

# **Central Bedfordshire Council Local Plan (2015-2035)**

**Sustainability Appraisal  
(January 2018)**

**CENTRAL BEDFORDSHIRE COUNCIL  
CENTRAL BEDFORDSHIRE LOCAL PLAN:  
Pre-Submission  
Regulation 19 Consultation**

**SUSTAINABILITY APPRAISAL (SA)  
(incorporating Strategic Environmental  
Assessment, Health Impact Assessment,  
Equalities Impact Assessment)**

**SA Report**

<i>date:</i>	Regulation 18 v01 March 2017 Draft Regulation 18 v02 June 2017 Draft & Final Regulation 19 v01 November 2017 Draft Regulation 19v02 December 2017 Final	
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# CENTRAL BEDFORDSHIRE LOCAL PLAN: Pre-Submission Regulation 19 Consultation SUSTAINABILITY APPRAISAL: SA REPORT

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## Non-Technical Summary (NTS)

(available separately

[www.centralbedfordshire.gov.uk/planning/policy/local-plan](http://www.centralbedfordshire.gov.uk/planning/policy/local-plan))

## 1.0 INTRODUCTION

### **Sustainability Appraisal (SA) & Strategic Environmental Assessment (SEA)**

- 1.1 Sustainability Appraisal (SA) is a systematic process that must be carried out during the preparation of a Local Plan. The purpose of SA is to promote sustainable development through assessing the extent to which an emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives<sup>1</sup>. Initially the scope of the SA is determined by establishing the baseline conditions and context of the draft plan by considering other relevant plans and objectives, and by identifying issues, problems and opportunities for the area. From this scope, an SA Framework of objectives relevant for sustainable development in the plan area is developed to form the basis against which the draft plan is assessed.
- 1.2 The requirement for SA is set out in planning legislation<sup>2</sup> and in paragraph 165 of the National Planning Policy Framework<sup>3</sup> (NPPF). Local Plans must also be subject to Strategic Environmental Assessment<sup>4</sup> (SEA) and Government advises<sup>5</sup> that an integrated approach is taken so that the SA process incorporates the requirements for SEA – and to the same level of detail. This (Integrated) SA Report is part of the evidence base for the Regulation 18 Draft Central Bedfordshire Local Plan (CBLP) and it accompanies the Regulation 18 Draft CBLP for public consultation. Central Bedfordshire Council (the Council) has commissioned independent specialist consultants Enfusion Ltd to undertake the SA process (incorporating SEA) for the CBLP.

### **Health Impact Assessment (HIA) & Equalities Impact Assessment (EqIA)**

- 1.3 The Council has chosen to integrate Health Impact Assessment (HIA) and Equality Impact Assessment (EqIA) processes, as well as SEA, within the overarching SA process. HIA is not a statutory requirement for Councils but is good practice in plan-making; health considerations are a requirement of the SEA process and thus the overall SA process. Public bodies have a duty<sup>6</sup> to assess the impact of their policies on different population groups to ensure

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<sup>1</sup> DCLG (2014) National Planning Practice Guidance - Strategic Environmental Assessment and Sustainability Appraisal <http://planningguidance.planningportal.gov.uk/blog/guidance/>

<sup>2</sup> Section 19(5) of the 2004 Act; Regulation 22(a) of the Town & Country Planning (Local Planning) (England) Regulations 2012

<sup>3</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>4</sup> EU Directive 2001/42/EC; UK Environmental Assessment of Plans & Programmes Regulations, 2004

<sup>5</sup> DCLG - National Planning Practice Guidance 2014

<sup>6</sup> UK Equality Act, 2010

that discrimination does not take place and, where possible, to promote equality of opportunity.

- 1.4 For the SA of the CBLP, the integration of health and equality considerations has focused on ensuring that these issues are well represented in the SA Framework (through objectives and thresholds of significance) against which the emergent strategic options, policies and sites are being assessed. Health and equality issues have been addressed iteratively as the appraisal process has progressed. Details of the EqIA are presented separately to demonstrate compliance with the Equality Act (2010) in Appendix VIII to this SA Report. An initial EqIA considered the effects of the proposed Spatial Strategy, Strategic and Development Management Policies, and the proposed approach to Strategic Growth Locations. This was updated with the findings of the SA of the Pre-Submission Draft CBLP and included consideration of the proposed Site Allocations.

### **Habitats Regulations Assessment (HRA)**

- 1.5 The Council is also required to undertake a Habitats Regulations Assessment<sup>7</sup> (HRA) of the Central Bedfordshire Local Plan. The aim of the HRA process is to assess the potential effects arising from a plan against the nature conservation objectives of any site designated for its nature conservation importance. The HRA screening considers if the potential impacts arising as a result of the CBLP are likely to have significant effect on these sites either alone or in combination with other plans and projects.
- 1.6 The HRA process has its own legislative drivers and requirements and, while the different processes can inform each other, it is important that the HRA remains distinguishable from the wider SA process. The HRA process has been undertaken in parallel with the SA process but the detailed methods and findings are reported separately. Summary HRA findings are incorporated into the integrated SA Report.

### **The Central Bedfordshire Local Plan (CBLP)**

- 1.7 The Local Plan sets out a long-term vision and objectives for how the Central Bedfordshire area will develop in the period up to 2035. The plan addresses future needs and opportunities in relation to housing, the economy, community facilities, and infrastructure as well as setting out the principles that will guide and support future development. It will set out the overall level and strategic direction for new development in the area during the life of the plan as well as identifying site allocations for housing, employment, and for Gypsies, Travellers and Travelling Showpeople.
- 1.8 The Council started developing the new Local Plan in February 2016 with the Call for Sites. This was an opportunity for agents, landowners and developers to submit land which they believe could be developed to meet future demand for homes and jobs. The full list of sites<sup>8</sup> that were submitted to the

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<sup>7</sup> The Conservation of Habitats & Species Regulations 2010  
<http://www.legislation.gov.uk/uksi/2010/490/contents/made>

<sup>8</sup> <http://www.centralbedfordshire.gov.uk/planning/policy/local-plan/call-for-sites/overview.aspx>



Council was published in May 2016. Later in 2017, the Council assessed potential sites for their suitability, sustainability and deliverability within the timescale of the Plan.

- 1.9 Since early 2016, the Council has been gathering evidence to inform the preparation of the Local Plan and this includes commissioning various technical studies, including the following:

- Strategic Housing Market & Land Assessments; Viability
- Urban Capacity & Growth Options
- Settlement Capacity/ Envelope Review
- Strategic Flood Risk Assessment & Water Cycle Study
- Economic & Employment Studies; Retail Study
- Strategic Green Belt Review
- Gypsy & Traveller Accommodation Assessment
- Transport Modelling

The findings of the technical studies will identify the needs for housing, employment, supporting infrastructure, and community facilities for the area 2015-2035.

- 1.11 The Council has also considered if the Central Bedfordshire area is able to help meet the housing needs arising from outside the Plan area since there are major urban areas with intensifying growth pressures adjacent to the CBC area. In particular, Luton is severely constrained by its boundary and has major housing pressures affecting CBC in the south-east, and development in Milton Keynes is now approaching the M1 with potential issues for CBC in the north-west of the area. Another key characteristic of the CBLP is that accommodating such growth pressures in the form of unmet need from neighbouring authorities, specifically Luton, could be achieved through considering those areas that do not contribute strongly to the objectives of the Green Belt designation in the south of Central Bedfordshire.

- 1.12 The first draft CBLP (Regulation 18 consultation 4 July – 29 August 2017) did not at this stage include allocation policies for specific development sites. This first draft of the CBLP included broad policies for guiding and shaping development, including potential Growth Location Options that could accommodate more homes than will be required at this stage, and comprised the following elements:

- Vision & Strategic Objectives for the Central Bedfordshire Local Plan area;
- The Spatial Strategy with directions of growth proposed in Areas A-D and a proposed approach to Strategic Growth Locations that could deliver between 42,000 and 55,000 homes through existing commitments and new allocations, and a minimum of 24,000 new jobs;
- Strategic Policies: Presumption in Favour of Sustainable Development; Strategic Growth Locations; General Requirements for Strategic Sites; Gypsy, Traveller & Travelling Showpeople Pitch Requirement; Development in the Green Belt; Coalescence; Important Countryside

Gaps; Settlement Hierarchy; Development within Settlement Envelopes and Green Belt Infill Boundaries Core Policies and Development Management Policies to guide development proposals categorised as follows: Housing H1-7; Employment EMP1-7; Retail & Town Centres R1-3; Transport T1-8; Environmental Enhancement EE1-12; Climate Change & Environmental Quality CC1-7; High Quality Places HQ1-11; Historic Environment HE1-3; Development in the Countryside DC1-6

- 1.13 The first draft CBLP was prepared in accordance with Regulation 18 of the planning requirements<sup>9</sup> and was submitted for formal and public consultation at the beginning of July 2017 for 8 weeks. Representations made to the draft CBLP have been considered and have informed the next stage of plan-making – this Regulation 19 Pre-Submission draft Local Plan.
- 1.14 The Council consulted in June -July 2016 on the proposed methods for assessing site allocation options (Site Assessment Technical Document). The final revised assessment criteria, taking into account the comments received, were used to help identify the most suitable and deliverable sites for new development. Potential site options for allocation in accordance with the Vision, Objectives, Spatial Strategy and the preferred approach for distributing growth were investigated.
- 1.15 The next draft of the CBLP (Regulation 19, Pre-Submission) includes proposed site allocations (strategic, small and medium sites), together with the preferred strategic approach, strategic and core/development management Policies – these have been refined as a result of consultation and ongoing technical studies. The revised Local Plan comprises the following elements:
- Vision & Strategic Objectives for the Central Bedfordshire Local Plan area;
  - The Spatial Strategy with an approach to deliver 39,350 homes and a minimum of 24,000 new jobs over the period 2015-2035; this number includes around 24,000 homes already planned for or built. The growth will be through strategic allocations with small and medium site allocations. Also Identified Areas for Future Growth beyond the Plan period after 2035 with a commitment for further assessment of these Areas to inform a Partial Review of the Plan. This will consider an updated evidence base on issues where work is ongoing and in particular at capacity for, and deliverability of, further growth on the strategic sites. The work will consider 3 scenarios: Base (as set out in Pre-Submission Plan); Medium Growth (if some but not all strategic infrastructure is delivered); and High Growth (if strategic infrastructure is delivered by 2025-30, improved viability, and high level of funding). These scenarios will also be subject to SA;
  - Strategic Policies: SP1 Growth Strategy with Town Extensions North of Luton & East of Arlesey; new Villages at Marston Valley & East of Biggleswade; Strategic Employment Areas at M1 J11a, M1 J13, A1 Biggleswade South, & RAF Henlow Mixed Use Specialist Employment;

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<sup>9</sup> Town & Country Planning (Local Planning) (England) Regulations 2012

SP2 Presumption in Favour of Sustainable Development; SP3 Generic Requirements for Strategic Sites; SP4 Development in the Green Belt; SP5 Preventing Coalescence & Important Countryside Gaps; Settlement Hierarchy; SP7 Development within Settlement Envelopes; SP8 Gypsy, Traveller & Travelling Showpeople Pitch Requirement

- Core Policies and Development Management (DM) Policies to guide development proposals categorised as follows: Housing H1-9; Employment EMP1-5; Retail & Town Centres R1-3; Transport T1-6; Environmental Enhancement EE1-14; Climate Change & Environmental Quality CC1-8; High Quality Places HQ1-11; Historic Environment HE1-3; and Development in the Countryside DC1-5

- 1.16 This Pre-Submission Local Plan is published for consultation in January 2018 and representations will be sent to the Inspector to be considered during the examination of the Local Plan. The Local Plan will be submitted to the Secretary of State for examination in March 2018. The Plan will be accompanied by all the supporting documents and evidence, including the SA/SEA, EqlA and the HRA Reports.

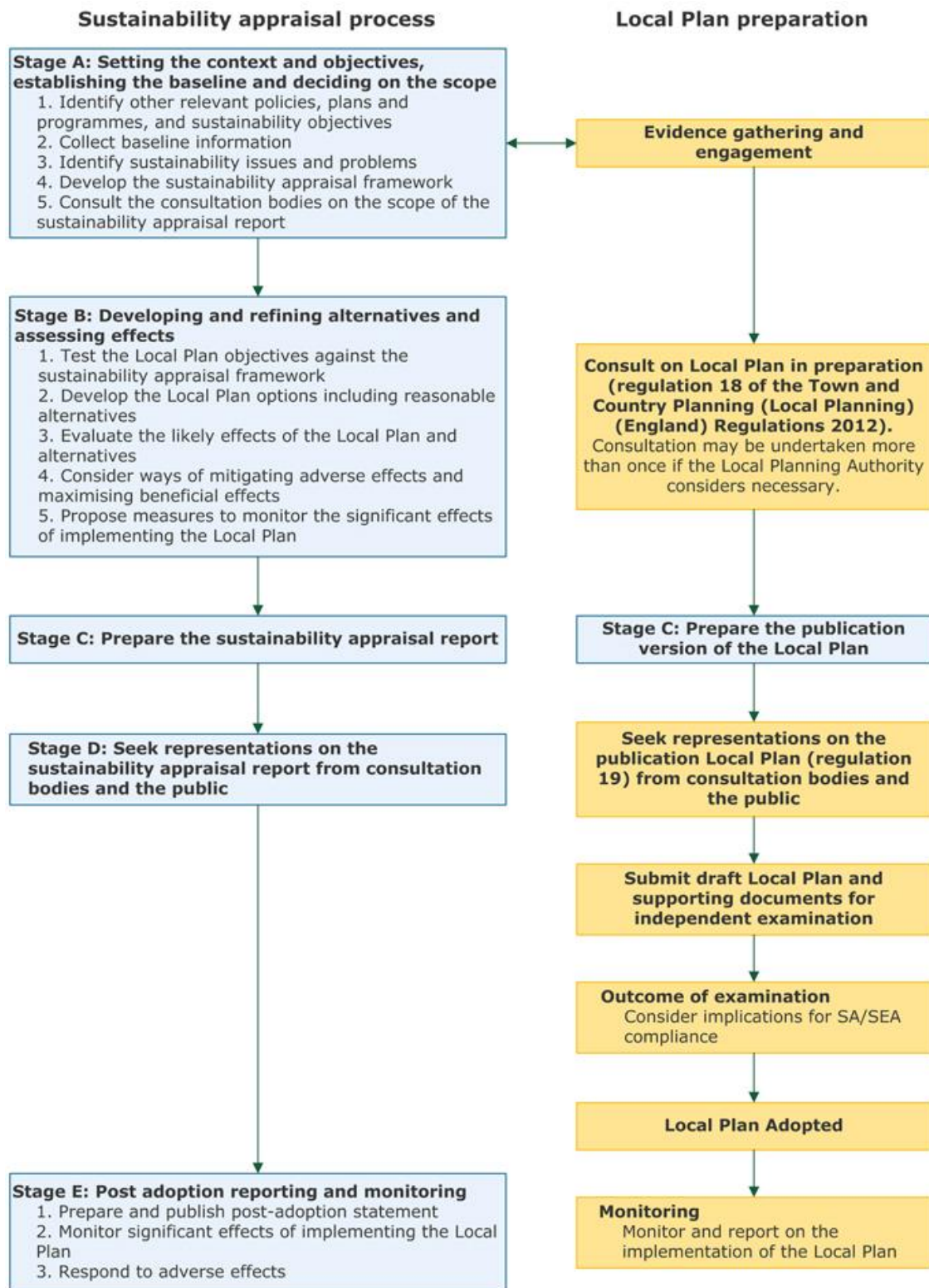
### **Inter-Relationships between SA & Plan-Making Processes**

- 1.17 National Planning Practice Guidance<sup>10</sup> sets out the key stages and tasks for SA and their inter-relationships with plan-making stages and tasks – as set out in the diagram following:

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<sup>10</sup> <http://planningguidance.communities.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-appraisal-requirements-for-local-plans/>

**Figure 1.1: SA and Plan-making Stages and Tasks**



- 1.18 Sustainability Appraisal is an iterative and ongoing process that informs plan-making by assessing developing elements of the Plan, evaluating and describing the likely significant effects of implementing the plan, and suggesting possibilities for mitigating significant adverse effects and enhancing positive effects. As the plan develops, stages and tasks in the SA

process may be revisited, updated or refreshed in order to take account of updated or new evidence as well as consultation representations.

- 1.19 An integrated approach to appraisal brings resource efficiencies and allows complementary issues to be considered concurrently. The Government's extant guidance recognises value in undertaking SA and HRA concurrently (although the findings and reporting of the two processes should be kept distinct)<sup>11</sup>. In practice, the evidence base for both SA and HRA processes can be shared, as well as with the evidence base for the plan-making process.

### **Consultation: Statutory, Public, Community & Stakeholder Engagement**

- 1.20 As part of the early preparation of the CBLP, consultation<sup>12</sup> has been undertaken on the emerging elements and evidence for the Local Plan. This includes formal requirements for notification and consultation under the Town & Country Planning Regulations 2012 and the SEA Regulations 2011, and informal engagement with interested communities and other stakeholders, such as developers and landowners.
- 1.21 The SEA Regulations require that the SA/SEA scoping stage is subject to formal consultation with the statutory environmental bodies – Environment Agency, Historic England, and Natural England. The Council published the SA/SEA Scoping Report for wider consultation through the website. Representations received on the draft SA Scoping Report were reviewed and responses made are set out in the appendix to the final SA Scoping Report (October 2016). The SA Scoping Report comprises part of this SA Report as Appendix II and is available separately on the Council's website.
- 1.22 The Initial SA Report (June 2017) accompanied the draft Local Plan on Regulation 18 consultation July-August 2017. Comments made on the SA were collated and are presented here at Appendix IX in this SA Report, together with responses and actions taken. Thus, consultation continues in an iterative and ongoing way, and it is an important element of the SA/SEA process.
- 1.23 The stages, documents and consultations on the plan-making and SA/SEA processes so far are summarised in the table following:

**Table 1.1: CBLP and SA/SEA Stages and Documents**

<b>CBLP Stage and Documents Consultation</b>	<b>SA/SEA Stage and Documents Consultation</b>
<b>CBLP Website</b> February 2016 <b>Call for Sites</b> Consultation April-May 2016 Full List of Sites Submitted published 25 May 2016	Draft Sustainability Appraisal <b>Scoping Report</b> June 2016  Consultation August-September 2016

<sup>11</sup> Planning for the Protection of European Sites: Appropriate Assessment: Guidance for Regional Spatial Strategies and Local Development Documents (DCLG, August 2006)

<sup>12</sup> <http://www.centralbedfordshire.gov.uk/planning/policy/local-plan/news-consultations.aspx>



Evidence Gathering February – December 2016	<b>Final SA Scoping Report</b> October 2016
<b>Community Planning Events</b> October 2016-March 2017  Evidence Gathering continues through 2017	
<b>Draft CBLP</b> June 2017 Regulation 18 Vision & Objectives; Spatial Strategy & Strategic Policies; Approach to Strategic Growth Locations; Core & Development Management Policies  Consultation 4 July-29 August 2017 (8 weeks)	<b>Initial SA Report</b> June 2017 with technical appendices detailing initial SAs of options and emerging elements of the draft Local Plan  Consultation 4 July- 29 August 2017 (8 weeks)
<b>Pre-Submission CBLP</b> Including proposed Site Allocations Regulation 19  Consultation 11 January-22 February 2018	SA Report Pre-Submission Regulation 19  Consultation 11 January – 22 February 2018
Submission to the Secretary of State March 2018	SA Report Submission March 2018
Examination Summer-Autumn 2018 (date to be confirmed)	Examination Summer-Autumn 2018 (date to be confirmed)

## Compliance with the Requirements of the EU SEA Directive

- 1.24 The Strategic Environmental Assessment Regulations set out certain requirements for reporting the SEA process and specify that, if an integrated appraisal is undertaken (i.e. SEA is subsumed within the SA process), then the sections of the SA Report that meet the requirements set out for reporting the SEA process must be clearly signposted. The requirements for reporting the SEA process are set out in Appendix I of this SA Report. Also, and in accordance with the SEA Directive, a Non-Technical Summary is provided – available separately.

## Structure of this SA Report

- 1.25 This document reports the SA process for the Central Bedfordshire Local Plan. Following this introductory Section 1, this report is structured into further sections:
- Section 2 describes the approach and methods used to appraise the emerging elements of the Plan

- Section 3 summarises the sustainability context and characteristics with details available in the final SA Scoping Report (October 2016) available on the Council's website
  - Section 4 explains how options in plan-making and alternatives in SA have been addressed and reported explicitly to demonstrate compliance with the requirements of the SEA Directive
  - Section 5 summarises the findings of the Initial SA of the strategic options investigated (Regulation 18)
  - Section 6 summarises the findings of the Initial SA of the Development Management Policies (Regulation 18)
  - Section 7 reports the findings of the SA of the Vision & Objectives and considers the initial sustainability appraisal of the implementation of the draft Local Plan as a whole (Regulation 18)
  - Section 8 explains how the draft Plan has developed from the Regulation 18 draft to take account of the consultation comments made and continuing technical studies; summarises and discusses the SA findings from testing the emerging and the final Pre-Submission Regulation 19 Plan
  - Section 9 summarises the approach and findings for the EqIA & HRA relevant for the Regulation 19 consultation
  - Section 10 introduces the approach to monitoring and the SA
  - Section 11 provides summary conclusions with key findings from the SA; outlines how the SA has informed the plan-making; explains the next steps, and sets out the requirements for consultation and making comments on this SA Report that accompanies the draft Regulation 19 CBLP
- 1.26 Technical Appendices provide the detailed findings of the SA. Appendix I comprises the Statement of Compliance with the SEA Directive and provides signposting to where key aspects of the SA are located in the SA Report. Appendix II is the SA Scoping Report, available separately, and including the details of the baseline evidence and the development of the SA Frameworks for assessment. Appendices III-VI present the details of the SAs of the Vision & Objectives, Strategic Options (Areas A-D; Approaches to Distributing Growth; Growth Scenarios, Potential Growth Locations), and the emerging draft Strategic Policies – as published for Regulation 18 consultation.
- 1.27 Appendix VII details the SAs of the potential site options for allocation: VIIa Strategic Allocation Options (Housing & Employment); VIIb Broad Locational Options for Identified Areas for Future Growth; VIIc Small and Medium Site Options; VIId outlines the reasons for selection or rejection of the non-strategic site options. Appendix X summarises changes made to draft Plan Policies between Regulation 18 and Regulation 19 and their significance with regard to SA/SEA and the previous SA findings.
- 1.28 Appendix VIII details the findings of the initial and updated EqIA and provides a separate document to demonstrate compliance for the Council with the requirements of the Equality Act, 2010. Summary findings are presented in Section 9 of this SA Report.

- 1.29 The Habitats Regulations Assessment (HRA) Report (December 2017) is a separate report to accompany the Pre-Submission Draft of the CBLP. The findings have been summarised and taken into consideration in this SA Report accompanying the Regulation 19 Pre-Submission consultation. Initial HRA considerations were summarised in the Initial SA Report (June 2017) in Section 8; the summary of the refreshed and updated HRA is provided here in this SA Report in Section 9.



