

Appendix X: SA Screening Changes to Strategic & Core/Development Management Policies for SA Significance

Note: Most Policies include changes to provide clarification and correction of any errors; these are not reported here as they are not significant with regard to SA/SEA.

Policy Number & Description	Summary of Changes, Deletions and Additions	Screening - do the changes, deletions and additions significantly affect the findings of the Initial SA Report (June 2017) accompanying the Draft CBLP Regulation 18 and/or do they give rise to significant environmental effects?
Strategic Policies		
Spatial Strategy Approach	Updated to reflect updated evidence, ongoing studies, & comments received from the Regulation 18 consultation. Approach still seeking to deliver a minimum of 24,000 new jobs & around 20,000 new homes.	Approach remains the same but refined from updated evidence to confirm numbers with delivery of 24,000 jobs and around 20,000 homes. The implications for the previous SA findings from this refinement for total numbers of jobs and homes is addressed through the Policies SP1-SP7, as follows:
SP1: Growth Strategy Policies SA1-5 Policies SE1-4 Policy HA1	New Policy text to confirm that the Plan will deliver 39,350 homes (20,000 new homes & 24,000 already planned/built) and a minimum of 24,000 new jobs. Policy explains that these will be delivered via a combination of strategic and small-medium scale allocations throughout Central Bedfordshire at specified locations. [Plan target is 39,350 new homes – objectively assessed need for CBC of	Significant with regard to the SA. Each potential growth location was subject to detailed SA & reported for the Regulation 18 consultation (Appendix V June 2017). The refined options for strategic site allocations for housing & employment were subject to further SA with any available updated or further information and reported here in Appendix VIIa & b and discussed in Section 8. The options for small and medium site allocations were subject to SA and reported here in Appendix VIIc; the reasons for selection/rejection of non-strategic site options is outlined in Appendix VIId and discussed in Section 8.

	32,000 & unmet needs from Luton of 7,350 + approximately 40,000 new homes.] Previous indicative requirements & objectives for Growth Locations refined and made specific for each allocation Policy – and as set out in the Key Diagram and proposed allocation maps.	The SA of the proposed combination of Strategic Site Allocations, Broad Locations/Areas Identified for Future Growth, and Small-Medium Site Allocations as presented in the Draft Plan Regulation 19 is discussed in Section 8 of this report and considers the effects of implementing the Plan as proposed – and as in accordance with the SEA Regulations.
SP2: Sustainable Development	No Change.	N/A
SP3: Generic Requirements for Strategic Sites	Previous explanatory text to potential Growth Locations refined and set out in new Policy that requires a comprehensive Development Brief for the whole site with proposals based on specific requirements and objectives.	Significant with regard to the previous SA findings, providing mitigation measures to remove previous uncertainties for some negative effects and confirming implementation of positive effects: discussed in Section 8 of this report.
SP4: Development in the Green Belt	Removal of clause regarding very special circumstances justifying development within the Green Belt that would be determined by the Council on a case-by-case basis. Confirmation of presumption against inappropriate development in the Green Belt - proposals within the Green Belt will be assessed in accordance with government guidance contained in the NPPF and NPPG.	Not significant with regard to the previous SA findings as there had been mitigation measures required through the earlier draft of the policy for any likely negative effects.
SP5: Preventing Coalescence and Important	Amalgamation of previous two draft Policies. Minor amendments for clarification.	Not significant with regard to the previous SA findings.

