning and Compulsory Purchase Act 2004 and Planning Policy Statement 12: Local Development Frameworks, 2008. Local Development Documents must also be subject to Strategic Environmental Assessments (SEA) and Government advises that an integrated approach is adopted so that the SA process incorporates the SEA requirements.
- 1.2 This is the SA Report that documents the SA/SEA process for the Luton and South Bedfordshire Core Strategy: Submission Document. This SA Report is published for consultation with the Core Strategy DPD: Submission Document in accordance with SEA Regulations and SA Guidance.

The Sustainability Appraisal Process

- 1.3 In November 2005, the Government published guidance on SA "Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents", which included guidance on the application of SA to Development Plan Documents (DPDs). The appraisal methodology and processes used in this SA Report were prepared to comply with the SA process for DPDs as set out in the guidance. The SA has been conducted to meet the requirements of SEA as set out in the Environmental Assessment of Plans and Programme Regulations 2004 (No.1633).
- 1.4 Work began on the Luton and South Bedfordshire Core Strategy in 2006. In accordance with the SA guidance and Regulations, a Scoping Report was initially prepared in April 2007 to correspond with the consultation on the Core Strategy Issues and Options Document and was consulted on from May 2007 to October 2007. The Issues and Options Sustainability Appraisal was published in January 2009. This document appraised the options for growth as identified in the Issues and Options Document.
- 1.5 Following the findings of the Issues and Options Sustainability Appraisal and the results of the consultation and evidence emerging from technical evidence studies, a Core Strategy Preferred Options Document was published for consultation in April 2009 together with an accompanying SA. The Preliminary Sustainability Appraisal of the Core Strategy Preferred Options Document, March 2009; hereafter referred

to as the Preferred Options SA Report; provided a broad appraisal of the policy direction regarding growth options and thematic policies.

- 1.6 A revised Scoping Report was published in October 2009 for consultation in response to changes in Government guidance for the preparation of LDFs, changes to the Luton and South Bedfordshire Local Development Scheme, the emerging East of England Plan and its Scoping Report and the availability of new and more detailed evidence coming forward from the technical reports commissioned to inform the progression of the Core Strategy.
- 1.7 The revised Scoping Report October 2009, recommended minor changes to the sustainability framework. This SA Report uses the revised sustainability framework to appraise the Core Strategy Pre-Submission.
- 1.8 The revocation of the East of England Plan and previous growth figures in the Milton Keynes South Midlands Sub-Regional Strategy in July 2010 halted the progression of the Core Strategy from the preferred options to its pre-submission consultation stage. The three statutory consultees (Natural England, Environment Agency, English Heritage) advised that there was no need to re-consult on the 2009 Scoping Report and recommended to just make amendments to the Scoping Report's Context Review to reflect the new changes.
- 1.9 The findings of the Preferred Options SA and the results of the consultation on the Preferred Options and associated SA Report, have led to certain amendments and refinements to the Core Strategy. Although the principle of the Preferred Option is carried through into the Core Strategy Pre-Submission, this is now assessed within the context of the Government's 'localism agenda' and the locally generated housing, employment and infrastructure requirements for the Luton and Southern Central Bedfordshire area. This is elaborated and expanded upon in the Core Strategy Pre-Submission through detailed policies, including the allocation of strategic sites.
- 1.10 At the Preferred Options stage of the Core Strategy, the preferred areas for growth and preferred policy direction was appraised. For the Core Strategy Submission, the growth strategy, which identifies the areas for growth, plan policies and plan objectives have been appraised against the 15 sustainability objectives of the SA framework. The key priorities for the Core Strategy and the sustainability objectives have not been changed by the 'localism' agenda.

Core Strategy Development Plan Document Context and Objectives

- 1.11 The Core Strategy is the overarching strategic document for the Luton and South Bedfordshire Local Development Framework. It sets out the key elements of the planning framework for the area.
- 1.12 The Core Strategy includes a Spatial Vision and Spatial Objectives for Luton and Southern Central Bedfordshire as follows:

Spatial Vision:

'The Luton and southern Central Bedfordshire area will be a green growth area. All its towns, villages and the countryside surrounding will contribute, according to their specific strengths, to achieving this aim.

Luton's main contribution will be to continue to develop as a sub-regional shopping and service centre and as the principal focus for new employment and inward investment within its area of influence. It will also be expanded to accommodate new housing development.

This will be supported by an enhanced public transport infrastructure, new green infrastructure, new strategic road infrastructure and by taking advantage of the town's regeneration opportunities and the asset of London Luton Airport.

Dunstable will have a less traffic congested town centre which will open up opportunities for a vibrant town centre, an improved evening economy, enhanced cultural activities and an improved physical environment.

Houghton Regis will be expanded and thus offer opportunities for the regeneration of its physical environment and its district centre in particular. New employment opportunities and new community facilities will be created in association with this development.

Leighton-Linslade will retain its high quality market town character with development mainly focussed on new housing and employment opportunities to support its self-sufficiency. It will retain and enhance its services in the town centre and seek to improve its "green wheel" of attractive open spaces.

The villages in the remaining areas will be important contributors to meeting new housing needs in a manner appropriate to their individual capacities and identities.

Development in the surrounding countryside and the smaller settlements will be local and limited within the constraints of the amended Green Belt boundaries, with respect for the value of existing landscape qualities and settings. Advantage will be taken of the rural area's contribution to the

economy and to the provision of and appropriate access to, green infrastructure.'

Objectives:

1. *To manage the natural growth of the area to help deliver sustainable and integrated communities.*
2. *To deliver a consistent supply of housing and range of housing types and tenures to help ensure greater affordability and choice.*
3. *To increase job opportunities in the area through an improvement of its image, skills, connectivity and quality of employment premises.*
4. *To improve strategic and local connectivity through the delivery of major transport infrastructure, improved access to existing strategic transport facilities, efficient integrated public transport and new sustainable transport opportunities.*
5. *To ensure that existing communities and new development are supported by a range of cost effective and well supported community and social facilities in step with changing needs.*
6. *To revitalise and support the delivery of 4 vibrant, dynamic, distinctive, safe and popular town centres.*
7. *To deliver development which offers the highest level of protection for and access to the natural environment to enable greater enjoyment of this resource.*
8. *To use development to help minimise the area's carbon footprint and to mitigate and adapt to climate change.*
9. *To improve the quantity and quality of green infrastructure by providing a network of spaces appropriate both for existing and new urban areas and also for improving biodiversity.*

Statement on the difference the SA process has made to date

- 1.13 The appraisal of the Core Strategy shows that its objectives, policies and development strategy are in general conformity with the themes of other relevant plans, policies and programmes. It highlights sustainability implications that could arise from implementing the Core Strategy. The Preferred Options SA of the Core Strategy Preferred Option Document remained broad to allow for discussion with stakeholders and the community over the most appropriate policy approach for the Core Strategy. The Core Strategy Submission provides detailed policies that aim to address the sustainability issues raised throughout the SA process.
- 1.14 The SA assessment of the Issues and Options and Preferred Options has informed the considerations of the pros and cons of adopting the

preferred option, including the inter-relationship of the options and implications of various elements of the preferred option and the development of more detailed policies and objectives to deliver the Core Strategy vision. The appraisal has also ensured that the objectives and vision bring about a plan that is sustainable and capable of implementation.

Summary Compliance with the SEA Directive and Regulations

- 1.15 The SEA Regulations set out certain requirements for reporting the SEA process, and specify that if an integrated appraisal is undertaken, then sections of the SA Report that meet the requirements set out for reporting the SEA process must be clearly signposted. The requirements for reporting the SEA process are set out in Appendix 6 and with the section of the report that progresses each SEA requirement indicated.

Compliance with the EU Habitats Directive and Regulations

- 1.16 The only European site located near the boundary to which the Core Strategy relates, and which could potentially be affected is the Chiltern Beechwoods SAC. In terms of possible effects that the plan could have, the only real potential issues would relate to increased visitor pressure to the sites as a result of the increased population projected within the LDF, and possibly air quality impacts.
- 1.17 The component part of the SAC most at risk (that nearest to the area's boundary) is Ashridge Commons and Woods SSSI. This site is currently in favourable/unfavourable recovering condition, and previous issues at the site (and the current conservation objectives for the site) relate to securing appropriate woodland management rather than the impacts of visitor pressure or air quality. Even if these were an issue, the proposed urban expansions/road schemes are sufficiently far away that they would be unlikely to exacerbate the problem.
- 1.18 Based on the above, Natural England concluded that the plan is unlikely to have a significant effect on the Chiltern Beechwoods SAC, and therefore further consideration of an Appropriate Assessment is not required.

2. Approach

Introduction

- 2.1 This SA report documents Stage B (Developing and refining options and assessing effects) of the five stage approach to SA and summarises Stage A of the process (Setting the context and objectives, establishing the baseline and deciding on the scope). By documenting and reporting Stages A and B, this report fulfils the requirements of Stage C, the preparation of the SA Report. Stage D is the consultation with stakeholders of the plan and its SA and Stage E is the monitoring of the implementation of the plan and its sustainability effects.

Table 1: SA Stages and Tasks

SA Stages and tasks	DPD stage
Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope	DPD Stage 1: Pre-production – Evidence gathering
A1: Identifying other relevant plans, programmes and sustainability objectives	
A2: Collecting baseline information	
A3: Identifying sustainability issues and problems	
A4: Developing the SA Framework	
A5: Consulting on the scope of the SA	
Stage B: Developing and refining options and assessing effects	DPD Stage 2: production
B1: Testing the DPD objectives against the SA framework	
B2: Developing the DPD options	
B3: Predicting the effects of the draft DPD	
B4: Evaluating the effects the draft DPD	
B5: Considering ways of mitigating adverse effects and maximising beneficial effects	
B6: Proposing measures to monitor the significant effects of implementing the DPD	DPD Stage 3: Submission of DPD to the Secretary of State and Examination of soundness
Stage C: Preparing the Sustainability Appraisal Report	
C1: Preparing SA Report	DPD Stage 4: Adoption and monitoring
Stage D: Consulting on draft DPD and Sustainability Appraisal Report	
D1: Public participation on the preferred option and the SA Report	
D2 (i) : appraising the effects of significant changes to the DPD	
D2 (ii) : appraising the effects of significant changes resulting from the representations	
D3: Making decision and providing information	
Stage E: Monitoring the significant effects of implementing the DPD	
E1: Finalising aims and methods for monitoring	
E2: Responding to adverse effects	

Sustainability issues and objectives

- 2.2 The revised SA Scoping Report, October 2009 identifies the key issues that the Local Planning Authorities (LPAs) took into account when drafting objectives for the LDF and the SA Framework used to assess the LDF. Appendix 3 contains a table with the main findings from the context review for reference.
- 2.3 The Scoping Report, July 2007 and the revised Scoping Report, October 2009 carried out a review of the relevant international, EU, national, regional and local plans, programmes and sustainability objectives, this was updated further in summer 2010 to reflect the changes brought by the localism agenda. In accordance with the SA government guidance and the SEA Directive, the review identifies the relationship and influences of other plans and programmes on the Core Strategy and helps in the development of objectives for the SA Framework. The review focussed on matters influencing or contributing towards the context of the Core Strategy. The review can be viewed in the Revised Scoping Report, October 2009, Appendix 1: Context Review of Policies, Plans and Programmes.
- 2.4 Table 2 below lists the environmental, social and economic problems facing Luton and southern Central Bedfordshire together with evidence of the problems. They have been identified in the context review (Task A1), through consideration of the baseline information (Task A2) and through other published information. Table 2 is not an exhaustive list of sustainability problems, but it includes those where, in the future, the planning system may contribute towards their solution or amelioration.

Table 2: SA Scoping Report Sustainability Problems

Sustainability problem		Evidence of the problem
Environmental		
1	Condition of Sites of Special Scientific Interest	The condition of SSSIs is worse than sites elsewhere in England. (Natural England assessment of SSSIs 2002-2009). It is not possible to know whether their condition is improving or declining, as there is no trend data available.
2	Poor biological quality of river water	Southern Central Bedfordshire has seen a general shift in biological quality from good to fair. Luton has seen a consistent grading of fair. (Environment Agency)
3	Poor chemical water quality	Luton's chemical water quality is in a poor state. (Environment Agency)
4	Loss of wildlife sites	It is unclear whether development taking place in wildlife sites in southern Central Bedfordshire relates to loss of or impact on wildlife sites. (Luton and South Bedfordshire AMR 07/08). There is not enough information and no trend data is available.
5	Loss of Green Belt	The growth agenda through urban extensions will require the review of the Green Belt boundaries. (Milton Keynes Sub-Regional Strategy)
6	Loss of agricultural land	The majority of land in southern Central Bedfordshire is classified as Grade 3 agricultural land, with some small areas of Grade 2 land for example to the north of Luton. Other land is classified as Non-agricultural, and urban.

