

Appendix IX: SA Regulation 18 Consultation Representations & Responses/Action Taken

SA Consultation Representations to Initial SA Report (June 2017) accompanying draft Local Plan on Regulation 18 Consultation

Section of Initial SA Report	Consultee (Ref Number) & Comments	Enfusion Responses & Action Taken
Environment Agency		
None specified	Various comments on draft Policies but no specific comments on the SA.	The plan-making will take into account the comments made by the regulator in preparing the next draft Policies – and such changes will be subject to SA.
Historic England (4509)		
Section 7 DM Policies	With regards to the Sustainability Appraisal, the relevant SA objective relating to the historic environment has not been properly provided as the sentence cuts out mid-way. This is likely to be a formatting error but should be rectified for clarity.	Noted with thanks. The SA Objective is correct in paragraph 7.33; the details of decision-aiding questions to elucidate are provided in Table 2.2.
Section 7 DM Policies	We have concerns with some of the policies and do not agree that the SA objectives are being achieved by the policies of the draft Plan and that they may produce some negative effects.	Noted with thanks. The SA will assess the draft Policies that will be amended in line with review comments made by statutory consultees.
Growth Locations & development	The evidence base lacks any up-to-date evidence on landscape or the historic environment. It is recommended that work is carried out which will address the impact of the proposed growth locations, specifically visual impact assessments which consider the	The SA has used the HER and it shares the evidence base for the development of the Local Plan –

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of Site Allocations.	potential impact of allocations upon the setting of heritage assets should be provided. The Plan is also lacking up-to-date evidence on archaeology. It is recommended that the HER is consulted to identify areas of archaeological potential and used to inform site allocations.	and as in accordance with Government guidance. Any gaps in information are described and recorded as uncertainties in the SA Report – and as in accordance with the SEA Regulations. SA is an ongoing and iterative process that will be updated as further evidence is completed.
Natural England (6488/6487)		
HRA findings incorporated into SA (Section 8)	<p>The Sustainability Appraisal (SA) report (Enfusion, July 2017) is not currently informed by the findings and recommendations of a HRA. It is therefore difficult for Natural England to provide detailed comments at this stage. We understand that this will be addressed through the next stage of plan making. In the interim our advice on the current SA is provided.</p> <p>The SA report provides an overview, rather than a detailed assessment, of the effects of the Central Bedfordshire Draft Local Plan on sustainability objectives. We note from section 10.9 that a further SA report will be prepared to include details for each proposed strategic growth location and the smaller non-strategic sites.</p>	Noted & Agreed. The SA Report (June 2017) accompanying the draft Plan on Regulation 18 consultation was an Initial SA Report of the SA work undertaken to date; it incorporated the initial HRA screening that had been done to date. The Regulation 19 Plan includes consideration of site options and site allocations; the HRA will consider likely significant effects, alone & in-combination, and the assessment recorded in a separate HRA Report, building upon the Initial HRA Report. The findings of the HRA will be

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		incorporated into the Regulation 19 SA Report.
Section 4.10 Growth Locations	<p>With regard to proposed growth locations Section 4.10 indicates that despite mitigation to address negative effects through the emerging development management policies, uncertainty of the significance of effects remains until further studies on the water cycle and transport impacts/capacities are completed. Natural England advises that these studies should be completed as soon as possible to provide the evidence required to inform the SA and enable sound judgements to be made regarding which allocations are sustainable and can be taken forward.</p> <p>Similar evidence-based assessments are required to address landscape, air quality and recreational pressure issues – to demonstrate that allocations will not have any adverse effect on the AONB or its setting and designated nature conservation and geological sites. ALC surveys are also required, where possible, to assess the impacts of allocations on BMV land and identify measures to mitigate adverse effects.</p>	<p>Noted, with thanks, and agreed.</p> <p>The SA & HRA share the evidence base for the development of the Local Plan – and as in accordance with Government guidance. Any gaps in information are described and recorded as uncertainties in the SA Report – and as in accordance with the SEA Regulations.</p> <p>SA is an ongoing and iterative process that will be updated as further evidence is completed.</p>
	<p>Natural England advises that the SA cannot rely alone on the emerging development management policies to mitigate the potential adverse effects of proposals on the natural environment, including designated sites and landscapes. Evidence will need to be provided to demonstrate that proposed growth locations are sustainable in terms of deliverability of appropriate mitigation to address any adverse impacts.</p>	<p>Noted. The development management policies will continue to be developed in line with updated information and with consultation comments; further draft policies will be assessed through the SA process.</p>
	<p>We welcome recognition of the hierarchy of designated sites, however reference needs to be made to European sites beyond the district boundary which could be impacted by plan development, through indirect effects such as recreational pressure and changes in air quality, water quality and water quantity/flooding.</p>	<p>Noted and agreed. Please see response regarding the HRA above.</p>

