

Appendix A

CENTRAL BEDFORDSHIRE DEVELOPMENT STRATEGY - SCHEDULE OF KEY ISSUES. SEPTEMBER 2012

Section of Plan	Key Issues	Proposed Action
1. Introduction	- Introduction should mention previous consultations held in March 2012 and the outcomes.	- Identify in the DS that previous initial consultation has taken place. Direct to Consultation Statement for details.
	- No mention of the Duty to Co-operate as detailed within the Localism Act	- Check Localism Act reference and existing wording in the DS about the Duty to Co-operate. Consider inclusion within the DS if appropriate.
	- Need to include an explanation as to how the document complies with policy in the NPPF.	- Check existing text in the DS and potentially expand in relation to NPPF compliance.
	- Need to clarify status of other planning documents once the new Strategy is adopted.	- Include new text detailing status of other documents once the Development Strategy is adopted.
	- There is no guarantee that the Regional Strategies will be abolished in May 2013.	- Consider existing text in the DS and potentially update in relation to the RS.
2. Profile, Issues & Challenges	- Profile needs to recognise that CBC falls within the southern half of the Marston Vale (30 square miles).	- Amend para 2.2 to identify that the southern half of the Marston Vale is within CBC
	- Reflect that environmental regeneration and improvement can be key mechanisms for addressing past and current difficulties.	- Amend text to reflect that environmental regeneration and improvement can be key mechanisms for addressing past and current difficulties.
	- Greater detail needed in relation to CBC's historic environment and the numbers of designated heritage assets should be stated.	- Enhance the Profile for Central Bedfordshire in relation to the historic environment and assets.
	- The Bedfordshire Greensand Ridge needs to be more widely recognised.	- Consider potential inclusion of the Bedfordshire Greensand Ridge within the Profile.
3. Vision & Objectives	- Not clear how challenges may differ for different parts of what is a diverse Borough, nor how the Vision may be slightly different for these different areas, seeking to respond to their differing needs.	- Include additional text before Vision diagram identifying the diverse nature and characteristics of Central Bedfordshire.
	- Add additional cog with the words: Creating strong, vibrant, healthy and inclusive communities to reflect the social dimension of sustainable development.	- Consider inclusion of appropriate wording in the Strategic Objectives to reflect the social dimension of sustainable development.
	- SO's should be renamed "Strategic Priorities" to accord	- Retain the heading "Strategic Objectives". Strategic

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	<p>with the NPPF.</p> <ul style="list-style-type: none"> - Add new Objectives about supporting and encouraging Neighbourhood Planning, to take account of the rural economy in line with the NPPF and the use of Brownfield land. - SO4 should be clear that in order to provide a sustainable form of development and meet future housing needs, it will be necessary to review the current Green Belt. 	<p>Priorities are identified throughout the Strategy through the inclusion of Strategic Policies which is considered in accordance with the NPPF.</p> <ul style="list-style-type: none"> - Include reference to the rural economy in SO3 and reference to the use of previously developed land in SO6. Neighbourhood Planning is considered in sufficient detail elsewhere within the Strategy. - Consider current wording of SO4 and revise if appropriate.
4. Sustainable Development	<ul style="list-style-type: none"> - The word 'sustainability' has not been adequately defined in the strategy - Amend Policy 1 to include the words 'without delay' after 'approved' in the second paragraph. - Policy 1 will not stop unacceptable development. It encourages development to go ahead regardless of adverse impacts, providing the benefits of the development outweigh the adverse impacts. - There are people who object to any review of the Green Belt and there are those who say the review has not gone far enough. In addition to the general argument there are specific sites mentioned. - Classification of various settlements within hierarchy in Policy 4 needs to be reviewed - Neighbourhood Planning has a mixed reaction, some think it is confusing and some support the principle of communities planning for themselves. - Planning for growth in the smaller settlements should be determined by the Development Strategy not left to parishes who may not want to allocate development 	<ul style="list-style-type: none"> - Consider adding a clearer definition of sustainability in planning terms - Review wording to check consistency with NPPF - Review wording to check consistency with NPPF - The Council considers that it has adopted the most sustainable and defensible case. Neighbourhood Plans may allow some much smaller change to the boundary. - A revised Settlement Hierarchy Technical Paper is currently being produced and Policy 4 will be reviewed in light of this. - Some wording changes will help clarify - The allowance of 1700 houses for Neighbourhood Plans and windfall seems appropriate. If insufficient schemes in the smaller settlements in the south come forward, a Site Allocations document will be produced.