		(www. Magic.gov.uk) Grade 2 Land to the north of Luton could be affected by growth agenda.
7	Congestion and air quality	Air Quality Management Areas designated because of traffic, high levels of car as mode of transport to work. Most airport journeys are by car or taxi. Future development of airport capacity could increase car traffic and aircraft movements, and increase air pollutants.
8	Need for conservation and enhancement of the Chilterns AONB and its setting	Scale of growth proposed in the area together with accompanying infrastructure is a potential threat to the AONB and its setting.
9	Pressure on water resources	Luton and southern Central Bedfordshire sits in a water stressed area with water resources already heavily exploited. A lot of its water supply to meet existing demand is imported from other catchments.
10	Flood risk	Large numbers of existing properties are at risk from flooding.
11	Heritage at Risk	A number of buildings in the Plaiters Lea Conservation Area (Luton) are on the SAVE Britain's Heritage Building at Risk Register. 1 Building, 5 schedule monuments, and one historic park and garden (Putteridge Bury) are on English Heritage's Heritage at Risk Register
12	Impact on conservation areas	Conservation areas may be affected by master plans and strategies for development. Plaiters Lea Conservation Area is currently on the SAVE Britain's Heritage Building at Risk Register. Dunstable Conservation Area is on English Heritage's Heritage at Risk Register
13	Noise	Noise impact from airport operations, and could increase with development of airport operations in the future. Airport is close to residential areas. Air noise contour maps are available to assist planning decisions.
Social		
14	Declining bus services	Bus patronage has been in decline since 2005.
15	Lack of open space provision	Existing provision is very low, or absent in some areas. Uneven distribution. Quality and value vary. Future housing and population growth forecasts indicate that Luton and southern Central Bedfordshire will require an additional 334ha of green space until 2021 and a further 196ha from 2021 to 2031 based on an overall standard of 51 sq.m per head. (Luton and South Bedfordshire Green Space Strategy, Draft SPD, Feb 2008)
16	Deprivation	Deprivation in Luton has worsened since 2004. It is currently ranked 87th most deprived out of 354 local authority areas. Although deprivation in southern Central Bedfordshire is not as bad, it has some localised deprivation issues. (Index of Multiple Deprivation)
17	Low community activity	There is a lower than average feeling that community activities have improved or stayed the same (Audit Commission)
18	Poor race relations	In Luton, there is a very low percentage of people who think race relationships have improved in their area. While southern Central Bedfordshire perception of race relations improvement is very high. (Audit Commission)
19	High level crime	Luton has high levels of crime. Southern Central

	and perception of crime	Bedfordshire has higher than England average crime rates in certain crimes. (Audit Commission). This is reflected in their perception of crime. Southern Central Bedfordshire has only high levels of crime on certain crimes. However, the perception of crime is equally poor. (Audit Commission)
20	Health inequalities	Health Inequalities are present in Luton and southern Central Bedfordshire. In Luton, most wards are in the most deprived or second most deprived category in comparison with England. In southern Central Bedfordshire, health is good for most wards but with exception of three wards in the second most deprived category. (Department of Health)
21	Lack of health services	The growth agenda will require action to ensure provision and access to health services are not compromised. <u>Future needs</u> Southern Central Bedfordshire 16 additional GPs by 2021 and 15 more between 2021 and 2031; 3 or 4 new polyclinics by 2021 and 2 more between 2021 and 2031; and 22 new dentists by 2021 and 10 more between 2021 and 2031 Luton 5 additional GPs by 2021 and possibly 1 between 2021 and 2031; possibly 1 new health centre by 2031; Total of 3 dentists by 2031; and possibly 1 new dental practice required (Identifying Existing and Future Social and Community Infrastructure Needs for Luton and Southern Central Bedfordshire, August 2008 (UCL and Colin Buchanan))
22	Uncertain community infrastructure coverage	Social and Community Infrastructure Study identified a mixed picture in terms of current level and distribution of infrastructure provision To serve population growth until 2021, southern Central Bedfordshire has additional need for: 4 community centres; 600sqm. of library space; 11 additional sports halls; 8 more swimming pools Luton has additional need for: 1 community centre; 15 additional sports halls; 10 more swimming pools (Identifying Existing and Future Social and Community Infrastructure Needs for Luton and South Bedfordshire, August 2008 (UCL and Colin Buchanan))
23	Decrease of adult participation in sport and active recreation	Luton has shown a decrease and is far below the regional and national average. While southern Central Bedfordshire has shown an increase. (Sports England)
24	High level of vacancies in RSLs housing	% of RSL dwellings vacant in the South Bedfordshire area showed a large increase from 2007 to 2008, well above the national average. (Bedfordshire Housing Monitor Compendium of Housing Statistics for Bedfordshire in 2007 And www.emptyhomes.com And http://www.housingmarkets.audit-commission.gov.uk/
25	Low housing affordability	Market housing is relatively affordable compared to other surrounding areas but still not affordable compared to the average wage in the area. (Bedfordshire Housing Monitor) The number of people on housing waiting lists has increased in Luton substantially, and decreased in southern Central Bedfordshire. (http://www.housingmarkets.audit-commission.gov.uk/)
26	Low affordable housing provision	The emerging Strategic Housing Market Assessment for Bedfordshire and Luton details need for affordable housing from 2007 to 2021. Luton requires 407 units per annum and southern Central Bedfordshire 371 per annum. (CLG)

27	Low overall housing provision	Current shortfall on housing supply (CLG)
Economic		
28	Declining town centres	Pedestrian flows decreased in Dunstable. In Leighton Buzzard and Houghton Regis pedestrian flows fell but have increased again. (2007/2008 AMR) Dunstable has experienced an increase in number of vacant units. Number of vacant units in Houghton Regis has remained the same. In Leighton Buzzard, the figure has fluctuated. All three centres have faced competition from larger centres and out of town centres. (2007/2008 AMR)
29	High level of in and out commuting	Out commuting is increasing. 36,800 people commute into Luton and southern Central Bedfordshire 50,800 commute out of the area. Luton:29,500 in-commute & 28,000 out-commute High levels of people commuting by private car or van in comparison with UK averages, and low levels of bicycle use. (The Luton, Dunstable and Houghton Regis Local Transport Plan 2006-2011)
30	Low employment levels	Luton is below the regional and national average. Southern Central Bedfordshire has experienced a slump in the last year, to below the regional and national average (NOMIS)
31	Low incomes	Luton average pay is lower than neighbouring areas, regional and national averages (NOMIS)
32	Low education achievement	Southern Central Bedfordshire has witnessed a decline in the higher qualifications (falling below the benchmarks). Luton consistently has levels of academic achievement below the benchmarks (including those with no qualification) though has a greater percentage of other foreign or professional, qualifications than it's neighbours, region or nation. (NOMIS)

2.5 This SA used the SA Framework in the Scoping Report, January 2009, which contains 15 objectives, listed in Table 3 below. The Core Strategy Objectives, Development Strategy and the Core Policies were then appraised against these objectives.

Table 3: SA Scoping Report Sustainability Objectives

Sustainability Objectives for Luton and South Beds SA Framework		Soc	Env	Eco
1	To maintain and enhance biodiversity		✓	
2	To conserve, restore and enhance landscape and townscape and local character particularly nationally protected assets such as the Chilterns AONB		✓	
3	Protect and enhance air, soil and water resources		✓	
4	Ensure that new developments avoid areas which are at risk from flooding and where possible, reduces flood risk	✓	✓	✓
5	Adapt to and mitigate against the impact of climate change	✓	✓	✓
6	Increase resource efficiency and reduce resource use and waste	✓	✓	✓
7	Maintain, enhance and deliver, new green infrastructure including green open space	✓	✓	

8	To identify, protect, maintain and enhance the historic environment and cultural assets and their setting	✓	✓	✓
9	Reduce poverty and inequality and promote social inclusion	✓		✓
10	Reduce both crime and fear of crime	✓		✓
11	To encourage healthier lifestyles and reduce adverse health impacts of new developments	✓		✓
12	Provide decent, affordable and safe homes for all	✓		
13	Revitalise town centres to promote a return to sustainable urban living and protect the identity of villages	✓		✓
14	To provide and encourage the use of sustainable integrated transport systems, improve access and mobility	✓	✓	✓
15	To promote employment, learning, skills and innovation	✓		✓

2.6 The SA is a qualitative exercise and the exact nature of impacts is, in some cases, uncertain given the strategic level of the policies. For that reason, professional judgment has been used to ensure the appraisal has a balanced perspective. Such professional judgements were informed by the evidence in the Scoping Report, technical reports and advice from other agencies.

2.7 The various Core Strategy options and policies were tested against the fifteen SA objectives contained in the SA framework, with comments made on the predicted social, economic and environmental effects of the options. The likely effects of each option were scored according to the criteria below.

++	Option will result in a significant positive effect on the SA objectives
+	Option will result in a minor positive effect on the SA objectives
+?	The effect of the option is dependant on implementation, but if there were to be an impact, it would most likely be positive or minor positive.
0	Neutral or negligible effect
?	Relationship between the SA Objective and the Option is unknown, or there is not enough information to make an assessment
-?	The effect of the option is dependant on implementation, but if there were to be an impact, it would most likely be negative or minor negative.
-	Option will result in a minor negative effect on the SA objectives
--	Option will result in a significant negative effect on the SA objectives

2.8 The options were appraised in terms of the significance of their effects giving consideration to the probability, duration, frequency and reversibility of the effect. The appraisal included consideration of measures to prevent, reduce or offset the adverse effects of the options and its results are presented in Appendix 4 and 5.

Difficulties encountered

- 2.9 No major difficulties were encountered when undertaking the appraisal of the Core Strategy. However, the nature of the effect of some of the options assessed, mainly those with wide strategic nature have been difficult to predict against more site-specific SA objectives.

3. Sustainability Appraisal Findings

Introduction

- 3.1 The following section of the report addresses the key component parts of the present Core Strategy: the strategic objectives, the development strategy and the thematic policies. The implications of the infrastructure delivery strategy have been taken into account as part of the wider appraisal. For each component a short introduction is given on the policy background, followed by a summary of previous Sustainability Appraisal findings (both at Issues and Options and Preferred Options stages) outlining where this has led to changes in policy direction. A summary of the sustainability appraisal findings for the Core Strategy Submission is then given, together with some concluding remarks on the policy.
- 3.2 The appraisal of the Core Strategy Submission covers the appraisal of the significant changes that have been made to the emerging Core Strategy since the preferred options stage.
- 3.3 The SEA Directive requires a number of procedural elements to be followed. The checklist in Appendix 6 of this report illustrates whether the SEA Directive requirements have been met.

Appraisal of Strategic Objectives

Background

- 3.4 The strategic objectives set out how the Core Strategy's vision will be achieved and provides the context for developing the policies. They are designed to enable the realisation of corporate and community aspirations within the planning period. The way in which the objectives will be attained is described by the delivery strategy that also includes contingency planning to ensure achievement across a range of different and future scenarios.

Influence of Issues and Options appraisal

- 3.5 The Issues and Options consultation document contained details of the proposed Vision for the Core Strategy. It was based on a combination of the visions from the two Sustainable Community Strategies for the Luton and southern Central Bedfordshire areas. However, the strategic objectives did not appear for consultation until the Preferred Options consultation in April 2009.

Influence of Preferred Options appraisal

- 3.6 The Core Strategy Preferred Options consultation document set out eight strategic objectives aimed at achieving the proposed Vision. These objectives were appraised for their sustainability implications and the findings are set out in the Preferred Options SA.

- 3.7 In general terms the greatest level of compatibility between the strategic objectives and the SA objectives occurred on socio-economic matters. Incompatibility generally occurred regarding the natural environment as many of the strategic objectives promote new development, although some strategic objectives afford the natural environment a degree of protection. The appraisal of the strategic objectives also resulted in some general recommendations for consideration in developing the policy direction of the Core Strategy and other LDF documents. These have been addressed in so far as they relate to the Core Strategy and issues for other LDF documents will be addressed in due course.

Appraisal of pre-submission document

- 3.8 The pre-submission Core Strategy contains nine strategic objectives. These are:

SO1: To manage the natural growth of the area to help deliver sustainable and integrated communities.

SO2: To deliver a consistent supply of housing and range of housing types and tenures to help ensure greater affordability and choice.

SO3: To increase job opportunities in the area through an improvement of its image, skills, connectivity and quality of employment premises.

SO4: To improve strategic and local connectivity through the delivery of major transport infrastructure, improved access to existing strategic transport facilities, efficient integrated public transport and new sustainable transport opportunities.

SO5: To ensure the existing communities and new development are supported by a range of cost effective and well supported community and social facilities in step with changing needs.

SO6: To revitalise and support the delivery of 4 vibrant, dynamic, distinctive, safe and popular town centres.

SO7: To deliver *development* which offers the highest level of protection for and access to the natural environment to enable greater enjoyment of this resource.

SO8: To require sustainable development and design quality, including opportunities to use renewable and decentralised energy, in order to help minimise the area's carbon footprint and to mitigate and adapt to climate change.

SO9: To improve the quantity and quality of green infrastructure by providing a network of spaces appropriate both for existing and new urban areas and also for improving biodiversity.

- 3.9 The first eight of these strategic objectives were the same or very similar to those appraised at Preferred Options Stage, with only minor wording changes. The compatibility test for strategic objectives SO1 to SO7 therefore remains as per the Preferred Option SA. Objective 8 has been redrafted and the final strategic objective is a new one. Table 4 below contains the compatibility test for objectives SO8 and SO9.

3.10 Amended objective 8 emphasises those areas where planning development can and is expected to make a contribution towards climate change. New strategic objective SO9 is not incompatible with any of the SA objectives and in addition to the environmental protection it offers, it is also compatible with some of the socio-economic SA objectives. This objective has the potential to address a level of incompatibility in those objectives promoting new development particularly concerning biodiversity and climate change.

Table 4: Appraisal of Core Strategy Objectives 8 and 9

	SA objectives	Core Strategy objective 8	Core Strategy Objective 9
1	To maintain and enhance biodiversity	✓	✓✓
2	To conserve, restore and enhance landscape and townscape and local character particularly nationally protected assets such as the Chilterns AONB	0	✓✓
3	Protect and enhance air, soil and water resources	✓✓	✓✓
4	Ensure that new developments avoid areas which are at risk from flooding and natural storage areas	✓	✓
5	Adapt to and mitigate against the impact of climate change	✓✓	✓✓
6	Increase resource efficiency and reduce resource use and waste	✓✓	0
7	Maintain, enhance and deliver, new green infrastructure including green open space	0	✓✓
8	To identify, protect, maintain and enhance the historic environment and cultural assets	0	✓
9	Reduce poverty and inequality and promote social inclusion	0	✓
10	Reduce both crime and fear of crime	0	0
11	To encourage healthier lifestyles and reduce adverse health impacts of new developments	0	✓✓
12	Provide decent, affordable and safe homes for all	0	0
13	Revitalise town centres to promote a return to sustainable urban living and protect the identity of villages	0	✓
14	To provide and encourage the use of sustainable integrated transport systems, improve access and mobility	0	0
15	To promote employment, learning, skills and innovation	0	0

Table key:

✓✓ Compatible	✓ Partially/Potentially compatible
0 Neutral	? Unknown
× Partially/Potentially incompatible	×× Incompatible

Appraisal of the Development Strategy

Background

- 3.11 An early part of the process of developing the growth strategy involved identifying land that could potentially be suitable for development. This was done by inviting landowners, developers and other interested parties to put forward sites for consideration.
- 3.12 Although the focus of the site search was informed by the areas of search identified in the Milton Keynes South Midlands Sub-Regional Strategy, there were no specific constraints put upon the invitation for submission of sites as the idea was to reveal as many options as possible at an early stage. Additional sites also emerged through later consultation responses and SA work. The sites that emerged through the site search and were consulted on through the Issues and Options stage are shown in Figure 1.