Countryside Gaps		
SP7: Settlement Envelopes & Hierarchy	Minor changes to the Hierarchy with Caddington & Henlow re-categorised from Minor Service Centres to Large Villages. Additional Policy sections provided for how the Council will work outside Settlement Envelopes; proposals for employment, tourism, leisure & community use will be considered favourably; limited extensions of gardens beyond Settlement Envelopes may be permitted.	Additional information provides clarification and further guidance. Overall, not significant with regard to the previous SA findings.
SP8: Gypsy, Traveller & Travelling Showpeople	No changes.	N/A
Core/Development Management Policies: Chapter 12 Housing		
H1: Housing Mix	Additional criterion in Policy – Self & Custom Build Register data	Additional source of evidence to judge proposals – not significant with regard to SA.
H2: Housing Standards	Supporting text on Disabilities includes new information on the increase in people with learning disabilities in the Borough; new paragraphs explain that supported living is becoming the preferred model of accommodation and that such models vary. Policy includes requirements for at least 35% Category 2 adaptable homes and at least 5% wheelchair	New supporting text provides additional explanation – not significant with regard to the SA; provides further support for positive effects identified through the EqIA. Provision of specific %targets for adaptable and wheelchair accessible homes in all new build homes strengthens the Policy and enhances the likely positive effects identified through the EqIA for the relevant protected characteristics, and also with regard to strengthening the SA findings for SA Objectives Nos 1 (Housing for all needs), 5 Health & Well-Being, reduce inequalities

	accessible homes for all new build housing.	
H3: Supporting Older People	Supporting text includes updated information on the extent of this national issue; new paragraph on downsizing research & its application to the tenure mix of schemes. Additional text in Policy Criterion No 6 that applications to convert bungalows will be resisted to maintain stock.	Additional evidence and text will support the positive effects found in the SA – overall, not significant with regard to the previous SA findings.
H4: Affordable Housing	Policy Criterion No 2 deleted to avoid duplication; clarification added to Criterion No 3; and in new Criterion No 4 stating that viability will determine affordable housing provision where policy compliant affordable housing cannot be achieved.	Additional text and clarification – overall, not significant with regard to the previous SA findings.
H5: Rural Exception Sites	Clarification that criteria refer to Exception Sites outside of the Green Belt & that proposals inside the Green Belt must demonstrate very special circumstances. Clarification re perpetuity in Criterion No 2 re s106 agreement or Unilateral Undertaking; clarification for requirements for housing needs above 10 dwellings.	Positive effects in the longer term confirmed through additional wording in perpetuity; clarification re sites in Green Belt confirms protection - overall, not significant with regard to the previous SA findings.
H6: Starter Homes	No change	N/A
H7: Self & Custom Build Housing	Additional supporting text and changes/new criteria in Policy to explain requirements for sites less or more than 10 dwellings, and additional requirements for s106 agreements	The additional text and clarification provides more guidance and certainty of positive effects for the previous SA – but overall, not significant with regard to the previous SA findings.

	including timescales, phasing, & return of unsold plots.	
H8: Assessing Planning Applications for Gypsy & Traveller Sites	New supporting text explaining definitions and Council's responsibility under the Equality Act; new Policy Criterion that proposals for mixed residential & business use should have regard to the safety and amenity of the occupants & neighbouring residents.	Additional explanation confirms positive effects identified for this distinct ethnic group in both the EqIA and the SA – but overall, not significant with regard to SA. New Criterion provides additional certainty of protection for safety and amenity with positive effects confirmed for the SA and Objective No 5 Health & Equalities.
H9: Assessing Planning Applications for Travelling Showpeople	New Criterion provides additional certainty of protection for safety and amenity with positive effects confirmed for the SA and Objective No 5 Health & Equalities.	New Criterion provides additional certainty of protection for safety and amenity with positive effects confirmed for the SA and Objective No 5 Health & Equalities.
Core/Development Management Policies: Chapter 13 Employment & Economy		
EMP1: Strategic Warehousing	Policy deleted as not needed since warehousing requirements now addressed through proposed strategic employment allocations.	Not significant for the SA as each proposed strategic employment allocation has been subject to SA and as reported in Appendix VIIa of this SA Report.
EMP1: Employment Sites & Uses (previously EMP2)	Small additions to Policy text for clarification.	N/A
EMP2: Change of Use to Non-Employment (previously EMP3)	Change from 12 to at least 6-month requirement for marketing site for current employment use before change.	Not significant with regard to the previous SA findings.
EMP3: Employment Proposals within &	Changes to title for clarification from "outside" to "within or adjacent";	Not significant with regard to the previous SA findings.