## 2.0 SUSTAINABILITY APPRAISAL METHODS

### Introduction & the SA/SEA Process

- 2.1 Sustainability (Integrated) Appraisal incorporating Strategic Environmental Assessment is an iterative and ongoing process that aims to provide a high level of protection for the environment and to promote sustainable development for plan-making. The role of SA is to inform the Council as the planning authority; the SA findings do not form the sole basis for decision-making – this is informed also by other studies, feasibility and feedback comments from consultation. SA is a criteria-based assessment process with objectives aligned with the issues for sustainable development that are relevant to the plan and the characteristics of the Plan area.
- 2.2 There is a tiering of appraisal/assessment processes (and see also later Figure 4.1) that aligns with the hierarchy of plans – from international, national and through to local. This tiering is acknowledged by the NPPF (2012) in paragraph 167 that states that “*Assessments should be proportionate and should not repeat policy assessment that has already been undertaken.*”
- 2.3 This SA is an Integrated Appraisal that has incorporated the requirements of the EU SEA Directive, the findings from the Habitats Regulations Assessment (HRA), and the findings of the Equality and Diversity Impact Assessment (EqIA). Since the HRA and the EqIA are driven by distinct legislation, the HRA Report and the EqIA Report are also provided separately to clearly demonstrate compliance.

### Scoping & the SA Frameworks

- 2.4 In January 2016, independent specialist consultants at Enfusion Ltd were commissioned by the Council to undertake the integrated SA and HRA. The first stage was to undertake the scoping process. Relevant plans and programmes (PP) were reviewed, baseline information was identified, collated and analysed to ensure that key issues, problems and opportunities for the CBLP area are identified. The details of this analysis are presented in final SA Scoping Report (October 2016) and a summary is provided in the following Section 3 of this Initial SA Report.
- 2.5 The SA Framework provides the basis by which the sustainability effects of the Central Bedfordshire Local Plan will be described, evaluated and options compared. It includes a number of objectives, elaborated by decision making criteria, that are relevant to the objectives of the Local Plan and sustainable development in Central Bedfordshire. These objectives have been identified through the SA Scoping Stage from the information collated in the PP review, baseline analysis, identification of sustainability issues, and scoping workshops with Council Officers and key stakeholders. Two SA Frameworks (strategic & sites) were developed through the scoping process. These were subject to consultation on the draft SA Scoping Report (June

2016) and as a result of comments received, some refinements were made to the decision-aiding questions supporting the SA Objectives.

- 2.6 The Strategic SA Framework is presented in Table 2.2 below and was used to test strategic options emerging from plan-making, including the growth scenarios for distributing new development. The Strategic SA Framework was refined to make it more relevant and effective for the consideration of site options that are locationally specific. Enfusion worked closely with the Council to develop standards and thresholds to determine the nature and significance of effects against SA Objectives. This helps to ensure that a consistent and comparative appraisal of reasonable site options is carried out. Any assumptions and uncertainties are noted along with a clear indication of the standards and thresholds that will be used to determine the nature and significance of the effects for site options.
- 2.7 The Sites SA Framework is presented in Table 2.3 below and reflects the more locationally specific nature of site options. It sets out the standards and thresholds that will be used to determine the nature and significance of effects against SA Objectives, including any assumptions or uncertainties that will be made. It should be noted that the Sites SA Framework (Table 2.3) was developed alongside the Council's site assessment criteria to ensure that they are consistent and effectively inform one another.
- 2.8 The categories of significance used with both SA Frameworks are as set out in the key below.

**Table 2.1: SA Significance Key**

Categories of Significance of Effects		
Symbol	Meaning	Sustainability Effect
++	Major Positive	Proposed development encouraged as would resolve existing sustainability problem
+	Minor Positive	No sustainability constraints and proposed development acceptable
0	Neutral	Neutral effect
?	Uncertain	Uncertain or Unknown Effects
-	Minor Negative	Potential sustainability issues: mitigation and/or negotiation possible
--	Major Negative	Problematical and improbable because of known sustainability issues; mitigation likely to be difficult and/or expensive
-	+	SA Objectives 2, 4, 5, 9 & 11 consider more than one sub-topic such that more than more than one significant effect may be predicted with two symbols.
		No 2 Communities – first symbol refers to in/out of Green Belt; second symbol refers to community & settlement identities No 4 Employment – first symbol refers to employment support; second symbol refers to vitality/viability of town centres No 5 Health & Equality – first symbol refers to regeneration/deprivation & equality; second symbol refers to Green Infrastructure for health & well-being

	<p>No 9 Water – first symbol refers to water resources; second symbol relates to water quality</p> <p>No 11 Soil &amp; Land – first symbol refers to greenfield &amp; agricultural land qualities; second symbol relates previously developed land</p>
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**Table 2.2: Strategic SA Framework**

Topic	Key Sustainability Issues	SA Objectives	Decision-Aiding Questions
<b>Communities</b>  SEA Directive Topic(s): Population and Human Health  NPPF Paragraphs: 47-78	<ul style="list-style-type: none"> <li>In line with national trends there is an increasing and ageing population.</li> <li>Maintaining the identity of settlements and communities in both rural and urban areas.</li> <li>Meeting the needs of communities with different sustainability issues and ensuring that any opportunities to address these issues are maximised. For example, Dunstable and Houghton Regis are more culturally diverse than the other settlements within Central Bedfordshire.</li> <li>There may be a need to accommodate housing growth from outside the Plan area.</li> <li>Minimising the loss of important Green Belt land that provides protection for soil quality and open land.</li> <li>There is poor access to services and facilities in some areas of Central Bedfordshire, particularly in rural settlements.</li> <li>Average wages compared to average house prices in the Plan area, make access to the property market unattainable for many.</li> </ul>	1. To ensure that the housing needs of all residents and communities are met.	<ul style="list-style-type: none"> <li>Does the option provide sufficient housing to meet the identified needs of all communities within the Plan area?</li> <li>Does the option provide an appropriate mix of types of housing to meet the identified needs of all communities within the Plan area?</li> <li>Does the option offer the opportunity to help meet housing needs arising from outside the Plan area?</li> </ul>
		2. To maintain and enhance community and settlement identities.	<ul style="list-style-type: none"> <li>Is the option likely to have an effect on the identity of any communities or settlements? For example, will development lead to coalescence?</li> <li>Will development result in the loss of Green Belt land?</li> <li>Can development effectively integrate within the existing settlement pattern?</li> <li>Are there any opportunities to enhance the identity of a community or settlement?</li> </ul>

Topic	Key Sustainability Issues	SA Objectives	Decision-Aiding Questions
	<ul style="list-style-type: none"> <li>There is a higher than average number of Gypsies and Travellers within Central Bedfordshire compared to England.</li> </ul>	3. To improve accessibility to services and facilities <sup>13</sup> .	<ul style="list-style-type: none"> <li>Does the option ensure that a sufficient level of services/facilities will be delivered to meet the identified needs of all communities within the Plan area, or will development result in a net gain in the level of services/facilities?</li> </ul>
<b>Economy and Employment</b>  SEA Directive Topic(s): Population and Human Health  NPPF Paragraphs: 18-22	<ul style="list-style-type: none"> <li>Approximately 50% of residents commute to the surrounding areas, including Hertfordshire, Luton, London, Milton Keynes and Bedford.</li> <li>People who work in Central Bedfordshire earn less than those who work in the nearby areas, such as those working in Hertfordshire, Luton, London, Milton Keynes and Bedford.</li> <li>Dunstable has a significantly higher retail vacancy rate compared to the national rate.</li> <li>The wards of Tithe Farm, Parkside, Dunstable Manshead, Dunstable Northfields and Sandy are currently experiencing higher rates of unemployment compared to the other wards in Central Bedfordshire.</li> <li>There are relatively high outflows of retail and convenience spending.</li> </ul>	4. To support the economy and ensure that there are suitable opportunities for employment.	<ul style="list-style-type: none"> <li>Does the option provide sufficient high quality employment land to meet the identified needs of all communities within the Plan area?</li> <li>Are there a range of types of employment land being proposed?</li> <li>Does the option provide sufficient safeguarding for existing employment land in the Plan area?</li> <li>Does the option offer the opportunity to support and enhance the vitality and viability of Town Centres, in particular Dunstable Town Centre?</li> <li>Would the option result in the loss of any existing strategic employment opportunities?</li> </ul>

<sup>13</sup> This relates to the provision of services and facilities, both existing, and what could potentially be provided as part of new development. Consistent with the settlement audit this includes community facilities (Place of worship, public library, village hall/community centre/social club), health facilities (GP/ Health centre (Primary Health Care), Dentist, Pharmacy), educational facilities (pre-school/nursery, lower school, middle school, upper school, Colleges/Academies, Universities)), financial (bank/building society), groceries (superstore, convenience store, newsagents), other retail (petrol station/garage, post office) and hospitality (restaurant/café/takeaway, public house with and without food).

Topic	Key Sustainability Issues	SA Objectives	Decision-Aiding Questions
	<ul style="list-style-type: none"> <li>Evidence suggests that there is a significant oversupply of industrial employment land, and that the quality and typologies will be an important factor for future development.</li> <li>Key economic sectors include wholesale and retail trade, construction, production and education.</li> <li>Both the urban and rural economies are important for the Central Bedfordshire economy as a whole.</li> </ul>		<ul style="list-style-type: none"> <li>Does the option regenerate or provide employment opportunities in areas that are currently experiencing high rates of unemployment?</li> <li>Does the options provide opportunities to enhance the provision of education and training facilities?</li> </ul>
<b>Health and Equalities</b>  SEA Directive Topic(s): Population and Human Health  NPPF Paragraphs: 69-78	<ul style="list-style-type: none"> <li>There are areas of higher deprivation<sup>14</sup> in the south of the Plan area, particularly around the boundary with Luton Town.</li> <li>Trends show that deprivation is increasing in the north of the Plan area, although this remains below areas in the most deprived 30% in England.</li> <li>The potential loss of Green Infrastructure as well as areas of open space or recreation for people.</li> <li>A need to reduce excess weight in adults, which is ranked significantly worse than the England average.</li> </ul>	5. To improve the health and wellbeing of communities and reduce inequalities.	<ul style="list-style-type: none"> <li>Does the option offer the potential for investment, regeneration or renewal in areas of higher deprivation?</li> <li>Does the option offer opportunities for protected or special groups of the community, including the ageing?</li> <li>Does the option result in the loss of any significant areas of Green Infrastructure, open space or recreation for people?</li> <li>Will the option result in a net gain in Green Infrastructure, open space and recreational areas for people, or improve the</li> </ul>

<sup>14</sup> Deprivation refers to the DCLG Index of Multiple Deprivation (IMD) which is overall measure of multiple deprivation experienced by people living in an area, calculated for each neighbourhood or Lower Super Output Area (LSOA) and ranked according to its level of deprivation relative to that of other areas.

Topic	Key Sustainability Issues	SA Objectives	Decision-Aiding Questions
	<ul style="list-style-type: none"> <li>Improving the quality of existing Green Infrastructure, open space and recreational areas.</li> </ul>		<ul style="list-style-type: none"> <li>quality of these provisions across the Plan area?</li> </ul>
<b>Transport and Movement</b>  SEA Directive Topic(s): Population and Human Health  NPPF Paragraphs: 29-41	<ul style="list-style-type: none"> <li>In a number of areas there is insufficient highway capacity to meet current and future demands. This results in congestion at peak times, predominantly in the main urban areas and on the strategic road network.</li> <li>Public transport is less accessible and frequent in rural areas compared to some of the larger settlements.</li> <li>Approximately 50% of residents commute for work to the surrounding areas - including Hertfordshire, Luton, London, Milton Keynes and Bedford - predominantly using the private vehicle.</li> <li>Ensuring that new development is in accessible locations that reduce the need to travel.</li> <li>Supporting a modal shift, and a built environment that supports a modal hierarchy in which the pedestrian and cyclist have appropriate priority.</li> <li>New transport infrastructure is being proposed within the Plan area, which includes the East West Rail Link.</li> </ul>	6. To maintain and improve the existing highway network and reduce associated indirect impacts on air quality and greenhouse gas emissions.	<ul style="list-style-type: none"> <li>Is the option likely to increase levels of traffic, and is this in an area already experiencing congestion issues?</li> <li>Does the option offer an opportunity to enhance or improve the existing network?</li> <li>Does the option support or enhance local ambitions for transport?</li> </ul>
		7. To encourage a demonstrable modal shift and reduce the need to travel.	<ul style="list-style-type: none"> <li>Does the option offer an opportunity to improve access to and quality of sustainable transport modes for all communities, to allow sustainable movement not only within Central Bedfordshire but into the surrounding areas?</li> <li>Does the option offer an opportunity to support the delivery of proposed transport infrastructure, such as the East West Rail Link?</li> <li>Does the option support or enhance local ambitions for transport?</li> </ul>

Topic	Key Sustainability Issues	SA Objectives	Decision-Aiding Questions
<b>Air Quality</b>  SEA Directive Topic(s): Air  NPPF Paragraphs: 109-125	<ul style="list-style-type: none"> <li>3 AQMAs designated for exceedances of Nitrogen Dioxide in Sandy, Ampthill and Dunstable. Traffic is the primary cause for exceedances in National Air Quality Objectives.</li> <li>Road traffic is very closely linked to air quality, and concentrations of air pollutants are particularly high in Central Bedfordshire where the road network is congested.</li> </ul>	<p><i>Air quality within Central Bedfordshire is closely linked to road traffic. This is demonstrated by the designation of the 3 AQMAs which cover areas where the road network is currently congested.</i></p> <p><i>Given the close relationship between traffic and air quality, it is not considered necessary to have a separate SA Objective specifically relating to air quality. For example, positive effects against SA Objectives 6 and 7 are likely to result in a positive indirect effect on air quality; equally, negative effects are likely to result in negative indirect effects on air quality. Mitigation provided through Local Plan policies and at the project level to reduce traffic impacts, such as improving access to sustainable transport modes will also help to mitigate impacts on air quality.</i></p>	
<b>Energy and Climate Change<sup>15</sup></b>  SEA Directive Topic(s): Climatic Factors  NPPF Paragraphs: 93-104	<ul style="list-style-type: none"> <li>Evidence suggests that demand for energy is rising.</li> <li>Road transport is the biggest contributor to greenhouse gas emissions; however, commercial and industrial buildings are also significant contributors.</li> <li>Adapting to the predicted effects of climate change.</li> <li>Evidence suggests that there is significant capacity for new renewable energy development.</li> </ul>	<p>8. To maximise the potential for energy efficiency, reduce greenhouse gas emission and ensure that the built and natural environment and its communities can withstand the effects of climate change.</p>	<ul style="list-style-type: none"> <li>Does the option set aspirational targets for energy efficiency in new development?</li> <li>Is the option likely to continue the trend of falling GH emissions?</li> <li>Does the option provide opportunities for a net gain in renewable energy production within the Plan area?</li> <li>Does the option ensure that new development is resilient to the effects of climate change?</li> </ul>
<b>Water: Resources, Quality and Flooding</b>	<ul style="list-style-type: none"> <li>Increased pressure on water resources particularly in the Anglian region as a result of high population density and relatively low rainfall.</li> </ul>	<p>9. To minimise the demand for water and maintain or improve water quality.</p>	<ul style="list-style-type: none"> <li>Is the option likely to have an effect on water resources?</li> <li>Is the option likely to have an effect on water quality?</li> </ul>

<sup>15</sup> Please note that flooding is dealt with separately under the Water: Resources, Quality and Flooding topic



Topic	Key Sustainability Issues	SA Objectives	Decision-Aiding Questions
SEA Directive Topic(s): Water  NPPF Paragraphs: 99-125	<ul style="list-style-type: none"> <li>According to the EA water quality is declining in some areas and improving in others. The EA identifies agriculture and rural land management as being the primary reason for water bodies not achieving good status under WFD.</li> <li>High flood risk areas situated around existing water courses, and areas at risk of surface water flooding.</li> </ul>	10. To reduce the risk of flooding from all sources.	<ul style="list-style-type: none"> <li>Does the option direct development towards lower flood risk areas<sup>16</sup>?</li> <li>Are there any opportunities to significantly reduce flood risk?</li> <li>Does the option safeguard land to manage flood risk?</li> <li>Does the option promote the use of sustainable drainage systems?</li> </ul>
<b>Soil and Land</b>  SEA Directive Topic(s): Soil  NPPF Paragraphs: 79-92, 109-125	<ul style="list-style-type: none"> <li>The retention and protection of best and most versatile agricultural land, which is a National issue.</li> </ul>	11. To protect and conserve soil.	<ul style="list-style-type: none"> <li>Is the option likely to result in the loss of greenfield land<sup>17</sup>?</li> <li>Is the option likely to result in the loss of agricultural land, in particular best and most versatile agricultural land<sup>18</sup>?</li> <li>Does the option provide an opportunity for the reuse or regeneration of previously developed land?</li> </ul>
<b>Biodiversity and Geodiversity</b>  SEA Directive Topic(s): Biodiversity, Flora and Fauna  NPPF Paragraphs: 109-125	<ul style="list-style-type: none"> <li>A number of nationally and locally designated sites for nature conservation and geodiversity as well as a range of important habitats and species.</li> <li>Important ecological corridors that run throughout Central Bedfordshire as well as into the surrounding LAs.</li> </ul>	12. To protect, enhance and manage biodiversity & geodiversity.	<ul style="list-style-type: none"> <li>Is the option likely to have an effect on any nationally or locally designated sites?</li> <li>Could the option result in the loss or fragmentation of important GI for biodiversity or ecological corridors as identified in the Nature Conservation Strategy (2015)?</li> </ul>

<sup>16</sup> For the purposes of this SA, a flood risk area relates to an area located within Flood Risk Zones 2 and / or 3, or an area at risk of flooding from surface water

<sup>17</sup> For the purposes of this assessment, greenfield land includes agricultural land graded 3b-5

<sup>18</sup> For the purposes of this assessment, best and most versatile agricultural land relates to agricultural land graded 1-3a

Topic	Key Sustainability Issues	SA Objectives	Decision-Aiding Questions
	<ul style="list-style-type: none"> <li>Improving ecological connectivity within the Greensand Ridge Nature Improvement Area</li> </ul>		<ul style="list-style-type: none"> <li>Are there any opportunities to enhance biodiversity &amp; geodiversity, or provide a net gain?</li> </ul>
<b>Landscape and Townscape</b>  SEA Directive Topic(s): Landscape  NPPF Paragraphs: 109-125	<ul style="list-style-type: none"> <li>Balancing the need for new development with the retention of a predominantly rural landscape character with important ridges, large areas of flat land, far-reaching views and high levels of tranquillity.</li> <li>Maintaining traditional field boundaries, habitats and building materials that contribute to landscape character.</li> <li>The loss of agricultural land is changing the landscape character of the Plan area.</li> <li>Protecting appropriate landscape settings e.g. the setting of the AONB</li> <li>There are a number of settlements that are vulnerable or sensitive to changes in the landscape/ townscape identified within the Landscape Character Assessment (2016).</li> </ul>	13. Protect and enhance the landscape and townscape.	<ul style="list-style-type: none"> <li>Is the option likely to have an effect on a nationally or locally designated landscape, townscape or its setting?</li> <li>Is the option likely to have an effect on the overall rural landscape character?</li> <li>Is there an opportunity to regenerate previously developed land or restore derelict sites such as disused market gardens, former quarries or pits<sup>19</sup>?</li> </ul>
<b>The Historic Environment</b>	<ul style="list-style-type: none"> <li>Central Bedfordshire contains a large number of designated heritage assets.</li> </ul>	14. To ensure the protection and enhancement of the historic environment and its setting.	<ul style="list-style-type: none"> <li>Is the option likely to have an effect on a nationally or locally designated heritage asset and/or their settings?</li> </ul>

<sup>19</sup> This relates to regeneration that may lead to positive effects on landscape character rather than land and soils

Topic	Key Sustainability Issues	SA Objectives	Decision-Aiding Questions
<p>SEA Directive Topic(s): Cultural Heritage</p> <p>NPPF Paragraphs: 126-141</p>			<ul style="list-style-type: none"> <li>Is the option likely to have an effect on any important or protected non-designated heritage assets and/or their setting or any potential archaeology?</li> <li>Are there any opportunities for enhancement of the historic environment and its setting?</li> </ul>
<p><b>Minerals and Waste</b></p> <p>SEA Directive Topic(s): Material Assets</p> <p>NPPF Paragraphs: 5, 142-149</p>	<ul style="list-style-type: none"> <li>Ensuring that the direction of new development does not conflict with the strategic allocations and plans outlined within the Minerals and Waste Local Plan, and minimises the associated effects of minerals and waste development / operations on human health.</li> <li>Supporting the waste hierarchy and encouraging increased recycling rates, ensuring new development contributes towards meeting the EU target rate of 50% of waste production recycled / reused by 2020.</li> </ul>	<p><i>The adopted Minerals and Waste Local Plan sets out the strategic allocations for mineral extraction and for waste management development in the Plan area (Bedford Borough, Central Bedfordshire and Luton Borough) together with strategic policies which will guide the ongoing supply of minerals and development of waste management facilities. The adopted Minerals and Waste Local Plan was subject to SA.</i></p> <p><i>At this stage, it is not considered that there are any significant sustainability issues within Central Bedfordshire in relation to Minerals and Waste. While development proposed through the Central Bedfordshire Local Plan will affect this topic, it is considered that these effects are unlikely to be of significance. This topic is unlikely to play a significant role in the identification and refinement of alternatives. Taking the above into account, this topic has therefore been scoped out of the SA process for the Local Plan.</i></p> <p><i>It is important to note that the Waste and Minerals Plan is in the process of being reviewed and as part of that process further SA work will be carried out. As part of the iterative and ongoing SA process, should any significant issues or effects arise that need to be considered through the SA process for the Local Plan then they will be taken into account.</i></p>	

**Table 2.3: Sites SA Framework**

Topic	SA Objective	Significance criteria, including any assumptions, uncertainties, standards and thresholds for SA of Site Options			
Communities  SEA Directive Topic(s): Population and Human Health  NPPF Paragraphs: 47-78	1. To ensure that the housing needs of all residents and communities are met.	SA Objective 1 primarily relates to the provision of an appropriate quantity and quality of housing to meet the needs of all residents and communities in Plan area.  The SA assumes that development at any of the site options could be delivered to a high quality and could provide an appropriate mix of housing types and tenures.  The nature and significance of the effects against this SA Objective will relate to the potential <b>capacity of the site to accommodate residential development</b> .  <b>Evidence base:</b> The Council's site assessment process, in particular the proposed use and estimated housing capacity of the site, will inform the assessment of effects against this SA Objective.	++	The site option has the potential to provide a significant amount of new housing (500 dwellings or more)	
			+	The site option has the potential to provide new housing (less than 500 dwellings)	
			0	If no housing is being proposed as part of development, as it is an employment site option, then it is considered to have a neutral effect against this SA Objective.	
			?	There is an element of uncertainty as the capacity of the site option for housing development is unknown.	
			-	Not applicable.	
			--	Not applicable.	
	2. To maintain and enhance community and settlement identities.	SA Objective 2 primarily relates to the nature and character of settlements that give them distinct and individual identities, and retaining and enhancing these identities whilst accommodating growth needs.  <b>Evidence Base:</b> The Council's site assessment process will inform the assessment of effects against this SA Objective. In particular criteria 13, 18, 19, & 24	++	The site option relates well to an existing settlement (within settlement envelope or bordered by settlement on 3 sides) Evidence suggests that development at the site option could significantly enhance the identity of the settlement, with the potential for major positive effects.	
			+	Development at the site option may positively contribute to the identity of settlements, for example through the regeneration of previously	