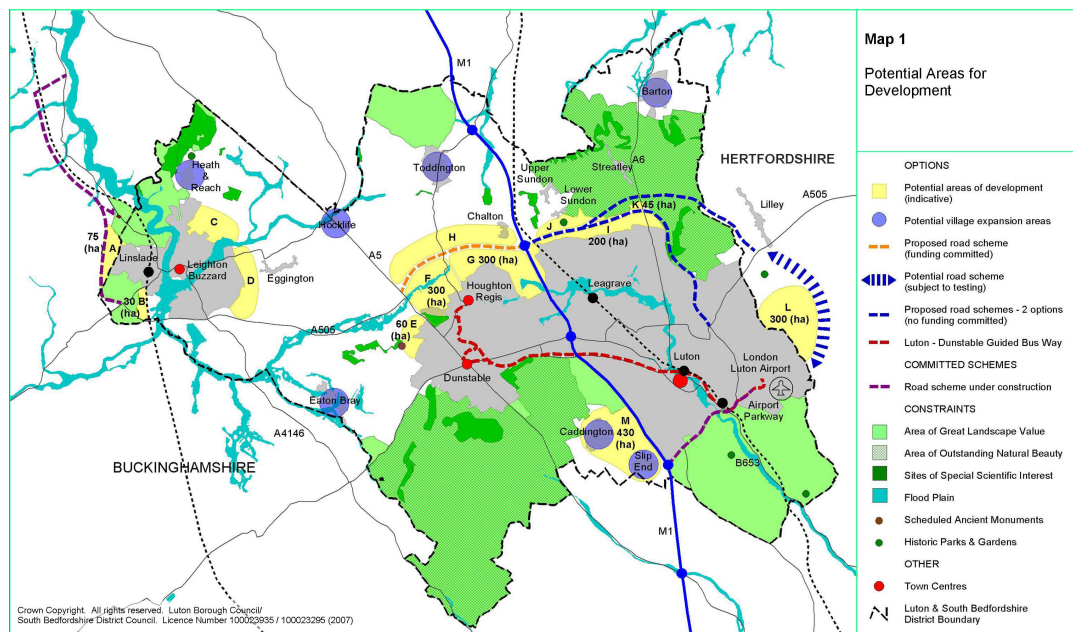


Figure 1: Core Strategy Issues and Options Key Diagram

- 3.13 Using the results of the site search, ten alternative approaches to accommodating development were constructed. These ten options involved a combination of the sites and varied in terms of their proposed geographical spread and land take. The options were set out for consultation at the Issues and Options stage and are duplicated below.

Option 1: Focus development within the bypasses with minimum land-take (at least 50 dwellings per ha) within new development areas (north of Dunstable, Houghton Regis and Luton).

Option 2: Focus development within the bypasses with maximum land-take (30

dwellings per ha) within new development areas (near Houghton Regis, Dunstable and Luton and around Leighton Linlade).

Option 3: Focus development within and beyond bypasses with minimum land-take, the proposed urban extension areas being located north of Houghton Regis on either side of the proposed A5-M1 link.

Option 4: Focus development within and beyond bypasses with maximum land-take (at least 30 dwellings per ha) with new development areas located to the north of Houghton Regis and Luton.

Option 5: Focus development near town centres and main employment areas with minimum land-take. New development areas located near Leighton Linlade, Houghton Regis, Dunstable and Luton to be developed with high capacity of 50 dwellings per ha.

Option 6: Focus development on maximising proximity to town centres and main employment areas with maximum land-take (30 dwellings per ha).

Option 7: Focus development on achieving a wide distributional spread with minimum land-take, the proposed development areas being spread across the Joint Area located outside Leighton Linlade, Houghton Regis, Dunstable and Luton towns.

Option 8: Focus development on achieving a wide distributional spread with maximum land-take, the proposed development areas being spread across the Joint Area located outside Leighton Linlade, Houghton Regis, Dunstable and Luton towns.

Option 9: Focus development on Luton with minimum land-take with new development areas located south and east of Luton respectively.

Option 10: Focus development on Luton with maximum land-take.

Influence of Issues and Options Appraisal

- 3.14 The appraisal of the options is set out in the Issues and Options Core Strategy and its SA report. The Issues and Options SA report considered Spatial Option 7 (based on achieving wide distributional spread with minimum land take) to be the best spatial option. This was due to its good performance under most of the economic and social factors and some positive effect under environmental themes.
- 3.15 The Issues and Options SA report made a number of recommendations to enhance the sustainability performance of Spatial Option 7, contained in Appendix 1 of this report.
- 3.16 The report's recommendations with regard to village settlements was less conclusive with 'positives' and 'negatives' for both options (incorporate villages close to the urban fringe into the new development or create green buffers between new development areas and existing villages).

- 3.17 In employment terms, the report showed again 'positives' and 'negatives' on the two options (safeguard existing employment sites or encourage employment development land within urban extensions).
- 3.18 The Issues and Options SA concluded that distributing additional retail, cultural and leisure development between existing town centres but with the majority of development going to Luton would provide the best sustainable outcome. This option would enhance the vitality and viability of all town centres and therefore increase opportunities for economic prosperity across the Core Strategy area. This distribution of town centre growth accorded with the Milton Keynes and South Midlands Sub-Regional Strategy still relevant at the time.
- 3.19 In addition to the above, the SA tested options relating to where people will work, how people will travel, the role of communities and neighbourhood health and inclusiveness.

Influence of Preferred Options Appraisal

- 3.20 In the course of preparing the Core Strategy Preferred Options, evidence gathered through the Issues and Options consultation responses and technical studies revealed that:
- a) significant amounts of green and other infrastructure will be needed to support growth. When taken together with the various landscape constraints and the location of the urban extensions, it was considered more appropriate to plan for an average density of 40 dwellings per hectare in order to integrate development within the existing area and still provide a coherent transition from the urban environment to the countryside; and
 - b) greater flexibility should be applied to housing figures to ensure the delivery of housing targets. This meant a contingency provision was needed to ensure the housing requirements are met.
- 3.21 These concerns left the Joint Committee with two options: either to proceed with Spatial Option 7 but provide a lower level of growth than that required by the sub-regional strategy; or retain the principles embedded in Spatial Option 7 but with a greater land take i.e. Spatial Option 8. Given that housing requirements are expressed as minimum targets, planning for a lower level of housing was not considered a realistic option. Therefore, Spatial Option 8 was taken forward as the basis for accommodating growth.
- 3.22 Spatial Option 8, together with the emerging spatial objectives and general policy direction, was therefore tested through the Preferred Options Core Strategy and accompanying Preliminary SA Report, March 2009.
- 3.23 The Preferred Options SA report notes that the levels of development to be accommodated through the growth agenda would be significantly detrimental to the natural environment. However, if the sub-regional

growth strategy is to be delivered, a key aim of the Core Strategy is to ensure that the distribution of new development is environmentally sustainable. It also points out that in socio-economic terms the Core Strategy is likely to be of benefit. The report identifies potential effects of the Core Strategy and makes a number of recommendations as summarised in Appendix 2. The Preferred Options SA highlights that Stage B4 of the SA process (Evaluation of Effects) was to be detailed in the final SA report to accompany the Core Strategy Pre-Submission.

- 3.24 In addition to the SA of the growth strategy options described above, a separate but related exercise was undertaken to assess the relative merits of each of the sites or areas that emerged through the site search process. Known as the “Site Assessment Matrix”, this process established 27 criteria aimed at assessing a broad range of sustainability-related issues. While not part of either the Issues and Options or Preferred Options Sustainability Reports, the Site Assessment Matrix is nevertheless a key part of the wider sustainability appraisal of growth options.
- 3.25 The Site Assessment Matrix that was prepared alongside the Preferred Options document helped inform the choice of preferred sites and strategies. The conclusions of the Matrix on the most appropriate sites to take forward at that stage fed into the final Preferred Options report.

Appraisal of submission document

- 3.26 On 6th July 2010, the Secretary of State revoked Regional Spatial Strategies (RSS). This revocation meant that this SA could go back to explore different levels of growth outside the minimum housing figures in the RSS, including Option 7 of the Core Strategy Issues and Options stage.
- 3.27 The Secretary of State decision also meant that the area of search in the RSS no longer applied and any allocations outside the Luton and southern Central Bedfordshire would need to be resolved with adjoining local authorities outside the overall regional context. PPS12 makes clear that spatial planning objectives for local areas should be coherent with the development plans prepared by neighbouring authorities, where cross boundary issues are relevant. Although the Sustainability Appraisal should not be too constrained by boundaries, it should make an assessment of options which have a good prospect of delivery.
- 3.28 The preferred options SA identified that the East of Luton extension into North Hertfordshire would offer most in terms of regenerating Luton town centre and CS objectives. However, the community and its representatives rejected this proposal. The development scenarios assessed in the submission SA changed given the opposition of the community and North Hertfordshire District Council to a Strategic Site Specific Allocation of the scale proposed in the Preferred Options and the review of the housing figures.

3.29 Notwithstanding the above changes, the main principle behind the Development Strategy that new development must be distributed in a sustainable manner remains unaffected. This is guided by the following directions:

- a) New development will be distributed to strengthen the established network of settlements, while new development in the countryside will be strictly controlled.
- b) Priority will be given to the reuse of previously developed land and buildings within urban areas, followed by other suitable land within urban areas.
- c) When locating new development, preference will be given to sites that are accessible by a range of transport modes.
- d) The importance of existing town/suburban centres will be strengthened.
- e) New development will be focused in the existing built up areas until 2012/13 when new development in the form of Strategic Site Specific Allocations (SSSAs) will commence in phases. The strategy allocates SSSAs in the main conurbation: north of Luton, north of Houghton Regis and a SSSA to the east of Leighton Linlade. In addition, the Strategy recommends a SSSA to the East of Luton to be allocated through the North Hertfordshire LDF.
- f) Opportunities for extending the villages to facilitate appropriate development required to support rural communities will be identified through other LDF documents, such as the Site Allocations DPD. The strategy identifies the main villages where such development will be focused.
- g) Integrating new development with sustainable transport linkages.
- h) Provision of employment to accompany housing growth, maximise airport opportunities, increase employment opportunities outside Use Class B (i.e. retail, tourism, education etc) and diversify the economy.

3.30 The key priorities for the development area include the provision of housing for the existing population and its growth needs, the relief of current and future congestion, the provision of new employment opportunities, the protection of the surrounding countryside, the provision of green infrastructure and the strengthening of existing centres.

3.31 The delivery of the strategy relies on a considerable amount of infrastructure requiring significant funds. Ensuring a combination of funding sources will be essential to the delivery of the strategy under the current austerity measures on Government spending. Relying on public funding sources for the delivery of the strategy will be more difficult. This infrastructure provision is addressed through a combination of measures:

- a) The preparation of an Infrastructure Delivery Plan for the strategy area;
- b) Public funding sources;

- c) Developer contributions;
- d) Efficient use of services and facilities including co-location of services and community hubs;
- e) Location of new development in accessible locations; and
- f) Phasing of development to support the timely delivery of infrastructure.

3.32 The Core Strategy will increase pressures on the environment that need to be prevented, mitigated or compensated in that order of preference where they are likely to arise.

Selection of the chosen strategy

3.33 The strategy in the Submission document has been selected because it is considered to provide the best overall alignment of SA objectives and CS objectives while responding to the growing needs of the population. In particular:

- a) Providing a long-term view in the direction of growth to provide certainty and secure infrastructure as encouraged by PPS12;
- b) Maximising airport opportunities and employment diversification;
- c) Distributing required development to promote town centre regeneration, minimise trip generation and address congestion; and
- d) Ensure development is planned to support green infrastructure.

Where will development happen and when

3.34 Core Policy CS1 sets out the approach to accommodating development, and is represented graphically on the key diagram included below:

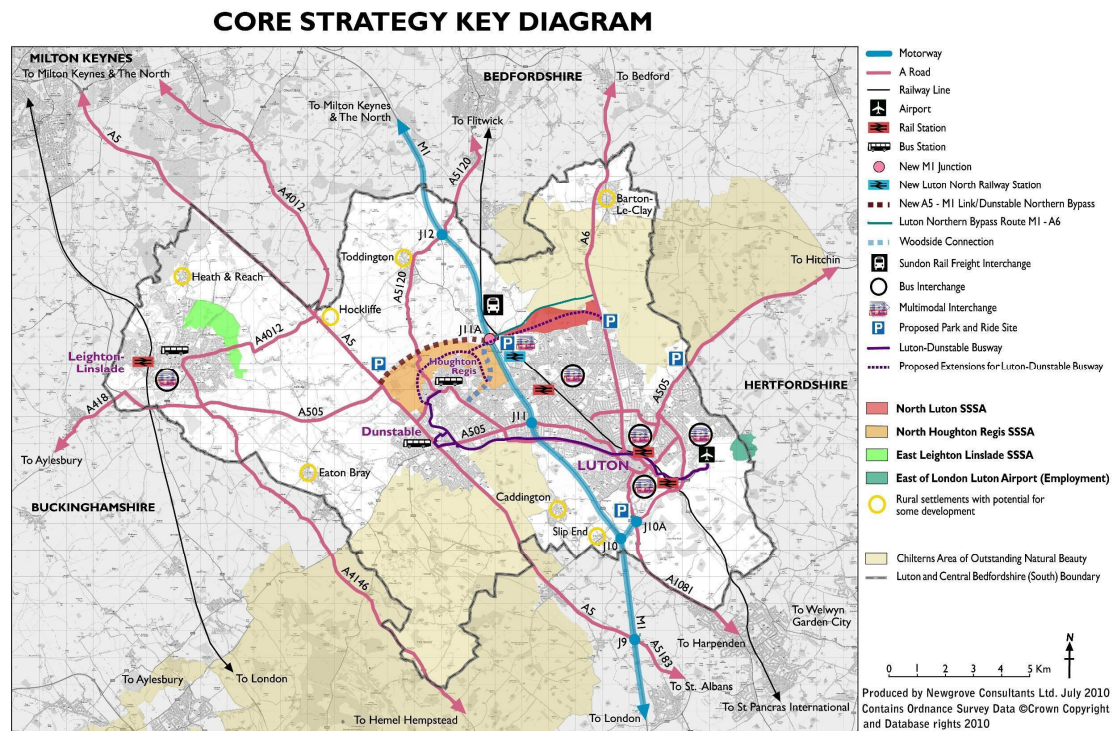


Figure 2: Pre-submission key diagram, September 2009.

- 3.35 The Core Strategy is required to deliver at least 23,000 new dwellings for the period 2011 to 2026. It is anticipated that it will be delivered by development in the existing urban areas, rural areas and SSSAs as identified below.

	2011/12-2020/21	2021/22-2025/26	Total
Existing urban area	9,962	3,100	13,062
Rural area	388	250	638
SSSAs	5,550	3,900	9,450
Total	15,900	7,250	23,150

- 3.36 The Development Strategy plans to deliver 9,450 new dwellings in three mixed use SSSAs during the period 2011 to 2026. The Strategy identifies 1,077 ha to be released from the Green Belt although only a proportion of the land is proposed for allocation during the plan period.

	Size in hectares	Number of dwellings	Phasing (Start)
North of Houghton Regis	Site 1: 300 Site 2: 280	5,150	2011/12
East of Leighton Linlade	240	2,500	2011/12
North of Luton	257	1,800	2015/16
Total	1077	9,450	

- 3.37 The Development Strategy also identifies a further 4,050 new homes beyond the plan period. They are not allocated within the Core Strategy but are referred to as a contingency within the Contingency Plan for Housing and Employment Areas Delivery Strategy.