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		<p>The north area already has in place such a document. Neighbourhood Planning can also provide for employment development and community facilities.</p>
5. A Strategy for Growth	<ul style="list-style-type: none"> - Alternative approaches to distribution of development not considered e.g. a more dispersed approach to development or a new settlement 	<ul style="list-style-type: none"> - The Sustainability Appraisal is being reviewed to take account of the comments made through consultation and in light of the updated evidence emerging. This will include detailed assessment of alternative strategies.
	<ul style="list-style-type: none"> - Approach not supported by earlier consultation results 	<ul style="list-style-type: none"> - The response to earlier consultations in terms of housing provision was mixed (see Consultation Statement for details). The Council has had to balance consultation responses with evidence findings and the need for a “sound” approach.
	<ul style="list-style-type: none"> - Concern about deliverability of urban extensions, particularly in relation to major transport infrastructure projects 	<ul style="list-style-type: none"> - Viability of urban extensions is currently being assessed. These findings will be incorporated into policy.
	<ul style="list-style-type: none"> - More smaller sites should be allocated, particularly in the rural area. Such developments can be easier to integrate. A more detailed growth plan for smaller towns and villages is needed. 	<ul style="list-style-type: none"> - The Development Strategy is a strategic document and sets the strategic framework for smaller scale sites to come forward. The primary delivery mechanism for smaller sites will be Neighbourhood Plans.
	<ul style="list-style-type: none"> - Concern about reliance on Neighbourhood Plans 	<ul style="list-style-type: none"> - The allowance of 1700 houses for Neighbourhood Plans and windfall seems appropriate. If insufficient schemes in the smaller settlements in the south come forward, a Site Allocations document will be produced. The north area already has in place such a document. Neighbourhood Planning can also provide for employment development and community facilities.
	<ul style="list-style-type: none"> - Classification of various settlements within hierarchy in Policy 4 needs to be reviewed 	<ul style="list-style-type: none"> - A revised Settlement Hierarchy Technical Paper is currently being produced and Policy 4 will be reviewed in light of this.
	<ul style="list-style-type: none"> - Concern about site assessment process. Alternative sites suggested. 	<ul style="list-style-type: none"> - The appraisal of strategic sites is being reviewed to take account of the comments made through consultation and in light of the updated evidence emerging. This

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		work will use a single threshold for all strategic sites across Central Bedfordshire.
	- Concern about housing provision being too high or too low. Lack of general conformity with Regional Strategy in terms of housing numbers.	- See housing chapter responses below.
	- Need to plan for Milton Keynes growth, as required by Regional Strategy	- Notwithstanding the expected revocation of the Regional Strategy, Milton Keynes Council are not currently proposing growth in Central Bedfordshire. Further work will be undertaken with MKC over future housing needs.
	- Concern about impact on Green Belt.	- Difficult decisions have been needed in terms of meeting the development needs of the area. The most appropriate and sustainable approach is considered to be that set out in the draft Strategy, whereby the Green Belt boundary is redrawn in certain areas in order to ensure the protection of the remaining Green Belt. Further information will be provided setting out in more detail the exceptional circumstances that exist.
	- Concern about impact on specific locations, particularly Leighton Buzzard and villages north of the conurbation	- See chapter 13 responses below.
	- Concern about impact on countryside, on the AONB and on the ability to grow food.	- As with Green Belt issues above. Strong mitigation measures have been put in place to ensure that the local impacts can be mitigated as far as possible.
6. Employment & Economy	- Justification for 27,000 jobs	- Add additional text to Strategy for clarification.
	- Justification for the additional 117ha	- Add additional text to Strategy for clarification.
	- The Strategy plans for too many jobs to 2031.	- Consider the appropriate number of jobs to be planned for within the Development Strategy.
	<ul style="list-style-type: none"> - The Strategy doesn't plan for enough jobs to 2031. - 27,000 are not enough for 28,750 new homes, as it is less than one job per household. - Should plan for 36,000 jobs. 	- Additional work is underway to refine the number of jobs to be planned for within the Strategy. It is considered that rolling forward the current job targets to deliver 36,000 is undeliverable, particularly given the likely changes in demographics to 2031.