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Harpenden Town Council (1204)		
Strategic Alternatives for Spatial Strategy	Expectation that the SA will consider the chosen Spatial Strategy carefully against reasonable alternatives and one such reasonable alternative should comprise directing all strategic development away from the Green Belt, using more greenfield land in north of CBC near planned transport infrastructure. The assertion that more development in the north would be unsustainable needs to be robustly evidenced at Reg 19 stage, in order to be considered a sound approach, along with robust consideration of all major sites against reasonable alternative options as a separate but related exercise.	In drawing up the scenarios and options for distributing growth, CBC considered the findings of evidence studies (including growth options study, transport, green belt, SFRA & the WCS) to help identify those options that were reasonable. As such, one of the scenarios (Scenario A) for distributing growth across CBC avoided any growth in Area A (green belt designation). This was assessed and also investigated in a comparative assessment for 4 strategic options and as reported in Appendix IV of the Reg 18 SA Report.
Resident (303)		
	Built development must not destroy or harm important sites for wildlife. County Wildlife Sites (CWS) must be managed appropriately on an annual basis, including those owned by CBC. CBC appears to not have sufficient funding to manage its CWS; this is wrong! Funding MUST be found; eg. thousands of pounds were spent on the Biggleswade Green Wheel. New development offers opportunities to raise money for nature conservation and should be included in local Green Spaces plans. However, green spaces do NOT deliver for wildlife if they have open public access, cycling and dog walking, which not benefit wildlife.	The SA recognises this differentiation – SA Objective No 5 considers green space for people & their health; No 12 considers protecting & enhancing biodiversity.

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Village Focus Groups (1558)		
Gypsies, Travellers & Travelling Showpeople. SA of Policies SP7 & H8	<p>Since CBC's withdrawal of the preceding Gypsy and Traveller Plan (GTLP), this local authority has had 3 years to gather valid housing evidence for G&T/Showpeople. Given the GTLP now is incorporated under this one draft local plan, it is curious that there were no evidence or details presented in the sustainability appraisal on sustainability of G&T/Showpeople housing which has its own national policy and unique housing needs as emphasised in the 'Planning policy for traveller sites' (PPTS 2015). There are no references in the main sustainability appraisal nor in the associated non-technical summary. The latter highlights the omission by the table on Page xxiii/Section 52 under Development Management Policies: <i>"The emerging Policies were tested through SA at an early stage of plan-making in autumn 2016. Interrelationships between topics and cumulative effects were considered by assessing the policy chapters against SA themes as follows..."</i> However no relevant G&T/Showpeople policy is included despite the indirect reference to <i>"higher deprivation"</i> in area A which matches the location of over half of G&T and the majority of Showpeople in Central Bedfordshire. The only repeated mention of G&T in the sustainability appraisal is one technical document, the Gypsy and Traveller Accommodation Assessment (GTAA) which in itself is problematic due to the quality of the evidence. Only a third of all G&T housed in the district were able to be located by the CBC-hired consultants so that the proposed numbers for 5 year G&T housing does not appear transparent or referenced to withstand either Inspector or public scrutiny. The oversight can only lead to further unsound planning, lack of sustainability and poorly based evidence which currently has made the G&T/Showpeople an escalating planning issue that is requiring a proposed costly and extraordinary intervention by CBC.</p>	<p>The plan-making process will determine if any policies on Gypsy, Traveller & Travelling Showpeople, such as SP7 & H8 are amended as a result of Regulation 18 consultation comments. The SA will assess these policies as part of the Regulation 19 SA & the findings will be recorded in the SA Report to accompany Regulation 19 Plan consultation.</p>
Eaton Bray Parish Council (3559)		
	Agree with SA.	