	Number of dwellings	Phasing (Start)
North of Houghton Regis	1,850	After 2026
North of Luton	2,200	After 2026
Total	4,050	

- 3.38 The three mixed-use SSSAs allocate 55 ha of employment land and a further 75 ha are identified on two employment SSSAs. The total of employment land is expected to deliver 19,000 new jobs to 2026.

SSSAs	Size in ha	Use classes	Phasing start	No .of jobs
North of Houghton Regis	30	B1/B2/B8	2014/15	19,000
East of Leighton Linlade	16	B1/B2/B8	2014/15	
North of Luton	13	B1/B2/B8	2021/22	
East of London Luton Airport	35	B1/B2/B8	2016/17	
Sundon Quarry	40	B8	2016/17	
Total	134			

- 3.39 The Core Strategy allows for 17 hectares of employment land within North of Houghton Regis (10ha) and North of Luton (7ha) to help

address any events that may affect the delivery of employment land needed to 2026.

Appraisal of the selected strategy

- 3.40 A number of options have been identified following the findings of previous SA stages, Core Strategy consultation and technical studies. The Core Strategy contains SSSAs and the appraisal process needs to consider the various site options to identify the most appropriate site based on sustainability considerations and the spatial pattern of development set out in the Core Strategy.
- 3.41 The Councils made a second call for sites in early summer 2010 to update information on potential sites for allocation. Landowners, developers and interested parties were invited to put forward sites without being constrained to any area of search. The call for sites did not bring forward any new strategic sites neither changes to known sites.
- 3.42 The SA used the assessment criteria in the Site Assessment Matrix to help identify the likely effect of the site options against the SA Framework. Site Assessment Matrix is available as a separate document. It has been updated with site-specific information from the Preferred Options consultation and latest available evidence studies.
- 3.43 The SA criteria was organised around a first tier of major constraints and opportunities significant enough on their own to:
- a) pose a threat to the strategic environmental objectives; or
 - b) contribute to main strategic objectives regarding regeneration, green infrastructure and alleviation of congestion.
- 3.44 A second tier of criteria addressed the potential contribution of the sites to the existing character and needs of the area. A third tier looked at site deliverability.
- 3.45 Tables A4.1 to A4.3 in Appendix 4 test the different site options against the SA framework and illustrates that all sites will result in a significant detrimental effect on the environment. However, given the need to address population growth requirements, infrastructure shortfalls and employment imbalances, the SA assessment attempts to provide the distribution of growth that would cause the least amount of harm to the environment. Some of the sites perform better than others in social and economic terms and some are able to incorporate mitigation measures that minimise negative environmental impacts. Based on the assessment of Tables A4.1 and A4.2, site areas C&D, F, G, I and L are recommended as the most sustainable options.
- 3.46 Table A4.3 illustrates the correlation between site scale and dependence on major infrastructure but it will be the information in a finalised Infrastructure Delivery Plan that would provide the necessary

information to assess delivery within the plan period. The sites tested in tables A41 to A4.3 are:

Site A – West of Leighton Linlade: Located in Aylesbury Vale between the western edge of Leighton Linlade and the A4146

Site B – South West of Leighton Linlade: Located to the south of Leighton Linlade, the site is located within the eastern half of the triangle formed by the A418, A4146 and the railway line.

Site C – North East of Leighton Linlade: Located to the north east of Leighton Linlade between Broomshill Farm and the Clipstone Brook, with the narrow gauge railway running through the middle.

Site D – East of Leighton Linlade: Located in the southern eastern edge of Leighton Linlade, extending from Clipstone Brook in the north to the A505 in the south.

Site E – North West of Dunstable: Located to the north west of Dunstable and includes the Maiden Bower Scheduled Ancient Monument (SAM). Primary access to the A5 is gained from French's Avenue.

Site F - North West of Houghton Regis: Located between the A5 to the west and the A5120 (Bedford Road) to the east. The south of the site is bounded by the existing urban area of Dunstable and Houghton Regis and the northern boundary is the proposed A5-M1 link road.

Site G: North East of Houghton Regis Located to the north of Houghton Regis between the M1 to the east and the A5120 to the west. The southern boundary will comprise the existing urban edge of Houghton Regis and Lewsey Farm and the northern boundary will be the proposed A5-M1 link road.

Site H - North of A5 M1 Link: Located north of Houghton Regis and Dunstable beyond the proposed A5-M1 link road, extending from the M1 in the east to the A5 in the west. The site will encompass Chalton.

Site I – North of Luton: Located to the north of Luton from the M1 in the west to the A6 in the east with the proposed North Luton Bypass as the northern boundary.
rephrase this

Site J – North of North Luton Bypass: Located to the north of Luton, north of Site I and the proposed North Luton Bypass, south of Lower Sundon

Site K – North East of Luton Bypass: Located to the north of Luton beyond Site I and the proposed North Luton Bypass. The site is surrounded by AONB to the north.

Site L – East of Luton: Located to the east of Luton, extending from the A505 in the north to Luton Airport in the south. The eastern boundary would be Lilley Bottom and the site encompasses the villages of Mangrove Green, Cockernhoe and Tea Green.

Site M – West of Luton: Located to the west of Luton, between the M1 and Chaul End Road and to the north of the villages of Caddington and Slip End.

3.47 The Sustainability Appraisal of sites indicates that sites A, H, J and K had the greatest environmental impact and the least ability to mitigate that impact. Site E is also constrained and the actual scope for development, taking into account the significant mitigation measures that would be necessary, was considered to be very limited. On this basis, sites A, E, H, J and K have not been taken forward for further assessment at this stage.

3.48 On this basis, these sites are considered least preferable as contingency options.

Appraisal of development options

3.49 There were a number of possible scenarios to be tested based on the sites discussed earlier and the Luton and southern Central Bedfordshire work on urban housing capacity and draft Infrastructure

Delivery Plan. However, a number of set conditions outside the Councils' control also influenced the choice of scenarios.

The givens	The consequences
1. RSS figures and area of search revoked	a) Shortened plan period
2. Infrastructure and national planning advise uncertainties	b) Sites particularly affected by cuts on infrastructure funding and unknowns on the forthcoming planning reform and its localism agenda are: East of Luton, North of Luton, North of Houghton Regis and Century Park
3. Lack of short term government funding	c) Can explore I&Os Sustainability Appraisal recommended option for minimum land take – There is an assumption that the Core Strategy needs to provide for the natural growth of the population as a minimum
4. The strategy is dependent on large sites in need of major infrastructure.	d) East of Luton SSSA no longer a valid option to progress given to the lack of joint working arrangement with North Hertfordshire, demonstrated political and community opposition and the area of search directing growth there had been revoked.

3.50 All the possible scenarios were tested for the Submission Core Strategy 2010 with the exception of the Core Strategy Preferred Options scenario and the scenario which would provide less than the development needed to accommodate the natural growth of the population. The potential scenarios were:

1. Maximum geographical distribution with maximum land take

a) Core Strategy Preferred Options scenario with sites: North of Houghton Regis, North of Luton, East of Luton and East of Leighton Linlade.

b) North of Houghton Regis, North of Luton, West of Luton and East of Leighton Linlade.

Both scenarios would mean the provision of 51% more dwellings than the needed under the circumstances described in paragraph 3.49.

Source of housing	Maximum geographical distribution with maximum land take	
	a)	b)
NoHR	7,000	7,000
NL	6,000	6,000
EoLL	2,500	2,500
WL	0	5,500
EoL	5,500	0
Urban capacity and villages	13,700	13,700
Total	34,700	34,700
% over the 23,000 dwellings needed to 2026	51%	51%

3.51 These two scenarios were part of the SA work undertaken following the Preferred Options consultation in 2009. Then, the Council had a given regional minimum housing target and area of search for allocation of sites. The draft SA concluded that all sites would have a negative environmental impact if developed and recommended progressing into scenarios only those which provided the greatest positive effect on the main objectives of the strategy and had the capacity to be mitigated against. West of Luton did not score as well as the other sites and given that sufficient land would be provided by the sites in scenario 1a), scenario 1b) did not progressed to be tested. See **Appendix 6** for 2009 Draft SA Site and scenario testing. The summary of significant effects concluded that:

1. All three scenarios perform similarly against main environmental protection objectives (Objectives 1, 2 and 3) and require considerable mitigation to overcome potential negative impacts.
2. Given the scale and location in relation to existing centres, all three scenarios have the potential to contribute towards environmental and resource management objectives (Objectives 4 and 7). However, it is uncertain how Scenario 2 could contribute towards these objectives at the same level as Scenarios 1 and 3. The ability of smaller urban and rural sites to contribute to integrated sustainable infrastructure is likely to be limited while their cumulative effect could be significant. Although Scenario 2 strengthens the Core Strategy commitment to develop previously developed land first, this may be undermined by the need to identify further smaller sites in the rural areas and around towns.
3. The Core Strategy should make clearer identification of resilient Green Belt boundaries following the identification of development sites that that future Green Belt boundaries are defensible.
4. The same happens in relation to social objective 9 where the effect of increased urban capacity needs to be assessed so that the cumulative effect of small sites does not place undue pressure on existing facilities, nor does it result in unacceptable development densities.
5. Scenarios 1 and 3 are likely to provide the greatest contribution towards affordable housing (Objective 12). Suitable thresholds and/or rural exception sites would be required to yield a similar level of contribution from Scenario 2.
6. Scenario 2 may also result in lost regeneration opportunities for Luton town centres (SA objective 13).
7. The SSSAs in all three scenarios are likely to positively contribute to objective 14. Given the greater reliance on smaller sites and greater dispersal of sites into the rural area Scenarios 1 and 3 perform better against this objective.
8. Neither of the scenarios contributes significantly to promoting employment and skills innovation (SA objective 15). Scenarios 2 and 3 may reduce opportunities to build a knowledge-based economy related to Luton's airport and university.

3.52 Scenario 1a is no longer a deliverable option as noted in paragraph 4.50 and is now discarded without further testing.

2. Maximum geographical distribution with minimum land take scenario with sites: North of Houghton Regis, North of Luton, West of Luton and East of Leighton Linlade.

Given the context set out in paragraph 3.49, East of Luton is no longer an option and West of Luton becomes the next better scoring site to be included in this scenario. Also, it is unlikely that the SSSAs to the North of Houghton Regis and North of Luton will be developed in their entirety during the plan period. This scenario would provide 24.50% of the houses needed during the period 2026 to accommodate the natural growth of the population.

Source of housing	Maximum geographical distribution with minimum land take
NoHR	5,150
NL	1,800
EoLL	2,500
WL	5,500
EoL	0
Urban capacity and villages	13,700
Total	28,650
% over the 23,000 dwellings needed to 2026	24.50%

3. Reduced geographical distribution and land take with sites:

- a) North of Houghton Regis, North of Luton and East of Leighton Linlade.
- b) North of Houghton Regis, West of Luton and East of Leighton Linlade.
- c) North of Houghton Regis, North of Luton and West of Luton
- d) North of Houghton Regis and West of Luton
- e) North of Houghton Regis and North of Luton

All options under this scenario have been tested with the exception of option e) which does not provide sufficient housing to meet the natural growth of the population 23,000 new homes to 2026 and has been discarded.

Source of housing	Reduced geographical distribution and land take				
	a)	b)	c)	d)	e)
NoHR	5,150	5,150	5,150	5,150	5,150
NL	1,800	0	1,800	0	1,800
EoLL	2,500	2,500	0	0	0
WL	0	5,500	5,500	5,500	0
EoL	0	0	0	0	0
Urban capacity and villages	13,700	13,700	13,700	13,700	13,700

Total	23,150	26,850	26,150	24,350	20,650
% over the 23,000 dwellings needed to 2026	0.65%	17%	13%	6%	-10%

4. Reduction on urban capacity

A reduction of urban capacity scenario was added to the assessment table of development options. This is not an option to provide a development strategy on its own but it provides a variation of circumstances worth assessing alongside development strategy options. This would help inform monitoring of urban capacity changes and implementation of different development options.

3.51 The SA for the Submission Core Strategy 2010 tested the scenarios:

<p>Option 1: Maximum geographical distribution with maximum land take – High level of development (34,700 dwellings) with four SSSAs: North of Houghton Regis, North of Luton, West of Luton and East of Leighton Linlade.</p> <p>Option 2: Reduced geographical distribution and land take – Medium-high level development with 3 SSSAs: a) North of Houghton Regis, West of Luton and East of Leighton Linlade (26,850 dwellings) or b) North of Houghton Regis, North of Luton and West of Luton (26,150 dwellings).</p> <p>Option 3: Reduced geographical distribution and land take – Low level development with 3 SSSAs: a) North of Houghton Regis, North of Luton and East of Leighton Linlade (23,150 dwellings) or with 2 SSSAs: b) North of Houghton Regis and West of Luton (24,350 dwellings)</p>

3.52 **Table A4.4 in Appendix 4** assesses the scenarios against the SA Framework. The summary of significant effects concludes:

<p>SA objective 1</p> <p>At strategic level all the sites will have similar impact on biodiversity the only difference is the scale of the land take and level of development. Although all sites will have the capacity to address Green Infrastructure deficits in the area which could help enhance biodiversity, Options 1, 2a and 3a would help deliver Leighton Linlade's Green Wheel and identified need for green corridors north of Luton. No corridors have been identified to the West of Luton and any links are likely to be difficult to the barrier created by the M1.</p> <p>Potentially, a lower urban capacity would reduce pressure on urban green spaces and help maintaining biodiversity in the urban area.</p> <p>SA objective 2</p> <p>Reducing the land allocation in North Luton and West of Luton would reduce pressure on AONB and sensitive landscapes to the east of Luton and North of West of Luton.</p> <p>At the proposed scale, West of Luton would result on the coalescence of Caddington and Slip End with Luton to the detriment of townscape and character aims in objective 2.</p> <p>A reduction in urban capacity presents potential positives and potential negatives for objective 2. The higher the urban capacity the greater the pressure on townscapes and historic built environment. The smaller scale of urban sites may</p>
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mean less capacity to mitigate against loss of local character and negative effect on townscape which cumulatively could have a significant effect. On the other hand it alleviates development pressures to build non previously developed land.

Given the level of development needed even if scenarios were limited to natural growth, planned urban extensions may have a greater scope to respond to this objective than small urban sites subject to individual planning applications. However, the cumulative effect of smaller urban sites is better deal with through development management policies.

SA objectives 1& 2

Options 2a) and 3a) provide opportunities to restore and enhance former quarry areas at Houghton Regis and East of Leighton Linlade.