Topic	SA Objective	Significance criteria, including any assumptions, uncertainties, standards and thresholds for SA of Site Options		
		of the Council's Site Assessment Framework for Housing Sites; criteria 11, 16, 17 & 19 of the Council's Site Assessment Framework for Employment Sites and criteria 11, 16, 17 of the Council's Site Assessment Framework for Gypsy and Traveller Sites.		developed land that is currently detracting from the character of the settlement.
			0	Development at the site option will not contribute towards coalescence and is unlikely to affect the overall character of the settlement. Potential for a residual neutral effect.
			?	There is an element of uncertainty, most likely until lower level assessments have been carried out.
			-	Development at the site option is likely to contribute towards coalescence and / or erode settlement identity.
			--	The site option is located within the Green Belt, or development at the site option will directly lead to coalescence.
	3. To improve accessibility to services and facilities.	SA Objective 3 relates to the ability of communities to sustainably access the services and facilities they require to meet their needs.	++	The site option is located within reasonable walking distance (within 800m) of all key services and facilities.
		The SA assumes that any proposal for development can make appropriate and timely provision or contributions for necessary supporting infrastructure, including community facilities and services.	+	The site option is located within reasonable walking distance (within 800m) of most of the key services and facilities.
		The nature and significance of the effects against this SA Objective will relate to the <b>distance of the site from existing services/facilities</b> .	0	A neutral effect is not considered possible.
		The Council considers key facilities/services to include schools (primary and secondary), GP	?	There is an element of uncertainty, most likely until lower level assessments have been carried out through planning applications.
			-	

Topic	SA Objective	Significance criteria, including any assumptions, uncertainties, standards and thresholds for SA of Site Options		
		<p>surgery/medical centre &amp; retail provision (Town Centre/ Local Centre).</p> <p>The SA assumes that larger strategic development options have greater potential for enhancements to existing provisions. However, this will not have an impact on the nature and significance of the effect against this SA Objective. This will be a consideration through the Council's wider site assessment process.</p> <p><b>Evidence base:</b> The settlement audit and Council's site assessment process will be used to inform the assessment of effects against this SA Objective. Reasonable walking distance informed by the Department for Transport (2007) Manual for Streets. Barriers to movement informed by the Council's Site Assessment Framework for Housing criterion 6.</p>		<p>The site option is located beyond reasonable walking distance (over 800m) of most of the key services and facilities.</p>
			--	<p>The site option is located beyond reasonable walking distance (over 800m) of all key services and facilities.</p>
<b>Economy and Employment</b>  SEA Directive Topic(s): Population and Human Health	4. To support the economy and ensure that there are suitable opportunities for employment.	SA Objective 4 relates to the provision and loss of employment land within the Plan area.  The nature and significance of the effects against this SA Objective will relate to the <b>capacity of the site to accommodate employment land, and the potential for development to lead to the loss of existing employment.</b>	++	Potential for the site option to accommodate a strategic level of employment development (equal to or more than 10ha).
			+	Potential for the site option to accommodate employment development (less than 10ha).
			0	If no employment is being proposed as part of development, as it is a housing site option, then it is considered to have a neutral effect against this SA Objective.

Topic	SA Objective	Significance criteria, including any assumptions, uncertainties, standards and thresholds for SA of Site Options		
NPPF Paragraphs: 18-22		<p>For the purposes of the SA an employment site is considered strategic if it is equal to or above 10ha, which is the threshold used in the Council's call for sites.</p> <p>For the purposes of this appraisal, the loss of agricultural land is not considered of significance for the economy at a Plan level, as the sectors contribution is less than 1% (Agriculture, Forestry and Fishing accounts for 0.7%)<sup>20</sup>. The cumulative loss of agricultural land however, is a significant factor that will be assessed within the full SA Report.</p> <p><b>Evidence base:</b> The Employment Land Review and the Councils estimated capacity of site options, and assessment of site options will inform the assessment of effects against this SA Objective.</p>	?	There is an element of uncertainty as the capacity of the site option for employment development is unknown.
			-	Development at the site option may result in a net loss of existing employment.
			--	Not applicable.
<b>Health and Equalities</b>  SEA Directive Topic(s): Population and Human Health	5. To improve the health and wellbeing of communities and reduce inequalities.	<p>SA Objective 5 relates to the built environment's contribution to healthy and active lifestyles, and any disparities in provisions across the Plan area.</p> <p>The nature and significance of the effects against this SA Objective will relate to the <b>provision of development in deprived areas</b><sup>21</sup></p>	++	The site has good access to open/recreational space or sports/leisure facilities (480m), and will deliver new development in an area of higher deprivation.
			+	The site has good access to existing open/recreational space or sports/leisure facilities (480m) or will deliver new development within or in close proximity to an area of higher deprivation.

<sup>20</sup> Office for National Statistics - 2011 Census.

<sup>21</sup> DCLG Indices of Deprivation - Lower Super Output Areas (LSOAs) in the most deprived 10 to 30% in England 2015; Parkside (601 and 602), Dunstable Manshead (594), Houghton Hall (580), Tithe Farm (619), Houghton Hall / Tithe Farm (618), Sandy (433), Leighton Buzzard North (605 and 609), Flitwick (400), Dunstable Northfields (596), Dunstable Central / Dunstable Northfields (568) and Caddington (562).

Topic	SA Objective	Significance criteria, including any assumptions, uncertainties, standards and thresholds for SA of Site Options		
NPPF Paragraphs: 69-78		<p><b>and access to existing open/recreational space and sports/leisure facilities.</b></p> <p>The SA assumes that any proposal for development can make appropriate and timely provision or contributions for necessary supporting infrastructure, including health, and green infrastructure. The SA further assumes that any new provisions can be delivered to the aspirational quality standards.</p> <p>The appraisal narrative will note if there are any potential issues at site options with regard to the compatibility of surrounding land uses. It will also identify where mitigation may overcome any identified potential negative effects.</p> <p><b>Evidence base:</b> Reasonable walking distance is informed by the Central Bedfordshire Leisure Strategy (2014). The strategy identifies a range of different accessibility standards for different typologies of space, however for the purposes of this SA, the most common distance used (480m) has been utilised in the analysis. Map layers of open and recreational space will be provided by Central Bedfordshire Council and data analysis within ArcGIS will inform the assessment of effects against this SA Objective. The settlement audit and Council's site assessment process will also help to inform the SA.</p>	0	A neutral effect is not considered possible.
			?	An element of uncertainty exists until lower level assessments have been carried out
			-	The site is beyond reasonable walking distance (480m) to existing open/recreational space or sports/leisure facilities.
			--	Or Development would result in a net loss of existing open/recreational space, and / or sports/leisure facilities on site.
				Development at the site option would result in a net loss of open/recreational space, and / or sports/leisure facilities, and is located beyond reasonable walking distance (480m) to further open/recreational space or sports/leisure facilities.



Topic	SA Objective	Significance criteria, including any assumptions, uncertainties, standards and thresholds for SA of Site Options			
<b>Transport and Movement</b>  SEA Directive Topic(s): Population and Human Health  NPPF Paragraphs: 29-41	6. To maintain and improve the existing highway network and reduce associated indirect impacts on air quality and greenhouse gas emissions.	SA Objective 6 relates to the capacity of the highways network to accommodate new development, which can have indirect effects on air quality and greenhouse gas emissions.  The nature and significance of effects against this SA Objective will relate to the potential <b>traffic impacts</b> of development at the site options.  The SA assumes that appropriate access can be provided for any of the site options; however, if the evidence suggests that access may be a significant issue then this will be noted within the summary appraisal narrative.  <b>Evidence base:</b> Available evidence, including traffic modelling, further detail through existing planning applications, the Council's site assessment process and input from Council Officers will also inform the assessment of effects against this SA Objective.	++	Development at the site option has the potential to significantly enhance the highways network, which will reduce levels of traffic in an area that is experiencing congestion issues.	
			+	Development at the site option has the potential to enhance the highways network, which will reduce levels of traffic.	
			0	The site option is well located in respect of the road network and vehicle movements. Whilst development at the site has the potential to increase traffic, there is suitable mitigation available to reduce negative effects with the potential for a residual neutral effect.	
			?	There is an element of uncertainty, most likely until lower level assessments have been carried out.	
			-	Development has the potential to increase traffic in the surrounding road network and the site is not well located in respect of the road network and vehicle movements. Mitigation available, potential for a residual minor negative effect.	
			--	Development will increase the levels of traffic in an area that is already experiencing congestion issues, and the site is not well located in respect of the road network and vehicle movements. Mitigation difficult and/or expensive, potential for a residual major negative effect.	

Topic	SA Objective	Significance criteria, including any assumptions, uncertainties, standards and thresholds for SA of Site Options			
	7. To encourage a demonstrable modal shift to more sustainable forms of transport and reduce the need to travel.	<p>The nature and significance of the effects against this SA Objective will primarily relate to <b>existing access to sustainable transport modes</b> (train, bus, walking and cycle routes).</p> <p>For the purposes of the SA Primary/ Secondary Pedestrian Routes and Primary/Secondary/Inter Urban Cycle Routes are considered to be of greater significance than routes below them in the pedestrian and cycle network hierarchies set out in the Walking and Cycling Strategies published in 2011.</p> <p>A key aspect of encouraging walking and cycling is that routes need to be direct and accessible. Taking this into account, for the purposes of the SA a reasonable distance to these key walking and cycling routes is considered to be within 100m.</p> <p>Distances will be measured using a buffer zone of the set reasonable walking distance calculated from the site boundary within ArcGIS. It is recognised however that the distance by buffer zone is not the only aspect to consider in accessibility, and as such the narrative will note if potential barriers to movement, or poor quality infrastructure is likely to restrict the potential use of the mode.</p> <p>The SA assumes that development at any of the site options could potentially provide or contribute to improved sustainable modes of transport.</p>	++	The site option is within reasonable walking distance to a train station (800m) and bus stop (400m) with a frequent service (every half hour) and is also within a reasonable distance (100m) to either a key pedestrian or cycling route.	
			+	The site option is within reasonable walking distance to either a train station (800m) or bus stop (400m) with a frequent service (every half hour) and is within a reasonable distance (100m) to either a key pedestrian or cycling route.	
			0	A neutral effect is not considered possible.	
			?	There is an element of uncertainty, for example the quality of the route is questionable or unknown, most likely until lower level assessments have been completed.	
			-	The site option is not within reasonable walking distance to either a train station (800m) or bus stop (400m) with a frequent service (every half hour) but is within a reasonable distance (100m) to either a key pedestrian or cycling route.	
			--	The site option is not within reasonable walking distance to either a train station (800m) or bus stop (400m) with a frequent service (every half hour) and is not within a reasonable distance (100m) to either a key pedestrian or cycling route.	

Topic	SA Objective	Significance criteria, including any assumptions, uncertainties, standards and thresholds for SA of Site Options		
		<p>The SA assumes that larger strategic development options have greater potential for enhancements to existing infrastructure and services/provisions.</p> <p><b>Evidence base:</b></p> <ul style="list-style-type: none"> <li>• Local Transport Plan 2011 - 2026</li> <li>• Walking Strategy (2011)</li> <li>• Cycling Strategy (2011)</li> <li>• Local Area Transport Plans</li> <li>• Council GIS shapefiles</li> </ul> <p>Reasonable walking distances informed by the Council's site assessment criteria.</p> <p>Barriers to movement informed by the Council's Site Assessment Framework for Housing criterion 6.</p>		
<p><b>Air Quality</b></p> <p>SEA Directive Topic(s): Air</p> <p>NPPF Paragraphs: 109-125</p>	<p><i>Air quality within Central Bedfordshire is closely linked to road traffic. This is demonstrated by the designation of the 3 AQMAs which cover areas where the road network is currently congested.</i></p> <p><i>Given the close relationship between traffic and air quality, it is not considered necessary to have a separate SA Objective specifically relating to air quality. For example, positive effects against SA Objectives 6 and 7 are likely to result in a positive indirect effect on air quality; equally, negative effects are likely to result in negative indirect effects on air quality. Mitigation provided through Local Plan policies and at the project level to reduce traffic impacts, such as improving access to sustainable transport modes will also help to mitigate impacts on air quality.</i></p>			
<p><b>Energy and Climate Change</b></p> <p>SEA Directive Topic(s):</p>	<p>8. To maximise the potential for energy efficiency, reduce greenhouse</p>	<p><i>The potential indirect effects of development on emissions of greenhouse gases from road traffic is assessed under the Transport and Movement topic. The SA assumes that all new development can meet policy targets for energy efficiency, using sustainable construction methods and could promote building form and layout that aids adaptation. It should be noted that further aspects of climate change, e.g. flooding, green infrastructure and landscapes, are assessed under the topics relating to Water: Resources, Quality and Flooding; Health and Equalities; and Landscape and Townscape.</i></p>		

Topic	SA Objective	Significance criteria, including any assumptions, uncertainties, standards and thresholds for SA of Site Options			
Climatic Factors  NPPF Paragraphs: 93-104	gas emissions and ensure that the built environment and its communities can withstand the effects of climate change.	It is therefore assumed that all site options have the potential for neutral effect against SA Objective 8, and this SA Objective will not be a key differentiator between site options.			
<b>Water: Resources, Quality and Flooding</b>  SEA Directive Topic(s): Water  NPPF Paragraphs: 99-125	9. To minimise the demand for water and maintain or improve water quality.	SA Objective 9 relates to the water efficiency of new development, and its potential effects on water quality.  The SA assumes that development at any of the sites can incorporate aspirational water efficiency measures and that any proposal can make appropriate and timely provision for necessary supporting infrastructure, including waste water treatment.  The appraisal summary narrative will note if water intensive development is being proposed at the site option.  <b>Evidence base:</b> The Water Cycle Study (forthcoming) (this will take account of the Asset Management Plan process) will be used to inform the assessment of effects against this SA Objective.	++	Evidence from the Water Cycle Study suggests that development at the site option will lead to significant positive effects on water quality.	
			+	Evidence from the Water Cycle Study suggests that development at the site option will lead to positive effects on water quality.	
			0	Evidence from the Water Cycle Study suggests that development at the site option is unlikely to lead to any significant effects on water quality, or that appropriate mitigation is in place to reduce negative effects with the potential for a residual neutral effect.	
			?	There is an element of uncertainty, most likely until lower level assessments have been carried out.	
			-	Evidence from the Water Cycle Study suggests that development at the site option will lead to minor negative effects on water quality.	
			--	Evidence from the Water Cycle Study suggests that development at the site option will lead to major negative effects on water quality.	

Topic	SA Objective	Significance criteria, including any assumptions, uncertainties, standards and thresholds for SA of Site Options			
	10. To reduce the risk of flooding from all sources.	<p>SA Objective 10 relates to existing areas of flood risk within the Plan area.</p> <p>The nature and significance of effects against this SA Objective will therefore relate to whether a site option is located within an area of <b>flood risk</b><sup>22</sup> (from all sources) or has the potential to reduce flood risk.</p> <p>The SA assumes that development at any of the site options has the potential to incorporate Sustainable Drainage systems.</p> <p><b>Evidence base:</b> The Environment Agency Flood Map for Planning and Risk of Flooding from Surface Water and the Council's SFRA will be used to inform the assessment of effects against this SA Objective.</p>	++	The site option is not located within an area of flood risk and there is evidence that development at the site option could offer an opportunity to potentially reduce flood risk.	
			+	The site option is not located within an area of flood risk and is not at risk of surface water flooding.	
			0	The site option is located partially within an area of flood risk, or at risk of surface water flooding in parts of the site. However, development could avoid this area, or suitable mitigation is available, with the potential for a residual neutral effect.	
			?	There is an element of uncertainty until more detailed lower level surveys and assessments have been carried out.	
			-	The site option is located partially within an area of flood risk, or at risk of surface water flooding in parts of the site. The areas of flood risk would be difficult to avoid, and mitigation is likely to be expensive/ difficult.	
			--	The site option is located wholly within an area of flood risk or at risk of surface water flooding across the entire site.	
<b>Soil and Land</b>  SEA Directive Topic(s): Soil	11. To protect and conserve soil	<p>SA Objective 11 relates to soil and land quality.</p> <p>The nature and significance of the effect will relate to the <b>land type</b> and potential loss of <b>best and most versatile agricultural land</b>.</p>	++	The site is entirely brownfield and will not result in the loss of any greenfield or agricultural land, and/or development at the site will remediate contaminated land	
		+			

<sup>22</sup> For the purposes of this SA, a flood risk area relates to an area located within Flood Risk Zones 2 and/or 3, or an area at risk of flooding from surface water

Topic	SA Objective	Significance criteria, including any assumptions, uncertainties, standards and thresholds for SA of Site Options			
NPPF Paragraphs: 79-92, 109-125		<b>Evidence base:</b> Council's site assessment process, in particular criterion 25 of the Council's Site Assessment Framework for Housing Sites; criterion 20 of the Council's Site Assessment Framework for Employment Sites and criterion 20 of the Council's Site Assessment Framework for Gypsy and Traveller Sites.  Council shapefiles, DEFRA Magic Map application, as well as information available from planning applications where available, will be used to inform the assessment of effects against this SA Objective.		The majority of the site is brownfield land and will not result in the loss of best and most versatile agricultural land.	
			0	A neutral effect is not considered possible.	
			?	An element of uncertainty exists for all sites until more detailed lower level surveys and assessment have been carried out through planning applications.	
			-	The majority of the site is greenfield and does not contain any best and most versatile agricultural land.	
	--	Development at the site option could result in the loss of best and most versatile agricultural land.			
<b>Biodiversity and Geodiversity</b>  SEA Directive Topic(s): Biodiversity, Flora and Fauna  NPPF Paragraphs: 109-125	12. To protect, enhance and manage biodiversity & geodiversity.	SA Objective 12 relates to existing identified biodiversity and geodiversity assets, and ecological corridors that provide strategic connectivity for biodiversity.  The nature and significance of effects against this SA Objective will primarily relate to potential <b>effects on biodiversity</b> .  Is the site within, adjacent to, or in close proximity (200m) to any nationally designated biodiversity (NNRs) or located within an identified Impact Risk Zone (SSSI)?	++	Development at the site option will deliver biodiversity gains, or improve ecological corridors / connections to strategic GI, or development will address a significant existing sustainability issue relating to biodiversity.	
			+	Development will not lead to the loss of an important habitat, species, trees and hedgerows or lead to fragmentation of ecological corridors identified in the Nature Conservation Strategy (2015) and there are potential opportunities to enhance biodiversity.	
			0	Development at the site is not likely to have negative effects on any nationally or locally designated biodiversity or contribute towards a severance of green and blue infrastructure or	

Topic	SA Objective	Significance criteria, including any assumptions, uncertainties, standards and thresholds for SA of Site Options		
		Is the site within, adjacent to, or in close proximity (200m) to any biodiversity sites designated as being of local importance (Local Wildlife Site, Local Nature Reserve)?		impede the migration of biodiversity. Potential for a neutral effect.
		Would development at the site result in the loss or fragmentation of important habitats or GI for biodiversity as identified in the Nature Conservation Strategy (2015)?		or Development at the site has the potential for negative effects on sites designated as being of local importance. Mitigation possible, potential for a residual neutral effect.
		It is recognised that when considering the potential for effects on designated biodiversity, distance in itself is not a definitive guide to the likelihood or severity of an impact. The appraisal commentary will try to note any key environmental pathways that could result in development potentially having a negative effect on designated biodiversity that may be some distance away.  The capacity of the site to accommodate housing and employment development will also influence the judgements made in terms of the nature and significance of effects against this SA Objective.  Are there opportunities to enhance biodiversity? Possibly improve connectivity, green/blue infrastructure or enhance an important habitat?  For the purposes of this SA an important habitat is considered to encompass Priority Habitats,	?	Element of uncertainty exists until more detailed lower level surveys and assessments have been carried out.
			-	Development at the site option has the potential for negative effects on sites designated as being of local importance or Priority Species, or will lead to the loss of important habitats, or fragmentation/severance of the connectivity of ecological corridors as identified in the Nature Conservation Strategy (2015).
				or Development at the site has the potential for negative effects on nationally designated sites. Mitigation possible, potential for a minor residual negative effect.
			--	Development at the site has the potential for negative effects on an internationally or nationally designated site. Mitigation difficult and / or expensive, potential for a major residual negative effect.

Topic	SA Objective	Significance criteria, including any assumptions, uncertainties, standards and thresholds for SA of Site Options		
		<p>Ancient Woodland, wetlands and carbon stores such as peatland.</p> <p><b>Evidence base:</b> DEFRA Magic Map application, analysis of ArcGIS map layers CBC Officer input and the Nature Conservation Strategy will inform the assessment of effects against this SA Objective.</p>		
<p><b>Landscape and Townscape</b></p> <p>SEA Directive Topic(s): Landscape</p> <p>NPPF Paragraphs: 109-125</p>	<p>13. Protect and enhance the landscape and townscape.</p>	<p>SA Objective 13 relates to valued landscapes and townscapes, as well as features and assets that contribute to landscape and townscape character.</p> <p>The nature and significance of the effects against this SA Objective will relate to the <b>sensitivity of the landscape or townscape.</b></p> <p>The capacity of the site to accommodate housing and employment development will also influence the judgements made in terms of the nature and significance of effects against this SA Objective.</p> <p>It is considered that there is an element of uncertainty for all sites until more detailed lower level surveys and assessments have been carried out through planning applications.</p> <p>The SA assumes that any trees protected by Tree Preservation Orders within a site option will</p>	++	Development significantly enhances the landscape or removes a significant eyesore and/or would regenerate previously developed land and buildings (PDL) that is currently having a major negative effect on the landscape/ townscape.
			+	Development would remove an eyesore, or enhance the landscape and/or would regenerate PDL that is currently having a minor negative effect on the landscape/ townscape, or the site is identified as of low landscape sensitivity.
			0	A neutral effect is not considered possible.
			?	Element of uncertainty exists until more detailed lower level assessments have been carried out.
			-	The site option has medium sensitivity in landscape terms or is within the setting of the AONB or is located within a village or landscape setting where the landscape or townscape character is identified within the Landscape Character



Topic	SA Objective	Significance criteria, including any assumptions, uncertainties, standards and thresholds for SA of Site Options		
		be retained, unless there is evidence to suggest that this is not the case.		Assessment (2016) as vulnerable to the impacts of development.
		<b>Evidence base:</b> Council's site assessment process - in particular in particular criteria 17 & 38 of the Council's Site Assessment Framework for Housing Sites; criteria 15 & 30 of the Council's Site Assessment Framework for Employment Sites and criteria 15 & 32 of the Council's Site Assessment Framework for Gypsy and Traveller Sites - will inform the assessment of effects against this SA Objective.	--	The site option has medium to high or high sensitivity in landscape terms and/ or is within the AONB.
				Mitigation is likely to be difficult/ expensive. Potential for major residual negative effect.
<b>The Historic Environment</b>  SEA Directive Topic(s): Cultural Heritage  NPPF Paragraphs: 126-141	14. To ensure the protection and enhancement of heritage assets, the historic environment and its setting.	The nature and significance of the effects in this instance will relate to <b>designated heritage assets</b> (Scheduled Monuments, Listed Buildings, Conservation Areas, Registered Parks and Gardens, and Areas of Archaeological Potential & Importance) and their setting. Any important non-designated heritage assets will be noted within the appraisal commentary.  Are there any designated heritage assets or their setting, which could be affected within or adjacent to the site?  Are there any opportunities to enhance heritage assets, such as: securing appropriate new uses for unused Listed Buildings; the removal of an eyesore could have a positive effect on the setting of designated assets; improved access and signage?	++	Development at the site option has the potential for a major positive effect on the significance of a designated heritage assets and / or its setting.
			+	Development at the site option has the potential for minor positive effects as it may secure appropriate new uses for unused Listed Buildings and / or enhance the setting of, or access / signage to designated assets.
			0	Development at the site option will have no significant effect. This may be because there are no heritage assets within the influence of proposed development, or that mitigation measures are considered to reduce negative effects with the potential for a residual neutral effect.
			?	Element of uncertainty for all sites until more detailed lower level surveys and assessments have been carried out.