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Land Promoters (5093, 5087, 3805)		
<p>Strategic Growth Location Slip End (West Luton) (M1 J10)</p> <p>Table 5.7</p>	<p>The SA confirms positive attributes to development at Slip End including: <i>'opportunities for limited allocations...promoting sustainable development in areas that have seen little growth due to Green Belt Restrictions....delivering unmet housing need from Luton close to where it arises where there is the capacity to do so sustainably'</i>. LGC note and support the comment that the expansion of the village should be considered as part of a collective of settlements in the Green Belt for allocations to be decided through the next stages of the CBLP. This is commensurate with its status as a 'Large Village' in the defined CBLP settlement hierarchy.</p> <p>The SA confirms positive attributes to development at Slip End including: <i>'opportunities for limited allocations...promoting sustainable development in areas that have seen little growth due to Green Belt Restrictions....delivering unmet housing need from Luton close to where it arises where there is the capacity to do so sustainably'</i>. LGC support the conclusion that residential extensions to the village of Slip End would comprise an appropriate sustainable location for development. LGC also support the comment that the expansion of the village should be considered as part of a collective of settlements in the Green Belt for allocations to be decided at Regulation 19.</p>	<p>Noted, with thanks.</p> <p>The reasons for selection/rejection of reasonable alternatives is a matter for plan-making; the SA finding is only one factor that is taken into consideration, albeit that the outline reasons must be recorded in the SA Report to comply with the SEA Regulations.</p>
<p>Appendix VI</p>	<p>LGC note and support the assessment at page AVI_40 which identifies Slip End as a large village. In addition, Slip End also has other attributes comprising a school, two community halls, a social club, recreation grounds, a basic retail offer in the local shop, two pubs serving food and a more frequent public transport than CBC's assessment shows.</p>	<p>Noted, with thanks</p>
Land Promoter (5053)		
<p>Scenarios</p>	<p>Our client recommends that in addition to the high level SA, both the Green Belt Review</p>	<p>Noted, with thanks</p>

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	<p>and the Site Assessment Technical document demonstrate that there is further capacity in Area A for development to contribute towards housing levels and ensure continuing delivery. Our clients reiterate that it will be necessary to release land from the Green Belt in order to ensure the delivery of sustainable development across Central Bedfordshire as a whole. Our clients support the overall tone of the text around the policy which supports the high level of growth offered in Scenario 1; and the scenario for growth in and around villages in Area A.</p>	
Land Promoter (5339)		
<p>Cranfield East Growth Location Section 5 Page 80 Table 5.7</p>	<p>Land promoted by Linden Homes lies to the east of Cranfield and is identified on the attached plan. It comprises all of ALP109 (edged blue), and also part of the wider area assessed as NLP104 (edged red). This land forms part of a wider area referred to as Cranfield East in the Sustainability Appraisal that has been dismissed as not sustainable on the grounds of concern about landscape/topography, and capacity of education facilities (page 80). In relation to landscape, the supporting evidence presented in the North Central Bedfordshire Growth Options Study confirms that Cranfield East is not a designated landscape, nor is it a locally sensitive landscape (page 33). In fact, it is noted from the Study that Cranfield East is identified as the option having the least number of secondary constraints and scores highly in all other areas. Its dismissal within the Sustainability Appraisal does not accord with this evidence.</p>	<p>The reasons for selection/rejection of reasonable alternatives is a matter for plan-making; the SA finding is only one factor that is taken into consideration, albeit that the outline reasons must be recorded in the SA Report to comply with the SEA Regulations.</p>
Land Promoter (6241)		
<p>Overall & Growth Strategy</p>	<p>Overall, we consider that a comprehensive approach to the SA has been undertaken, ensuring that a good balance and range of growth scenarios are tested. It provides a good starting point for determining an appropriate growth strategy. However, we consider that there are a number of key points to raise in relation to the SA that could directly impact upon the growth strategy in the Local Plan:</p>	<p>Noted with thanks</p>

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Table 5.1 Area C	<p>O&H have concerns relating to the following:</p> <ul style="list-style-type: none"> • Under-estimating the positive impact of planning sustainable growth adjacent to railways and the genuine alternative they provide to the private car. This should be reflected as a positive score in relation to Highways and Air Quality given the potential for modal shift. There should also be greater recognition to Area C's proximity to EWR in 'Sustainable Transport'. • Given its increased level of accessibility in terms of strategic road and rail, it is not clear why Area C receives the same rating as Area D for Highways and Air Quality. • The SA recognises that strategic sites have better opportunities for achieving high energy efficiency and addressing the effects of climate change (category 8). This should be reflected in the scoring for Area D for which the SA indicates is not suitable for strategic development. The same applies to Category 9 (Water Resources). Furthermore, it is considered that the landscape character and topography within Area C, in particular the Marston Vale, offers greater potential for strategic water management utilising the lakes, the proposed waterway and existing watercourses. This should score more highly than the other areas in this respect. • Category 13 relates to landscape. Area C contains the route of the B&MK Waterway Park and the Forest of Marston Vale. These are important local objectives and delivering growth in Area C would help secure significant improvements towards such objectives. Therefore, this area should receive a more positive rating when compared to the other areas. The impact of the incorrect assessments above means that the sustainability of Area C is not sufficiently highlighted in comparison to the other areas particularly in terms of its public transport offer. 	<p>This was a high level strategic assessment undertaken at an early stage of plan-making. It is agreed that there is the potential for positive effects for growth adjacent to railways (and this is acknowledged in Table 5.2 of the SA) – but overall for Areas A-D, uncertainty & potential negative effects were recorded at this stage of SA until traffic modelling and further studies were undertaken, including more locational specificity.</p> <p>SA No 8: all four options have the potential for neutral effects at this stage of assessment – uncertainty for any positive effects until next stage of plan-making & assessment.</p> <p>SA No 9 & 13: Agree re the B&MK Waterway and the Forest of M Vale in Area C – and this is addressed as the SA considered growth locations.</p> <p>The Council developed a Spatial Strategy taking into account new development in each of the</p>