SA objective 3

The location of sites in and around the urban areas is likely to minimise pollution of these resources but need to consider the effect of pollution from construction stage.

Option 1 is unlikely to mitigate against pollution and enhance air quality given the lack of transport infrastructure to support the level of growth proposed. Any scenario with West of Luton (1, 2a, 2b and 3b) will have a negative effect on water resources unless a solution is found for the transfer to East Hyde.

Sites in and the urban areas are likely to minimise use of resources but need to consider the effect of pollution from construction stage.

On the other hand, the ability of smaller urban sites to contribute to integrated sustainable infrastructure is likely to be limited while their cumulative negative effect on this objective could be significant.

SA objective 4

The screening of possible SSSAs eliminated sites in areas at risk of flooding. All sites could accommodate integrated sustainable infrastructure measures and renewable energy technology, which would minimise their effect on objective 4 and may be able to incorporate measures to help reduce flood risk in some areas.

Given level of water stress in the area, the Core Strategy should introduce earlier code level 4 for water.

SA objectives 5 & 6

The location of development in and around urban areas and sites' capacity to contribute towards integrated sustainable infrastructure and renewable technology help address the causes of climate change with the exception of Option1 which is unlikely to be accompanied by the required transport infrastructure. The rest of the climate change elements are addressed as part of development management environmental policies.

With regards to land efficiency, the Core Strategy sets clearly its development strategy and, considering the level of development needed to support natural growth as a minimum, the strategy generally supports the preservation of the Green Belt's openness through its direction of growth.

Option 1 proposes a maximum distribution of development across the area with maximum land take which is no longer supported by major transport infrastructure. This was a given during the Preferred Options due to the RSS figures. Other lower scenarios can now be explored that provide a more balanced approach between needed growth and environmental priorities.

Decreasing urban capacity will weaken the strategy's commitment to prioritise the development of previously developed land and enhance town centre services and facilities. The concentration of population on established service centres has associated efficiencies in the use of resources. The significance of the effect would

depend on the level of the reduction on urban capacity and on whether that reduction were to be directed to improve environmental conditions on identified pressure areas. Although, this would be better addressed in development management documents.

There is less capacity to incorporate integrated sustainable infrastructure as part of smaller urban and rural sites and therefore their cumulative effect should be assessed through the monitoring of development management policies.

SA objective 7

Option 1 provides the greatest opportunity to address green infrastructure and green corridor deficiencies across the plan's area. Although the effect of the locational approach of development options contributes to this objective, the direct effect is contained in development management policies.

While focusing development within the urban area reduces the impact on the surrounding countryside, it could lead to increased development pressure for urban green spaces which are important features of local green infrastructure.

The shortage of existing green space in the urban area would make any further loss significant effect. A reduction on urban capacity could have a positive effect against this objective.

SA objective 8

This is a site-specific issue relating to the design and layout of proposals. Master planning of SSSAs to ensure that historic and architectural assets and their setting are protected, preserved and enhanced. Policy CS8 on quality of design provides the principles to guide development to respect local character while providing high quality of design. This will be developed further through Development Management policies.

SA objective 9

Distribution of development and its focus on addressing lack of existing infrastructure in deprived areas maximises opportunities to address social inequalities. However, it is through employment Policy SC9 and Policy SC7 on social and community infrastructure where the Core Strategy addresses this objective.

Require code level 6 (zero carbon) for SSSAs and introduce minimum level 4 by 2013 and level 6 by 2016 for any other sites.

The causes of deprivation are varied and approaches other than spatial policies such as housing management, health and skill programs may be better suited to reduce deprivation.

SA objective 10

Distribution of development to in and around existing centres and its focus on addressing lack of existing infrastructure in deprived areas maximises opportunities to address crime and fear of crime. However, it is through design Policy CS8, masterplanning for the Strategic Site Allocations a forthcoming design SPD and town centre master planning which the Core Strategy addresses this objective.

SA objective 11

With the exception of Option 1, the distribution of growth in all options and their focus on addressing lack of existing infrastructure in deprived areas maximises opportunities to encourage healthier lifestyles. However, it is through Design Policy CS8, Green Infrastructure Policy CS10 and Social and Community Infrastructure Policy CS7 that improved access to services and facilities is provided for.

SA objective 12

The scale of development proposed is likely to result in a significant step change in the provision of affordable housing in the area. When preparing the master plans of

SSSAs, proposals should have regard to the tenure mix in the surrounding area to maximise opportunities to create sustainable mixed communities. Option 1 provides the greatest benefit against this objective.

A decrease in urban capacity is likely to increase certainty on the provision of affordable housing and minimise the reliance on urban capacity and the use of thresholds which could preclude smaller sites coming forward or being developed below the threshold.

SA objective 13

Distribution of growth in and around existing centres and the strengthening of the existing town centre hierarchy is likely to have a long-term positive effect on town centres and reduce erosion of village identity through small piece meal development. However, given the lack of transport infrastructure to support the level of growth in option 1, and the potential coalescence of settlements to the West of Luton only option 3a) performs well against this objective.

A decrease in urban capacity may lead to less pressure to redevelop urban sites for housing purposes rather than other town centre or commercial uses.

SA objective 14

Distribution of growth in and around existing centres and the strengthening of the existing town centre hierarchy is likely to have a long-term positive effect on town centres and reduce erosion of village identity through small piece meal development. However, it is unlikely that infrastructure will be available to deliver option 1 within the plan period. The other options have not been tested through transport modelling and not scoring is given in the appraisal table. It can only be assumed based on existing modelling findings that a reduction on number of dwellings with a scaled down transport infrastructure would provide the highest environmental gain. The assessment did not provide evidence which would favour a site over another but there remain concerns with the impact of West of Luton on the transport network showed in the transport modelling work.

Scenarios without West of Luton would remove concerns on the impact on the transport network.

SA objective 15

Distribution of growth in and around existing centres together with employment allocated in the SSSAs is likely to have a positive effect on employment, skills and innovation. However, it is through employment policy CS9, that the Core Strategy will meet this objective.

A decrease in urban capacity could reduce pressure on the release of employment and commercial land in the urban areas.

See also site-specific mitigation in Tables A4 to A43 in **Appendix 4**.

Appraisal of the selected employment strategy

- 3.53 Employment scenarios seek the location of employment near the largest concentration of population and strategic transport nodes as per the growth strategy direction. Therefore, options such as no employment in SSSAs, relying entirely on the redevelopment of employment sites are not reasonable options. Equally, with the amount of housing growth and the strategy's aspiration 'business as usual' is not a reasonable option other than for comparison.

3.54 The Employment Land and Market Assessment, March 2010 sets out two employment growth scenarios, which involve equal land intake but different mix of employment uses and therefore different job numbers.

Option 1: Provision of employment land based on long term aspirations for the area and its sub-region (Range of B1 to B8 uses across SSSAs and Increased proportion of non-B use employment).

Option 2: Provision of employment land based on current market views on likely demand and capacity (Range of employment led by the market).

3.55 In addition, two more options have been tested to assess the performance of mixed use SSSAs against only employment led SSSAs option. In practice, there will always be need for some only employment allocations to accommodate specific uses.

Option 3: Distribution of employment on mixed use SSSAs and employment led SSSAs

Option 4: Distribution of employment mainly on employment led SSSAs

3.56 Table A4.5 in **Appendix 4** assesses the four against the SA Framework. The summary of significant effects concludes:

Summary of significant effects:

SA objective 1: Option 3 is likely to contribute to the enhancement of biodiversity through the large green infrastructure expected to accompany the mixed-use SSSAs

SA objectives 3, 5 and 6: Option 1 performs relatively well against the protection and management of resources while option 2 is likely to reduce opportunities to diversify the economy and its potential to balance the traffic and land use intensive logistic and manufacturing uses with other employment uses which may be less resource intensive. Option 3 is likely to generate more energy and resource efficiencies and respond more effectively to climate change than option 4 which would depend mainly on development management policy targets.

SA objective 7: Mixed use SSSAs are expected to be accompanied by substantial green infrastructure.

SA objective 9: All four options will have a significant positive contribution towards this objective. However, Option 3 allows synergies between different uses to build on skills and education. Providing homes and employment together may help reduce access inequalities.

SA objective 10: Only option 3 contributes to this objective. Mixed-use SSSAs are likely to create 24hour environments where surveillance occurs naturally by the transit of people.

SA objective 11: Option 3 is likely to encourage walking and cycling by brining housing and employment together which is likely to lead to healthy lifestyles.

SA objective 13: Only option 1 is likely to have a significant positive effect on objective 13. A wider range of employment uses and a greater proportion of non-B employment uses are likely to help revitalise town centres and the rural economy if adequate rural employment policies are developed. The LDF could provide greater certainty to business if its Development Plan Documents contained policies

regarding town centre boundaries, primary and secondary frontages and percentage of town centre and employment uses. Options 3 and 4 are both likely to affect positively this objective new employment sites can free space in the town centres for regeneration by providing new suitable employment spaces for those uses which do not need or are not suited to be in the town centre.

SA objective 14: Options 1, 2 and 4 have the potential to contribute positively to the achievement of this objective but only option 3 strongly contributes to this objective by minimising car travel, create opportunities for linked journeys, concentrate infrastructure provision and increase potential patronage for public transport.

SA objective 15: Although all options will help increase employment provision, option 1 and 3 will be likely to support the required environment to support learning, skills and innovation.

Selection of employment site options

- 3.57 The search for employment sites followed the same consultation process as the mixed use SSSAs and was supplemented by site evidence in the Employment Land and Premises Review (January 2008) and the Retail Study Update (January 2009).
- 3.58 The Employment Land and Market Assessment by Nathaniel Lichfield and Partners, March 2010 identifies a number of potential drivers of change that set the criteria for identification of sites:
- a) Expansion of Luton Airport and activities linked to this, which could increase demand for freight and support activities;
 - b) Provision of large, attractive, well accessed development sites to encourage relocations and speculative development;
 - c) High population growth from planned urban extensions, which could drive increased demand for services and jobs;
 - d) Much improved road/public transport infrastructure making the area a more attractive place in which to live and work;
 - e) Building on linkages with research and development institutions to create an area with more knowledge intensive focus; and
 - f) The ability to change perceptions of parts of the area through high quality new development (perhaps combined with more active promotion).
- 3.59 The study explores the options of redeveloping existing employment sites and some of the sites identified are part of the SSSAs. The study also identifies Sundon Quarry and Junction 10A as potential stand-alone employment sites.
- 3.60 The Luton Local Plan allocates employment land at Butterfield Park and exploring the potential expansion of this site is considered an option to be assessed.
- 3.61 Although the SSSAs to the east of Luton is no longer an option as explained earlier, Century Park gained outline planning permission in Autumn 2009 and this SA tested a small allocation for employment uses as an expansion of the existing allocated site.

3.62 Table A4.6 of **Appendix 4** assesses the potential employment sites against the SA framework. The options tested are:

- Option 1:** Sundon Quarry
- Option 2:** Junction 10A
- Option 3:** Expansion of Butterfield Park
- Option 4:** Expansion of Century Park

Summary of significant effects:

All sites are out of centre employment-led potential allocations and although ancillary uses may be present as part of proposals these are not the main purpose for the selection of a particular site. Also different types of employment require locations which avoid conflict with other uses for their operations and therefore sites may not be comparable under some criteria.

All sites are located within the green belt and the test refers to how the site would retain Green Belt principles avoiding coalescence of settlements and providing robust and defensible boundaries for the future.

All sites will be expected to contribute to public transport provision and prepare travel plans.

All sites will have the potential to reduce deprivation by increasing employment close to the urban area but it will mainly depend on development management policies and Councils' skills initiatives.

Given to the limited uses (employment led) and smaller scale of these sites, the ability to contribute to the delivery of an integrated sustainable infrastructure systems is likely to be smaller than the mixed-use SSSAs but it is expected that all sites will make a contribution as per development management policies.

Sundon Quarry

1. Unique opportunity for the allocation for a rail freight terminal and associated distribution development. It is well located to provide B8 uses, the largest employment growth sector in the Core Strategy area, and take advantage of the Midlands Mainland train line. No other rail linked distribution exists in Luton and southern Central Bedfordshire and the rail terminal could serve a wider area with economic and environmental benefits associated with transferring freight from road to rail. There is a potential significant contribution towards enhancement of Luton Town Centre Regeneration.
2. Potential significant contribution towards economic and sustainable transport infrastructure including strategic rail and model transfer.
3. The site may generate significant traffic (including HGVs) on the local network and so phasing of development with existing and planned transport capacity improvements will be critical to managing delivery.
4. The development should be contained within existing physical and visual boundaries to avoid adverse effects on the wider landscape and without compromising the function of the green belt in preventing coalescence with Lower Sundon.
5. Major impact on sensitive landscape, biodiversity and Historic Buildings/areas. Any allocation in the Core Strategy would have to be 'in principle' and subject to further detailed work on either a Site Allocations

DPD or a Masterplan for the site.

Junction 10A

6. Well located for aviation-related businesses and a B1/business park location with good transport accessibility. There is a potential significant contribution towards enhancement of Luton Town Centre Regeneration although it may have an impact on existing employment land at Capability Green
7. Local traffic congestion from over development unless connected to planned J10A improvement and provision of significant new public transport connectivity linking the town centre and airport.
8. No major contribution to sustainable transport infrastructure.
9. Major contribution to community infrastructure if Luton Football Club were to be relocated to the parcel east of the M1 and north of Airport Way as per Luton Local Plan allocation.
10. As per current development proposals, the site would result on the coalescence of Luton, Harpenden and Slip End and would erode the robust Green Belt boundary to the West of Luton currently set by the M1.
11. Major landscape sensitive constraints with the exception of the parcel to the east of M1 and north of Airport Way.
12. Allocation of this site would have to be considered against the provision of employment land as part of mixed-use SSSAs in similarly well connected locations such as Junction 11A.

Expansion to Butterfield expansion

13. Potential significant contribution towards diversification and restructuring the Luton economy with technology business, the regeneration of the town's employment base and the improvement and vitality of Luton Town Centre. This site with its university focus would have an important role in the diversification of the local economy.
14. Depending on the direction of the expansion (not known at this stage), the development could result on the coalescence with smaller settlements e.g. Lilley.
15. Major landscape sensitivity constraints. With regards to biodiversity, archaeology and historic landscape, some development maybe appropriate with adequate mitigation. The level of detail required to ascertain whether mitigation measures could overcome the environmental impact of the development and its effect on the transport network is not available. If allocated in the Core Strategy, this should be done 'in principle' with further work done through a Site Allocations DPD or Masterplan.
16. Local traffic congestion from over development unless connected to planned transport infrastructure and provision of significant new public transport connectivity linking the town centre and airport.