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	<ul style="list-style-type: none"> - Need to know how many Luton jobs need to be delivered within Central Beds to know how many jobs to plan for in total to 2031. 	<ul style="list-style-type: none"> - Consider existing text and provide further information about the Duty to Co-operate. Consider outlining LBC's position in relation to employment provision.
	<ul style="list-style-type: none"> - Additional sites should be allocated. Sites suggested include Holme Green Farm Biggleswade; Stratton Farm, Biggleswade; Junction 10a (M1); the Marston Vale area; 	<ul style="list-style-type: none"> - The final outcomes of the Stage 2 Economic and Employment study may result in additional land being identified to deliver jobs. This is currently under consideration.
7. Town Centres & Retailing	<ul style="list-style-type: none"> - New retail facilities at East Leighton Linslade will draw people away from the town centre and will have a detrimental impact on existing businesses 	<ul style="list-style-type: none"> - The details of the retail element of the proposed urban extension will be agreed at a later date. However the purpose of it will be to act as a neighbourhood centre to meet local needs, not compete with retail premises in the town centre. An impact assessment would need to be provided as part of a planning application.
	<ul style="list-style-type: none"> - Objection to edge of centre and out of centre retailing (including large supermarkets) which harms town centres 	<ul style="list-style-type: none"> - Policy 11 requires applicants to apply the sequential test to proposals for retail, office and leisure uses that are outside designated town centre boundaries. This approach requires consideration of potential town centre sites first followed by edge of centre and then finally out of centre sites.
	<ul style="list-style-type: none"> - The protection for retail services in rural areas provided by Policy 13 is welcomed. 	<ul style="list-style-type: none"> - Support welcomed.
	<ul style="list-style-type: none"> - The quantum of floorspace need identified by the South Beds and Luton retail study is insufficient, particularly with Dunstable which focuses on long term provision rather than addressing existing need in the short term. 	<ul style="list-style-type: none"> - Update Strategy to reflect findings of recently completed retail study.
	<ul style="list-style-type: none"> - The thresholds for requiring impact assessments are too low and will discourage some investors and operators, particularly small businesses, which would contribute to the diversity and niche markets which should be encouraged and supported in Central Bedfordshire's centres. Threshold should be 2,500 sq m in line with the NPPF 	<ul style="list-style-type: none"> - The threshold figure of 500 sq m is reflective of the findings of the retail study. However consider reviewing the figure in light of the NPPF.

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	<ul style="list-style-type: none"> - The chapter should include a hierarchy of centres in order that future floorspace provision gets directed to the most appropriate locations. 	<ul style="list-style-type: none"> - The Development Strategy includes a hierarchy of centres within Policy 4.
	<ul style="list-style-type: none"> - The policies needs to refer to preserving and enhancing the town centres historic environment and heritage assets 	<ul style="list-style-type: none"> - Consider inserting a sentence to this affect.
	<ul style="list-style-type: none"> - There is little prospect of the A5-M1 link road improving the traffic situation. The new housing planned will create just as much if not more congestion on the high street 	<ul style="list-style-type: none"> - Traffic modelling work is ongoing but current outputs indicate that the A5-M1 link will reduce traffic, particularly heavy goods movements along High Street North and South thereby improving the town centre environment
	<ul style="list-style-type: none"> - Policy 12 is an exact duplication of part of Policy 11 and should be deleted. Paragraph 7.8 should be repositioned before Policy 11. 	<ul style="list-style-type: none"> - Consider merging these to policies to avoid any duplication.
8. Infrastructure	<ul style="list-style-type: none"> - The Infrastructure Schedule has omissions and is difficult to understand. 	<ul style="list-style-type: none"> - The Infrastructure Schedule is an evolving document which will be updated as and when new information is provided and/or clarified. Consider the format of the schedule.
	<ul style="list-style-type: none"> - Concern about the funding gap and how it will be met in the current economic climate. 	<ul style="list-style-type: none"> - Add additional text setting out the various funding steams that are available and directing to the CIL Charging Schedule which is being informed by the current viability work.
	<ul style="list-style-type: none"> - Viability of development and the consequences for infrastructure provision. 	<ul style="list-style-type: none"> - Consider additional text outlining the Council's Viability work and the outcomes.
	<ul style="list-style-type: none"> - Infrastructure should be provided before development. 	<ul style="list-style-type: none"> - Consider existing text and potentially strengthen where appropriate. Potentially identify that in some locations some development is required to help fund major pieces of infrastructure.
	<ul style="list-style-type: none"> - Should have a greater consideration for the rail network. 	<ul style="list-style-type: none"> - Consider existing text and amend if appropriate.
	<ul style="list-style-type: none"> - Impact on existing facilities and infrastructure ahead of the provision of new. 	<ul style="list-style-type: none"> - Consider existing text about the requirement for impact assessments. Strengthen where appropriate.
	<ul style="list-style-type: none"> - Proposed policies should not constrain development unnecessarily 	<ul style="list-style-type: none"> - Ensure policies are sufficient to require infrastructure without constraining the delivery of development.