Topic	SA Objective	Significance criteria, including any assumptions, uncertainties, standards and thresholds for SA of Site Options			
		<p>Consider the nature and significance of the effects identified against the topic Landscapes and Townscapes in terms of the setting of designated heritage assets.</p> <p>The capacity of the site to accommodate housing and employment development will also influence the judgements made in terms of the nature and significance of effects against this SA Objective.</p> <p>It is considered that there is an element of uncertainty for all sites until more detailed lower level surveys and assessments have been carried out.</p> <p><b>Evidence base:</b> DEFRA Magic Map application, the National Heritage List for England, analysis of ArcGIS map layers and Central Bedfordshire Council Officer input will inform the assessment of effects against this SA Objective.</p>	-	Development has the potential for a residual minor negative effect on a Conservation Area, Scheduled Monument, Listed Building, Registered Historic Parks and Gardens and/ or their setting.	
			--	Development has the potential for a residual major negative effect on a Conservation Area, Scheduled Monument, Listed Building, Registered Historic Parks and Gardens and/ or their setting. Mitigation is likely to be difficult/ expensive. Potential for major residual negative effect.	
<b>Minerals and Waste</b> SEA Directive Topic(s): Material Assets  NPPF Paragraphs: 5, 142-149	<p><i>The adopted Minerals and Waste Local Plan sets out the strategic allocations for mineral extraction and for waste management development in the Plan area (Bedford Borough, Central Bedfordshire and Luton Borough) together with strategic policies which will guide the ongoing supply of minerals and development of waste management facilities. The adopted Minerals and Waste Local Plan was subject to SA.</i></p> <p><i>At this stage, it is not considered that there are any significant sustainability issues within Central Bedfordshire in relation to Minerals and Waste. While development proposed through the Central Bedfordshire Local Plan will affect this topic, it is considered that these effects are unlikely to be of significance. This topic is unlikely to play a significant role in the identification and refinement of site options and is not a significant constraint to development.</i></p>				

## Appraising the Central Bedfordshire Local Plan (CBLP)

- 2.9 Each emerging element of the CBLP was appraised against the SA Frameworks of Objectives using professional judgment supported by the baseline and wider Plan evidence base. The nature of the likely sustainability effects (including major/minor, positive/negative, duration (short, medium or long term), permanent/ temporary, secondary<sup>23</sup>, cumulative<sup>24</sup> and synergistic<sup>25</sup>) were described in the appraisal commentary, together with any assumptions or uncertainties. Where necessary, the SA made suggestions and recommendations to mitigate negative effects or promote opportunities for enhancement of positive or neutral effects. A summary appraisal commentary reported any significant effects identified with suggestions for mitigation or enhancement to be made where relevant, and likely residual effects. SA is informed by the best available information and data; however, data gaps and uncertainties exist and it is not always possible to accurately predict effects, particularly at a strategic level of assessment.
- 2.10 The draft Vision for the CBLP was appraised against the strategic SA Objectives grouped by themes for sustainable development and reported here in Section 7. A compatibility analysis of the proposed CBLP Objectives with the SA Strategic Objectives was undertaken and the findings reported here in summary in Section 7, with the detailed analysis provided in Appendix III.
- 2.11 The SA was used in an iterative and ongoing way to help identify and refine reasonable strategic alternatives for the plan-making. At the strategic level of assessment, there is more uncertainty as details may depend upon lower level studies and options are less locationally specific. The Strategic SA Framework was used with commentary and including comparative analysis, where possible for the options appraised. This included the level and distribution of development for the Spatial Strategy, and the emerging Growth Locations in the four Areas A-D<sup>26</sup>.
- 2.12 The Initial SA Report did not include consideration of any proposed site allocations because the Regulation 18 draft CBLP did not include possibilities for site allocations but rather consulted on the proposed Spatial Strategy and potential approach with strategic growth locations in Areas A-D. Sites were considered at the next stage of plan-making and SA. As explained in the SA Scoping Report, the Sites SA Framework was used to test each reasonable alternative site option. The Regulation 18 draft CBLP did include Core and Development Management Policies that will guide development proposals and these were tested through SA using the SA Framework.

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<sup>23</sup> Any aspect of a plan that may have an impact (positive or negative), but that is not a direct result of the proposed plan.

<sup>24</sup> Incremental effects resulting from a combination of two or more individual effects, or from an interaction between individual effects – which may lead to a synergistic effect (i.e. greater than the sum of individual effects), or any progressive effect likely to emerge over time.

<sup>25</sup> These arise from the interaction of a number of impacts so that their combined effects are greater than the sum of their individual impacts.

<sup>26</sup> <http://www.centralbedfordshire.gov.uk/planning/policy/local-plan/shaping-central-beds-consultation.aspx>

- 2.13 The SA was structured under topic headings that have been linked to Objectives in the SA Framework as well as topics in the SEA Directive and paragraphs in the NPPF. This provides a robust framework and structure to evaluate the likely significant effects of the emerging Plan against these key factors. The appraisal under each topic considered the potential effects of the relevant policies against the objectives as well as the interrelationships between topics and cumulative effects of the Plan as a whole (and as required by SEA Regulations). This also avoids duplication as many factors are inter-related.
- 2.14 The draft Core and Development Management Policies were appraised by topics as follows:
- Communities
  - Economy and Employment
  - Health and Equalities
  - Energy and Climate Change
  - Transport (Air Quality is primarily affected by transport and so has not been considered as a separate topic)
  - Water Resources, Quality and Flood Risk
  - Soil and Land
  - Biodiversity and Geodiversity
  - Landscape and Townscape
  - Historic Environment
- 2.15 At this next stage of plan-making and SA – Regulation 19 - the SA considers the site allocation options, further including cumulative effects and the implications for settlements. The changes made to the Strategic and Core/Development Management Policies as a result of ongoing technical studies and consultation comments were screened for their significance with regard to SA/SEA (detailed in Appendix X of this SA Report). The SA then considers the implementation of the draft CBLP as a whole – with the strategic approach, the Policies, and the proposed Site Allocations. This is presented in Section 8 of this Pre-Submission SA Report (December 2017) that accompanies the Pre-Submission Draft Plan for consultation in early 2018. This continuing SA work was carried out using the same SA Frameworks, in the same way and to the same levels of detail and as appropriate to the stage of plan-making.
- 2.16 SA is an assessment tool that helps to inform decision-making; it is not the only basis for deciding the preferred options for the Plan. The Council will consider the findings of the SA alongside the wider evidence base to inform decision-making in relation to the selection or rejection of alternatives and development of policy for the Local Plan. SA is an iterative and ongoing process that will be undertaken at each stage of plan-making. SA Reports will accompany the Local Plan on consultation at various stages and set out the findings of the SA, as well as reasons for the selection or rejection of alternatives in plan-making.

## Consultation

- 2.17 The SEA Directive and Regulations require early and effective public consultation. The development of the CBLP has been subject to wide consultation since February 2016. The SA Scoping Report was subject to consultation through the Council's website in summer 2016, and including formal consultation with the SEA statutory bodies (Historic England, the Environment Agency, and Natural England). Comments received on the SA scoping were taken into consideration and reported in the final SA Scoping Report (October 2016).
- 2.18 The Initial SA Report accompanied the Draft Regulation 18 CBLP for consultation at the end of June 2017 for 8 weeks. Comments made have been taken into consideration and are included with responses in Appendix IX of this next draft of the SA Report. This SA Report (December 2017) accompanies the Draft Pre-Submission Plan on Regulation 19 consultation for consultation between 11 January and 22 February 2018. Any comments made on the SA will be reported in the next stages of plan-making and SA/SEA – for submission to the Secretary of State for independent examination in March 2018.

### 3.0 SUSTAINABILITY CONTEXT, OBJECTIVES & BASELINE CHARACTERISTICS

#### Introduction

- 3.1 In order to establish a clear scope for the SA of the Central Bedfordshire Local Plan, it is necessary and a requirement of SEA, to review and develop an understanding of the baseline conditions of the plan area and the wider range of plans and programmes that are relevant to the plan. The Central Bedfordshire Scoping Report (October 2016) considered and reported baseline conditions for the plan area, as well as Plans and Programmes that may affect or be affected the development of the Central Bedfordshire Local Plan. Analysis of this information allowed the SA to identify the key issues and opportunities for sustainable development in Central Bedfordshire and create sustainability objectives to address these key issues. Full details can be found in the final Scoping Report and are summarised in this section.

#### Plans and Programmes

- 3.2 The following plans, programmes and projects were considered during scoping:
- DCLG, National Planning Policy Framework (NPPF), 2012
  - Air Quality Plan for Nitrogen Dioxide, 2017
  - DCLG, Planning Policy for Traveller Sites, 2015
  - Environment Agency, Managing Water Abstraction, 2013
  - The Heritage Alliance, Heritage 2020
  - Historic England, Action Plan 2015-2018
  - Defra, Biodiversity 2020 - A strategy for England's wildlife and ecosystem services, 2011
  - Defra, Waste Management Plan for England, 2013
  - Public Health England, Global Health Strategy 2014 to 2019
  - Infrastructure and Projects Authority, National Infrastructure Delivery Plan 2016 - 2021
  - Anglian Water, Water Resources Management Plan 2015
  - Affinity Water, Final Water Resources Management Plan 2015 - 2020
  - Thames Water, Water Resource Management Plan 2015 – 2040
  - Defra and Environment Agency, Anglian River Basin District River Basin Management Plan, December 2015
  - South East Midlands Local Enterprise Partnership Strategic Economic Plan, 2015 – 2020
  - Central Bedfordshire Council, Local Transport Plan 3, 2011-2026
  - Central Bedfordshire Council, Local Area Transport Plans
  - Central Bedfordshire Council, Minerals and Waste Local Plan: Strategic Sites and Policies, 2014
  - Central Bedfordshire Council, Climate Change Strategy, 2010
  - Central Bedfordshire Council, Carbon Management Plan, 2010

- Bedfordshire and Luton Strategic Green Infrastructure Plan (2007)
- Chilterns AONB Management Plan, 2014-2019
- Greensand Trust, Luton and Southern Bedfordshire Green Infrastructure Plan, 2009
- Greensand Trust, Mid Bedfordshire Green Infrastructure Plan, 2008
- Central Bedfordshire Council, Leisure Strategy, 2014-2019
- Central Bedfordshire Council, Housing Strategy 2011/12 - 2015-16 - The
- Central Bedfordshire Council, Rent Strategy 2014/15
- Central Bedfordshire Together Local Strategic Partnership, Sustainable Communities Strategy, 2010-2031
- Your Countryside, The Outdoor Access Improvement Plan for Central Bedfordshire, 2013 – 2031
- Central Bedfordshire School Organisation Plan, 2016 – 2021
- East-West Rail
- A428 Oxford to Cambridge Expressway
- Luton Borough Council, Luton Local Plan 2011-2031, Pre-Submission Version October 2015; submitted and examined; adopted November 2017.
- North Hertfordshire District Council Draft Local Plan 2011-2031 - Preferred Options Consultation Paper 2014 and New Sites 2015; submitted for examination in 2017.
- South Cambridgeshire District Council Local Plan Proposed Submission March 2014, examined and March 2016 proposed modifications; not yet adopted.
- Bedford Borough Council Draft Local Plan 2032 - issues and options and two calls for sites complete so far, draft plan due in 2018, further consultation planned February-March 2018; not yet submitted for examination.
- Milton Keynes Council, Plan: MK Strategic Development Directions (Consultation Document) Jan-April 2016; Draft Plan consultation upon March – June 2017; not yet submitted for examination.
- Aylesbury Vale District Council, Vale of Aylesbury Local Plan 2013-2033 Pre-Submission Plan consulted upon November-December 2017; not yet submitted for examination).
- Dacorum Borough Council Saved Local Plan (adopted 2004) and Core Strategy (Adopted 2013). Current work on producing a Single Local Plan, with a call for sites undertaken in 2015; Issues & Options consultation October-November 2017.
- St Albans City and District Council Local Plan to 2036; Issues & Options consultation January – February 2018; not yet submitted for examination
- Huntingdonshire District Council Draft Local Plan to 2036 (stage 3 consultation 2013; Proposed Submission consultation until 5 February 2018 not yet adopted)
- Mayor of London, The London Plan, March 2015 (including Minor Alterations 2015-16

## Baseline Conditions

- 3.3 A brief summary of the baseline conditions is provided below, these are considered by theme:

## Communities

- 3.4 The plan area contains largely rural communities with a total population of around 269,000 residents<sup>27</sup>. The biggest increase in population in the period up to 2021 is expected in the number of people aged 65 and over<sup>28</sup>. The area is considered to be less culturally diverse than a number of the surrounding Local Authority Areas as well as England as a whole. In 2011 approximately 0.2% of the population identified themselves as a Gypsy or Irish Traveller. In line with national trends there is an under delivery of housing in the Plan area. The predominant tenure is home ownership and the average wage in Central Bedfordshire is higher than the national average. The affordability of housing has become a critical issue in the area. There are a large number of designated Neighbourhood Plan areas, although no Neighbourhood Plans have yet been adopted. The west and south of Central Bedfordshire is also designated Green Belt land situated between Milton Keynes and Luton.

## Economy and Employment

- 3.5 The main industries of employment within Central Bedfordshire include wholesale and retail, education, manufacturing, construction and human health and social work activities. Along with these key sectors there are also a number of specialisms, which reflect Central Bedfordshire's strengths in the engineering/manufacturing sector. The rural economy also plays an important role through leisure and tourism as well as veterinary activities<sup>29</sup>. In 2011, Construction had the highest turnover at just over £2.5 million with Production having the second highest turnover at just over £2 million within Central Bedfordshire<sup>30</sup>. The employment rate in Central Bedfordshire is higher than national and regional comparator areas, and residents earn more than the England average weekly gross pay. Dunstable has a significantly higher number of retail vacancies when compared to other towns in Central Bedfordshire. A significant oversupply of industrial land within the Plan area is also demonstrated. Under the Joint Local Broadband Plan<sup>31</sup> approximately 96.5% of Central Bedfordshire will be able to receive superfast broadband (speeds of at least 24 megabits per second) by 2018/19.

## Health and Equalities

- 3.6 The health of people in Central Bedfordshire is generally better than the England average. Deprivation is lower than average; however, about 13.1% (6,500) of children live in poverty. Life expectancy for both men and women is higher than the England average. However, it should be noted that life expectancy is 6.0 years lower for men and 5.2 years lower for women in the most deprived areas of Central Bedfordshire than in the least deprived areas<sup>32</sup>. Estimated levels of adult excess weight are the only health indicator measured within the Public Health England profile<sup>33</sup> that is ranked significantly

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<sup>27</sup> Central Bedfordshire (January 2016) Key Facts and Figures.

<sup>28</sup> Ibid.

<sup>29</sup> Central Bedfordshire Council (Sept 2012) Central Bedfordshire Local Economic Assessment.

<sup>30</sup> Ibid.

<sup>31</sup> Milton Keynes, Central Bedfordshire and Bedford Joint Local Broadband Plan (JLBP) April 2012

<sup>32</sup> Public Health England (2015) Central Bedfordshire Health Profile 2015.

<sup>33</sup> Ibid.



worse than the England average. The areas with higher levels of deprivation are generally in the south of Central Bedfordshire near to the boundary with Luton Borough Council. This includes the settlements of Houghton Regis, Dunstable and Caddington.

- 3.7 The Outdoor Access Improvement Plan<sup>34</sup> identifies that of the total population of Bedfordshire, 96% of people accessed the countryside, and of those residents who undertook the various activities within the countryside, 63% indicated that they used footpaths, bridleways, cycle paths or other tracks rather than pavements or roads always or often. In addition, 83% of resident visit country parks at some time. 94% of those surveyed agreed that having green space close to where they live is important to them and is an important part of their life.

### **Transport and Movement**

- 3.8 Central Bedfordshire has numerous key road connections running through the Plan area including the strategic road connections of the M1, A1, A5 and A421. The plan area has good existing north-south links; however, it is recognised that there are strategic gaps in movement east to west. Though partially rectified with the opening of the A421, this is likely to be improved with the A5-M1 link which began construction in 2015 and is expected to be complete in the summer of 2017<sup>35</sup>. There are also three strategically important rail lines; the East Coast Mainline, the Midland Mainline and the West Coast Mainline; serving the towns of Sandy, Biggleswade, Arlesey, Flitwick, Harlington, Aspley Guise, Ridgmont, Lidlington, Millbrook, Stewartby, and Leighton Buzzard. The Walking Strategy<sup>36</sup> identifies that Central Bedfordshire is conducive to encouraging walking due to the relatively flat topography and in containing a number of small towns all of which provide services accessible within a short walk.
- 3.9 Significant employment areas are largely based in the surrounding major urban areas, as well as a wider range of services and facilities; and although these are accessible by public transport, the distances to these centres result in journeys (particularly to work) which are much longer than average, with high levels of out-commuting placing additional pressure on the strategic transport routes<sup>37</sup>.

### **Air Quality**

- 3.10 Road traffic is very closely linked to air quality, and concentrations of air pollutants are particularly high in Central Bedfordshire where the road network is congested<sup>38</sup>. There are 3 Air Quality Management Areas (AQMAs) designated for exceedances of Nitrogen Dioxide (NO<sub>2</sub>) within Central Bedfordshire:

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<sup>34</sup> Central Bedfordshire Council (2013) Your Countryside - The Outdoor Access Improvement Plan for Central Bedfordshire 2013 to 2031.

<sup>35</sup> Highways England: A5-M1 Link (Dunstable Northern Bypass)

<sup>36</sup> Central Bedfordshire Council (2011) Local Transport Plan Appendix E - More People Walking - The Walking Strategy for Central Bedfordshire

<sup>37</sup> Central Bedfordshire Council (2011) Local Transport Plan 3

<sup>38</sup> Central Bedfordshire Council (2011) Local Transport Plan 3

- Sandy - The designated area incorporates 10 metres from the kerbside of both sides of the A1 at the Georgetown exit, then south along the London Road A1 to the Bedford Road junction.
- Ampthill - The declared area incorporates part of Bedford St between Market Square and Brewers Lane on both sides of the road.
- South Bedfordshire - The AQMA incorporates Dunstable Town Centre, the A505 from the town centre to the junction of Poynters Road/Dunstable Road, the A5 from Union St to Borough Road, and the B489 - West St from the town centre to St Marys Gate.

## **Energy and Climate Change**

- 3.11 The statistics identify an average domestic consumption per household of 17.7MWh (megawatt hours). The total consumption of all fuels in Central Bedfordshire in 2013 was 6,184.6GWh, which has been steadily increasing since 2011 when 6111.7GWh were consumed, but remains below the 2010 level of 6405.9GWh. However, the current Renewables Capacity Study<sup>39</sup> estimates that the total energy demand in Central Bedfordshire could rise over coming years, largely due to an increased electricity consumption. It will be important to implement measures to reverse the current trend of increased consumption each year and achieve overall reductions. Evidence<sup>40</sup> suggests that road transport is the biggest contributor to greenhouse gas emissions within Central Bedfordshire at approximately 42% of the total emissions. However, it is also important to note that domestic use contributes approximately 33% and industry and commercial contributes approximately 25% to the total greenhouse gas emissions in Central Bedfordshire.
- 3.12 The Central Bedfordshire Climate Change Adaptation Evidence Base Report<sup>41</sup> identifies that the impacts of climate change that are likely to affect Central Bedfordshire most are:
- Flooding
  - Water resources
  - Overheating
  - Subsidence
  - Risks to the natural environment

## **Water: Resources, Quality and Flooding**

- 3.13 The majority of Central Bedfordshire falls within the Ruthamford South Water Resource Zone (WRZ), which is supplied by Anglian Water. A small proportion of Central Bedfordshire to the south falls within the Lee WRZ, which is supplied by Affinity Water. The Anglian Water Resource Management Plan forecasts that under dry year annual average conditions and without investment to maintain the supply-demand balance, the Ruthamford South WRZ will be in deficit by 2026/27, and the Affinity WRMP forecasts that the Lee WRZ will also

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<sup>39</sup> LDA Design (2014) Renewables Capacity Study for Central Bedfordshire

<sup>40</sup> DECC (2013) Local and Regional CO2 emissions 2005 - 2012

<sup>41</sup> LDA Design (2012) Central Bedfordshire Climate Change Adaptation Evidence Base Final Report

be in deficit during the Plan period without appropriate mitigation and investment. Central Bedfordshire overlies areas of Secondary and Principal Aquifer as well as unproductive strata. The use of groundwater in the area makes it vulnerable to pollution; and, a number of licensed abstractions are present across the plan area. The overall water quality classification status for most water bodies in the Plan area are largely moderate to good. The Broughton Brook to the west (east of Milton Keynes) is the only water body to be identified as currently having an overall poor status within Central Bedfordshire<sup>42</sup>.

- 3.14 Records of historic flooding are spread throughout Central Bedfordshire, but there is a greater intensity of reported events to the centre and northeast of the area. The areas of Ampthill, Campton and Chicksands parish and Henlow, each sited close to watercourses which flow eastwards towards the River Ivel, as well as Eaton Bray, are reported to have higher numbers of properties at risk than elsewhere within Central Bedfordshire. The parishes at greatest risk from surface water flooding are also identified in the Local Flood Risk Management Strategy<sup>43</sup> as Biggleswade; Dunstable; Flitwick; Houghton Regis and Leighton Buzzard.