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		<p>Areas A-D. The Council has considered all comments received with regard to developing the next stage of plan-making – Regulation 19 Draft Plan – and including comments on the Spatial Strategy. The amended Spatial Strategy will be subject to SA and the findings provided in the SA Report that accompanies the Regulation 19 Plan on consultation.</p>
<p>Table 5.2 Approaches to Distributing Growth</p>	<p>We appreciate that this assessment was undertaken as an initial stage of the SA work and needs to be better informed by site specific circumstances. It is important to note however, that there are significant benefits associated with strategic development when compared against other forms of development including village extensions and higher densities. Strategic development provides much greater opportunities to secure comprehensive solutions to energy and climate change, flood risk, biodiversity and water resources. All the development forms are rated the same which is not reflective of the benefits of planning comprehensively for a strategic site.</p>	<p>SA recognises the opportunities possible from major development – and at this high level of SA, it is agreed that new settlements & urban extensions can provide at least mitigation for development effects on SA topics energy/CC, biodiversity & water to give neutral – but uncertainty for any further positive effects. For village extensions, DM Policy can provide mitigation within the constraints of the smaller levels of development – again with overall neutral effects.</p>

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Table 5.3 Growth Scenario Options – Housing	<p>Whilst O&H consider that a robust range of growth scenarios have been tested a number of concerns are highlighted which affect the growth strategy set out in the draft Plan: The scenarios do not appear to make allowances for the level of development that can be delivered in the Plan period according to reasonable delivery rates.</p> <p>We suggest a revised approach to testing the scenarios is pursued which has regard to practical delivery in the Plan period. This does not necessarily mean sites should not be allocated for the levels of growth shown, but to ensure that there is a flexible housing land supply to meet the OAN within the Plan period, it may mean that the Plan needs to rely on a broader scope of allocations.</p>	The Council has considered what are reasonable alternatives to test at each stage of the SA process. The Initial SA tested growth locations & scenarios at a high level. The SA of the Regulation 19 draft Local Plan will test the potential allocations and broad locations in more detail and will also take into account reasonable delivery rates.
Table 5.10 Area C Strategic Growth Locations Summary	<p>O&H agree with the assumptions in this table, however, as set out in the main representations, Marston Valley should receive a more favourable rating than Aspley Guise in relation to 'sustainable transport' as it benefits from a better physical connection, with the potential for direct public transport links, to a stopping station on EWR. Therefore, it has a greater likelihood of achieving increased modal shift to rail. This would also have a more positive effect on highways and air quality.</p> <p>Furthermore, given the potential of Marston Valley to help achieve wider Council and policy objectives, including FoMV canopy cover and delivery of the B&MK Waterway Park, it considered that Marston Valley should also receive a higher rating than other sites in terms of landscape.</p>	<p>At this strategic level of assessment, the SA reported additional positive effects (p5.91) in the text but did not consider overall that effects could be reported as major positive.</p> <p>Agreed that there is the potential to help achieve wider Council objectives, but the extent of mitigation for negative effects of major development & the possibilities for implementing enhancement with positive effects remains uncertain at this level of assessment.</p>