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	<ul style="list-style-type: none"> - Need greater information regarding existing assets and infrastructure and their safeguarding. 	<ul style="list-style-type: none"> - Consider strengthening Policies 22 and 23 as well as the supporting text.
9. Transport	<ul style="list-style-type: none"> - Safeguard the route of the East West rail link 	<ul style="list-style-type: none"> - Include text to state that the potential route of the rail link will be considered when deciding on development proposals.
	<ul style="list-style-type: none"> - The very limited positive impact that the North Luton bypass would have on travel times cannot be justified when measured against the impacts on the environment and the cost in monetary terms. 	<ul style="list-style-type: none"> - The route of the bypass will be considered in due course in order to ensure that the impact is minimised as much as possible.
	<ul style="list-style-type: none"> - People will not use public transport in larger numbers, they will continue to use their cars 	<ul style="list-style-type: none"> - The Strategy aims to provide for a mix of travel needs. Encouraging greater use of public transport is an important strand of the Strategy, while accommodating an increase in road traffic is also part of the overall package. Further transport modelling work is also ongoing. However.
	<ul style="list-style-type: none"> - There needs to be an improvement to the public transport network in the rural areas/generally. More affordable, more accessible and more frequent. 	<ul style="list-style-type: none"> - The Strategy seeks to support improved public transport.
	<ul style="list-style-type: none"> - The concept of an East of Leighton Linlade distributor road would serve no useful purpose, would lead to even more traffic congestion, and should be abandoned. 	<ul style="list-style-type: none"> - Transport modelling work is ongoing but current outputs indicate that the distributor road is important in providing for existing traffic and growth already planned, as well as the proposed urban extension.
	<ul style="list-style-type: none"> - Provision of a bus stop or station should apply to existing developments as well as new development 	<ul style="list-style-type: none"> - Consider including wording to say that improvements to public transport network should benefit existing developments as well as new developments.
	<ul style="list-style-type: none"> - Development Strategy assumes that the proposed layout of M1 Junction 11a will be sufficient to accommodate traffic generated after implementation of the Woodside Connection and Luton Northern Bypass. Evidence presented at the Public Inquiry in early 2012 indicates that the assumption has been that further works may be required to facilitate the Woodside Connection and Luton 	<ul style="list-style-type: none"> - Consider how evidence presented at this public inquiry might impact Strategy.

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	Northern Bypass at M1 Junction 11a.	
10. Housing Provision	- Housing numbers too low	<p>- The housing provision in the Development Strategy is being reviewed to take account of the comments made through consultation and in light of the updated evidence emerging. New evidence has been published in the form of initial Census 2011 results and revised Mid Year Estimates and these will need to be taken on board. New population forecasts are being generated using this new information and these will inform the revisions to the Development Strategy.</p> <p>- The housing trajectory is being reviewed to take account of the comments made through consultation and in light of the updated evidence emerging.</p> <p>- Provide a clearer, more detailed definition and explanation of Windfall sites and Neighbourhood Plans</p> <p>- The provision for windfall sites and Neighbourhood Plans within the Development Strategy is being reviewed to take account of the comments made through consultation and in light of the updated evidence emerging. An allowance for delivery of homes through Neighbourhood Plans should be made but at this stage it is difficult to quantify exactly how much might be delivered over the plan period. Similarly, housing delivery from windfall sites has historically been a significant element of overall delivery but there remains uncertainty as to how this might change going forward. Additional evidence is being gathered to inform the possible sources of urban capacity. Given the potential uncertainty about these two sources of housing delivery, the contingency arrangements assume even greater importance so that delivery can continue in a variety of circumstances.</p>
	- Housing numbers too high	
	- Housing trajectory inaccurate	
	- Windfall sites and Neighbourhood Plans need further explanation	
	- Over reliance on windfall sites and Neighbourhood Plans	