### **Soil and Land**

- 3.15 The geology of Central Bedfordshire largely comprises clay and chalk. The dominating soils include lime-rich loamy and clayey soils with impeded drainage, slightly acid loamy and clayey soils with impeded drainage, freely draining slightly acid loamy soils, freely draining slightly acid sandy soils, and shallow lime-rich soils over chalk or limestone. Defra identifies small pockets of best and most versatile agricultural land situated largely around the borders of the Plan area, particularly surrounding Bedford and Milton Keynes, and also an area surrounding Biggleswade<sup>44</sup>. Of new employment completions in 2015/16, a high level (71%) were completed on previously developed land. Of all new housing completions in this same period, 38% were located on previously developed land.
- 3.16 In 2010, the Council identified some 1800 sites of potential concern of contamination due to their historical or current exposure to landfill, sand/clay extraction, and various other types of industrial land use. Further to this, some areas of Bedfordshire have been designated as lowest level radon affected areas and require case-by-case investigation<sup>45</sup>.

### **Biodiversity and Geodiversity**

- 3.17 There are no European designated sites within Central Bedfordshire. There are a number of nationally designated sites, including 33 Sites of Special Scientific Interest (SSSIs) and 3 National Nature Reserves (NNR). There are also a number of sites that are designated locally for their biodiversity and geodiversity importance, these include:

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<sup>42</sup> Ibid.

<sup>43</sup> Ibid.

<sup>44</sup> Defra Magic Map Application

<sup>45</sup> Central Bedfordshire Council (2010) Contaminated Land Strategy 2010 - 2015

- 12 Local Nature Reserves (LNR)
- 267 County Wildlife Sites (CWSs); 8 are shared with Bedford, and 5 are shared with Luton
- 20 Road Verge Nature Reserves (RNRs); nine are within or adjacent to a SSSI
- 20 Local Geological Sites (LGSs)

3.18 Central Bedfordshire contains a variety of habitats and species which are recognised in Section 41 of the Natural Environment and Rural Communities Act 2006 as of "principal importance for the purpose of conserving biodiversity". Around 107 species and 18 habitats of 'principal importance' have been recorded in Central Bedfordshire. The Greensand Ridge is also a narrow, elongated, elevated area which runs in a north-east/south-west direction covering a significant part of Central Bedfordshire and is an identified Nature Improvement Area.

### **Landscape and Townscape**

3.19 South east of Dunstable and north of Luton lies the distinctive chalk escarpment of the Chilterns Area of Outstanding Natural Beauty (AONB). In the north of the Plan area lies the southern half of the Marston Vale Community Forest. The Plan area contains for different National Character Areas:

- NCA87: East Anglian Chalk
- NCA88: Bedfordshire and Cambridgeshire Claylands
- NCA90: Bedfordshire Greensand Ridge
- NCA110: Chilterns

3.20 The Central Bedfordshire Landscape Character Assessment (LCA)<sup>46</sup> characterises the rural landscapes of the plan area and identifies key features and attributes which contribute to character and sense of place and which could be vulnerable to change. The LCA has identified key villages which are vulnerable to the impacts of development including; Cockayne Hatley, Biggleswade, Astwick, Sandy, Barton, Charlton, Salford, Stewartby, Woburn, Aspley Guise, Heath and Reach, Husborne Crawley, Flitwick, Ampthill, Whipsnade, Studham, Caddington, and Toddington, as well as the landscapes at Wrest Park, Woburn Safari Park, East Hyde, and Tempsford Airfield.

### **The Historic Environment**

3.21 It is identified that within Central Bedfordshire there are<sup>47</sup>:

- 84 Scheduled Monuments
- 14 Registered Parks and Gardens

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<sup>46</sup> LUC (2016) Central Bedfordshire Landscape Character Assessment

<sup>47</sup> CBC Monitoring Report 2014/15 and CBC (2010) Design Supplement 5; The Historic Environment

- 1912 Listed Buildings (63 Grade I, 100 Grade II\*, and 1749 Grade II)
- 60 Conservation Areas
- Several thousand non-designated archaeological sites
- Non-designated locally listed buildings

3.22 Central Bedfordshire has a rich and varied archaeological heritage with nationally significant sites and monuments dating from the prehistoric through to the post medieval periods. The earliest archaeological remains relate to the Palaeolithic over 125,000 years ago discovered at Caddington and internationally recognised. Two major Roman roads pass through Central Bedfordshire; Watling Street (A5) and the road linking Godmanchester and Baldock via Sandy (partly on the line of the A1).

### **Minerals and Waste**

3.23 The underlying geology that characterises the landscape of Central Bedfordshire and its surrounds also yields economic minerals. The major resources are aggregate sands, gravel, chalk, and silica sand. There are currently 30 sites at some stage of mineral extraction within the plan area.

3.24 In total, 117,728 tonnes of household waste were produced in Central Bedfordshire<sup>48</sup> in 2014/15, equivalent to 1,052kg per household, or 435kg per person. In 2014/15, 48.5% of household waste was reused, recycled or composted. In Central Bedfordshire, most waste that is not reused, recycled or composted is processed to remove recyclable material such as metals and the remainder is made into a fuel which is used to create energy. 22.1% of municipal waste is sent to landfill. There are currently 66 sites managing waste within the plan area.

### **Likely Evolution of Baseline Conditions without the CBLP**

3.25 Without the Plan there is likely to be a less coordinated approach to the delivery of new employment, housing and infrastructure. New development is less likely to be delivered in areas where it is needed most, which could exacerbate inequalities, deprivation and problems with housing affordability across the Plan area. It could adversely affect the economic viability of towns and ability to effectively meet the needs of the communities. It could also reduce opportunities to address existing issues, such as out-commuting for employment and retail needs.

3.26 New development can be planned to ensure accessibility and increase opportunities for healthy and active lifestyles. Without a Plan in place development is less likely to deliver health benefits. There would be an increased likelihood of negative effects on Green Infrastructure networks and existing facilities (for example through loss of undesignated areas or established facilities, or fragmentation of spaces), and less clarity over the type of provisions expected within new development.

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<sup>48</sup> Central Bedfordshire Council (January 2016) Key Facts and Figures

- 3.27 Without the Plan development may be less likely to deliver the necessary highways capacity improvements to accommodate the cumulative effects of new development. The Plan can strategically plan for development in areas where the existing transport networks can accommodate growth, or where the necessary improvements can be more easily provided, and in locations that improve accessibility for local communities and better promote sustainable transport.
- 3.28 Issues for sustainable water management are likely to be exacerbated without the opportunity from the Plan to set more aspirational requirements for future development in terms of water efficiency standards and the management of surface water run-off, with a longer-term risk-based approach to flood risk management. Land and soils are key in the provision of new development, and development that is not managed through the Plan could lead to significant effects loss of the best quality soils and limited use of previously developed land.
- 3.29 Without the Plan, the cumulative effects of development on biodiversity are unlikely to be addressed and the national aim of no net loss is less likely to be achieved through a lack of coordinated planning of development, with missed opportunities to improve habitat connectivity. Without the Plan, future development has an increased likelihood of resulting in negative effects on landscape and townscape character, and a decreased likelihood of delivering coordinated and prioritised improvements. Without the Plan, designated heritage assets would still be protected through national and local policy; however, undesignated heritage assets, heritage settings and potential archaeology could be more vulnerable to the impacts of development.

### Key Sustainability Issues

- 3.30 From this information, the following key sustainability issues have been identified for the Plan area.

**Table 3.1: Key Sustainability Issues**

Topic	Key Sustainability Issue
Communities	<ul style="list-style-type: none"> <li>In line with national trends there is an increasing and ageing population.</li> <li>Maintaining the identity of settlements and communities in both rural and urban areas.</li> <li>Meeting the needs of communities with different sustainability issues and ensuring that any opportunities to address these issues are maximised. For example, Dunstable and Houghton Regis are more culturally diverse than the other settlements within Central Bedfordshire.</li> <li>There may be a need to accommodate housing growth from outside the Plan area.</li> <li>Minimising the loss of important Green Belt land that provides protection for settlement identity, soil quality and open land.</li> </ul>

	<ul style="list-style-type: none"> <li>There is poor access to services and facilities in some areas of Central Bedfordshire, particularly in rural settlements.</li> <li>Average wages compared to average house prices in the Plan area, make access to the property market unattainable for many.</li> <li>There is a higher than average number of Gypsies and Travellers within Central Bedfordshire compared to England.</li> </ul>
Economy and Employment	<ul style="list-style-type: none"> <li>Approximately 50% of residents commute to the surrounding areas, including Hertfordshire, Luton, London, Milton Keynes and Bedford.</li> <li>People who work in Central Bedfordshire earn less than those who work in the nearby areas, such as those working in Hertfordshire, Luton, London, Milton Keynes and Bedford.</li> <li>Dunstable has a significantly higher retail vacancy rate compared to the national rate.</li> <li>The wards of Tithe Farm, Parkside, Dunstable Manshead, Dunstable Northfields and Sandy are currently experiencing higher rates of unemployment compared to the other wards in Central Bedfordshire.</li> <li>There are relatively high outflows of retail and convenience spending.</li> <li>Evidence suggests that there is a significant oversupply of industrial employment land, and that the quality and typologies will be an important factor for future development.</li> <li>Both the urban and rural economies are important for the Central Bedfordshire economy as a whole.</li> </ul>
Health and Equalities	<ul style="list-style-type: none"> <li>There are areas of higher deprivation in the south of the Plan area, particularly around the boundary with Luton Town.</li> <li>Trends show that deprivation is increasing in the north of the Plan area, although this remains below areas in the most deprived 30% in England.</li> <li>The potential loss of Green Infrastructure as well as areas of open space or recreation for people.</li> <li>A need to reduce excess weight in adults, which is ranked significantly worse than the England average.</li> <li>Improving the quality of existing Green Infrastructure, open space and recreational areas.</li> </ul>
Transport and Movement	<ul style="list-style-type: none"> <li>In a number of areas there is insufficient highway capacity to meet current and future demands. This results in congestion at peak times, predominantly in the main urban areas and on the strategic road network.</li> <li>Public transport is less accessible and frequent in rural areas compared to some of the larger settlements.</li> <li>Approximately 50% of residents commute for work to the surrounding areas - including Hertfordshire, Luton, London, Milton Keynes and Bedford - predominantly using the private vehicle.</li> <li>Ensuring that new development is in accessible locations that reduce the need to travel by private car.</li> <li>Supporting a modal shift, and a built environment that supports a modal hierarchy in which the pedestrian and cyclist have appropriate priority.</li> </ul>



	<ul style="list-style-type: none"> <li>■ New transport infrastructure is being proposed within the Plan area, which includes the East West Rail Link.</li> </ul>
Air Quality	<ul style="list-style-type: none"> <li>■ 3 AQMAs designated for exceedances of Nitrogen Dioxide in Sandy, Ampthill and Dunstable. Traffic is the primary cause for exceedances in National Air Quality Objectives.</li> <li>■ Road traffic is very closely linked to air quality, and concentrations of air pollutants are particularly high in Central Bedfordshire where the road network is congested.</li> </ul>
Energy and Climate Change	<ul style="list-style-type: none"> <li>■ Evidence suggests that demand for energy is rising.</li> <li>■ Road transport is the biggest contributor to greenhouse gas emissions; however, commercial and industrial buildings are also contributors.</li> <li>■ Adapting to the predicted effects of climate change.</li> <li>■ Evidence suggests that there is significant capacity for new renewable energy development.</li> </ul>
Water: Resources, Quality and Flooding	<ul style="list-style-type: none"> <li>■ Increased pressure on water resources particularly in the Anglian region as a result of high population density and relatively low rainfall.</li> <li>■ According to the EA water quality is declining in some areas and improving in others. The EA identifies wastewater discharges from Waste Recycling Centres and physical modifications of watercourses as being the primary reasons for water bodies not achieving good status under WFD.</li> <li>■ High flood risk areas situated around existing water courses, and areas at risk of surface water flooding.</li> </ul>
Soil and Land	<ul style="list-style-type: none"> <li>■ The retention and protection of best and most versatile agricultural land, which is a National issue.</li> <li>■ The appropriate remediation of contaminated land</li> </ul>
Biodiversity and Geodiversity	<ul style="list-style-type: none"> <li>■ A number of nationally and locally designated sites for nature conservation and geodiversity as well as a range of important habitats and species.</li> <li>■ Important ecological corridors that run throughout Central Bedfordshire as well as into the surrounding LAs.</li> <li>■ Improving ecological connectivity within the plan area and particularly within the Greensand Ridge Nature Improvement Area</li> </ul>
Landscape and Townscape	<ul style="list-style-type: none"> <li>■ Balancing the need for new development with the retention of a predominantly rural landscape character with important ridges, large areas of flat land, far-reaching views and high levels of tranquillity.</li> <li>■ Maintaining traditional field boundaries, habitats and building materials that contribute to landscape character.</li> <li>■ The loss of agricultural land is changing the landscape character of the Plan area.</li> <li>■ Protecting appropriate landscape settings e.g. the setting of the AONB</li> <li>■ There are a number of settlements that are vulnerable or sensitive to changes in the landscape/ townscape identified within the Landscape Character Assessment (2016).</li> </ul>
The Historic Environment	<ul style="list-style-type: none"> <li>■ Central Bedfordshire contains a large number of designated heritage assets.</li> </ul>

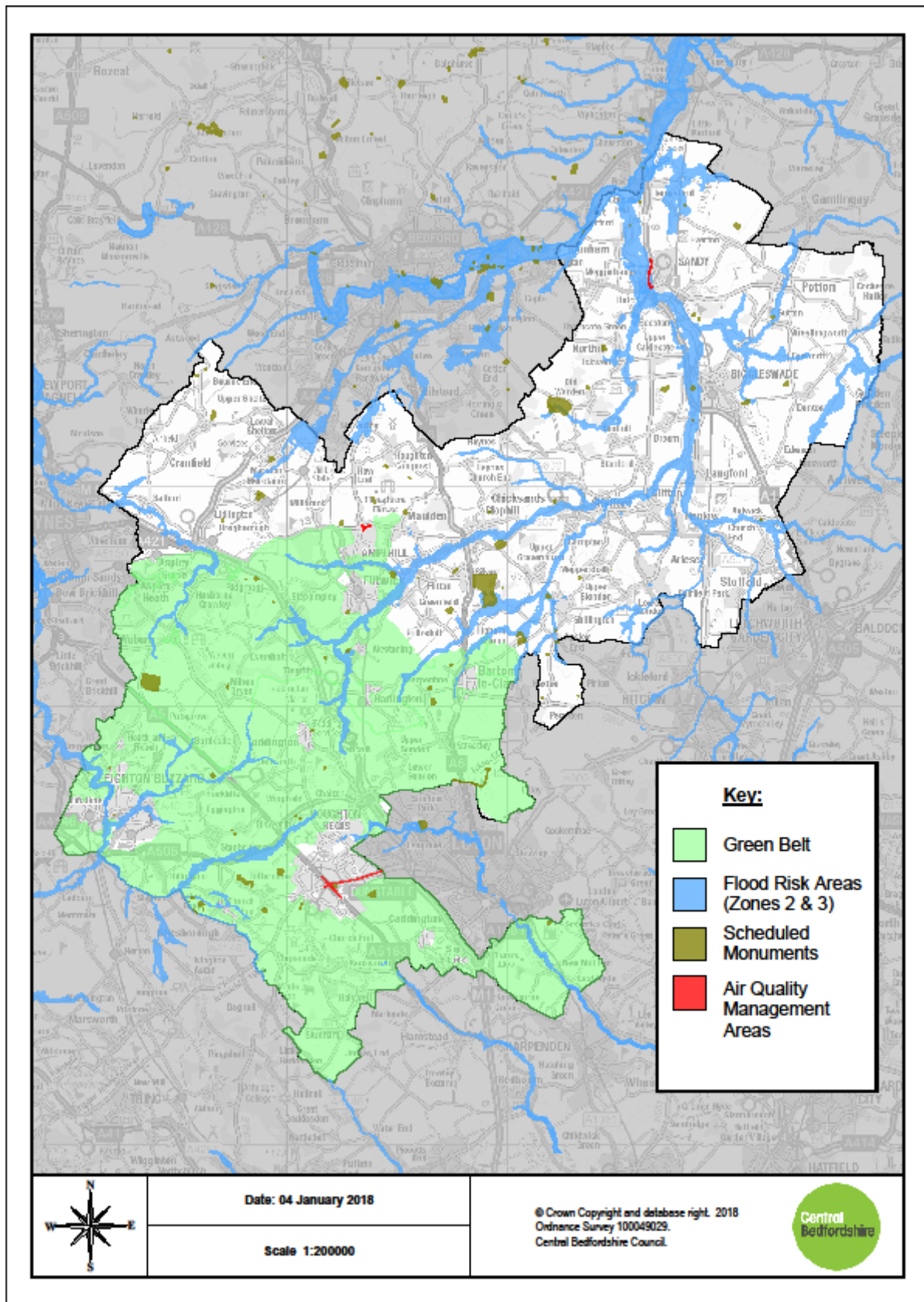


	<ul style="list-style-type: none"> <li>■ Conserving and enhancing designated and non-designated heritage assets and the contribution made by their settings</li> <li>■ Heritage assets at risk from neglect, decay, or development pressures</li> </ul>
Minerals and Waste	<ul style="list-style-type: none"> <li>■ Ensuring that the direction of new development does not conflict with the strategic allocations and plans outlined within the Minerals and Waste Local Plan, and minimises the associated effects of minerals and waste development / operations on human health.</li> <li>■ Supporting the waste hierarchy and encouraging increased recycling rates, ensuring new development contributes towards meeting the EU target rate of 50% of waste production recycled / reused by 2020.</li> </ul>

### Updating the Baseline Information

- 3.26 Technical studies were ongoing as the initial (June 2017) and Pre-Submission (November 2017) SA was being prepared and further studies, including on transport and the water cycle, are being undertaken as the plan preparation continues. Thus, there were information gaps and the SA recorded uncertainty where applicable at this strategic stage of assessment. The baseline information will be kept updated and as appropriate to the stage of the SA.
- 3.27 The constraints associated with planning for new development in the Central Bedfordshire area is shown in Figure 3.1, as follows:

**Figure 3.1: Constraints in the Central Bedfordshire Area**

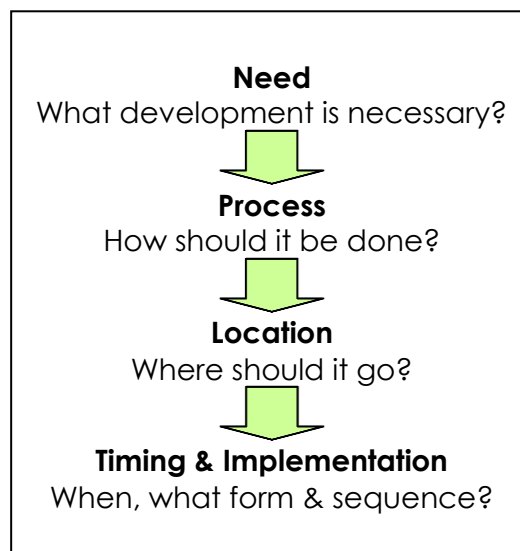


## 4.0 CONSIDERATION OF PLAN-MAKING OPTIONS & ALTERNATIVES IN SA/SEA

### Assessment of Alternatives in SA/SEA

- 4.1 The EU SEA Directive<sup>49</sup> requires assessment of the likely significant effects of implementing the plan and “reasonable alternatives” taking into account “the objectives and geographical scope” of the plan and the reasons for selecting alternatives should be outlined in the Report. The Directive does not specifically define the term “reasonable alternative”; however, UK SA/SEA guidance<sup>50</sup> advises that it should be taken to mean “realistic and relevant” i.e. deliverable and within the timescale of the plan. The NPPF (paragraph 165) requires that a Sustainability Appraisal which meets the requirements of the SEA Directive should be integral to the plan preparation process.
- 4.2 Extant SEA guidance<sup>51</sup> sets out an approach and methods for developing and assessing alternatives. This includes acknowledgement of a hierarchy of alternatives that are relevant and proportionate to the tiering of plan-making. Alternatives considered at the early stages of plan-making need not be elaborated in too much detail so that the “big issues” are kept clear; only the main differences between alternatives need to be documented i.e. the assessment should be proportionate to the level and scope of decision-making for the plan preparation. The hierarchy of alternatives may be summarised in the following diagram:

**Figure 4.1: Hierarchy of Alternatives in SA/SEA and Options in Plan-Making**



- 4.3 Recent case law in England has clarified and provided further guidance for current practice on how alternatives should be considered in SA/SEA of spatial and land use plans. The Forest Heath Judgment<sup>52</sup> confirmed that the

<sup>49</sup> <http://ec.europa.eu/environment/eia/sea-legalcontext.htm>

<sup>50</sup> <http://planningguidance.communities.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/>

<sup>51</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/7657/practicalguidesea.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf)

<sup>52</sup> Save Historic Newmarket Ltd v Forest Heath District Council (2011) EWHC 606

reasons for selecting or rejecting alternatives should be explained, and that the public should have an effective opportunity to comment on appraisal of alternatives. The SA report accompanying the draft plan must refer to, summarise or repeat the reasons that had been given in earlier iterations of the plan and SA, and these must still be valid.

- 4.4 The Broadlands Judgment<sup>53</sup> drew upon the Forest Heath findings and further set out that, although not an explicit requirement in the EU SEA Directive, alternatives should be appraised to the same level as the preferred option; the final SA Report must outline the reasons why various alternatives previously considered are still not as good as the proposals now being put forward in the plan, and must summarise the reasons for rejecting any reasonable alternatives - and that those reasons are still valid. The Rochford Judgment<sup>54</sup> confirmed that the Council had adequately explained how it had carried out the comparative assessment of competing sites and that any shortcomings in the early process had been resolved by the publication of an SA Addendum Report; this was subsequently upheld at Appeal.

### **Assessment of Options in Plan-Making**

- 4.5 Development planning issues, such as how much, what kind of development and where, are considered within the requirements of legislation and policy together with the characteristics of the plan area and the views of its communities. Potential options for resolving such issues are identified by the Councils through various studies, such as population projections and housing need, community strategies, infrastructure capacities, and environmental constraints analysis – and through consultation with the regulators, the public, businesses, service providers, and the voluntary sector.
- 4.6 At the earlier and higher levels of strategic planning, options assessment is proportionate and may have a criteria-based approach and/or expert judgment; the focus is on the key differences between possibilities for scale, distribution and quality of development. At this early stage, the options presented may constitute a range of potential measures (which could variously and/or collectively constitute a policy) rather than a clear spatial expression of quantity and quality. Each option is not mutually exclusive and elements of each may be further developed into a preferred option. As a plan evolves, there may be further consideration of options that have developed by taking the preferred elements from earlier options. Thus, the options for plan-making change and develop as responses from consultation are considered and further studies are undertaken.
- 4.7 At the later and lower levels of development planning for site allocations, options assessment tends to be more specific, often focused on criteria and thresholds, such as land availability, accessibility to services, and impacts on local landscape - and particularly informed by technical studies such as the Strategic Housing Market Assessment (SHMA), the Strategic Housing Land Availability Assessment (SHLAA), and Strategic Flood Risk Assessment (SFRA). There is a hierarchy of options assessment with sites that are not viable or

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<sup>53</sup> Heard v Broadland District Council, South Norfolk District Council, Norwich City Council (2012) EWHC 344

<sup>54</sup> Cogent Land LLP v Rochford District Council (2012) EWHC 2542

deliverable or might have adverse effects on protected environmental assets rejected at an early stage.