adjacent to Settlement Envelopes (previously EMP4)	clarification in guidance through changes in Policy wording.	
EMP4: Rural & Visitor Economy (previously EMP5)	Additional paragraph in supporting text to explain how the conservation & enhancement of the historic environment contributes to the wider economic benefits (previously in Policy text); need to protect historic environments added to Policy text.	Strengthens the positive effects for SA Objectives on employment and the historic environment – but overall, not significant with regard to the previous SA findings.
EMP5: Countryside & Green Belt (previously EMP5)	Minor changes in supporting text for clarification. Additional paragraph in Policy text that any management plan, development brief or masterplan for a significant facility should be a material consideration.	Not significant with regard to the previous SA findings.
Core/Development Management Policies: Chapter 14 Retail and Town Centres		
R1: Ensuring Town Centre Vitality	Minor changes in supporting text for clarification. Addition of service centres & large villages in Policy text.	Not significant with regard to the previous SA findings.
R2: Retail for Rural Economy	No change for minor service centres, villages and rural economy	N/A
R3: Town Centre Development	Minor changes in supporting text for clarification and updating; new text on having regard to heritage assets in Dunstable town centre. Updating in Policy text to reflect relevant and up-to-date town centre masterplans and development briefs.	Not significant with regard to the previous SA findings.

Core/Development Management Policies: Chapter 15 Transport		
T1: Transport Network	Policy deleted.	Not significant with regard to the previous SA findings.
T1: Mitigation of Transport Impacts on the Network (previously T2)	Additional in supporting text to explain examples for promotion of public transport services; minor changes for clarification.	Not significant with regard to the previous SA findings.
T2: Highway Safety & Design (previously T3)	Policy text changes to make explicit that appropriate access in accordance with Council standards must be provided.	Text changes for clarification & to make explicit - not significant with regard to the previous SA findings.
T3: Parking (previously T4)	Minor text additions for clarification.	Not significant with regard to the previous SA findings.
T4: Public Transport Interchanges (previously T5)	Additional Policy text to make explicit that cycling & walking should be encouraged as well as public transport use.	Text additions will strengthen the positive effects previously found for SA Objective No 7 – overall, not significant to the previous SA.
T6: Strategic Transport Improvements	Policy deleted as not now needed because requirements covered through SP3 and site-specific details in SA1-5 and SE1-4.	Not significant for the SA as Policy SP3 and each proposed strategic housing and employment allocation has been subject to SA and as reported in Section 8 and the Appendix VIIa of this SA Report.
T5: Ultra Low Emission Vehicles (previously T7)	Additional requirement for other large scale trip generating developments to provide charging points to support low emission vehicles.	Additional requirement will strengthen the positive effects found for SA Objectives on energy and climate change - overall, not significant to the previous SA.
T6: Management of Freight (previously T8)	No change	N/A

Core/Development Management Policies: Chapter 16 Environmental Enhancement		
EE1: Green Infrastructure	Additional supporting text to make explicit the contribution of heritage to the much valued character of the area; explaining that agricultural land is covered in another section of the Plan; and minor amendments/additions for further clarification; new paragraph explaining that there is a wide range of tools for assessing Green Infrastructure, ecosystem services & natural capital. Additional text in Policy requires that any unavoidable loss of GI should be adequately mitigated.	Additional supporting text provides more clarity and guidance. Additional Policy text specifies that any unavoidable loss of GI should be mitigated – thus ensuring that mitigation measures are in place and should be implemented to avoid any negative effects.
EE2: Enhancing Biodiversity	Additional Policy text to make explicit that existing biodiversity should be enhanced and new created; additional text requiring links between ecological networks and habitats of principal importance.	Additional Policy text strengthens the positive effects previously found by the SA and should ensure that biodiversity is enhanced – for net gain.
EE3: Nature Conservation	Reference to BS42020 added to supporting text. Changes to Policy text for clarification, including requirement for ecological surveys to be undertaken in accordance with both industry guidelines – and standards.	Additional Policy text strengthens the positive effects previously found by the SA and should ensure that biodiversity is enhanced – for net gain.
EE4: Woodlands, Trees & Hedgerows	Supporting text includes reference to the Forest of Marston Vale, nationally designated; additional paragraph explaining the requirements to allow a tree's natural development, including	Additional Policy text for adequate root protection and canopy clearance will strengthen the mitigation measures to ensure protection of trees to at least neutral effects for the previous SA findings.