Expansion to Century Park

17. Scale of site, reasonable proximity to M1 and Luton Airport and absence of incompatible uses suggest distribution and other industrial uses. There is potential for contribution towards enhancement of Luton Town Centre Regeneration and to contribute to knowledge base and skills industries with

the allocation of a small office park.

18. No major constraints have been identified with regards to landscape, biodiversity, archaeology and historic environment. However, any development should relate to the rural character of the landscape.
19. Existing road bordering the site would help contain development and provide a robust Green Belt boundary.
20. An allocation on this site would not result on the coalescence of settlements but it would narrow the gap between Luton and Tea.
21. An allocation in this area would have to be supported by improved public transport. No major contribution to sustainable transport infrastructure.
22. Site lies entirely within North Hertfordshire District and although a large mixed use SSSA at this location has been strongly opposed by the administration and the public, this should not in principle preclude an extension to Century Park to support Airport related industries subject to further joint working between the local planning authorities.

See detailed assessment and mitigations in Tables 4.6 to 4.8 of **Appendix 4**.

Major transport infrastructure to support development

- 3.63 Luton and South Bedfordshire Local Development Framework Transport Appraisal, 2009 assessed the effect of different development options and transport infrastructure scenarios on the strategic transport network.

Reference Case Scenario: Committed development and infrastructure	Emerging Preferred LDF Core Strategy: Additional LDF Core Strategy development and minimal "uncommitted" infrastructure;	Enhanced Emerging Preferred LDF Core Strategy: Additional LDF Core Strategy development with Enhanced "uncommitted" infrastructure;	Alternative Enhanced Emerging LDF Core Strategies, Options 1 and 2
M1 widening (Jcts. 6a-10); Leighton Buzzard Town Centre Scheme;	Luton Town Centre Transport Scheme;	Same infrastructure as emerging Preferred LDF case plus:	Same infrastructure as enhanced scenario but testing
East Luton Corridor (Capability Green-Airport);	Leighton Buzzard Eastern Distributor Road; New local distributor roads to serve potential urban extensions -to the north of Dunstable and Houghton Regis; and -the north and east of Luton;	East Luton Bypass; M1 Junction 10a Grade Separation; Woodside Connection to the M1 at Junction 11a; and Luton Northern Bypass from M1 Junction 11a to A505 with an intersection on the A6.	Option 1: Housing and jobs in area L re-allocated to areas C and D east of Leighton Buzzard, area E west of Dunstable, and areas H and J north of Luton and Houghton Regis
Luton – Dunstable Guided Busway;	Extensions to the Luton – Dunstable Guided Busway system to serve potential urban extensions - to the north of Dunstable/ Houghton Regis; and - the north and east of Luton;		Option 2: Housing and jobs in area L re-allocated to
Ridgmont bypass; Bedford Western bypass (A421-A428);	On-road bus priority measures along - A6 (in-bound only) - A505 (in and out-bound as far as the Vauxhall Way); and - Vauxhall Way as far south as		
A421 dualling			

Reference Case Scenario: Committed development and infrastructure	Emerging Preferred LDF Core Strategy: Additional LDF Core Strategy development and minimal “uncommitted” infrastructure;	Enhanced Emerging Preferred LDF Core Strategy: Additional LDF Core Strategy development with Enhanced “uncommitted” infrastructure;	Alternative Enhanced Emerging LDF Core Strategies, Options 1 and 2
(M1 Jct. 13-Bedford); M1 Widening (Jcts. 10-13); A5-M1 Link (Dunstable Northern Bypass) and M1 Junction 11a.	Crawley Green Road (in-bound only) - Heath Road/ Church Street/ North Street/West Street corridor in Leighton Buzzard (in and outbound).		areas C&D east of Leighton Buzzard. Area E west of Dunstable, and area M west of Luton.

- 3.64 The testing of alternative options (option 1 and 2) concluded that both alternative scenarios have a similar or only marginally worse effect than the Core Strategy Preferred Option 2009.
- 3.65 The detailed assessment of the transport appraisal is available on the “Shape your future” website (www.shapeyourfuture.org.uk).
- 3.66 Since then a further scenario was modelled by Halcrow on behalf of the West of Luton consortium using this study’s model and substituting site L (East of Luton) in the Enhanced scenario Preferred Option Core Strategy by site M (West of Luton).
- 3.67 The consultant conclusion is that with site M instead of L whilst there would be increases in flows and delays there would be no widespread congestion and that measures to mitigate the problems would be confined to junction improvements on the surrounding network. There would be additional traffic through the neighbouring villages of Caddington and Slip End, but it concludes that the relative increase is not unmanageable and measures to reduce and divert through movements can be expected to have an ameliorating effect. It also concludes that when assessed on a like by like basis there are no clear benefits for the East (site L) and in almost all the key measures the West (site M) produces more sustainable results.
- 3.68 The Councils’ views on the assessment is that there are concerns with regards to the robustness of the highway journey times particularly into the centre of Luton. However, it agrees that given the location of site M between Dunstable and Luton, combined with the fact that it is closer to Luton town centre, the results of the accessibility statement appear reasonable.
- 3.69 The consultant concludes that West of Luton (site M) does not result in an increase in Ratio of Flow to Capacity (RFC) categories at any key junctions in the vicinity of the site and only results in slight increase in delays at junctions in employment areas at Capability Green and Boscome Road in Dunstable. The Councils transport engineers view is

that this does not necessarily mean that delays have not increased and highlight that the delays and RFCs are averaged over the whole junction and are likely not to reflect condition on the worst approach.

- 3.70 Consultant traffic flows illustrate that the more significant increases in traffic will occur on Hatters Way, the A505, Chaul End and Newlands Road which have already queuing problems
- 3.71 Since the preparation of the study a number of major changes occurred, the RRS are no longer constraining the options and the Government's committed transport infrastructure in the area has changed, A5-M1 link Inquiry has been postponed pending the Government Spending Review and the M1 widening for junctions 10 to 13 changed in January 2009 to a hard shoulder running.
- 3.72 Although the reference scenario of the 2009 study may still be a valid starting point the number of uncommitted infrastructure which could be realistically expected within the 2009 Core Strategy Plan period has changed and the site scenarios are no longer constrained to RSS figures. In addition, infrastructure which was already committed has also been affected. A5-M1 link Inquiry has been postponed pending the Government Spending Review and the M1 widening for junctions 10 to 13 changed in January 2009 to a hard shoulder running.
- 3.73 The specific findings of the 2009 study cannot be applied to the new scenarios but there are a number of key overall conclusions which may help guide some options subject to further strategic modelling work and Site Specific Transport Assessments to inform detailed masterplan proposals outside the Core Strategy.
1. A significant shift to public transport use between the "Reference Case" and the Emerging Preferred LDF Core Strategy scenarios.
 2. Public transport decrease in the Enhanced Emerging Preferred LDF Core Strategy scenario, compared with the Emerging Preferred LDF Core Strategy scenario, due to the inclusion of strategic highway transport improvements.
 3. Locating most of the development on the northern periphery of the urban area, some distance from Luton Town Centre with the additional transport infrastructure provided in the Enhanced Emerging Preferred LDF Core Strategy scenario, the outer bypass routes became more attractive for some car travel. However, this option reduced congestion on some routes within the urban area.
 4. Increased levels of congestion in Luton and Southern Central Bedfordshire if the target growth in housing and employment as identified in the East of England Regional Spatial Strategy, is to be met without any additional investment in strategic highway infrastructure.
 5. The additional travel benefits of building the A6-A505 section of the Northern Bypass are marginal overall, although they do give some benefit in areas such as North East Luton.

6. Although a number of individual of site scenarios were modelled it was difficult to isolate the impacts of individual schemes.
7. Despite the increased private vehicle trips, the carbon emissions per capita are reduced with the additional investment in highway infrastructure, with less congestion on the road network with the Enhanced Emerging Preferred LDF Core Strategy, compared with the Emerging Preferred LDF Core Strategy scenario, with limited infrastructure improvements. Although in general the benefits are due to improvements in vehicle performance.

3.74 Further strategic modelling of new scenarios would provide a better evidence base to assess the impact of the different development options. However, the overall findings of the 2009 study above seem to indicate that:

1. High level of growth to former RSS requirements cannot be accommodated without major infrastructure funding and this is no longer available.
2. The scenario of minimal uncommitted infrastructure would not have considerably worse effects on congestion and would provide the greatest shift to public transport. It could be assumed that a scenario with lower development than those in the former RSS and minimal uncommitted infrastructure would provide the greatest sustainable transport gain.
3. Modelling of the effect of different transport scenarios on the strategic network is unlikely to provide information to favour one individual site over another. All sites tested were in potentially sustainable locations with access to the strategic network and adjacent to the urban areas the effect of individual sites on the local network would have to be tested at masterplan level.

The Policies

3.75 Core policy CS1 sets the development strategy, policies CS2 and CS3 establish the means to fund the strategy proposals and CS4 establishes the new Green Belt boundaries under the strategy. The development strategy is tested in Appendix 4 and was detailed in the previous section.

3.76 Policies CS5 to CS12 set out how the Core Strategy seeks to achieve the strategy's objectives and vision. They comprise thematic policies considered to be fundamental to the success of the strategy and Policies CS13 to CS22 are site-specific policies that help illustrate the effects of the policies on a site or area-specific form highlighting areas of significant change. Table 5 lists the Pre-Submission Core Policies.

Table 5: Pre-Submission Core Policies

CS1 – Development Strategy
CS2 – Public Funding for Infrastructure
CS3 – Developer Contributions for Infrastructure
CS4 – Extent of the Green Belt

CS5 – Linking Places
CS6 – Housing for all Needs
CS7 – Increasing access to social and community infrastructure
CS8– Quality of design
CS9 – Delivering economic prosperity
CS10 – Green Infrastructure
CS11 – Resource efficiency
CS12 - Adapting to and mitigating Flood Risk
CS13 - North of Luton SSSA
CS14 – Houghton Regis North SSSA Site 1
CS15 - Houghton Regis North SSSA Site 2
CS16 - East of Leighton -Linslade SSSA
CS17 - Luton Town Centre
CS18 - Luton Urban Area
CS19 - Dunstable Area
CS20 - Houghton Regis Town Centre
CS21 - Leighton –Linslade Town Centre
CS22- Rural Settlements

- 3.77 Policies CS5 to CS12 and CS22 are thematic policies that set out the principles under which the Councils will address identified housing need, provision of social and community infrastructure, economic prosperity and management of environmental resources. The principles of the area policies CS13 to CS21 are assessed as part of both the growth and thematic policies and are therefore not assessed in isolation.

Linking places – Policy CS5

Background

- 3.78 The transport options to support the required growth are addressed as part of the growth strategy. However, transport policy developed to support the Core Strategy objectives with regard to increasing sustainable transport opportunities, minimising carbon footprint and supporting town centres is contained within Policy CS5 Linking places.

- 3.79 Policy CS5 provides:

- a) a spatial dimension to the Local Authorities’ Local Transport Plans which are on their own subject to an Environmental Impact Assessment; and
- b) the broad principles to guide development management policies when assessing transport implications, including the requirement for Transport Assessments to accompany some planning applications.

Influence of Issues and Options appraisal

- 3.80 The Issues and Options SA tested the options:

- a) Make improvements to public transport and make it reliable, cost effective, efficient and attractive;

- b) Reduce car parking in new housing and discourage multi-car households;
- c) Reduce/discourage car-parking provision in town centres;
- d) Encourage sustainable transport;
- e) Provide pedestrian/cycle routes only;
- f) Provide more dedicated bus ways/lanes to make bus journeys quicker;
- g) Pursue Park & Ride facility provision to reduce congestion in town centres; and
- h) Encourage local employers to promote sustainable transport for employees.

3.81 It concluded that any options that would discourage car use would have a positive effect on the area. However, the assessment considered that the likely effects of 'improvement to public transport' and 'park & ride provision' were uncertain due to the lack of an east-west linkage across the area.

3.82 The options were not mutually exclusive and Policy CS5 incorporates measures addressing all of them. The policy requirement for a Transport Assessment is likely to lead to the promotion of sustainable transport from employees although detailed policy on this respect should be developed through the Development Management DPD.

Influence of Preferred Options appraisal

4.83 The Preferred Options SA concluded that the level of growth required is likely to result in an increased tendency to travel. It also noted that the transport proposals are likely to improve air quality and help in combating climate change. However, proposed new road schemes as part of the growth strategy are also likely to result in the emission of air pollutants and greenhouse gases and could detrimentally affect habitats and landscape character.

3.84 There are no reasonable options to assess against this policy that have arisen from previous SA work, national and regional guidance, consultation on the Core Strategy or technical evidence.

Appraisal of pre-submission document

3.85 Policy CS5 provides the spatial framework for the Local Transport Strategy, which is subject to its own Strategic Environmental Assessment.

3.86 The policy is expected to have a positive impact in terms of sustainability, particularly in terms of air quality and mitigating against climate change through encouraging a modal shift away from the private car. The policy also has the potential to reduce inequality through enhancing access to services and facilities, particularly in town centres. In addition, the policy encourages healthier lifestyles through the provision of new and enhanced cycling and walking routes. Finally,

Policy CS5 should have a particularly positive impact in terms of providing a sustainable integrated transport strategy.

Housing for all Needs – Policy CS6

Background

3.87 Policy CS6 and its supporting text contains the criteria to guide provision of affordable and specialist housing in Luton and southern Central Bedfordshire and covers:

- a) Housing size, type and tenure;
- b) Affordable housing percentage requirement from privately developed sites;
- c) Lifetime homes and
- d) Gypsies and Travellers.

Influence of Issues and Options

3.88 The Issues & Options SA tested the following affordable housing options:

- a) Retain existing targets and thresholds for Luton and South Bedfordshire (50% and 35% respectively);
- b) Have a standard target for whole Luton and Southern Central Bedfordshire; and
- c) Considering varying targets/thresholds for different areas (town centres, villages).

3.89 The SA report noted that retaining the existing affordable housing targets in the respective development plans (50% for Luton and 35% for South Bedfordshire) would have a positive effect and would increase access to housing for a wide range of social groups. It also recommended consideration of varying targets and thresholds for rural areas and town centres.

3.90 The Issues and Options SA tested the following Gypsies and Traveller policy options:

- a) Allocate a range of sites within the potential urban extensions and require them to be purchased at market value;
- b) Encourage provision of sites by Registered Social Landlords and developers, secured through planning obligations; and
- c) Seek a mix of sites for sale and social renting.

3.91 The SA report found the effect of the options to be in the majority of the cases neutral or unknown given the lack of information on site location at that stage. The two areas where the assessment was different were community inclusiveness and accessibility where options b) and c) were found to have a minor positive effect and option a) an unknown effect.