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	<ul style="list-style-type: none"> - Over reliance on Strategic Urban Extensions 	<ul style="list-style-type: none"> - Meeting housing requirements on the scale needed in Central Bedfordshire can only realistically be achieved through the allocation of large sites. However, smaller sites will be needed to complement the delivery of larger sites and a significant number of these have already been allocated through the Site Allocations DPD for the north of Central Bedfordshire. Further sites will be brought forward through Neighbourhood Plans or, if required, a Site Allocations process.
	<ul style="list-style-type: none"> - Housing numbers Sustainability Appraisal not accurate or justified 	<ul style="list-style-type: none"> - The Sustainability Appraisal is being reviewed to take account of the comments made through consultation and in light of the updated evidence emerging.
	<ul style="list-style-type: none"> - Insufficient housing allocation to act as 5% buffer 	<ul style="list-style-type: none"> - The housing trajectory is being reviewed to take account of the comments made through consultation and in light of the updated evidence emerging. However, the emerging trajectory suggests a buffer in excess of 5% against the requirements in the Development Strategy.
	<ul style="list-style-type: none"> - Housing distribution inappropriate, there should be more small scale development and more allocations in the north 	<ul style="list-style-type: none"> - The distribution of housing development is being reviewed to take account of the comments made through consultation and in light of the updated evidence emerging. However, the evidence suggests that, given recent allocations in the north of Central Bedfordshire, the majority of the need for new development remains in the south. In relation to small-scale sites, the Strategy contains a positive framework for Neighbourhood Plans to deliver this type of development, but also contains a contingency provision for a Site Allocations process if Neighbourhood Plans do not deliver as expected.
	<ul style="list-style-type: none"> - Using a different threshold for strategic sites in the north and south made the site assessment methodology 	<ul style="list-style-type: none"> - The appraisal of strategic sites is being reviewed to take account of the comments made through consultation

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	inappropriate. Sites should be reassessed	and in light of the updated evidence emerging. This work will use a single threshold for all strategic sites across Central Bedfordshire.
	- Not in line with the Regional Strategy	- Government policy remains that Regional Strategies are to be revoked, subject to the Strategic Environmental Assessment process.
	- 5 year review of progress against housing trajectory is too long. Earlier reviews should take place	- This is considered to be appropriate review period. No action is proposed
	- SHMA data is not up to date and a SHLAA is required	- SHMA was updated in 2012; full census data is not yet available. - Develop a SHLAA
	- Housing size – emphasis on larger homes is not supported by evidence	- Evidence suggests a mix of dwelling size and type is required. Reduce emphasis on number of bedrooms and emphasise quality and space standards.
	- The 35% Affordable Housing target is un-deliverable	- Re-Consider deliverability of affordable housing in light of viability testing
	- Exception Sites should allow an element of Private homes	- Review & re-consider the policy on exception sites in light of para 54 of the NPPF
	- Policies on Housing for Older people should mirror exception site policies	- Review and re-consider the policy on delivering accommodation for older people and the mechanism for delivery.
11. Settlements, Green Belt & the Countryside	- As set out earlier there is a conflict between those who would like more flexibility in the Green Belt and those who do not want it to change.	- The Council needs to allocate some land in the Green Belt, but needs to maintain the character elsewhere. The case for the allocations will be made elsewhere.
	- Safeguarded land should not be continued beyond the previous plan period if it is not needed for development. Part of the safeguarded land is a wildlife area and should be Green Belt	- Agree that the safeguarded land should be reallocated as Green Belt or not designated. Policy can be deleted.
	- Settlement boundaries should be reassessed to allow for more development in minor service centres and villages.	- The settlement boundaries are drawn to reflect circumstances on the ground, not to allow for more development. There are no plans at present to review settlement boundaries, although individual reviews