	BS5837. Minor changes to Policy text to reflect these matters.	
EE5: Landscape Character & Value	Additional supporting text to reflect the role of the historic and cultural heritage, & recreation- as important ecosystem services for local economy. Changes to Policy text for clarification and updating.	Not significant with regard to the previous SA findings.
EE6: Tranquillity	Very minor text amendments for clarity.	N/A
EE7: Chilterns AONB	No Changes	N/A
EE8: Greensand Ridge NIA	No Changes	N/A
EE9: Forest of Marston Vale	New paragraph in supporting text setting out how CBC will work with Bedford BC to prepare a common SPD to inform and guide development in the Forest area.	Commitment to collaborative working and a common SPD will confirm mitigation measures for any potential negative effects and help ensure that possibilities for environmental enhancement are implemented in a coordinated manner with positive cumulative effects in the long-term.
EE10: Bedford & MK Waterway Park	Additional text "an attractive green space destination" in supporting text – for clarification/explanation.	Not significant with regard to the previous SA findings.
EE11: River & Waterway Network	New Policy that recognises the importance of Central Bedfordshire with the river and canal network & its role in contributing to SD. The Policy acknowledges that waterways have different characteristics & provide a range of functionsEE11.	The new Policy requires protection, conservation & enhancement of the waterways' heritage, built environment, landscape character & biodiversity, together with promotion of the waterway & riverside paths as part of the green infrastructure network – all with major positive effects for SA Objectives No 5 Health; No 12 Biodiversity; No 13 Landscape; No14 Historic Environment. The Policy requires promotion of the use of the waterway & paths for sustainable transport & recreational routes for walking & cycling – all with major positive effects for SA Objective No 7.

		<p>Positive effects are also indicated for SA Objective No 4 Economy through the Policy requirement for promoting the waterway as a catalyst for urban regeneration & in support of waterway related enterprise.</p> <p>Overall, this new Policy will have major positive effects on many objectives for SD that are likely to be synergistic and cumulative in the longer-term.</p>
EE12: Public Rights of Way (previously EE11)	Minor amendments for clarification and to include explicitly bridleways and horse riding.	Not significant with regard to the previous SA findings.
EE13: Outdoor Recreation (previously EE12)	<p>Minor amendments and additional supporting text for clarification and further guidance; includes new paragraphs explaining requirements for sports facilities and major developments.</p> <p>Rewording in Policy Criterion No 3 for clarification; addition of "heritage" to requirement for design.</p>	The addition of explicit requirement for design of open spaces to complement proposals for heritage enhancement (as well as other factors) supports other policies protecting the historic environment with positive effects – but not significant with regard to the previous SA findings.
EE14 Minerals & Waste	Change of title to Restoration of Minerals & Waste Sites. Additional explanation of best & most versatile land (BVL) added to supporting text.	Not significant with regard to the previous SA findings.
Core/Development Management Policies: Chapter 17 Climate Change & Sustainability		
CC1: Climate Change & Sustainability	New wording for paragraph 17.2.3 to make explicit the requirements, baseline & standards for minimising lifetime carbon emissions. Additional text explaining that protected impacts for design should take into account current best estimates and allow	The additional and changed wording provide clarification regarding requirements from developments for energy and climate change – overall confirms previous findings of the SA. The additional requirement for aiming for water neutrality supports SA Objective No 9 Water – and could have positive cumulative effects in the longer-term, especially in this area with issues for water scarcity.