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CPRE (6544)		
	<p>The Council's Sustainability Appraisal is driven and thus fundamentally flawed, by the need to accommodate the high growth figures and housing numbers. As stated earlier we believe these figures are way in excess of what CBC should be planning for in the future and therefore what needs to be accommodated within the Local Plan.</p>	<p>The CBC Local Plan is required by Government to meet its objectively assessed need for housing and employment land. The SA is required to assess the draft Plan when judged against reasonable alternatives.</p>
<p>Area A & Green Belt</p>	<p>This study seeks to justify developing in the Green belt through a list of nebulous, unquantified positives, namely:</p> <ol style="list-style-type: none"> 1. Growth in this area will offer opportunities associated with new development which Green Belt designation restricts. 2. Appropriately located housing and supporting infrastructure around Houghton Regis and Luton could have major positive effects for these areas with high deprivation 3. Growth in this area will support the provision of housing supply for the Luton HMA. 4. The location of key transport corridors here provides employment benefits for this area. 5. There is good access to open space, recreation and green infrastructure, which would benefit existing and new communities. <p>The negative effects are noted and also significant but not assessed in any detail:</p> <ol style="list-style-type: none"> 1. The loss of green belt designations could result in the coalescence of small settlements. 2. Growth along the transport corridors, namely along the M1 corridor around Dunstable and the AQMA, could result in poorer air quality. 3. Potential for negative effects on the predominantly rural landscape. These could be cumulative and residual effects will depend on the scale and scope of the development and how the potential effects are mitigated. 4. Increased development will result in loss of soil resources. 	<p>Noted with thanks.</p> <p>The SA shares the evidence base for the development of the Local Plan – and as in accordance with Government guidance. Any gaps in information are described and recorded as uncertainties in the SA Report – and as in accordance with the SEA Regulations.</p> <p>SA is an ongoing and iterative process that will be updated as further evidence is completed – and will seek to assess cumulative effects of new development within Area A and the Green Belt.</p>

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	This does not present a balanced picture as no analysis has been provided of the detrimental impact on the Green Belt as a whole by removing large tracts of strongly performing land.	
Land Promoter (6590)		
Table 5.3 Growth Scenario Options	<p>The <i>Sustainability Appraisal</i> (July 2017) ('SA') sets out the Growth Scenario Options that have been tested in the overarching sustainability appraisal of the plan. Table 5.3: Growth Scenario Options Potential Housing Numbers, shows that the Council tested 1,000 dwellings in Area C for 'Wixams South' but has identified a capacity of 500 homes under the Land South of Wixams Growth Location.</p> <p>The scope of the Sustainability Appraisal is limited to testing scenarios for new strategic growth with the potential to be included within the emerging Local Plan as new allocations. O&H agree that it is sensible to test with 'headroom' between the 500 homes identified for Land South of Wixams (as well as the 650 proposed in the current planning application) and the 1,000 tested for SA. However, O&H are concerned that the SA has not fully tested the sustainability of new allocations in addition to the existing allocation of 1,000+ dwellings established by Policy MA3 of the Site Allocations DPD.</p> <p>O&H are concerned that this approach does not give the fullest consideration of the cumulative sustainability of the potential development of new potential new allocations of Land South of Wixams alongside the development of 1,000+ dwellings at Land South of Wixams allocated by Policy MA3 of the Site Allocations DPD.</p> <p>O&H recommend that further consideration is given to the cumulative effect of the maximum potential quantum of growth which could be directed towards the area to the south of the Wixams Main Settlement. This should comprise an assessment of the cumulative sustainability of the delivery of 1000+ dwellings at Land South of Wixams and the development of Wixams Southern Extension.</p>	<p>Para 5.48 in the SA Report indicates that all the scenarios include around 1000 homes at Wixams South – and therefore, this potential allocation is not a differentiator.</p> <p>The Council included a range up to 1000 dwellings for the growth scenarios as they wanted to test the higher growth options for this area.</p> <p>Reported in the Regulation 18 SA Report Appendix IV.</p>

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Land Promoter (6632)		
	<p>The Sustainability Appraisal Non-Technical Summary (July 2017)¹² makes the following comments with regard to development in Area A of the CBLP.</p> <p>Area A paragraph 31 identifies the positive effects of growth as;</p> <ul style="list-style-type: none"> • offering opportunities with new development which Green Belt designation restricts • providing infrastructure around Houghton Regis and Luton with positive effects for these areas with higher deprivation • Support provision of housing for Luton HMA • Key transport corridors provide employment benefits for the area • Good access to open space, recreation and green infrastructure to the benefit of new and existing communities <p>With regard to options for extending villages with good services and facilities the likely significant positive effects were found to be;</p> <ul style="list-style-type: none"> • Potential for improving health and well-being through the provision of new Green Infrastructure, open space and recreation • Potential for the provision of good quality housing with accessibility to services and facilities <p>With regard to testing Scenarios for growth it is important to note that each scenario including growth in villages within the Green Belt for Area A (of either 2,000 or 3,000 dwellings, for each Scenario tested apart from 'Scenario 4: No growth in the Green Belt'). The outcomes of Scenario 4 were found to be;</p> <ul style="list-style-type: none"> • Communities in Area A would fail to benefit from the positive effects of development – new residents can revitalise communities • Fails to meet housing needs of the residents and communities located in the southern half of Central Bedfordshire and unmet need from adjoining areas • Strong negative impacts on social sustainability and environmental sustainability of all new development leap frogged the Green Belt and was delivered solely in the north of the 	<p>Disagree that there is any internal inconsistency – reflects the different levels of assessment but comment noted with thanks and will ensure that internal consistencies are addressed at the next stage of SA when both site options and DM Policies will be considered.</p>