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	<ul style="list-style-type: none"> - Local Green Space around Aspley Guise is generally welcomed. The boundary should be part of the master plan for the area. - There is a lot of support for the policy on High Quality Development; there are also some detailed comments on the justification of some elements, such as Lifetime Homes, Development Briefs for sites over 35 Dwellings, 20mph zones, public art and larger homes. - The policy on Heritage Assets is considered to be too demanding by some and viability or delay in development occurring may be problem. - Re-use of existing buildings in the countryside did cause some interest, mainly from people seeking a more relaxed attitude to new dwellings. 	<p>could come forward through Neighbourhood Plans.</p> <ul style="list-style-type: none"> - The Local Green Space boundary at Aspley Guise will be drawn following the principles set out in the NPPF. There is no master plan being produced at the moment. - It is good to see support for the policy, but more justification is being developed and there may be some detailed changes. - There may need to be detailed changes to the wording but the general approach is not likely to change. - It is not considered appropriate to change the general approach but there may be some detail changes for clarification.
12. Environment & Sustainability	<ul style="list-style-type: none"> - Major policy contradictions, notably between Growth Strategy and claimed commitment to environmental improvement/protection, e.g. North Luton expansion vs AONB protection and Green Belt development. Mitigation an excuse for growth. Significant 'green' concerns incl. Nat England. - Viability issues. Code for Sustainable Homes requirement not viable. Demands too onerous and ahead of national guidelines and Building Regs. Some support but significant opposition. Must meet tests of NPPF para's 173/4. - Viability issue. 70% Lifetime homes inflexible, unjustified, will affect viability. Policy 52 duplicates Policy 44. 	<ul style="list-style-type: none"> - Promote more proactive 'green' policies overall. Emphasise CBC will actively promote net gains in biodiversity – Environmental Enhancement Strategy. Ensure N of Luton issue is resolved via reassurances that AONB will be fully protected. Clarify how development can assist. - The viability implications of the various requirements of the Development Strategy are currently being tested. Once the results are confirmed a view can be taken on where the priorities lie in terms of developer funding and standards of new development. - As above, the requirement for Lifetime Homes is currently being assessed. The need to provide a more flexible housing stock to better cope with an ageing population will need to be weighed against viability considerations. There may be some duplication of policy and changes will be put forward to address this.

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	<ul style="list-style-type: none"> - Flood risk concerns notably east of Leighton – Clipstone Brook. Issue chiefly used to reinforce opposition to growth in locality. 	<ul style="list-style-type: none"> - Issue refers to the Growth Strategy overall. If LB progressed reassurances will be needed that flood risk will not be any worse than prior to development through significant SuDS and GI provision.
	<ul style="list-style-type: none"> - Concern over CIL and offsite ‘strategic’ GI requirements. 	<ul style="list-style-type: none"> - Any offsite GI needs to be fully justified and meet tests set out in the NPPF. Clarify aims in DS.
	<ul style="list-style-type: none"> - Wind turbines – landscape impacts. Opposition and some support. 	<ul style="list-style-type: none"> - Refine landscape sensitivity tests.
	<ul style="list-style-type: none"> - DS fails to acknowledge scope, role and national status of the Forest of Marston Vale. 	<ul style="list-style-type: none"> - Clarify role of FoMV.
	<ul style="list-style-type: none"> - North Herts Landscape quality – SA/SEA lightly dismisses landscape quality of area. High quality landscape similar to AONB. 	<ul style="list-style-type: none"> - Need to re-visit SA/SEA conclusions.
13. North Houghton Regis	<ul style="list-style-type: none"> - It is unclear where and how much development can be delivered prior to the critical and essential infrastructure. 	<ul style="list-style-type: none"> - Seek to clarify the potential of early release sites. May require additional text.
	<ul style="list-style-type: none"> - The Key Milestones are incorrect/very optimistic. Unclear when critical and essential infrastructure will be in place. 	<ul style="list-style-type: none"> - Amend text to ensure accuracy and clarity.
	<ul style="list-style-type: none"> - Potential impact on heritage assets. 	<ul style="list-style-type: none"> - Seek to clarify any potential impact proposals may have on any local heritage assets and consider additional text to reflecting the need to protect the setting the SAM and heritage assets. The details of protection will be developed through the Framework Plan.
	<ul style="list-style-type: none"> - Potential impact on SSSI and CWSs. 	<ul style="list-style-type: none"> - Seek to clarify any potential impact proposals may have and consider additional text to reflecting the need to protect the setting the SSSI and CWSs. The details of protection will be developed through the Framework Plan.
	<ul style="list-style-type: none"> - The proposed employment allocations will fail to deliver strategic objective 3. 	<ul style="list-style-type: none"> - Further investigation needed.
	<ul style="list-style-type: none"> - The urban extension is unviable. 	<ul style="list-style-type: none"> - Viability of urban extensions is currently being assessed. These findings will be incorporated into policy.