	retrofitting of adaptation measures. New test aiming for water neutrality. Rewording of Policy text to provide clarification; addition of aim for achieving water neutrality, clarifying requirements re energy demand; & requirement for an Adaption Statement.	
CC2: Sustainable Energy	Refinement of title to – Sustainable Energy Development. Additional supporting text that explains the positive & technology neutral approach of the Council, that the most appropriate technology should be deployed in the most appropriate location; and that the energy market is rapidly evolving. Amendments to Policy text for clarification & updating, including new criterion that engagement with affected stakeholders must be demonstrated; new sections on Wind Energy & Solar Farm developments.	The amendments provide updating and clarification, including new Policy wording that makes explicit the requirements for energy developments, including specific guidance on wind and solar. This provides more certainty of positive effects – but overall, not significant with regard to the previous SA findings.
CC3: Flood Risk Management	Additional supporting text providing more information on the likelihood of increasing flood risk & impacts; rewording to clarify requirements for sustainable drainage (SuDS), using the CFMP, the SFRA, & the regulators/key stakeholders to be consulted with. Clarification provided in Policy text & new Criterion that development must	The changes made provide clarification & guidance that should remove any uncertainty recorded in the initial SA findings, confirming the likelihood for at least neutral effects on SA Objective No 10. The additional Policy text for consideration of offsite flood risk provides strong mitigation measure to ensure that the wider effects of new development are taken into account.

	consider the impacts on offsite flood risk.	
CC4: Development Close to Watercourses	Additional supporting text to clarify the key stakeholders involved & their roles; expectation for removal of existing culverts & optimum levels of light/shade. Minor changes to Policy wording.	Not significant with regard to the previous SA findings.
CC5: Sustainable Drainage	Additional supporting text to explain sustainable drainage. Minor amendments to Policy text for clarification, including approach to runoff rates for PDL & greenfield sites.	Not significant with regard to the previous SA findings.
CC6: Water Supply & Sewerage Infrastructure	<p>New Policy that reflects the importance of water infrastructure to this part of the UK. Supporting text sets out the Council's approach & requirements, including demonstrating capacity in the sewerage system, expectations to identify & fund appropriate improvements prior to occupation; & separation of foul & surface flows.</p> <p>New Policy text makes explicit the requirements to provide adequate (& protect) water resources; sewerage & STW must be able to meet the demands of new development & improvements must be to the satisfaction of the relevant water & sewerage undertaker.</p>	This new Policy provides strong mitigation measures that should ensure their implementation, thus helping to remove uncertainty from the previous SA findings with regard to SA Objective No 9 Water – to at least neutral effects overall.

CC7: Water Quality	Minor changes & additional explanation for clarification & guidance in the supporting text. Amendments in Policy text for clarification and change from the Council "will support" to "will expect" enhancements where rivers & lakes are not achieving GES.	The change to an expectation of enhancement to rivers and lakes not achieving Good Ecological Status (GES) or potential provides more certainty of implementation and resolving an existing sustainability problem with likely positive effects confirmed.
CC8: Pollution & Land Instability	Additional supporting text to explain requirements with regard to land contamination & instability, risks to health, property. Additional Policy text to make explicit that new development must comply with Council's adopted standards and SPD; addition of risks to water quality; planning conditions or legal agreements will be used to help limit impacts of pollution & cause no adverse effects.	The clarification and additional explicit requirements should help ensure that mitigation measures will be implemented and reduce any uncertainty identified in the previous SA findings.
Core/Development Management Policies: Chapter 18 High Quality Places		
HQ1: High Quality Development (previously HQ6)	New section in supporting text for requirement for inclusive design, including special consideration for the needs of people with disabilities. Minor amendments in Policy text for clarification and change from "should" to "must".	Not significant with regard to the previous SA findings.
HQ2: Planning Obligations & the Community	New Policy setting out how new development should make compensation to ensure that there is no overall reduction in provision of	The new Policy provides explanation and guidance on how the Council will ensure that there is no overall reduction in provision of infrastructure from new development. This removes uncertainty from the previous SA findings as it helps ensure that mitigation