- 3.92 Neither of the three options are mutually exclusive. However, the Issues and Options assume that options b) and c) involve sites located in previously developed areas.

Influence of Preferred Options appraisal

- 3.93 The Preferred Options SA highlighted the potential positive contribution of housing suitable for all needs to promoting social cohesion, combat inequality and supporting the economy by encouraging economically active people to stay in the area or relocate to the area. However, most of the discussion in this SA report refers to the effect of the housing growth.

Appraisal of pre-submission document

- 3.94 Policy CS5 provides general principles for the provision of housing for those with specific needs based on the evidence of the Strategic Housing Market Assessment. The policy sets the national indicative minimum site size threshold of 15 dwellings for the Luton/Dunstable/Houghton Regis conurbation but sets a lower threshold of 4 dwellings for Leighton-Linslade and the rural area. This lower threshold is based on the different characteristics of the housing market in Leighton-Linslade and the rural area and reflects the threshold set out in the adopted Core Strategy for the remaining part of Central Bedfordshire. In sustainability terms it is important to balance the need to secure much-needed affordable housing with the need to maximise the efficient use of land. The requirement for rural exception sites to attend to local housing need should also be considered.
- 3.95 The likely effect is uncertain in a number of policy areas:
- a) Affordable housing percentage requirement from privately developed land
 - i. Policy CS6 proposes 35% affordable housing to be required from privately developed sites based on the Strategic Housing Market Assessment findings, which conclude that this is an economically viable target across the plan area and period.
 - ii. The likely effects of the 35% target in relation to the current requirements (35% in southern Central Bedfordshire and 50% in Luton) are uncertain. The 50% requirement in Luton has only been in place since 2006 and so the overall effect of the existing policy across a range of housing market conditions cannot be assessed.
 - iii. On the other hand, since 2001 Luton has not provided affordable housing above 17% of all housing completions with the exception of 2002, which was a particularly good year with almost 60% of affordable housing provision mainly through Housing Associations. The provision of affordable housing in southern Central Bedfordshire has recently been higher than in Luton but has not been higher than 30%. These figures on affordable housing completions from the Annual Monitoring

Report highlight the importance of the SHMA findings on economically viability.

- iv. However, the AMR figures may also indicate that planning policies should recognise the need to work with Residential Landlords to help increasing affordable housing provision.
 - v. Aspirations could potentially be raised for an increased overall delivery of affordable housing across all sources. While evidence would be required to support this, it is assumed that unique initiatives such as the development of surplus public-sector land with high levels of affordable housing could increase overall delivery above that provided from the requirement of 35% on privately developed sites. Consideration should be given to the role that planning policy can take in facilitating such unique initiatives over the plan period.
 - vi. As drafted, Policy CS6 supports a flexible approach to the delivery of affordable housing to ensure that it can be provided with consideration of individual site and temporal housing market circumstances. It is likely that smaller volumes or different proportions of affordable housing will be generated during the early stages of housing market recovery but there is no stated approach to resolving this deficit as the market peaks. An approach to the assessment of planning applications based on evidence of financial viability should be developed through the Development Management DPD.
- c) Housing size mix
- i. Policy CS6 sets out the delivery of three or more bedroom houses as a priority but more information will need to be developed as part of a Development Management DPD on what will be expected from development proposals. It may also be useful to explore housing sizes in square metres rather than bedroom numbers to ensure that there is lifetime homes compliance.
 - ii. There may be a link between housing size and lifetime homes and Building for Life standards to ensure that the size of housing is not just determined by the number of bedrooms but also ensure good standards of living and flexibility to adapt to different living needs and expectations.
- e) Gypsies, Travellers and Travelling Show people
- i. There is no specific reference to Gypsies and travellers in the policy which does not comply with current advice on Government Circulars and the Gypsies and Travellers and Travelling Showpeople Needs Assessment and the requirement of sites as part of Core Strategies. The Government has announced its intention to revise its national advise on provision for Gypsy and Traveller and Travelling

Show People but at the time of writing the current national guidance and Circulars still stand.

- ii. There are a number of assumptions in the Issues & Options SA report that may have not taken into account the different needs of this group. With regards to community cohesion and accessibility, the Issues and Options SA report scores option a) 'urban extensions' as uncertain because there may be a risk that this option could isolate them and reduce access to facilities. However, urban extensions will have services to provide for the daily needs of their population and are located in accessible locations by private and public transport therefore it is an appropriate location for Gypsies and Travellers who traditionally need to have access to road transport to carry out their business and help their travelling. Their preference tends to be for sites which are adjacent but not in the town/village to help them carry out their traditional trades without affecting or being constrained by the settled population. An urban extension could have a greater scope to bring together different sections of the community since the master plan will be led by the different needs of all future users.

f) Housing for the elderly

- i. The supporting text to CS6 provides specific information on housing for the elderly although further specific information may need to be developed as part of the Development Management DPD.

3.96 Overall, this policy is expected to have a positive impact on sustainability particularly in terms of social and economic factors. The impact of this policy, in particular for the environmental objectives, will be dependent on a range of factors, such as the scale and location of the housing development, provision of community services and facilities, use of sustainable design methods and construction techniques and access to sustainable integrated transport systems.

3.97 It is considered that this policy will have a positive impact on the social objectives as it aims to ensure housing for all through the provision of a range of housing types and the provision of affordable housing. Improving access to housing will indirectly improve social mobility having a positive impact on social and economic issues, such as employment. The impacts on the economic objectives are more limited and will depend again on the scale and location of the housing development.

Increasing Access to Social and Community Infrastructure - Policy CS7

Background

3.98 Policy CS7 supports the delivery of social and community infrastructure to address current need and future need. It addresses:

- a) Co-location of services;
- b) The principles of planning obligations;
- c) Protection of existing facilities;
- d) Provision of interim community facilities;
- e) Timely delivery of infrastructure to accompany major development proposals; and
- f) Allocating land for Luton Town Football Club and a 50-metre swimming pool.

Influence of Issues and Options appraisal

3.99 The Issues and Options SA Report did not assess options for social and community infrastructure as its main purpose was to identify directions for growth.

Influence of Preferred Options appraisal

3.100 The Preferred Options SA highlighted the likely positive effects of Policy CS7 with regard to the co-location and location of services within settlements but also noted that large-scale development could have detrimental effects and highlighted in particular the 50-metre swimming pool and football stadium. It also highlighted the potential short-term negative effect of their construction and the need for sympathetic design in relation to the historic, natural and archaeological environment.

Appraisal of pre-submission document

3.101 The policy will have no direct impact upon many of the sustainability appraisal objectives. What impacts there are, are considered to be generally positive in nature. Nevertheless, the co-location of such facilities could help to mitigate against the effects of climate change by reducing private car use, while also making these facilities more accessible, particularly if they can be accessed using public transport. The impact on the town centres by providing such facilities will vary depending on location. However, there is potential to promote employment, learning and skills, particularly if facilities such as schools and libraries are provided.

3.102 With regards to the non site-specific elements of Policy CS7, there are no reasonable options to assess against which may have arisen from previous SA work, national and regional guidance, consultation on the Core Strategy or technical evidence. The policy provides a spatial element for strategies within other Council departments providing opportunities for multifunctionality and the co-location of services. The policy implementation and its likely effect depend on the findings of the forthcoming Infrastructure Delivery Plan and the options to be

assessed in the Planning Obligations Supplementary Planning Guidance.

3.103 The swimming pool and football stadium proposed in this policy are of a strategic nature and their inclusion within the Core Strategy is expected. However, there is not sufficient information available at this stage to assess whether the proposed location for these facilities is the most sustainable considering all reasonable options. Some of the reasons for this include:

- 1) The allocation of Luton Town Football Club near Junction 10A in Luton Local Plan has not been implemented since its allocation and its likely deliverability should therefore be tested rather than rolling forward the allocation;
- 2) Both facilities involve the construction of large structures and buildings likely to create a visual impact beyond their immediate location;
- 3) Both facilities are likely to generate a high level of use and therefore transport movements. Town centre sites and those with excellent public transport accessibility should be considered against the proposed locations. Luton's Sports Facilities Strategy 2008-2021 also promotes the siting of strategic swimming facilities near Houghton Regis, as this is central to the wider conurbation and would serve increased demand from potential urban extensions. The same strategy also considers allocation for a new football stadium adjacent to the M1 at Junction 12;
- 4) If these two sites were considered in isolation from other community needs, there may be a lost opportunity for co-location of services and multifunctionality; and
- 5) A 50-metre swimming pool could place extra pressure on water resources in an identified 'water stress area'. It is also considered that energy consumption will be high, leading to potentially high levels of energy-related pollution and revenue costs. Site location should be considered with particular emphasis with regards to water stress, on-site renewable power generation and opportunities for co-location of services to encourage resource efficiency and long-term financial viability.

3.104 Further information will be required to make an adequate assessment of possible site options. This could be carried out in the Site Allocations DPD when further information would be available.

Quality of design Policy – CS8

Background

- 3.105 This policy is a new policy that did not feature in previous rounds on consultation. However, it addresses issues that flow from national guidance on design (particularly PPS1 and PPS3) and is consistent with those guidelines.

Appraisal of pre-submission document

- 3.106 This policy will have a positive impact in terms of sustainability as good design is at the heart of adaption to and mitigation against climate change and flood risk, facilitating accessibility, designing out crime and fear of crime and using resources more efficiently. Well designed large developments can have a positive affect on the larger area by providing opportunities for more sustainable travel and green infrastructure, also resulting in healthier lifestyles for residents. High quality design will be used to regenerate and invigorate town centres and protect the identity and character of villages. The policy recognises the importance of historic, environment and architectural assets and aims to protect preserve and enhance their character, appearance and context. Good design will be used to create a 'sense of place' in urban extensions. All proposals will be required to incorporate sustainable design principles and meet recognised national industry design standards such as the Code for Sustainable Homes.

Delivering Economic Prosperity- Policy CS9

Background

- 3.107 This policy sets out support for economic development and, in particular, the approach towards employment development within Use Class B. It also advocates consideration of development around existing employment sites and at Sundon Quarry.

Influence of Issues and Options appraisal

- 3.108 The Issues and Options SA tested the options:
- a) Safeguard existing employment sites; enhance poor ones and lastly search for new sites; and
 - b) Encourage employment land development within urban extensions and encourage redevelopment of poor employment sites for other use.

These two options deal with the distribution of employment and given the level of growth proposed they are not necessarily mutually exclusive. Option b) scored more favourably.

- 3.109 It concluded that both options are considered to be approximately equal in terms of sustainability considerations. Option a) scores better in terms of town centre regeneration, economic prosperity and climate change adaptability, as it will capitalise on the existing transport network and proximity to residential development. Option b) scores better in terms of community inclusiveness as the redundant

employment could be used for housing and social and community facilities. However, this may lead to increases in work-travel distances due to the employment sites being located in the proposed urban extensions.

Influence of Preferred Options appraisal

- 3.110 The Preferred Options SA concluded that depending on the nature, scale and location of employment sites, they are likely to be detrimental for the natural environment. The preferred option was likely to have positive socio-economic effects while the historic environment could be adversely affected.

Appraisal of pre-submission document

- 3.111 Policy CS9 does not deal with the distribution of employment (this is dealt with through the Growth Strategy and accompanying appraisal) but sets out the principles that would support economic activity. The policy does not take advantage of airport, tourism related to airport and natural assets in the area. Strategic issues such as town centre boundaries, primary and secondary frontages and the Core Strategy approach to out of centre development is not indicated in the policy and will need to be addressed through the Development Management DPD or area/site-specific action plans or master plans.
- 3.112 Overall, this policy is expected to have a positive impact on sustainability in particular social and economic factors. The impact of this policy will however be dependent on a range of factors, such as location and scale of the new employment areas, accessibility to residential areas and town centres, use of sustainable construction techniques and access to sustainable integrated transport systems.
- 3.113 This policy has the most positive impact on the economic objectives due to the ability of this policy to create employment and deliver economic prosperity. It will be important that this policy seeks to attract and deliver a range of businesses offering a variety of jobs to suit the skills available locally and which offer the potential to enhance local skills. Learning linkages between the schools, colleges and businesses could be explored to ensure that the skills required by businesses are taught at a local level. The economic benefits of this policy will lead to a positive impact on the social factors by creating employment, people will be earning an income, which should lead people out of crime and reduce poverty in the area.
- 3.114 Sundon Quarry is a strategic site and has been appraised against the other possible sites such as an extension to Butterfield Park and site at Junction 10A. The proposed development at Sundon Quarry would have a positive contribution towards Core Strategy economic and sustainable transport infrastructure objectives. However, the adverse potential impact on national policy and statutory designations is so significant that it is likely it could not be mitigated against. Its

allocation should only be sought after detailed studies confirm that there is scope for mitigation.

- 3.115 It would not be appropriate to promote this option without a detailed EIA, heritage and Green Belt review, traffic modelling and infrastructure guarantees.
- 3.116 In relation to the employment site at Junction 10A, this would generate a significant positive contribution towards Core Strategy economic and 'place making' objectives but dependent on connection to J10Aa and transport access improvements to town centre and airport, with a need for some environmental mitigation via integrating local landscape and habitat features including one local designation. In addition, the allocation of this site would need to be assessed against other suitable employment allocations in the SSSAs.
- 3.117 It is important to consider that it would be feasible and appropriate to promote this option with landscape and green belt review, traffic modelling and infrastructure guarantees.
- 3.118 Finally, the potential extension of Butterfield development for employment purposes would produce a positive contribution towards the Core Strategy economic and regeneration objectives however, the adverse potential impact on national policy and statutory designations is so significant that its allocation should be sought only after detailed studies confirm that there is scope for mitigation.
- 3.119 Therefore, it would not be feasible or appropriate to promote this option without a detailed EIA, landscape assessment, heritage and Green Belt review, traffic modelling and infrastructure guarantees.

Green infrastructure – CS10

Background

- 3.120 This policy seeks to ensure that development has a positive effect on green infrastructure (GI) and, in particular, seeks a "net gain" in green infrastructure from new development.

Influence of Issues and Options appraisal

- 3.121 The Core Strategy Issues and Options presented five options for how readers would like formal and informal recreational green space to be provided in the urban extensions. The options included:
- a) Combine formal green space provision serving large areas into one or two large sites, with more facilities and better management;
 - b) Have more areas of formal green space, similar to traditional provision, with a standard number of pitches/fields per area, related to the size of development;
 - c) Encourage shared use of quality facilities at schools and colleges, and community centres;

- d) Have many small areas of informal green space within neighbourhoods; and
- e) Concentrate informal green space provision in large parks at the edge of the built up area, along a country park-type model.