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	<ul style="list-style-type: none"> - Objections regarding the determination of planning applications in advance of the Inspector's Report into the examination into the Development Strategy. 	<ul style="list-style-type: none"> - Timing of decisions on planning applications is not a relevant matter for the Development Strategy. No change required.
	<ul style="list-style-type: none"> - The scale of retail could undermine town centre regeneration and the retail hierarchy of Luton, Dunstable and Houghton Regis. 	<ul style="list-style-type: none"> - Clarify scale of retail proposed, its purpose and the need to consider impact on nearby town centres.
North of Luton	<ul style="list-style-type: none"> - Ensure that adequate supporting infrastructure is provided as part of development 	<ul style="list-style-type: none"> - This is an issue which will be addressed through a future Masterplan. However the policy does identify key elements of infrastructure that should be provided.
	<ul style="list-style-type: none"> - There needs to be consideration of the combined impact of North Houghton Regis and North Luton urban extensions on aspects such as traffic and the environment 	<ul style="list-style-type: none"> - Traffic issues are currently being considered and work is ongoing. The combined impact of the overall strategy on aspects such as the environment has been considered through the Sustainability Appraisal
	<ul style="list-style-type: none"> - The roads in the local area are already congested and the development will make things worse 	<ul style="list-style-type: none"> - This matter is being considered in detail by the highways section and the work is on-going.
	<ul style="list-style-type: none"> - The proposal should not infringe on the AONB boundary 	<ul style="list-style-type: none"> - The detailed boundary of the urban extension needs to be re-assessed in terms of the area of land that will be required.
	<ul style="list-style-type: none"> - Green Belt should be protected 	<ul style="list-style-type: none"> - Update Sustainability Appraisal to demonstrate that alternatives to developing existing Green Belt areas have been considered and to show that the chosen strategy is the most sustainable.
	<ul style="list-style-type: none"> - The urban extension is not viable 	<ul style="list-style-type: none"> - Viability of urban extensions is currently being assessed. These findings will be incorporated into policy.
	<ul style="list-style-type: none"> - The development will cause flooding issues 	<ul style="list-style-type: none"> - The detailed site layout will be considered during the masterplanning stage to ensure that any flooding issues are sufficiently mitigated.
	<ul style="list-style-type: none"> - It is unclear why the site has been selected ahead of the South East (Milton Keynes) Strategic Development Area (SESDA) 	<ul style="list-style-type: none"> - The Sustainability Appraisal assesses how sustainable each of the potential sites are and recommends which sites should be pursued.

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	<ul style="list-style-type: none"> - The North Luton Bypass is not funded and is not deliverable 	<ul style="list-style-type: none"> - Consider adding more detail regarding funding and delivery of this key piece of infrastructure. Work on viability is currently ongoing.
	<ul style="list-style-type: none"> - The development will impact on areas of sensitive landscape 	<ul style="list-style-type: none"> - Discuss with colleagues how the boundary can be defined in order to avoid areas of sensitive landscape.
East of Leighton Linslade	<ul style="list-style-type: none"> - The roads in the town are already congested and the new allocation would make this worse. 	<ul style="list-style-type: none"> - This matter is being considered in detail by the highways section and the work is on-going.
	<ul style="list-style-type: none"> - Flooding is raised as an issue across the whole site. 	<ul style="list-style-type: none"> - Only a small part of the site is within the floodplain and it is not intended to build on this; the drainage elsewhere will be expected to be sustainable.
	<ul style="list-style-type: none"> - The new distributor road does not do the job it should do, there are requests for it to be extended and increased in capacity or turned into a by-pass. 	<ul style="list-style-type: none"> - This matter is being considered in detail by the highways section and the work is on-going.
	<ul style="list-style-type: none"> - The proposal is larger than is required to meet local needs and should only be 1500 dwellings. 	<ul style="list-style-type: none"> - This urban extension is part of a package of proposals that aim to ensure housing needs are met.
	<ul style="list-style-type: none"> - There is an already existing infrastructure deficit and the development will make matters worse. 	<ul style="list-style-type: none"> - Studies being undertaken to look at this issue, CIL may assist with this matter and facilities and infrastructure will accompany the development. But it is an important issue and will be considered in some detail.
	<ul style="list-style-type: none"> - There is no obvious Green Belt boundary when the development is complete, will there be further expansion? 	<ul style="list-style-type: none"> - The proposed revision to the Green Belt boundary follows defined features on the ground such as roads and field boundaries. Reinforcing this new boundary (through landscaping/planting etc) can be pursued as the proposals are considered further.
	<ul style="list-style-type: none"> - There are doubts about the employment allocation; will it create the jobs needed so people do not have to commute and the developers consider it is too large. 	<ul style="list-style-type: none"> - The employment land study is due for completion, but the Council are trying to create a mixed and balanced community which will have the opportunity for people to live and work locally.
	<ul style="list-style-type: none"> - Anglian Water have said that there may be issues with: wastewater and foul sewerage treatment works as well as the foul sewerage network. 	<ul style="list-style-type: none"> - This will be considered as part of the Framework Plan process.
Sundon RFI	<ul style="list-style-type: none"> - Reference should be made to the heritage assets in the 	<ul style="list-style-type: none"> - Consider current wording and revise if appropriate.