Infrastructure Levy	infrastructure; explains how Council will work in partnership; phasing to ensure timely delivery; how the Council will introduce a CIL and prepare an SPD on the role & purpose of s106 agreements.	measures will be implemented in a timely way, and including working with adjoining LPAs to ensure that development is supported by the right infrastructure and contributions are collected on an equitable basis. Confirmation of implementation of mitigation should remove uncertainty to at least neutral for SA Objective No 3 Services & Facilities. The commitment to working with adjoin LPAs should mitigate potential indirect or cumulative negative effects that might arise.
Previous HQ1: Health Impact Assessment	Policy deleted.	Potentially significant with regard to the previous SA that had found positive effects through certainty of mitigation of any negative impacts that had been identified. However, this should be still ensured through the generic and site-specific requirements, including for provision of integrated Health & Care Hubs that promote a sustainable approach to health and well-being.
HQ3: Social & Community Infrastructure (previously HQ2)	Minor amendments for clarification and explanation.	Not significant with regard to the previous SA findings.
HQ4: Indoor Sport (previously HQ3)	No change.	N/A
HQ5: Communications	Changes to provide threshold of 30 dwellings or more with requirement for superfast broadband (now 100Mbps).	Not significant with regard to the previous SA findings.
HQ7: Public Art	No change.	N/A
HQ8: Back-Land	Changes to Policy text for clarification.	Not significant with regard to the previous SA findings.
HQ9: Larger Sites	Minor changes to clarify the requirements for a Development Brief by development size and/or sensitivity of the site.	Not significant with regard to the previous SA findings.
HQ10: Small Open Spaces	Addition of word "significantly" to Policy text.	Not significant with regard to the previous SA findings.

HQ11: Modern Methods of Construction	Additional wording "whilst maintaining high quality" in Policy.	Not significant with regard to the previous SA findings.
Core/Development Management Policies: Chapter 19 Historic Environment		
HE1: Archaeology & Scheduled Monuments	Additional Policy text that schemes resulting in a reduction in the number of heritage assets at risk will be encouraged.	Additional wording will help encourage resolution of existing environmental problem with potential for positive effects – overall, not significant with regard to the previous SA findings.
HE2: Historic Parks & Gardens	Additional Policy text that proposals resulting in a reduction in the number of heritage assets at risk will be encouraged.	Additional wording will help encourage resolution of existing environmental problem with potential for positive effects – overall, not significant with regard to the previous SA findings.
HE3: Built Heritage	Additional Policy text for clarification regarding definition of an asset; role of Council's conservation specialists, & that proposals resulting in a reduction in the number of heritage assets at risk will be encouraged.	Additional wording will help encourage resolution of existing environmental problem with potential for positive effects – overall, not significant with regard to the previous SA findings.
Core/Development Management Policies: Chapter 20 Development in the Countryside		
DC1: Development in Countryside (moved to SP1)		N/A – please see SA screening for SP1 above.
DC1: Re-Use of Buildings (previously DC2)	Minor changes to word order.	Not significant with regard to the previous SA findings.
DC2: Replacement Dwellings (previously DC3)	Minor amendments for clarification.	Not significant with regard to the previous SA findings.

DC3: Rural Workers (previously DC4)	Minor amendments for clarification.	Not significant with regard to the previous SA findings.
DC4: Equestrian (previously DC5)	Minor amendments for clarification, including new text on the risk of highway impacts.	Not significant with regard to the previous SA findings.
DC5: Agricultural Land (previously DC6)	No change	N/A