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	<p>authority</p> <ul style="list-style-type: none"> • Appropriate mitigation can help avoid potential negative effects on loss of identity and integration for new and existing communities <p>Paragraph 58 states that, "The SA supports growth in Areas A, B and C as having positive effects on housing delivery and employment."</p> <p>Turning to the main SA document13 paragraph 5.87 states that; "There are potential positive effects from new development for the villages in Area A with regard to housing and especially if located in those settlements that have services and facilities. Although this would require release of Green Belt (GB) land, recent evidence indicates that some parcels of land only contribute weakly to GB aims such that likely effects would be mitigated by directing new development accordingly."</p> <p>It is clear therefore that the SA reports prepared so far to support CBLP plan preparation are broadly supportive of the release of small parcels of Green Belt at Category A villages where these parcels perform poorly in terms of their contribution to the 5 purposes of the Green Belt.</p> <p>Indeed paragraph 7.5 continues; "small and medium sized sites have been identified for growth locations that are immediately adjacent to a town or village that is inset in the Green Belt (Area A) and tested through the SA at this stage as these smaller growth areas are integral to the overall preferred Spatial Strategy."</p> <p>The SA Appendix14, at p.AV-66 tests the delivery of 2,000 new dwellings at Villages in Area A and concludes that; "There is some uncertainty remaining at this stage of assessment for many of the SA Objectives as the specific location of smaller development in villages and dispersed throughout the areas is not yet known."</p> <p>It would seem therefore that the SA is a document is internally inconsistent and the findings</p>	

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	of the Appendix do not match the text of the main document.	
Amendments needed for Green Belt Study	<p>What is clear however is that the SA Appendix supports the delivery of new dwellings at villages in Area A as it would;</p> <ul style="list-style-type: none"> • Have positive effects on housing by meeting the housing needs of local population and potentially providing a mix of development meeting the needs of different members of the community • Potentially provide new services and facilities within the local villages, or enhance existing provision • Potentially improve and support the vitality of local villages and the local economy by using local services and facilities • Provide enhancements to green infrastructure corridors with a minor positive effect on health • Potentially provide new sustainable transport infrastructure including bus stops, footpaths and cycle paths • Potentially enhance local biodiversity by providing habitat linkages and appropriate ecological landscaping <p>It will be necessary therefore, in order to inform the Regulation 19 consultation, for the Green Belt study to be amended such that it clearly appraises all small parcels adjacent to villages inset within Area A to identify those areas that perform poorly against the 5 purposes of the Green Belt so that they can also be subject to appropriate SA for consideration for allocation and inclusion in the Reg 19 CBLP. This would also be in accordance with the guidance in paragraph 84 of the NPPF (see paragraph 7.17 above).</p> <p>The work identified above needs to be undertaken as the Stage 1 Green Belt Study only looks at the role that broad locations perform with regard to the five purposes of the Green Belt, not at the role that smaller parcels adjacent to inset Large Villages perform.</p> <p>Should the authority select locations for Area A Large Village growth solely from the Green Belt Study Stage 1 and Stage 2 there is a risk that the sites chosen may be more</p>	<p>Matter for plan-making.</p> <p>The SA shares the evidence base for the development of the Local Plan – and as in accordance with Government guidance. Any gaps in information are described and recorded as uncertainties in the SA Report – and as in accordance with the SEA Regulations.</p> <p>SA is an ongoing and iterative process that will be updated as further evidence is completed – and will seek to assess cumulative effects of new development within Area A and the Green Belt.</p>

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	unsustainable; for reasons such as its proximity from major employment centres or accessibility to public transport; than sites adjacent to villages with green belt broad locations that currently make a moderate or higher contribution to the Green Belt and are therefore discounted from Stage 2 of the Green Belt Study.	
Land Promoter (6675/6732)		
Spatial Strategy	The Sustainability Appraisal, which underpins the Central Bedfordshire Local Plan 2035 has been used to support the strategy supports growth in Areas A, B and C as having positive effects on housing delivery and employment. We support focusing development in these locations, and believe particular emphasis should be given to sites in locations close to or not major transport corridors.	Noted.
Land Promoter (6689)		
Site NLP244	Supports the conclusions in Strategic Employment Site Assessment Technical Document and Sustainability Appraisal that their site (NLP244) is most suited to achieve the employment development aspirations of the Council at J13.	Noted.
Land Promoter (6830)		
Growth Location Option	<i>Housing</i> The Consortium agrees with the assessment for major positive effects in relation to delivery of housing.	Noted.
Aspley Guise Area C	2. <i>Communities</i> The Council's analysis states that housing growth in this broad location will expand the urban area of Aspley Guise. This is not correct. The main urban area of Aspley Guise is some 0.5km south of the railway line. Although there are some sporadic properties north of the railway line along Salford Road, these do no amount to an urban area, and	Noted with thanks and the additional information will be used at the next stage of SA.