- 4.8 The role of the SA is to inform the Councils in their selection and assessment of options; SA is undertaken of those reasonable alternatives (options) identified through the plan-making process. The findings of the SA can help with refining and further developing these options in an iterative and ongoing way. The SA findings do not form the sole basis for decision making – this is informed also from planning and other studies, feasibility, and consultation feedback.

### **Options for Accommodating Growth in the Central Bedfordshire Area**

- 4.9 Different options for accommodating proposed growth have been considered since early in developing the new Local Plan. During September-October 2016, the public were invited to comment on the Shaping Central Bedfordshire consultation that included consideration of 4 main areas (A-D) for development growth. Comments received have been considered in developing the next stage of options assessment that included approaches to distributing development and the consideration of 5 Scenarios for the distribution of growth, the drafting of the Spatial Strategy, and the options for Growth Locations – housing and employment. These were subject to consultation at the end of June 2017 for 8 weeks and comments received were considered in identifying the preferred strategic approach and the potential site options.
- 4.10 The strategic SAs of the Areas A-D and the approaches to distributing new growth were undertaken at an early stage of plan-making when other studies had yet to be completed. As to be expected at this high level of appraisal, assumptions were made, including the mitigation measures for negative effects provided by the emerging Development Management Policies. There is uncertainty of the significance of effects, particularly until further studies on the water cycle and transport impacts/capacities are completed. Nonetheless, significant effects were indicated and the initial findings from these strategic SAs, together with the initial strategic SA findings of the growth location options, informed the development of the scenarios for growth, the spatial strategy and policies. Thus, the SA contributed to identifying and refining reasonable strategic alternatives in an iterative and ongoing way and in accordance with good practice and regulatory requirements.

### **Options for Allocating Strategic and the Small-Medium Sites**

- 4.11 The emerging options for the proposed Strategic Allocations (Housing, Employment) and Broad Locational areas (to identify areas for future growth after the Plan period 2035) were subject to SA. The options identified as reasonable alternatives for the small-medium sites, having passed through Stage 1-3 of the Sites Assessment Method and deemed to be suitable and deliverable, were subject to SA.

### **The Do-Nothing Scenario**

- 4.12 It may be noted that “doing nothing” is not a reasonable alternative for the Local Plan since the Council has a duty to plan positively for objectively identified needs for housing and employment land.

### **Duty to Cooperate**

- 4.13 A feature of plan-making for CBC is to consider any reasonable options for accommodating growth for unmet housing need from adjacent Councils. This was acknowledged as a particular characteristic for the CBC area and the Strategic SA Framework (see previously Table 2.3) includes a sub-objective/decision-aiding question “*Does the option offer the opportunity to help meet the housing needs arising from outside the Plan area?* Accordingly, this aspect of considering meeting unmet need from outside the Plan area has been tested through SA in an integrated way.

## **5.0 SUSTAINABILITY APPRAISAL OF THE REGULATION 18 DRAFT CENTRAL BEDFORDSHIRE LOCAL PLAN: Options for the Spatial Strategy & Strategic Policies**

### **Introduction**

- 5.1 The SA was involved in early preparation of the CBLP during autumn 2016. The Shaping Central Bedfordshire consultation<sup>55</sup> through the Council's website from September and ending 1 November 2016, invited comments on early preparation for the CBLP with consideration of four potential areas for development growth (A-D). These four areas were subject to high level SA using the Strategic SA Framework.
- 5.2 During late 2016, the Council was also considering potential approaches for distributing development growth, including new settlements, village extensions, urban extensions, growth in transport corridors and around transport hubs, and higher density development. These seven approaches were subject to high level SA using the Strategic SA Framework.
- 5.3 During the summer and autumn 2016 consultants were working on two Growth Options Studies to consider potential strategic growth locations. The first study was a joint commission with Luton Borough Council and Aylesbury Vale and North Hertfordshire District Council's and covered the Luton Housing Market Area (HMA). The second study was a sole commission by CBC and covered the remaining area of Central Bedfordshire. Potential site options that were proposed through the CBC Call for Sites<sup>56</sup> were investigated for those that were suitable for assembling together to form possible strategic sites. Potential Growth Locations were identified and site options were further investigated by the Council using its Site Assessment process that had also been consulted upon in 2016. The findings of these studies helped identify potential growth location, including some that were suitable for non-strategic level development. All reasonable alternatives identified as potential growth locations were subject to SA using the Strategic SA Framework.
- 5.4 The comments received from Shaping Central Bedfordshire consultation, the findings from the Growth Options Studies, the Site Assessment studies, and the SA informed the development of the five Scenarios for development growth in the CBC area. Key strategic studies were being undertaken at the same time through the latter part of 2016 and into early 2017 in an iterative and ongoing way to identify the reasonable strategic options that should be considered towards development of the Spatial Strategy for the CBLP. Thus, the SA was used positively to help identify and refine reasonable alternatives in accordance with good practice and the requirements of the SEA Regulations and NPPF.

<sup>55</sup> <http://www.centralbedfordshire.gov.uk/planning/policy/local-plan/shaping-central-beds-consultation.aspx>

<sup>56</sup> <http://www.centralbedfordshire.gov.uk/planning/policy/local-plan/sites-submitted.aspx>



## Strategic Options: Four Areas for Development Growth

5.5 The four Areas that comprised the Shaping Central Bedfordshire consultation were as follows:

- **Area A South & West/M1 Corridor:** This area is heavily constrained by the Green Belt and Chiltern AONB designations. Major sites to the north of Houghton Regis are under development and extensive growth is underway at Leighton Linlade. Smaller settlements generally have limited capacity to grow, although there may be possibilities along major transport routes such as the Midland Main Railway Line. Overall, the Council identified some growth potential primarily to serve the needs of Luton & Dunstable, depending upon the justification for release of Green Belt.
- **Area B East/A1 Corridor:** The broad corridor running north-south along the A1 and the East Coast Main Railway Line is well served with regard to transport and there is the potential for significant upgrades. At Sandy, there is the potential to benefit from the interchange between north-south and east-west links and to attract business growth along the Oxford to Cambridge corridor. Overall, the Council identified potential for major growth on large sites with good infrastructure.
- **Area C East/West Corridor:** This area in the north of CBC includes an important section of the Oxford to Cambridge corridor with its advanced R&D and higher education centres. Future upgrading of the strategic transport network could support access and economic opportunities but the timing and commitment of further investment is uncertain. Overall, the Council identified some growth potential depending upon infrastructure and viability of large sites.
- **Area D Central Section:** The central part of the CBC area is characterised by small towns and villages with very limited potential to upgrade infrastructure such as roads. Therefore, overall the Council found only limited potential for growth.

5.6 The detailed findings of the early strategic level SA of the four Areas is provided in Appendix IV of this SA Report and summarised in the table following:



**Table 5.1: Areas A-D Summary Strategic SA**

SA Objective	Areas for Potential Development Growth Summary Strategic SA							
	A		B		C		D	
1 Housing	++?		++?		++?		+?	
2 Communities <sup>57</sup>	--?	?	+	?	+	?	+	?
3 Accessibility - Services & Facilities	+?		+?		+?		+?	
4 Economy & Employment	+?		++?		++?		+?	
5 Health & Equalities	++?		+?		++?		0?	
6 Highways Air Quality <sup>58</sup> ; GHGs	0?		-?		-?		-?	
7 Sustainable Transport	+?		++?		++?		0?	
8 Energy & Climate Change	0?		0?		0?		0?	
9 Water Resources & Quality	0?		0?		0?		0?	
10 Reduce Flood Risk	0?		0?		0?		0?	
11 Soils	-		-		-		-	
12 Biodiversity & Geodiversity	0?		0?		0?		0?	
13 Landscape & Townscape	-		-		-		-	
14 Historic Environment	0		0		0		0	

5.7 At this strategic level of assessment, there is some uncertainty of SA findings until further studies are undertaken since the identified likely effects depend upon the scale, scope and precise locations of proposed development and with the possibilities for successful implementation of locationally specific mitigation measures. However, the emerging Development Management Policies provide guidance to avoid or minimise potential negative effects and these draft Policies were taken into account in the strategic SAs.

5.8 **Housing:** Areas A, B & C are likely to have major positive effects on SA objectives for housing. All the Areas could provide an appropriate mix of types of housing but this is more likely to be deliverable with more certain major positive effects for the medium to larger scale growth that could be potentially possible in Areas A, B & C. Positive effects are reduced to minor

<sup>57</sup> Please note that first symbol relates to location in/out of Green Belt designation; second symbol relates to effects on integration & identity for existing settlements

<sup>58</sup> Please note Air Quality & Green House Gas emissions are essentially associated with emissions from road vehicles for the purposes of this SA and as explained in the SA Scoping Report

significance for Area D that is characterised by market towns and villages linked by rural roads and any growth potential is likely to be small-medium and focused around settlements with good services.

- 5.9 **Communities:** All the Areas have the potential for negative or positive effects with regard to integration and the identity of a settlement or community. Uncertainty at this stage as this depends upon the sensitivity of the settlement/community and the scale/design of the development proposal. Whilst smaller developments might seem to be more readily integrated, larger developments can be more creative in scope and design offering enhancements to existing communities.
- 5.10 The fundamental aim of Green Belt policy<sup>59</sup> is to prevent urban sprawl by keeping land permanently open and Area A is characterised by established Green Belt designation to help neighbouring towns from merging into each other. However, such constraints have also restricted the opportunities for communities that can be associated with new development including new housing and supporting infrastructure. There is the potential for major cumulative negative effects for coalescence of existing settlements through loss of Green Belt land - uncertainty at this stage of assessment since the effectiveness of mitigation measures such as significant landscape buffering and avoiding land that only weakly contributes to GB purposes need further investigation at the next stage of plan-making.
- 5.11 Area A recognises the Green Belt policy constraints, suggesting some growth potential around Luton and only limited growth for settlements and larger villages along major transport routes. The growth potential depends upon justification for release of Green Belt land such as providing development in the Luton HMA and near areas of deprivation to improve services and facilities for these areas. Mitigation measures may be possible through reducing the amount of development to non-strategic levels of new homes to better integrate development within existing settlements and locating sites on those areas that weakly contribute to Green Belt purposes. Growth in Areas B, C & D will avoid the Green Belt with minor positive effects.
- 5.12 All the Areas have the potential for negative or positive effects with regard to integration and the identity of a settlement or community. There is uncertainty at this stage as this depends upon the sensitivity of the settlement/community and the scale/design of the development proposal. Whilst smaller developments might seem to be more readily integrated, larger developments can be more creative in scope and design offering enhancements to existing communities.
- 5.13 **Services & Facilities:** Generally, all four Areas are likely to have minor positive effects on SA objectives for accessibility to services and facilities. Although major development sites (including new villages or extensions to settlements) have the potential to have major negative effects on services, they also have the greater potential for positive effects through early, creative masterplanning with the scale and scope to provide sustainable community

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<sup>59</sup> <https://www.gov.uk/guidance/national-planning-policy-framework/9-protecting-green-belt-land>

infrastructure. A Development Management Policy: Provision for Social & Community Infrastructure is being drafted for the Local Plan – developers will be required to deliver new facilities & services taking an integrated approach, ensuring timely delivery, and applying the principles of multi-functional space – thus mitigating potential negative effects.

- 5.14 **Employment:** All four Areas are likely to have positive effects on SA objectives for employment. Potential major positive effects are indicated for Area C with close links to Milton Keynes and well-connected with the improved A421, M1 and the planned upgrading for the East West Rail between Oxford and Cambridge. Area B also has the potential for major positive effects due to the location of the A1 corridor through this area and the planned upgrading for the East West Rail. Area A offers strong opportunities to support and enhance the vitality and viability of town centres – Dunstable and Luton- with further positive effects.
- 5.15 **Health & Equality:** Health, wellbeing and equality objectives are closely linked to provision of housing and employment that are addressed directly through other SA objectives. Area A includes areas of higher deprivation around Houghton Regis and Luton – with potential for major positive effects from new development.
- 5.16 Health and well-being is also associated with provision of and equality of access to open space, recreation and Green Infrastructure. Areas A, B & C have the potential for minor positive effects; the larger scale of development for Areas B & C could provide for GI enhancements that could be cumulative and synergistic in the longer-term. Since growth potential for Area D is likely to be small-medium, there may be less possibility for delivering GI enhancements reducing potential effects to neutral.
- 5.17 **Highways & Air Quality:** There is some potential for growth along the major transport corridor following the M1, A5 and the railway with likely negative effects in Area A but mitigation measures may be available by ensuring that new development is located where there is existing capacity with potential neutral effects.
- 5.18 Minor negative effects are indicated for SA objectives to maintain and improve the existing highway network with regard to Areas B, C & D. The A1 corridor running through the Plan Area B is a strategic location for the warehousing industry with good, fast access to the national/international road network and important to maintain; also, the East Coast Railway. Area C is well-connected with the improved A421, the M1 and the planned section upgrade for East West Rail<sup>60</sup> between Oxford and Cambridge. There is the potential for major development, including new settlements, to contribute to further improvements and ensure the continuing capacity of the strategic road and rail networks; uncertainty until further transport and capacity studies completed. Larger developments are more likely to be able to support funding for upgrading the strategic road network. The smaller-medium scale

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<sup>60</sup> <http://www.eastwestrail.org.uk/>

developments indicated for Area D are less likely to support the potential to upgrade roads.

- 5.19 Effects on traffic and the highway network will have concomitant effects on air quality and greenhouse gas emissions. Significant negative effects are more likely to occur in the short-term as it is assumed that long-term air quality is likely to improve as a result of stringent emissions controls on new vehicles via European standards<sup>61</sup>. In 15 to 20 years' time low emission vehicles will make up most cars on the roads in the UK. It is also likely that there will be reductions in various contributing sectors that will also result in reductions in background concentrations of atmospheric pollutants. However, this is uncertain at this stage. This along with the potential improvements to strategic road infrastructure and public transport could help to improve air quality. Particular consideration will be needed for Sandy, Ampthill and Dunstable that have Air Quality Management Areas designated primarily due to traffic.
- 5.20 **Sustainable Transport:** Area A is well connected to the Midland Main railway line and smaller-medium sized developments for towns/villages such as Ampthill, Flitwick, Westoning & Harlington, along well-connected public transport routes could encourage a modal shift with positive effects. Larger scale developments with major opportunities to promote sustainable transport are only likely to be possible adjacent to Luton and to help meet the needs outside the Plan area. Larger scale developments indicated for Areas B & C have the scope for effective design and implementation of sustainable transport modes – cycling and walking – with the potential for major positive effects, especially if this can be linked into the limited networks available in the Plan area. Smaller-medium scale development indicated for Area D limits possibilities with likely neutral effects.
- 5.21 **Energy, Water:** All development has the potential for high energy and water efficiencies but generally, the scale and scope of the larger developments, especially new villages/settlements, offers potential possibilities for exemplar design and construction. A Development Management Policy on Flood Risk is being drafted for the Local Plan in line with Government guidance. This will provide mitigation measures with resultant neutral effects. The larger developments can have the scale and scope to provide creative design and potentially contribute to resolving existing flood risk issues.
- 5.22 **Soil & Landscape:** All development will take land and the soil resource will be lost with permanent negative effects. However, mitigation is available to avoid the best and most versatile agricultural land resulting in minor effects. All development has the potential for negative effects on landscape and townscape – and this may be particularly significant for the Plan area with its' predominantly rural character with larger areas of flat land and high levels of tranquillity. Development Management Policies on Landscape Character & Value are being drafted for the Local Plan and these will avoid important assets and settings to reduce negative effects. Uncertainty for the SA at this stage as effects will depend upon the scale/scope of development and the precise location.

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<sup>61</sup> <http://ec.europa.eu/environment/air/transport/road.htm>

5.23 **Natural & Historic Environment:** Development Management Policies on Green Infrastructure, Enhancing Ecological Networks, Nature Conservation and the Historic Environment are being drafted for the Local Plan and these will avoid important assets to avoid negative effects on SA objectives for biodiversity/geodiversity and the historic environment. These will provide mitigation measures with resultant neutral effects.

5.24 **Key Recommendations from the SA:**

- Reducing the amount of development to non-strategic levels of new homes (<500) to better integrate development within existing settlements and
- Locating such sites in those areas that weakly contribute to Green Belt purposes in Area A
- Seeking exemplar and creative design from major developments in Areas B and C to maximise mitigation measures and enhancement possibilities

### Strategic Options: Approaches to Distributing Development Growth

5.25 The Council investigated seven approaches to distributing development growth as follows:

- Option 1: New settlement (village scale) – assumed to be between 2,000 to 5,000 new homes
- Option 2: New settlement (town scale) – assumed to be between 7,000 to 10,000 new homes
- Option 3: Village extensions – especially those with services and facilities
- Option 4: Growth in transport corridors
- Option 5: Urban extensions – assumed to be 1,500-2,000 (and up to 4000) and for the larger settlements
- Option 6: Urban intensification around transport hubs – for settlements with railway stations, bus stations and park and rides
- Option 7: Higher densities – development offering around 75 to 130 dwellings per hectare

5.26 These options place greater emphasis on each approach to distributing growth, for example option 3 places greater emphasis on village extensions. There is considerable uncertainty with information gaps at this stage of SA testing since the significance of effects will depend upon further studies and plan-making, including more locationally specific indications and scales. This initial SA was undertaken at an early stage and the findings, together with those findings from the SA of the 4 Areas A-D, informed consideration of possible Scenarios for growth and the development of the overall growth strategy. Emerging drafts of Development Management Policies were

available and these provide mitigation measures for potential negative effects. Thus, the likely significant effects of these approaches can be identified but with assumptions made and some uncertainties remaining until further studies are undertaken – as to be expected at this strategic early level of appraisal.

- 5.27 The detailed findings of the strategic level SA of the seven approaches to distributing growth is provided in Appendix IV of this Initial SA Report and summarised in the table following:

**Table 5.2: Summary Strategic SA for Approaches to Distributing Growth**

SA Objective	Summary Strategic SA						
	1. New Settlement (village)	2. New Settlement (town scale)	3. Village Extensions	4. Transport Corridors	5. Urban Extensions	6. Transport Hubs	7. Higher Densities
1 Housing	++?	++?	+?	++?	++?	++?	++?
2 Communities <sup>62</sup>	+	+	-?	+ ?	++?	++?	?
3 Accessibility - Services & Facilities	++?	++?	+?	++?	++?	++?	++?
4 Economy & Employment	++?	++?	-?	++?	++?	++?	?
5 Health & Well-Being	++?	++?	+?	++?	++?	++?	++?
6 Highways Air Quality <sup>63</sup> ; GHGs	++?	++?	--?	-?	0?	0?	++?
7 Sustainable Transport	++?	++?	-?	++?	++?	++?	++?
8 Energy & Climate Change	0?	0?	0?	0?	0?	0?	0?
9 Water Resources & Quality	0?	0?	0?	0?	0?	0?	0?
10 Reduce Flood Risk	0?	0?	0?	0?	0?	0?	0?
11 Soils	-	-	-	-	-	-	-?
12 Biodiversity & Geodiversity	0?	0?	0?	0?	0?	0?	0?
13 Landscape & Townscape	-	-	--?	-	-	-	-?
14 Historic Environment	0?	0?	0?	0?	0?	0?	0?

<sup>62</sup> Please note that first symbol relates to location in/out of Green Belt designation; second symbol relates to effects on integration & identity for existing settlements

<sup>63</sup> Please note Air Quality & Green House Gas emissions are essentially associated with emissions from road vehicles for the purposes of this SA and as explained in the SA Scoping Report

- 5.28 **Housing:** All the options have the potential for positive effects but there is some uncertainty about whether each option could provide sufficient housing to meet identified needs of all communities within the Plan area and/or housing needs outside the Plan area. The greater scale of new development in Options 1,2, 4, 5, 6 & 7 is more likely to have major positive effects, including an appropriate mix of housing, that will be cumulative in the longer term. For Option 3 village extensions, positive effects may only be minor since it is less clear that the scale of the identified need could be delivered.
- 5.29 **Communities:** The scale and scope of new settlements, urban extensions & higher densities for Options 1,2, 5 & 7 respectively can promote new thriving & inclusive communities through good & early design with positive effects. Urban extensions at the larger settlements are also more likely to be able to integrate with existing communities. All the options have the potential for negative and/or positive effects regarding integration and the identity of a settlement or community – uncertainty at this stage as this depends upon the sensitivity of the settlement/community and the scale/design of the development proposal. Whilst smaller developments might seem to be more readily integrated, larger developments can be more creative in scope and design offering enhancements to existing communities. This is acknowledged by Government, for example, with the recent call for interest in locally-led garden villages<sup>64</sup>. All new development can ensure that there are no negative effects on existing facilities & services and all could have the potential to improve accessibility.
- 5.30 Major development in Area A for all the Options will result in loss of the Green Belt (GB) with potential major cumulative negative effects for identity and coalescence of existing settlements without significant landscape buffering. However, the recent Green Belt Study has identified those areas that only weakly contribute to GB aims, including areas adjacent to the Luton Council area – therefore, potential for neutral effects but uncertainty at this stage of assessment as this depends upon the scale and the precise location of possible development sites.
- 5.31 **Employment:** All the options have the potential to provide a range of employment opportunities that are suitable for the skills of the workforce and will help to meet the identified needs of the communities. Larger areas, & including adjacent to existing larger settlements, tend to provide more sustainable employment to meet the needs of existing businesses, to attract future inward investment, and to be more resilient to change – with potential positive effects indicated for most options. The limited scale for employment land opportunities through village extensions in Option 3 will not support the economic focus for larger warehousing facilities that must have good accessibility to transport corridors – potential for negative effects. Conversely, this indicates potential major positive effects for Option 4, particularly in Area C to the north west, Area B with the north-south corridor to the east, and Area A to the south east with London Luton Airport, including a new 24-hour light

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<sup>64</sup> <https://www.gov.uk/government/publications/locally-led-garden-villages-towns-and-cities>



rail link between the railway station and the terminal. Uncertainty remains as depends upon precise locations.