3.122 There was support for all options during the consultation and the Issues and Options SA assessed all the options as having a positive impact against the sustainability objectives. Options c) and d) were assessed as having the potential to increase community participation, improve cohesion and, with appropriate management, could tackle crime. Option e) was assessed as having limited access to users that could reach larger parks, or serve people living in the vicinity leaving others to a disadvantage, thus the overall benefit of option e) was considered limited.

3.123 There was no option to 'do nothing' due to the need to provide a sustainable living environment in the proposed urban extensions and existing urban areas. The Preferred Option was therefore identified to maintain, enhance and deliver new green infrastructure at appropriate scales throughout the Growth Area.

Influence of Preferred Options appraisal

3.124 Preferred Option CS14 sought to maintain and deliver new green infrastructure throughout the Growth Areas by requiring new development to contribute towards the delivery of new green infrastructure, taking forward areas identified in the Strategic Green Infrastructure Plans and protecting and enhancing existing and new green infrastructure.

3.125 The Preferred Options SA found this Option to be sustainable and could result in related benefits for the Growth Area. These would include recreation, tourism, public access, biodiversity, landscape protection, cultural heritage, public open space and water environment.

3.126 Preferred Options CS15, 16 and 17 sought to protect, conserve, promote and enhance the Countryside and Landscape, Heritage and Townscape and Biodiversity and Geology. All the policies were considered to be sustainable and could result in benefits for the Growth Area.

3.127 There was support for all these Options during the consultation period and some stakeholders considered that there should be more linkages between green infrastructure, areas of historic interest, landscape, biodiversity and flooding given the character of the natural environment. As a result, the Policy in the Core Strategy Pre-Submission covers the protection and enhancement of green infrastructure that promotes recreation, public access, biodiversity, tourism, protection and enhancement of the local landscape and historic assets and a reduction in the risk of flooding.

Appraisal of pre-submission document

3.128 Policy CS10 will have a positive impact on sustainability. The provision of green infrastructure assets that are connected and multi-functional will result in general positive impacts relating to health, well-being, environmental protection, historic environment protection, encourage the use of sustainable transport and protect biodiversity. Green infrastructure assets will need to be carefully planned into any new development, particularly the urban extensions to ensure that they are fully integrated into the development and community and making use of existing features and assets in the area. If not, it is feared that the green infrastructure assets will become separated from the community and not used to their potential thus attracting anti-social behaviour and increasing fear of crime.

Resource efficiency – CS11

Background

3.129 The policy seeks to ensure that all new developments reach a high level of resource efficiency through the implementation of Code for Sustainable Homes standards. Where these standards cannot be met, the policy advocates the provision of an offset fund, money from which will be used to help make existing developments more resource efficient.

Influence of Issues and Options appraisal

3.130 With regards to the issue of resource efficiency, the Issues and Options SA tested the following options:

- g) To not seek any minimum Code for Sustainable Homes or BREEAM ratings on new developments; and
- h) To include policy that seeks compliance with the Code for Sustainable Homes or BREEAM to a reasonable level.

It concluded that the Option a) would not be valid due to the fact that Code for Sustainable Homes standards had already come into effect.

3.131 In terms of renewable energy, the Issues and Options SA tested the following options:

- a) Leaving thresholds and targets as set out in RSS;
- b) Lowering development size threshold to include more new developments;
- c) Increasing the renewable energy target above 10% but maintain RSS thresholds; and
- d) A combination of lowering the site threshold and increasing the renewable energy target.

It concluded that Option a) was the most relevant in sustainability terms while Options c) and d) could be considered good development practice.

Influence of Preferred Options appraisal

- 3.132 The SA concluded that the Preferred Option should contribute positively to SA objectives 1-12, 17 and 18. It also concluded that SA objectives 13-16 were unlikely to be effected.

Appraisal of pre-submission document

- 3.133 Overall, the policy should contribute positively to the SA objectives. The approach of implementing the Code for Sustainable Homes standards will most directly impact upon SAObjectives 5 and 6 relating to adapting to climate change and resource efficiency. Whilst the policy primarily seeks to address new developments, the concept of an offset fund means that existing development should also benefit.

Adapting and mitigating Flood Risk – CS12

Background

- 3.134 This policy seeks to ensure that development, in terms of building, roads, community facilities and open space, is located, designed and laid out to mitigate the risk of flooding and is able to adapt to future changes in climatic conditions, in line with PPS25.

Influence of Issues and Options appraisal

- 3.135 There was no Issues and Options question relating to Flooding. However, work on the Strategic Flood Risk Assessment Level 1 was continuing and this document was to provide policy guidance for the Core Strategy. PPS25 and its Companion Guide also provided policy direction.

Influence of Preferred Options appraisal

- 3.136 Following completion of the SFRA Level 1, the findings of study were used in drafting the Preferred Policy Approach, in line with national guidance in PPS25. Policy CS12 was drafted in close consultation with the Environment Agency and sought to mitigate flood risk. This policy was found to be sustainable in light of the Preferred Options SA. Comments during the consultation were in support of flood mitigation and stakeholders considered that there could be more linkages of flooding with the natural environment.

- 3.137 The policy in the Core Strategy Pre-Submission has been developed in close consultation with the Environment Agency and the completion of the SFRA and Water Cycle Study Phase 1.

Appraisal of pre-submission document

- 3.138 Policy CS12 will have a positive impact on sustainability and the strategy area will benefit from the implementation of this policy. By avoiding development in areas of flooding, new development will be concentrated around the urban areas of Luton, Dunstable and Houghton Regis and Leighton Buzzard. This will aid the regeneration of these town centres protecting the countryside from inappropriate development. More development in and around the town centres will facilitate the use of more sustainable modes of transport thereby reducing the impact on the climate change.
- 3.139 The river restoration works proposed on the River Lea in Luton will also contribute to the regeneration of the town centre by making it a more attractive town centre. Opening up the river in parts will make an attractive focal point in the town centre encouraging more and longer visits to the town centre and improving the biodiversity and natural environment of this river and reducing the risk of flooding.
- 3.140 Linking Policy CS12 with Policy CS10 (Green Infrastructure) will also have a positive impact on the natural environment, as areas at risk of flooding could be included within the GI network, enhancing this asset. Increasing the GI asset in the area will encourage healthier lifestyles due to the improved access to open space. The management of the GI network including the areas at risk of flooding will be important to ensure that they do not become areas attracting anti-social behaviour.
- 3.141 New developments, particularly the urban extensions, should be planned to include measures to reduce run-off and with sustainable measures to reduce the impact on the environment. Liaison with the Environment Agency for strategic developments and the urban extensions will be essential to ensure that there is a reduced risk of flooding across the Core Strategy area.

Rural Settlements –CS22

Background

- 3.142 This policy seeks to ensure that any growth in and around rural settlements maintains the character and setting of the villages, while improving public transport provision between settlements and protecting existing employment sites.

Influence of Issues and Options appraisal

- 3.143 The Issue and Options SA considered the following options in terms village settlement strategy:
- a) Urban extensions should incorporate the villages close to the urban edge, and integrate them into the new communities; and
 - b) Green buffers should be created between new development areas and existing villages.

3.144 The Issues and Options SA stated that the options were broad in nature and therefore the response to most of the social and environmental objectives could not be predicted. It concluded that the effect would depend on the scale of housing growth and the scale of village growth. The sustainability of the two options was therefore difficult to compare.

Influence of Preferred Options appraisal

3.145 The Preferred Options SA report did not make specific reference to the part of Preferred Option CS1 that refers to rural settlements.

Appraisal of pre-submission document

3.146 The scale of development in the rural areas will be limited so the impact on any of the sustainability objectives will be limited. The main positive impact will be the potential to provide affordable housing in areas where homes are often unaffordable to many. Village identity should be a major consideration when identifying which sites to allocate for housing. Inevitably, new development will increase pressure on natural resources. It is therefore important for the requirements of the resource efficiency policy to be met to reduce the impact of the new development as far as possible.

4. Conclusions, Mitigation and Monitoring

Introduction

- 4.1 The SA/SEA Report of the Core Strategy Pre-Submission appraises the Core Strategy's development strategy, thematic policies and plan objectives. It is considered overall that the Core Strategy is sustainable and will contribute towards more sustainable communities in Luton and southern Central Bedfordshire.
- 4.2 There will be SA objectives that will be negatively impacted upon due to the nature and scale of development required in this area. However, there are measures, which can be adopted that will mitigate against these impacts. These include measures such as implementation of development and the effectiveness of all policies within the Core Strategy, in particular those relating to environmental and social objectives.
- 4.3 A key issue on which the deliverability of the urban extension is dependent on is the provision of major infrastructure. This would include major transport infrastructure (such as strategic roads and provision of sustainable modes of transport) and social and community infrastructure (such as schools).
- 4.4 To ensure that that Core Strategy delivers sustainable communities, the policies need to be monitored on how they are being implemented and how effective they are. This is important to measure the sustainability of the overall LDF.

Implementation and Monitoring

- 4.5 This section discusses indicators and targets to help monitor the sustainability effects of the LDF. Targets and/or indicators for each sustainability objective have been identified from the SA Framework to provide a suggested list, as required by the SEA Directive. ODPM's SA Guidance (November 2005) specifies that monitoring arrangements should be designed to:
 - a) Highlight significant effects;
 - b) Highlight effects that differ from those that were predicted; and
 - c) Provide a useful source of baseline information for the future.
- 4.6 Government requires local planning authorities to produce AMRs and according to guidance from ODPM (now CLG) these would need to include the findings of SA monitoring. Accordingly, the monitoring strategy for the SA should be integrated with the LDF AMR.
- 4.7 The Luton and South Bedfordshire Joint Technical Unit produce a joint AMR and future AMRs will need to include indicators that can also be used to meet the requirements for SA monitoring.

4.8 The SA indicators are aligned with national and regional indicators and the AMR. The AMR will monitor the performance of the Core Strategy and progress on implementation. The AMR will specify those indicators or aspects of the environment that will be monitored, the methodology used, by whom, and the frequency of data collection. There are some indicators that cannot be monitored annually. This data will be collected and added to the baseline data as and when it is available. The monitoring will also provide a clear and understandable picture on how the implementation of the LDF is affecting Luton and southern Central Bedfordshire and establish a mechanism for action to enhance positive effects of the plan, mitigate any negative ones and assess any areas that were originally identified as containing uncertainty.

4.9 The SA Indictors are drawn from:

- a) Objectives and targets set out in the LDF;
- b) Indicators already identified and used in the SA process;
- c) Measures drawn from the baseline data collected during the LDF; and
- d) Any other measures suggested.

4.10 The table below contains a list of SA indicators and targets that are recommended to be incorporated into future AMRs.

Table 6: Proposed Targets and Indicators

	Target	Indicators
1	Biodiversity	
	To achieve BAP targets.	<ul style="list-style-type: none"> • Condition of designated sites. • Change in areas and population of biodiversity importance.
2	Landscape, townscape and local character	
	New developments to demonstrate compatibility with the surrounding landscape, townscape and local character.	<ul style="list-style-type: none"> • New build completions on housing sites of 10 or more dwellings scored against CABI Buildings for Life criteria. • Number of planning applications and approvals in the AONB and Green Belt.
3	Air, soil and water resources	
	60% of new housing to be built on PDL. Reduction pollution levels. Maintain river water quality.	<ul style="list-style-type: none"> • Use of previously developed land. • Nitrogen dioxide levels at the three AQMAs. • Air quality monitoring • Percentage of agricultural land lost to development. • Condition of biological quality in local rivers.
4	Flood risk	
	New developments to be located in flood zone 1.	<ul style="list-style-type: none"> • Number of properties at risk of flooding. • Number of planning permission granted contrary to the advice of the EA of flood defence grounds.
5	Climate change	

	Reduce greenhouse gas emissions.	<ul style="list-style-type: none"> Greenhouse gas emissions.
6	Resource efficiency	
	<p>Decrease water consumption per household.</p> <p>Reduce tonnage of waste to landfill.</p> <p>Renewable energy to meet 10% of the District's energy consumption by 2010 and 17% by 2020.</p> <p>All new development to meet level 3 of Code for Sustainable homes standards.</p>	<ul style="list-style-type: none"> Water consumption per household. Percentage of new development incorporating water efficiency measures. Recycling rates. Tonnage of waste to landfill. Percentage of new development including renewable energy generation, water efficiency measures and sustainable drainage systems. Percentage of new development meeting BREEAM standards. Renewable energy installed by type.
7	Green infrastructure	
	Achieving a net gain in green infrastructure provision.	<ul style="list-style-type: none"> Percentage of new developments providing green infrastructure, and accessible open space.
8	Historic environment	
	New developments to take into account historic assets.	<ul style="list-style-type: none"> Number of listed buildings on the Buildings at Risk Register and number removed from the Register. Number of conservation area appraisals produced. Number of planning applications which archaeological investigations were required.
9	Poverty and inequality	
	Reduce poverty and inequality.	<ul style="list-style-type: none"> Indices of deprivation. Residents' perceptions over community activities and race relations. Voluntary sector participation.
10	Crime	
	New developments to be designed to reduce crime.	<ul style="list-style-type: none"> Crime statistics. Residents' perceptions on crime and fear of crime.
11	Health	
	Reduce health inequalities in Luton and southern Central Bedfordshire.	<ul style="list-style-type: none"> Deprivation by ward. Life expectancy levels. Provision of health services and recreation and sport and leisure facilities from new development. Adult participation on sport and active recreation.
12	Housing	
	At least 35% affordable housing on new sites throughout Luton and southern Central Bedfordshire.	<ul style="list-style-type: none"> Percentage of housing which is affordable. Average house prices compared with average earnings. Housing completions. Housing stock by tenure.
13	Town centres	
	Revitalised and regenerated town centres.	<ul style="list-style-type: none"> Change of use and loss of A1 retail in town centres. Number of vacant units. Pedestrian flows in town centres.
14	Sustainable transport	

	Increase travel by means other than the car.	<ul style="list-style-type: none"> • Car ownership. • Mode of and distanced travelled to work/school. • Percentage of new residential development within 30 minutes public transport time of a GP, hospital, primary and secondary school, employment and major health centre. • Cycle network delivery.
15	Employment	
	Increase the amount of employment opportunities in Luton and southern Central Bedfordshire.	<ul style="list-style-type: none"> • Amount of land developed for employment (by type). • Employment jobs by sector. • Percentage of residents working.

Next Steps

- 4.11 The SA/SEA report accompanies the Core Strategy Pre-Submission Document. Consultation on both these documents will be from *****. Examination is anticipated to commence in **** with final adoption of the Core Strategy DPD scheduled for 2010. A Sustainability SA/SEA Statement will be produced alongside the final adopted plan.