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	<p>would in any case be separate from the new villages proposed. The vision for Hayfield assumes substantial green buffers between new development and the existing urban area of Aspley Guise. Coalescence with Milton Keynes can be avoided, but proximity to Milton Keynes is clearly a benefit for this site.</p> <p>The negative score seems to stem from the text description of development that 'is less likely to effectively integrate given the existing railway line' and 'would require significant infrastructure investment to overcome this barrier'. The Consortium has engaged extensively with Parish Councils in the area, all of whom prefer to see a proposal that does not integrate new urban areas with the existing communities, but separates them with green space, and creates new, separate communities. Road connections and a number of public rights of way connect the existing villages in this location, and would similarly connect to the new villages proposed. In addition, the new villages would link into the wider red routes and bus connections to Milton Keynes. We would therefore expect that the score for this item is '+' as there are no constraints, and development in the form proposed would be acceptable.</p>	<p>The Initial SA was a high level appraisal that tested potential strategic growth locations and was not site-specific.</p>
	<p>3. <i>Services & Facilities</i> The Consortium agreed with the assessment for major positive effects in relation to Services and Facilities.</p>	<p>Noted.</p>
	<p>4. <i>Employment</i> The vision for the site is to include a number of areas for employment opportunities, including more than 10ha for employment uses, and up to 6ha of social and community facilities offering employment opportunities. Employment provision includes local employment in each of the village centres proposed, enhanced employment opportunities around the existing employment at Hayfield Farm itself, and new strategic employment at the east of the site linked with junction 13 of the M1. This has the potential for up to 2,000 jobs in addition to the temporary jobs associated with the construction work (see Appendix 2). The assessment of a neutral effect in relation to employment should therefore be increased to one of positive effects.</p> <p>The assessment recognises that the location is in close proximity to Milton Keynes, and will therefore increase accessibility to employment areas. The assessment goes on to recognise further benefits in terms of transport connections from the site to existing employment areas. A number of opportunities are therefore identified for mitigation of existing travel in</p>	<p>Noted with thanks and the additional information will be used at the next stage of SA.</p>

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	relation to employment provision, where development at Hayfield offers better opportunities to link into existing employment. The assessment as a single '+' benefit should therefore be amended to '++'.	
	<i>Health & Equality</i> The Consortium agrees with the assessment.	Noted.
	6. <i>Highways & Air Quality</i> The very broad 'Key Finding' from the Aecom (2016) Technical Note Stage 1A Growth Area Analysis identifies 'significant levels of congestion' in Area C, especially on the M1, A421 and A6. This does not differentiate between (for instance) the reduced impacts of development at Hayfield (due to its proximity to Milton Keynes and ability to use existing red ways / bus provision) compared to the Marston Vale (that is much more distant from strategic leisure and employment areas. The conclusion that good access to public transport networks will mitigate increases in traffic is supported. Furthermore, the site at Hayfield offers opportunities to provide strategic facilities such as a park and ride, which could also function as a multi-modal hub for mass transit into Milton Keynes (an aspiration that appears in the MK LTP 3). The site therefore offers opportunities to mitigate existing issues, and should be rated accordingly as '++' and not '0?'.	Noted with thanks and the additional information will be used at the next stage of SA.
	7. <i>Sustainable Transport</i> The assessment correctly recognises that Hayfield has the ability to connect with local train stations and bus connections together with the ability to link to Ridgmont, leading to a positive assessment of '+'. As set out in paragraph 4.8 the proposals at Hayfield will also offer the ability for modal shift through provision of a park and ride / transport hub. This will have the ability to mitigate existing traffic movements by car in addition to the opportunities to limit new car journeys. The assessment should therefore be amended to '++'.	Noted with thanks and the additional information will be used at the next stage of SA.
	8. <i>Energy & Climate Change</i> The Consortium agrees with this assessment, but is carrying out further work in relation to opportunities for reduction in energy usage, and greenhouse gas emissions.	Noted with thanks.
	9. <i>Water Resources & Quality</i> ; 10. <i>Flood Risk</i> ; 11. <i>Soil</i> ; 12. <i>Biodiversity & Geodiversity</i> ; 13. <i>Landscape</i> ; and 14. <i>Archaeology</i> The Consortium agrees with this assessment.	Noted.
Bedford Local Nature Partnership (6919)		