- 5.32 There is some potential for medium scale employment growth along the major transport corridor following the M1, A5 and the railway with positive effects for meeting employment needs of communities in Area A, particularly for Dunstable with higher rates of unemployment. Potential for minor positive effects for Options 4, 5 & 6; it is unclear how higher densities in Option 7 would affect the economy and employment.
- 5.33 **Health & Equality:** All options have the potential for improving health and well-being through provision of Green infrastructure (GI), open space & recreation but this is more likely to be implemented through the scale and scope of the larger developments that are indicated for Options 1, 2 & 5 with major cumulative positive effects in the longer term. The approaches for Options 4, 5, 6 & 7 in Area A with its' communities of high deprivation<sup>65</sup>, around Houghton Regis and the boundary with Luton, have the potential for major positive effects. Also, potential for positive effects for deprived communities in Luton (59 most deprived out of 326 authorities in England) – with identified needs outside the Plan area. Care would be needed to ensure that existing health facilities & green infrastructure (GI) have the capacity to accommodate increased numbers of people.
- 5.34 The village extensions in Option 3 are assumed to be of less size than other options and thus with less effects likely – both positive and negative. Higher densities in Option 7 may have positive effects as open space & GI might be used more creatively, including roof and vertical wall gardens, but may have negative effects through limited capacity of open space and increased pressures on the multifunctionality of GI. The new settlements in Options 1 & 2 offer possibilities for exemplar GI and a rethinking of how health/care services can be delivered, for example, as being trialled through the healthy new towns initiative<sup>66</sup> with potential for major positive effects.
- 5.35 **Highways & Air Quality:** Whilst there are several strategic transport schemes that are either planned or under construction, the identified need for development growth will place demands on the capacities of the highway networks with the potential for cumulative negative effects in both short and longer terms – particularly for Option 4 where growth would be concentrated along the transport corridors.
- 5.36 New settlements through Options 1 and 2 have the potential for positive effects as they can be designed through creative masterplanning to minimise negative effects on the existing transport networks and contribute to resolving existing problems but may need major infrastructure investment with associated uncertainties of funding and timing. Urban Extensions as suggested through Option 5 have the potential to mitigate likely negative effects on the transport networks by careful masterplanning that minimises the need to travel by car because of the location of such developments adjacent to the larger settlements. The scale and scope of such

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<sup>65</sup> <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2015>

<sup>66</sup> <https://www.england.nhs.uk/ourwork/innovation/healthy-new-towns/>



developments is sufficient to support transport improvements with the potential for overall neutral effects. Similarly, potential for neutral effects through Option 6 with urban intensification around transport hubs that should reduce the need to travel by car.

- 5.37 The scale of identified development growth spread around the larger villages in Option 3 is likely to have major negative effects on the transport network as the villages are characterised by their rural nature (and with limited sustainable transport services). The effects of Option 7 and the effectiveness of higher densities in maintaining the highway network is uncertain, although this could offer positive effects by reducing the need to travel.
- 5.38 **Sustainable Transport:** Options 1, 2, 4, 5 and 6 have the potential for major positive effects as larger scale developments have the scope for effective design and implementation of sustainable transport modes – cycling and walking; and the focus within transport corridors and around transport hubs will reduce the potential negative effects.
- 5.39 The scale of potential growth in village extensions in Option 3 may not be sufficient to support new provision of sustainable transport modes. The villages are characterised by rural roads and limited sustainable transport modes; there is also an issue for the long distances needed to access services and facilities in the rural area, encouraging car use. The effects of Option 7 with higher densities indicates likely positive effects by reducing the need to travel but some uncertainty at this stage of assessment. It has been found in the Netherlands<sup>67</sup> that the success of high density development is closely linked to the effectiveness of public transport – not just provision but encouragement of use.
- 5.40 **Energy, Water, Soil, & Biodiversity/Geodiversity:** All options are likely to be neutral for energy, water and biodiversity/geodiversity SA objectives since proposals will be required to meet with the emerging Development Management Policies that provide strong guidance and protection. The larger developments, including new settlements and urban extensions as in Options 1, 2 & 5, have the scale and scope to provide creative design and contribute to enhancement of green infrastructure and ecological networks, and provide exemplar energy and water efficiencies. However, there is uncertainty until further studies completed and this depends upon precise location. All development will take land and the soil resource will be lost with permanent negative effects. However, mitigation is available by avoiding the best and most versatile agricultural land resulting in residual minor effects. The higher densities for Option 7 offer mitigation measures by reducing land take for new development and potentially reduced negative effects.
- 5.41 **Landscape:** All development has the potential for negative effects on landscape and townscape – and this may be particularly significant for the Plan area with its' predominantly rural character with larger areas of flat land and high levels of tranquillity. Extensions to the larger villages through Option 3

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<sup>67</sup> For example, see: Paul Kuitenbrouwer & Raf De Saeger High-density, Low-rise – a challenge for Dwelling Landscapes in the Netherlands, Architectural Research by Design as a process towards incorporated typologies Conference paper for Housing & Welfare – Boundaries | Encounters | Connections, Copenhagen, 7-9 May 2015

may have the potential for more major negative effects as it may be more difficult to mitigate the cumulative effects throughout the dispersed and rural landscape of the area. The larger developments in Options 1, 2 & 5 may have the potential for greater negative effects but also have the opportunity for more creative design and mitigation through careful early masterplanning. Higher densities in Option 7 can reduce land take with less negative effects dispersed through the landscape but uncertain at this stage as depends upon precise location and design factors.

**5.42 Historic Environment:** The Plan area has a rich historical heritage with nationally and locally important assets that should be protected by the emerging requirements in draft Development Management Policies to at least neutral effects avoid important assets and settings. However, uncertainty at this stage as effects will depend upon the scale/scope of development and the precise location.

**5.43 Key Findings & Recommendations from the SA:**

- Larger developments can be more creative in scope and design offering enhancements to both existing and new communities with major positive effects particularly for Options 1, 2 & 5 with new settlements and urban extensions
- Option 4 is most likely to support the economic focus for larger warehousing facilities that must have good accessibility to transport corridors
- Options 1 & 2 with new settlements offer opportunities for exemplar Green Infrastructure and possibilities for healthy new towns
- Higher densities in Option 7 reduces negative effects on land take/soil resource and may mitigate cumulative landscape/townscape negative effects depending upon design and location
- Development should be limited in the rural areas away from transport corridors/hubs to minimise negative effects from the need to travel by car; conversely, focusing development in transport corridors, around transport hubs and new settlements offers major positive effects for sustainable transport
- Cumulative negative effects in the rural areas may be mitigated by reducing new development to non-strategic levels

### **Strategic Options: Scenarios for Distributing Development Growth (Housing & Employment)**

**5.44** The Council considered the comments received from the Shaping Central Bedfordshire public consultation and the findings from the ongoing technical studies, including the SA, the Growth Locations<sup>68</sup> studies, and the approaches to distributing growth. The Council identified possible Growth Scenarios for

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<sup>68</sup> LUC for Central Bedfordshire Council - North Growth Options Study & Luton Growth Options Study (November 2016)

accommodating and distributing the identified need<sup>69</sup> for development growth. Five Scenarios for Housing and two Scenarios for Employment were developed with potential Growth Locations in each of the four Areas A-D and applying the opportunities from each of the approaches to distributing growth – aiming to avoid or minimise significant negative effects and to promote likely positive effects. The housing numbers relate to the likely capacities identified from evidence to date, including the growth locations study, and therefore, represent alternatives that are reasonable to test through SA. The possible Scenarios were developed as shown in the table following.

**Table 5.3: Growth Scenario Options – Housing**

	<b>Growth Scenario Options Potential Housing Numbers</b>				
	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>
<b>Area A</b>					
North of Luton	4,000	4,000	4,000	0	4,000
Green Belt Villages	2,000	2,000	2,000	0	3,000
West of Luton	2,000	0	2,000	0	0
<b>Area B</b>					
Tempsford	7000	7000	0	7000	0
East of Biggleswade	3,000	0		3,000	0
In/around Biggleswade			500		
East of Arlesey Villages	2,000	2,000	2,000	2,000	2,000
	0	0	500	0	2,500
<b>Area C</b>					
Marston Vale (new settlement)	5,000	5,000	5,000	5,000	5,000
Apsley Guise	3,000	3,000	3,000	3,000	0
Wixams South Villages	1,000	1,000	1,000	1,000	1,000
	0	0	0	0	650
<b>Area D</b>					
RAF Henlow Villages	1,000	1,000	1,000	1,000	1,000
	500	500	500	500	1,500
<b>Totals</b>	<b>30,500</b>	<b>25,500</b>	<b>21,500</b>	<b>22,500</b>	<b>20,650</b>

5.45 At this strategic stage of plan development and SA, the housing numbers represent the baseline figures for the Growth Locations and this CBLP only considers development locations that are typically of a strategic scale for the purposes of testing the scenarios. The Council may consider safeguarding additional housing at some of these locations to address growth beyond the plan period. This would be subject to Sustainability Appraisal further at the next stage of plan-making and consultation - Regulation 19 later in 2017.

5.46 The Growth Scenarios may be summarised as follows:

<sup>69</sup> Central Bedfordshire and Luton Strategic Housing Market Assessment 2015 to 2035 (April 2017)

- Scenario 1: Higher levels of growth across all Central Bedfordshire
- Scenario 2: No growth to the west of Luton and east of Biggleswade
- Scenario 3: No strategic transport infrastructure delivered in the A1 corridor (Area B)
- Scenario 4: No growth in the Green Belt (Area A)
- Scenario 5: A mixed approach with higher growth in villages

- 5.47 Scenarios 1, 2, 3 & 5 aim to help meet the current identified unmet need for Luton (7,350 homes) by considering Growth Locations in Area A - north of Luton (around 4000 homes) and limited extensions to the larger towns and villages within the Green Belt (collectively around 2000 homes). Scenarios 1 & 3 ensure meeting the unmet need for Luton by also including consideration of the Growth Location west of Luton (2000 homes); Scenario 4 does not include any growth to help meet the unmet need from Luton.
- 5.48 All five Scenarios include a potential new settlement at Marston Valle in Area C (5000 homes); Scenarios 1, 2 & 4 further include a potential new settlement at Tempsford (Area B). Two Scenarios include around 3000 homes east of Biggleswade and around 2000 homes east of Arlesey – in Area B and the A1 corridor where evidence indicates that this area is the best of the four areas to take large scale growth, although it is recognised that further investment will be needed in strategic transport. All five Scenarios include around 3000 homes at Aspley Guise (except Scenario Number 5), and around 1000 homes at Wixams south (Area C), with some 1000 new homes at RAF Henlow and limited extensions to other settlements in Area D.
- 5.49 Marston Vale and Tempsford are potential new settlements and this offers different characteristics to Scenarios 1, 2 & 4 that include both new settlements. Scenario 4 does not include any proposed development in Area A, thus avoiding the Green Belt but also not including the possibilities for growth to the north and west of Luton to contribute to unmet need for Luton Borough Council. Scenarios 1 & 2 have a higher quantum of proposed development than the other three scenarios but this is proposed in new settlements, and villages in the Green Belt. Options 2, 3, 4 & 5 consider variations to strategic locations in Area B. Option 5 has a higher quantum (2,500) of proposed development in the villages of Area B and less strategic locations in Areas B and C.
- 5.50 The amount of growth in the villages has been influenced by the Settlements Study<sup>70</sup> that seeks to determine how much growth could be accommodated sustainably within existing settlements in Central Bedfordshire. The total amount of new homes proposed in each Area has been informed by the initial findings of this study. Both Areas C and D are identified as having no settlements with the capacity of high levels of growth, such that lower ranges of village growth were considered. Area B is identified as having high capacity for growth in some settlements and Area A has the higher capacity

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<sup>70</sup> Enfusion & CBC Initial Settlements Study (June 2017)

(if Green Belt was to be released), as reflected in the higher levels of village growth in these Areas. The detailed findings of the strategic level SA of the five Growth Scenarios for Housing are provided in Appendix IV of this Initial SA Report and summarised in the table following:

**Table 5.4: Summary Strategic SA for Housing Growth Scenarios**

SA Objective	Summary Strategic SA									
	1. 30,500 New Homes		2. 25,500 New Homes		3. 21,500 New Homes		4. 22,500 New Homes		5. 20,650 New Homes	
1 Housing	++		++		++		-		++	
2 Communities <sup>71</sup>	-- ?	++ ?	-- ?	++ ?	-- ?	+? ?	+? ?	+? ?	--?	
3 Accessibility - Services & Facilities	++?		++?		++?		+?		+?	
4 Economy & Employment	++		++		+		+		+	
5 Health & Well-Being	++		++		++		0		++	
6 Highways Air Quality <sup>72</sup> ; GHGs	-?		-?		-?		-?		-?	
7 Sustainable Transport	++?		++?		-		-		-?	
8 Energy & Climate Change	+		+?		0?		+?		0?	
9 Water Resources & Quality	0?		0?		0?		0?		0?	
10 Reduce Flood Risk	0		0		0		0		0	
11 Soils	--?		--?		--?		--?		--?	
12 Biodiversity & Geodiversity	+?		+?		+?		+?		0?	
13 Landscape & Townscape	-?		-?		-?		-?		-?	
14 Historic Environment	0?		0?		0?		0?		0?	

- 5.51 **Housing:** Scenarios 1, 2, 3, & 5 all have the potential for significant positive effects through the delivery of housing to meet the needs of all residents and communities. The greater the total number of dwellings the more significant these positive effects with Scenario 1 offering the most potential for major positive effects. Scenario 4 fails to meet the housing needs of the residents and communities located in the southern half of the area (the Green Belt), as well as the cross-boundary needs of Luton under the Duty to Cooperate in

<sup>71</sup> Please note that first symbol relates to location in/out of Green Belt designation; second symbol relates to effects on integration & identity for existing settlements

<sup>72</sup> Please note Air Quality & Green House Gas emissions are essentially associated with emissions from road vehicles for the purposes of this SA and as explained in the SA Scoping Report

what could be considered reasonable locations to meet Luton Council's needs – with likely minor long term negative effects.

- 5.52 **Communities:** Scenarios 1, 2, 3 & 5 include significant growth within the Green Belt and thus major negative effects are indicated that will be cumulative in the longer-term. Conversely, Scenario 4 avoids growth in the Green Belt with potential for minor positive effects but uncertainty as these communities would not then benefit from the positive effects of development – new residents can revitalise communities.
- 5.53 For all the scenarios, there is the potential for negative effects through loss of identity and integration for new and existing communities, but these effects can be avoided through the appropriate sizing and siting of development. There is uncertainty at this stage of assessment until more information and precise locations; also, emerging Strategic Policies are likely to guide and manage development growth to avoid coalescence or loss of identity.
- 5.54 Scenario 1 has the higher quantum of development but includes potential new settlements (as do Scenarios 2 & 4) that provide mitigation measures by reducing the development pressures on the identity of other settlements. New settlements offer opportunities for creating thriving and inclusive communities through good and early design with positive effects for identity.
- 5.55 The lower overall housing numbers in Scenarios 3, 4 & 5 will reduce the likelihood of significant negative effects on integration & identity compared to the other options. However, Scenario 5 includes significantly higher growth (2,500 vs 500) for villages in Area B with the potential for negative effects. Focusing development in urban extensions to the east of Biggleswade as in Scenarios 1 and 4 will help reduce the likelihood of significant negative effects on the villages, compared to Scenario 3 and 2. Scenario 5 also has more growth (3000 vs 2000) in the Green Belt villages in Area A compared to other scenarios. Thus overall, Scenario 5 has potential for major negative effects on community identities and Green Belt - but some uncertainty at this stage of strategic assessment. Scenario 1 has the most growth in Area A and, by including west of Luton, best helps meet the identified need for housing and communities from Luton.
- 5.56 **Services & Facilities:** All the growth scenarios propose significant levels of growth that could support the delivery of new services and facilities with the potential for long-term positive effects. The extent of the positive effects will vary depending on the scale of development at individual settlements, and there remains an element of uncertainty until precise locations are determined. Potential negative effects on existing services and facilities can be mitigated through appropriate sizing and siting through strong policy requirements set out in the next draft of the CBLP for proposed strategic site allocations policies. Positive effects are likely to be reduced to minor for Scenario 4 since no growth is proposed for Area A indicating little change to the accessibility to services and facilities for these communities. Scenario 5 includes more growth (3000 vs 2000) for Green Belt villages in Area A; this is unlikely to be at sufficient scale to support significant services and facilities, so positive effects also reduced.

- 5.57 Scenario 1 with two new settlements (as do Scenarios 2 & 4) offer the scale and scope for major positive effects that will be cumulative in the longer term. However, and with the higher quanta of development, strong planning requirements will be needed in specific policy at the next CBLP draft to ensure timely and good provision of services and facilities to guide masterplanning. So, some uncertainty remains at this strategic stage.
- 5.58 **Employment:** Strategic level sites would not only potentially improve access and connectivity to employment areas but as they are large scale they would be mixed-use and so also provide employment areas with positive effects but some uncertainty still at this stage of assessment as depends upon precise locations. All the Scenarios 1-5 capitalise on opportunities to sustainably connect with major employment areas with East West Rail<sup>73</sup> (due to proximity of Ridgmont Station, in Central Bedfordshire, which will be the location of an EWR station connecting to the Western Section) with the potential new settlement (5000) at Marston Vale in Area C with major positive effects.
- 5.59 Scenarios 1 and 2 distribute growth in a manner which seeks to capitalise on opportunities to improve East-West connections in both Areas B and C, as well as significant growth in Area A supporting existing strategic connections to the Midland Main railway line and Luton and Milton Keynes – with major positive effects likely overall for economy and employment for Central Bedfordshire.
- 5.60 **Health & Equality:** All the scenarios have the potential to deliver investment and regeneration in areas of deprivation with the potential for long term positive effects. Most areas of highest deprivation in Central Bedfordshire are in the south where no development is proposed in Scenario 4 such that this scenario is less likely to result in major positive effects as it fails to capitalise on opportunities to address inequalities. All the options have the potential to support investment and improvement in priority Green Infrastructure (GI) corridors; however, Scenario 4 again by avoiding development in the south of the Plan area is less likely to distribute these gains across the Plan area and reduce inequalities in this respect with only neutral effects indicated overall.
- 5.61 **Highways & Air Quality:** Long journey times exacerbated by high out-commuting are established characteristics for the Plan area indicating cumulative negative effects for proposed development. Major growth in all scenarios would need to be associated with jobs to minimise increased out-commuting. Strategic sites are likely to include employment land providing some mitigation measures but uncertainty at this stage. Scenario 1 has higher quantum of proposed development with the likelihood of more significant negative effects – but this is mitigated by the inclusion of new settlements (as do Scenarios 2 & 4) that will have the scale and scope for enabling infrastructure, including potential for contributing to highway infrastructure. Ongoing transport studies indicate that there may be adverse effects for RAF Henlow and the A507.

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<sup>73</sup> <http://www.eastwestrail.org.uk/>

- 5.62 Effects on traffic and the highway network will have concomitant effects on air quality and greenhouse gas emissions. Significant negative effects are more likely to occur in the short-term as it is assumed that long-term air quality is likely to improve, but this is uncertain at this stage.
- 5.63 **Sustainable Transport:** Scenarios 1 and 2 seek to deliver development in all Areas and capitalise on opportunities to support a modal shift. For example, through strategic growth in Area A which is well connected to the Midland Main railway line, and strategic growth in Areas B and C which will support improved sustainable East-West connections in the future development of the East-West Rail. Scenarios 3 and 5 do not deliver growth north of Sandy and thus fail to support a modal shift in east-west movement across the north of the Plan area. Scenario 4 avoids development in the south of the Plan area and thus fails to connect development to the strategic Midland Main railway line and support a modal shift in this respect.
- 5.64 Scenario 5 disperses a larger proportion of development across village locations, which are less likely to support viable public transport services. Scenario 1 has a higher quantum of development than other options but it includes new settlements (as do Scenarios 2 & 4) that will have the scale and scope to provide exemplar sustainable transport that could benefit the wider areas in B and C. Potential for major positive effects but uncertain as depends on further studies.
- 5.65 **Energy, Water:** All development has the potential for high energy and water efficiencies but generally, the scale and scope of the larger developments offer more possibilities for exemplar design and construction. Scenarios 3 and 5 have less large scale developments (of over 5000 homes) and as such are less likely to deliver positive effects compared to other options, on the assumption that larger scale development has greater potential for renewable energy technology and production. Scenarios 1, 2 and 4 include new settlements with the scale and scope to deliver energy efficiencies (including exemplar) with more certainty of positive effects.
- 5.66 All scenarios include large scale development and thus may require water infrastructure investment to avoid negative effects on water quality – uncertainty at this stage of assessment and there may be issues of timing for enabling infrastructure that needs to be considered – when the next stage of the Water Cycle Study is completed. A Development Management Policy on Flood Risk is being drafted for the Local Plan in line with Government guidance. This will provide mitigation measures with resultant neutral effects. The larger developments, especially new settlements as in Scenario 1, can have the scale and scope to provide creative design and potentially contribute to resolving existing flood risk issues.
- 5.67 **Soil:** All development will take land and the soil resource will be lost with permanent negative effects. All scenarios include a new settlement at Marston Vale and East of Arlesey which is likely to result in the loss of best and most versatile agricultural land (Grade 2) with permanent major negative effects but uncertainty at this stage until the precise location and mitigation



possibilities are investigated, including higher densities and creative design. Each scenario includes some development at RAF Henlow where there may be issues of contaminated land through previous use. Whilst care will be needed to protect human health, remediation of this land would resolve an existing sustainability problem with positive effects.

- 5.68 **Landscape:** All development has the potential for negative effects on landscape and townscape – and this may be particularly significant for the Plan area with its' predominantly rural character with larger areas of flat land and high levels of tranquillity. Scenario 4 avoids development in the south of the Plan area and thus largely avoids the potential for significant negative effects on the designated AONB landscape. Scenarios 1, 2, 3, and 5 are likely to negatively affect the designated AONB landscape to some degree, particularly through development North of Luton and in some of the Green Belt villages. Scenarios 1 & 2 have higher quanta of development with likely more significance of negative effects but this may be mitigated through the inclusion of two new settlements (as does Scenario 4) that have the scale and scope for exemplar design, and higher densities that could provide mitigation measures.
- 5.69 Development Management Policies on Landscape Character and Value are being drafted for the Local Plan and these will avoid important assets and settings to reduce negative effects. Uncertainty for the SA at this stage as effects will depend upon the scale/scope of development and the precise location.
- 5.70 **Biodiversity & Geodiversity:** Development Management Policies on Green Infrastructure, Enhancing Ecological Networks, and Nature Conservation are being drafted for the Local Plan and these will avoid important assets to provide mitigation measures with resultant neutral effects. Strategic level development (and especially new settlements in Scenarios 1, 2, and 4) has the potential to contribute to ecological networks and overall biodiversity connectivity through investment and new provisions with positive effects. Scenario 5 with less strategic locations and more growth in villages may offer less opportunities, so only uncertain neutral effects indicated at this stage.
- 5.71 **Historic Environment:** Development Management Policies on the historic environment are being drafted for the Local Plan and these will avoid important assets to provide mitigation measures with resultant neutral effects – but some uncertainty at this stage as depends upon precise locations and further studies, particularly regarding the significance of effects on the settings of historic assets.
- 5.72 **Key Findings from the SA:**
- Scenarios 1, 2, 3 and 5 all have major positive effects for housing; Scenario 4 has minor negative effects for the needs of communities in the south of the Borough as well as the cross-boundary unmet needs of Luton Borough.
  - Each Scenario 1-5 capitalises on opportunities to sustainably connect with major employment areas with East West Rail.