Section of Plan	Key Issues	Proposed Action
	<p>surrounding area.</p> <ul style="list-style-type: none"> - The Key Diagram needs to be amended to reflect the correct terminology of Sundon Rail Freight Interchange. - The policy needs to ensure the protection of the County Wildlife Sites and SSSI. - The policy needs to provide more detail on noise, water, environmental and transport issues. 	<ul style="list-style-type: none"> - Agree change. - Consider current wording and revise if appropriate. - The broad parameters are included within the Development Strategy policy, with details set out in the Master Plan.
North East of Flitwick	<ul style="list-style-type: none"> - Potential impact of the proposed allocation on heritage assets. - Potential impact of the proposed allocation on the A507, M1 Junctions 12 and 13 and the A421/A6 junction. - Unclear as to who will deliver the Country Park - Green Belt in this area was previously protected by the Planning Inspector 	<ul style="list-style-type: none"> - Seek to clarify any potential impact proposals may have on any local heritage assets and consider additional text to reflecting the need to protect the setting of SAM's and heritage assets. - Consider including additional text identifying potential impacts on road junctions and that TA's would be required with future planning applications. - Clarify who will be responsible for providing the Country Park. - Consider strengthening justification for taking land out of the GB – exceptional circumstances.
Wixams Southern Expansion	<ul style="list-style-type: none"> - Concerns over the encroachment of Wixams towards Houghton Conquest, and the impact on the character of the village. - Potential impact of the proposed allocation on heritage assets both on site and within Houghton Conquest. - The cumulative impact of development at Wixams and Stewartby will result in a significant strain on local infrastructure. - The relationship between MA3 and Policy 63 is not 	<ul style="list-style-type: none"> - Clarify that the Masterplan will identify the scale and location of the proposed Country Park, which will safeguard and maintain adequate separation from Houghton Conquest. - Seek to clarify any potential impact proposals may have on local heritage assets and consider additional text to reflect the need to protect the setting of heritage assets. - Clarify that development will be well integrated with the Wixams main settlement, and will benefit from the significant new infrastructure being delivered at Wixams, as well as delivering new infrastructure to support residents. - Consider amendments to policy and supporting text to

Section of Plan	Key Issues	Proposed Action
	sufficiently clear.	clarify the relationship between MA3 and Policy 63, and the role of the Masterplan.
	<ul style="list-style-type: none"> - The Country Park will not be of a significant scale to ensure separation from Houghton Conquest. 	<ul style="list-style-type: none"> - Clarify that the Masterplan will identify the scale and exact location of the Country Park needed to ensure Houghton Conquest is safeguarded and adequate separation is maintained.
	<ul style="list-style-type: none"> - The Country Park should be designed as community woodland to ensure compliance with the creation of the Forest of Marston Vale. 	<ul style="list-style-type: none"> - The Country Park will contribute to the delivery of the Forest of Marston Vale. It will provide multi-functional benefits/uses in addition to woodland, and will therefore continue to be referred to as a Country Park in Policy 63.
	<ul style="list-style-type: none"> - Planting of the Country Park needs to occur in advance of the commencement of development. 	<ul style="list-style-type: none"> - The requirement for advance planting will be explored through the Masterplan. The Council will require this to occur as early as practicable.
	<ul style="list-style-type: none"> - Advance planting of the Country Park could result in MA3 being undeliverable. It is impractical to deliver the advance planting due to land ownership issues and prohibitively expensive given that no income would have been received. 	<ul style="list-style-type: none"> - The requirement for advance planting will be determined through the Masterplan. The Council require this to occur as close to the outset of development as practicable.