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Environmental Issues	The Sustainability Appraisal identifies key environmental issues that do not appear to have solutions proposed anywhere in the Plan. These include the potential loss of Green Infrastructure as well as the new provision of areas of open space and recreational areas for people; a need to reduce excess weight in adults, which is ranked significantly worse than the England average; increased pressure on water resources in an area of low rainfall (while it is acknowledged that Central Beds fall within the Upper & Bedford Ouse Catchment, the U&BO Catchment Partnership has not been consulted on the Local Plan).	The identification of environmental issues helped inform the development of the SA Framework of Objectives, against which the emerging elements of the Plan are being assessed. Opportunities to resolve existing environmental problems are acknowledged and are likely to have positive effects.
Land Promoter (6926)		
Reasonable Alternatives	The Central Bedfordshire Local Plan should be based on an SA process that clearly justifies its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Central Bedfordshire decision making and scoring should be robust, justified and transparent. As part of the site selection process, it considered vital that the Local Plan is underpinned by a process that includes a robust assessment of development opportunities across all scales of sites that exist in the area (not just strategic scale sites and those sites adjacent to Green Belt settlements as is currently the case in the Regulation 18 Sustainability Appraisal, July 2017). It is considered that small and medium sized sites across the district will form an essential element of a sustainable growth strategy for Central Bedfordshire and that an extensive number of alternatives will need to be thoroughly considered through the SA process. Due consideration must also be given to all development options outside of the Green Belt as part of any justification for the existence of 'exceptional circumstances' necessary for the adjustment of green belt boundaries. In addition, sites should not be discounted from consideration without being considered on a like-for-like basis with the option that is ultimately preferred within the Local Plan. Critically,	In a similar way to the SA of the strategic site options, the reasons for selection/rejection will be outlined for the non-strategic site options. As explained SA Scoping Report, potential options will be taken through the Council's Site Assessment process – which was also cross-referenced and correlated with the SA Sties Assessment Framework. Non-Strategic site options passing through Stage 3 of the Site Assessment are considered to be reasonable alternatives – and thus, will be subject to SA in accordance with the SEA

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	<p>the SA must positively reflect the Planning Practice Guidance which highlights that:</p> <p><i>“The sustainability appraisal should identify any likely significant adverse effects and measures envisaged to prevent, reduce and, as fully as possible, offset them. The sustainability appraisal must consider all reasonable alternatives and assess them in the same level of detail as the option the planmaker proposes to take forward in the Local Plan (the preferred approach).” (Our emphasis)</i></p> <p>At this stage, Gladman wish to raise a specific concern with the manner in which the Council's 'Site Assessment' has sought to discount a number of sites from further consideration through the local plan process. In particular, the approach to selecting sites for consideration as land use allocations will need to take into account the potential for negative impacts to be mitigated through a comprehensive and comparable assessment of all reasonable alternatives at the same level of detail as the preferred option that is ultimately selected.</p> <p>Clearly, the SA that accompanies this consultation is not at the stage where the comparative assessment of individual sites for residential allocation has been undertaken and we would therefore highlight the importance of the need for a comprehensive exercise to support the pre-submission version of the Local Plan. We look forward to reviewing the SA that accompanies the version of the Plan that is published under Regulation 19 in due course.</p>	<p>Regulations and extant Government guidance. Reasonable site options will be grouped within settlements and subject to SA individually and taking into account the cumulative and synergistic effects. Thus, all reasonable alternatives, including the preferred options, will be assessed through SA and to the same level of detail.</p>
Land Promoter (7132)		
Upper Shelton Area C	The Sustainability Appraisal supports growth in Areas AB and C as having "positive effects" on housing delivery and employment. The capacity for Upper Shelton/Area C in which the site is located is well demonstrated within the draft plan.	Noted.
Land Promoter (7148)		
Green Belt	Welcome the findings of the Sustainability Appraisal, namely that the benefit of releasing	Noted

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release & allocations in the Green Belt	land from the Green Belt outweighs the harm. Development in these Green Belt locations is vital to ensuring the vitality and future regeneration of towns and villages surrounded by the Green Belt. Without growth in these locations, local housing need will go unmet, resulting in a loss of residents and workers to other settlements potentially outside of Central Bedfordshire	