- Scenarios 1, 2 and 4 propose significant levels of growth that could support the delivery of new services and facilities with the potential for long-term positive effects.
- Scenarios 1 & 2 have higher development quanta with likelihood of more pressures on capacities of infrastructure but mitigation indicated as they include two new settlements (as does Scenario 4) with the scale and scope for exemplar design, especially for sustainable energy and water; also for landscape and potential enhancement of Green Infrastructure.
- Scenario 4 avoids any development in the south of the Plan area and is less likely to result in significant positive effects with regard to health and equality.
- All scenarios are likely to have negative effects on highways that will be cumulative in the longer term but uncertain until more transport impact studies are completed. Scenarios 1, 2 & 4 with two new settlements offer the scale and scope of development that could contribute to highways improvements and sustainable transport that could benefit wider areas within Central Bedfordshire.

### **Key Recommendations from the SA**

- Care will be needed for proposed development around Sandy, Dunstable and Ampthill with Air Quality Management Areas designated primarily due to traffic, but new development could help resolve such existing sustainability problems.
- Possible mitigation measures can be confirmed through appropriate sizing and siting together with specific development requirements for proposed strategic site allocations policies to be set out in the next draft of the CBLP.
- Major negative effects identified through potential locations in the Green Belt could be mitigated by reducing the size of growth to small-medium and directing development to those areas that weakly contribute to GB aims, although this would reduce the potential positive effects of increasing housing in the south of Central Bedfordshire around the major urban areas (see point above). Whilst Scenario 4 avoids such negative effects, communities would not benefit from the potential revitalisation that new development can provide.

5.73 The Council also considered options for possible strategic employment growth locations. These were informed by the responses to the Shaping Central Bedfordshire consultation and technical studies including the employment growth studies<sup>74</sup> and the initial findings of the SA. The two reasonable strategic employment scenarios tested through SA were as in the table following:

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<sup>74</sup> PBA for Central Bedfordshire Strategic Employment Growth Studies (March 2017)

**Table 5.5: Growth Scenario Options – Employment**

	Strategic Employment Scenarios (numbers of jobs)	
	1	2
<b>Area A</b>		
Sundon Rail Freight Interchange	2,300	0
<b>Area B</b>		
Biggleswade, West of A1	2,000	2,000
<b>Area C</b>		
M1 Junction 13	1,700	1,700
<b>Area D</b>		
	0	0
<b>Total Numbers of Jobs</b>	<b>6,000</b>	<b>3,700</b>

- 5.74 The detailed findings of the strategic level SA of the strategic employment growth options is provided in Appendix IV of this Initial SA Report. The SA findings for the strategic employment sites within the two potential scenarios are summarised in the table following:

**Table 5.6: Summary Strategic SA for Employment Growth Scenarios**

SA Objective	Summary Strategic SA			
	1. 6,000 new jobs		2. 3,700 new jobs	
1 Housing	0		0	
2 Communities <sup>75</sup>	-	+	+	+
3 Accessibility to Services & Facilities	+		+?	
4 Economy & Employment	++		+	
5 Health & Well-Being	+		+	
6 Highways Air Quality <sup>76</sup> ; GHGs	0?		0?	
7 Sustainable Transport	++		++	
8 Energy & Climate Change	+?		+?	
9 Water Resources & Quality	0		0	

<sup>75</sup> Please note that first symbol relates to location in/out of Green Belt designation; second symbol relates to effects on integration & identity for existing settlements

<sup>76</sup> Please note Air Quality & Green House Gas emissions are essentially associated with emissions from road vehicles for the purposes of this SA and as explained in the SA Scoping Report

10 Reduce Flood Risk	0	0
11 Soils	-?	-?
12 Biodiversity & Geodiversity	0?	0?
13 Landscape & Townscape	-?	0
14 Historic Environment	0	0

- 5.75 Both employment growth scenarios will provide jobs in the Central Bedfordshire area with positive effects that will contribute towards resolving the identified sustainability problem of out-commuting; the greater number of jobs in Scenario 1 will have more significance of effects that are considered to be major positive and cumulative in the longer term. Scenario 1 includes the Sundon Rail Freight Interchange (RFI) that is located within the Green Belt but will benefit from access to the M1 via the new Junction J11a<sup>77</sup>. Additional employment land would complement existing provision in north Luton with positive synergistic effects. The proposed strategic Link Road connecting the M1 to A6 will link to the A5-M1 link road scheme, completed in spring 2017, via the new M1 J11a. Thus, the area is already a major transport hub; freight vehicle movements will be 24 hours/day and it is assumed that the improvements to the highway network will accommodate this capacity. Some uncertainty remains at this stage until further detailed transport impact studies are completed. Promoting rail freight will lessen pressures on the national highway network with potential positive effects beyond the Bedfordshire/Luton area.
- 5.76 Scenario 1 includes the RFI strategic employment site which is in the Green Belt and so potential for major negative effects. However, it is unlikely to significantly affect the identity of any settlement as it is not located within or directly adjacent to a settlement but rather alongside the railway line. The RFI site is also close to the designated AONB landscape and has potential to negatively affect the AONB setting through urbanisation in a previously undeveloped area. However, it is recognised that there is existing development between the location and the AONB providing a buffer to some extent (Upper and Lower Sundon). Thus, minor long-term negative effects but uncertainty at this stage. Scenario 1 is also close to a SSSI and areas of Priority Habitat with a County Wildlife Site and the potential for negative effects. Possibilities for mitigation and enhancement are uncertain at this stage.

#### 5.77 Key Findings & Recommendations from the SA:

- Scenario 1 will provide more significant positive effects than Scenario 2 for the economy/employment SA objectives and will contribute towards resolving an existing sustainability problem for out-commuting

<sup>77</sup> <http://www.highways.gov.uk/roads/road-projects/A5-M1-Link--Dunstable-Northern-Bypass->

- Some uncertainty of significance of effects on community and environmental factors in Scenario 1 and Area A; further studies will be needed to confirm the details of likely impacts and effectiveness of possible mitigation measures and enhancement – especially for landscape and biodiversity objectives

### Strategic Options: Growth Locations for Development Growth – Housing

- 5.78 The Council investigated broad locational options for potential growth taking into account various technical evidence including the growth options studies<sup>78</sup> and strategic employment studies<sup>79</sup>. The Growth Options study (LUC for CBC, November 2016) only considered settlements or locations that could potentially accommodate strategic allocations and included the grouping together of potential development sites proposed through the CBC Call for Sites<sup>80</sup>. The Council applied its criteria-based Site Assessment method<sup>81</sup> to the potential growth locations and identified those options that were reasonable (suitable and deliverable) as a strategic growth location through a RAG analysis (Red/Amber/Green).
- 5.79 Not all locations that were found reasonable have been taken forward as suitable for strategic growth locations and therefore have not been subject to SA now. However, these locations have not been discounted by the Council. At the next stage of Local Plan preparation, parts of the locations could potentially be considered for small to medium scale growth, to be determined as part of the site allocations assessment. It should also be noted that some villages and settlements in Central Bedfordshire were not considered by LUC for strategic growth (and therefore are not listed in Table 5.7). However, sites within these settlements may also be considered for small to medium allocation at the next stage of Local Plan preparation; SA will be undertaken at that time.
- 5.80 Following identification of the strategic growth locations, the Council then identified, refined and investigated the potential Growth Scenarios, using the strategic growth locations and taking into account the Shaping Central Bedfordshire consultation, technical studies, and the emerging findings of the SA.
- 5.81 Only **strategic** level growth locations (with potential development capacity ranging from 1,000 to 7,000 new homes), rather than specific sites, are proposed in the Regulation 18 Local Plan consultation. Potential sites within growth locations that have not been progressed at this stage could still be considered for small to medium allocation as part of the subsequent Regulation 19 consultation. The strategic growth location options and the reasons for their progression or non-progression in plan-making are summarised in table 5.7 following:

<sup>78</sup> LUC for Central Bedfordshire Council (November 2016) Luton HMA Growth Options Study & North Central Bedfordshire Growth Options Study

<sup>79</sup> PBA for Central Bedfordshire (May 2016) Strategic Employment Study)

<sup>80</sup> <http://www.centralbedfordshire.gov.uk/planning/policy/local-plan/sites-submitted.aspx>

<sup>81</sup> <http://www.centralbedfordshire.gov.uk/planning/policy/local-plan/tech-supporting-studies.aspx>

**Table 5.7: Reasons for Selection or Non-Progression of Growth Location Options**

Area (A-D)	Strategic Growth Location	Comments	Progression as Strategic Growth Option?
B	Arlesey	<ul style="list-style-type: none"> <li>High levels of congestion and traffic along Arlesey High Street which could be alleviated through the provision of relief road in the growth location connecting from south of Hitchin Road to the new A507/High Street link road.</li> <li>Provision of care home, extra care (assisted living) and retirement village to alleviate demand for older person's accommodation.</li> <li>Potential for coalescence between Arlesey and Fairfield.</li> <li>Concentrating growth along transport corridors (A507, A1 and East Coast Main Line).</li> </ul>	<p>✓</p> <p>Progressed as a reasonable strategic alternative.</p> <p>Approximately 2,000 new homes</p>
C	Aspley Guise	<ul style="list-style-type: none"> <li>Proximity of the growth location to the EW Railway and Ridgmont Station, proposed Expressway and its location in the Cambridge – Oxford Growth Corridor.</li> <li>Proximity of the growth location to Junction 13 of the M1.</li> <li>Potential for the growth location to provide improvements to the A421 by widening the road into a dual carriageway.</li> <li>Potential of the growth location to help establish the new Bedford-Milton Keynes canal route.</li> </ul>	<p>✓</p> <p>Progressed as a reasonable strategic alternative.</p> <p>Approximately 3,000 new homes</p>
A	Barton le Clay	<ul style="list-style-type: none"> <li>Green belt designation - opportunities for limited allocations depending on the location and impact on the green belt.</li> <li>Impact of strategic development on the AONB and setting of the AONB.</li> <li>Promoting sustainable development in areas that have seen little growth due to Green Belt restrictions.</li> </ul>	<p>✗</p> <p>Not progressed as a reasonable strategic alternative.</p> <p>Could potentially be considered as part of a collective of settlements</p>

Area (A-D)	Strategic Growth Location	Comments	Progression as Strategic Growth Option?
		<ul style="list-style-type: none"> <li>Concentrating growth along key transport corridor (A6).</li> <li>Delivering unmet housing need from Luton close to where it arises where there is the capacity to do so sustainably.</li> <li>Emerging Neighbourhood Plan could support allocations in the area.</li> </ul>	in the green belt for allocations - to be decided at Regulation 19.
B	Biggleswade East	<ul style="list-style-type: none"> <li>Provision of a stand-alone development providing a significant number of homes with infrastructure, services and facilities to meet the needs of future residents.</li> <li>Concentrating growth along key transport corridors (A1 and East Coast Main Line Rail).</li> <li>Strategic development within the growth location will need to provide significant transport infrastructure improvements.</li> </ul>	<p>✓</p> <p>Progressed as a reasonable strategic alternative.</p> <p>Approximately 3,000 new homes.</p>
B	Biggleswade North	<ul style="list-style-type: none"> <li>Landscape concerns with large scale development in the Ivel Gap Vale.</li> <li>Concerns over the impact on the ecology with development in this area.</li> <li>Opportunities for limited allocations depending on the location and impact on the landscape.</li> <li>Concentrating growth along key transport corridors (A1 corridor and East Coast Main Line Rail).</li> </ul>	<p>✗</p> <p>Not progressed as a reasonable strategic alternative.</p> <p>Could potentially be considered for small to medium scale allocations - to be decided at Regulation 19.</p>
B	Biggleswade South	<ul style="list-style-type: none"> <li>Poor relationship with A1 causing separation from Biggleswade.</li> <li>Opportunities for limited housing allocations depending on the location and relationship with Biggleswade and the A1.</li> </ul>	<p>✗</p> <p>Not progressed as a reasonable strategic alternative.</p> <p>Could potentially be considered for small to medium scale</p>



Area (A-D)	Strategic Growth Location	Comments	Progression as Strategic Growth Option?
		<ul style="list-style-type: none"> <li>Concentrating growth along key transport corridors (A1 corridor and East Coast Main Line Rail).</li> </ul>	allocations - to be decided at Regulation 19.
D	Blunham South	<ul style="list-style-type: none"> <li>Coalescence between Blunham &amp; Chalton.</li> <li>Opportunities for limited allocations depending on the location and impact on the relationship between villages.</li> <li>Concentrating growth along key transport corridors (A1 corridor and East Coast Main Line Rail).</li> </ul>	<p>✗</p> <p>Not progressed as a reasonable strategic alternative. Could potentially be considered for small to medium scale allocations - to be decided at Regulation 19.</p>
D	Broom	<ul style="list-style-type: none"> <li>Detrimental impact of large scale development on the character of the village.</li> <li>Proximity to Mineral Workings Sites.</li> <li>Opportunities for limited allocations depending on the location to mineral workings sites and impact on the character of the village.</li> </ul>	<p>✗</p> <p>Not progressed as a reasonable strategic alternative. Could potentially be considered for small to medium scale allocations - to be decided at Regulation 19.</p>
A	Caddington	<ul style="list-style-type: none"> <li>Green belt designation - opportunities for limited allocations depending on the location and impact on the green belt.</li> <li>Proximity of the AONB to the village.</li> <li>Topography issues to the northern and western area of Caddington.</li> <li>Draft Neighbourhood Plan could support allocations in the area.</li> <li>Delivering unmet housing need from Luton close to where it arises where there is the capacity to do so sustainably.</li> </ul>	<p>✗</p> <p>Not progressed as a reasonable strategic alternative.  Could potentially be considered for small to medium scale allocations - to be decided at Regulation 19.</p>



Area (A-D)	Strategic Growth Location	Comments	Progression as Strategic Growth Option?
		<ul style="list-style-type: none"> <li>Promoting sustainable development in areas that have seen little growth due to Green Belt restrictions.</li> </ul>	
D	Clophill	<ul style="list-style-type: none"> <li>Historic settlement pattern and constrained infrastructure limit the options for growth in Clophill.</li> <li>Ecological concerns with large scale development.</li> <li>Opportunities for limited allocations depending on the location and impact on the character of the village.</li> <li>Growth along key transport corridor (A507).</li> </ul>	<p>✗</p> <p>Not progressed as a reasonable strategic alternative. Could potentially be considered for small to medium scale allocations - to be decided at Regulation 19.</p>
C	Cranfield East	<ul style="list-style-type: none"> <li>Concerns about landscape and uneven topography of the area.</li> <li>Limited capacity of education facilities in Cranfield.</li> <li>Opportunities for limited allocations depending on the location and impact on the landscape.</li> <li>Opportunities related to the EWR and proposed EW Expressway and Cambridge-Oxford Growth Corridor.</li> </ul>	<p>✗</p> <p>Not progressed as a reasonable strategic alternative. Could potentially be considered for small to medium scale allocations - to be decided at Regulation 19.</p>
C	Cranfield West	<ul style="list-style-type: none"> <li>Limited capacity of education facilities in Cranfield.</li> <li>Concerns over proximity of airfield.</li> <li>Opportunities for limited allocations depending on the location and impact on the landscape.</li> <li>Opportunities related to the EWR and proposed EW Expressway and Cambridge-Oxford Growth Corridor.</li> </ul>	<p>✗</p> <p>Not progressed as a reasonable strategic alternative. Could potentially be considered for small to medium scale allocations - to be decided at Regulation 19.</p>
D	Flitton	<ul style="list-style-type: none"> <li>Impact of large scale development on the character of the villages in this area.</li> </ul>	<p>✗</p> <p>Not progressed as a reasonable strategic alternative.</p>

Area (A-D)	Strategic Growth Location	Comments	Progression as Strategic Growth Option?
		<ul style="list-style-type: none"> <li>Opportunities for limited allocations depending on the location and impact on the settlement pattern.</li> </ul>	Could potentially be considered for small to medium scale allocations - to be decided at Regulation 19.
A	Flitwick West	<ul style="list-style-type: none"> <li>Green belt designation - opportunities for limited allocations depending on the location and impact on the green belt.</li> <li>Concern over coalescence between Flitwick and Ampthill.</li> <li>Potential detrimental impact on the landscape, ecology and heritage in the east of Flitwick.</li> <li>Concentrating growth along key transport corridors (A507, M1 and Midland Main Line Rail).</li> <li>Promoting sustainable development in areas that have seen little growth due to Green Belt restrictions.</li> </ul>	<p>✗</p> <p>Not progressed as a reasonable strategic alternative.</p> <p>Could potentially be considered as part of a collective of settlements in the green belt for allocations - to be decided at Regulation 19.</p>
A	Harlington	<ul style="list-style-type: none"> <li>Green belt designation - opportunities for limited allocations depending on the location and impact on the green belt.</li> <li>Impact on the setting of the AONB to the south of Harlington.</li> <li>Concentrating growth along key transport corridor (M1 and Midland Main Line Rail).</li> <li>Delivering unmet housing need from Luton close to where it arises where there is the capacity to do so sustainably.</li> <li>Promoting sustainable development in areas that have seen little growth due to Green Belt restrictions.</li> </ul>	<p>✗</p> <p>Not progressed as a reasonable strategic alternative.</p> <p>Could potentially be considered as part of a collective of settlements in the green belt for allocations - to be decided at Regulation 19.</p>
A	Harpenden	<ul style="list-style-type: none"> <li>Area has a poor relationship with the settlement.</li> </ul>	✗

Area (A-D)	Strategic Growth Location	Comments	Progression as Strategic Growth Option?
		<ul style="list-style-type: none"> <li>Potential impacts on the landscape to the north of Harpenden.</li> <li>Opportunities for limited allocations depending on the location and impact on the landscape.</li> <li>Concentrating growth along key transport corridor (M1 and Midland Main Line Rail).</li> <li>Delivering unmet housing need from Luton close to where it arises where there is the capacity to do so sustainably.</li> </ul>	<p>Not progressed as a reasonable strategic alternative.</p> <p>Could potentially be considered for small to medium scale allocations - to be decided at Regulation 19.</p>
D	Henlow-Clifton	<ul style="list-style-type: none"> <li>Concerns over the coalescence between Henlow and Clifton.</li> <li>Impact on the landscape and countryside gap between the two settlements.</li> <li>Opportunities for limited allocations depending on the location and relationship between the two villages.</li> <li>Growth along key transport corridor (A507).</li> </ul>	<p>✗</p> <p>Not progressed as a reasonable strategic alternative.</p> <p>Could potentially be considered for small to medium scale allocations - to be decided at Regulation 19.</p>
D	Henlow Airfield & Camp	<ul style="list-style-type: none"> <li>Redevelopment of Brownfield Land.</li> <li>Mixed use development including housing and employment provision.</li> <li>Impact of significant housing development on the A507.</li> <li>Areas of this growth location are in proximity to Hazardous substances, regard will be had to public safety in the context of major accidents, which may have an impact upon the potential for development within this growth location.</li> </ul>	<p>✓</p> <p>Progressed as a reasonable strategic alternative.</p> <p>Approximately 1,000 new homes.</p>

Area (A-D)	Strategic Growth Location	Comments	Progression as Strategic Growth Option?
A	Hockliffe	<ul style="list-style-type: none"> <li>Green belt designation - opportunities for limited allocations depending on the location and impact on the green belt.</li> <li>Flood risk implications.</li> <li>Emerging Neighbourhood Plan could support allocations in the area.</li> <li>Concentrating growth along key transport corridors (A5).</li> <li>Promoting sustainable development in areas that have seen little growth due to Green Belt restrictions.</li> </ul>	<p>✗</p> <p>Not progressed as a reasonable strategic alternative.</p> <p>Could potentially be considered for small to medium scale allocations - to be decided at Regulation 19.</p>
C	Lidlington South	<ul style="list-style-type: none"> <li>Potential impact on the landscape.</li> <li>Potential impact on the value of the Greensand Ridge Walk and John Bunyan Trail.</li> <li>Archaeological sensitivities within the area.</li> <li>Opportunities for limited allocations depending on the location and impact on the landscape.</li> <li>Opportunities related to the EWR and proposed EW Expressway and Cambridge-Oxford Growth Corridor.</li> </ul>	<p>✗</p> <p>Not progressed as a reasonable strategic alternative.</p> <p>Could potentially be considered for small to medium scale allocations - to be decided at Regulation 19.</p>
A	Luton – North	<ul style="list-style-type: none"> <li>Deliver unmet housing need from Luton close to where it arises where there is capacity to do so sustainably.</li> <li>Delivery of the A6/M1 Link road relieving congestion for surrounding settlements and providing economic benefits.</li> <li>Concentrating growth along key corridor routes (M1 and Midland Main Line Rail).</li> <li>Green belt designation – promoting sustainable development in areas that have seen little growth due to Green Belt restrictions.</li> </ul>	<p>✓</p> <p>Progressed as a reasonable strategic alternative.</p> <p>Approximately 4,000 new homes.</p>

Area (A-D)	Strategic Growth Location	Comments	Progression as Strategic Growth Option?
		<ul style="list-style-type: none"> <li>Potential impact on the AONB designation to the north of the growth location.</li> </ul>	
A	Luton - West	<ul style="list-style-type: none"> <li>Deliver unmet housing need from Luton close to where it arises where there is capacity to do so sustainably.</li> <li>Delivery of sustainable transport infrastructure benefits through connections to the Guided Busway.</li> <li>Strategic development within this Growth Location will need to provide significant transport infrastructure improvements.</li> <li>Green belt designation – promoting sustainable development in areas that have seen little growth due to Green Belt restrictions.</li> <li>Potential impact on the AONB designation to the west of the growth location.</li> <li>Opportunity to provide a new secondary school to meet the needs of the growth location and the shortage within Luton west.</li> </ul>	<p>✓</p> <p>Progressed as a reasonable strategic alternative.</p> <p>Approximately 2,000 new homes.</p>
C	Marston Moretaine North	<ul style="list-style-type: none"> <li>Ecological sensitivities within the area.</li> <li>Coalescence of villages.</li> <li>Opportunities for limited allocations depending on the location and impact on the landscape and ecology.</li> <li>Opportunities related to the EWR and proposed EW Expressway and Cambridge-Oxford Growth Corridor.</li> <li>Proximity to A421 and Junction 13 of the M1.</li> </ul>	<p>✗</p> <p>Not progressed as a reasonable strategic alternative. Could potentially be considered for small to medium scale allocations - to be decided at Regulation 19.</p>
C	Marston Moretaine South	<ul style="list-style-type: none"> <li>Opportunity to regenerate a scared landscape, contributing to the Forest of Marston Vale and improvements to existing water bodies.</li> </ul>	<p>✓</p>

Area (A-D)	Strategic Growth Location	Comments	Progression as Strategic Growth Option?
	(Marston Vale)	<ul style="list-style-type: none"> <li>■ Opportunity to connect to heat network that may be associated with the Energy Recovery Facility Planned at Rookery Pit South.</li> <li>■ Opportunity to support the Cambridge – Oxford Growth Corridor.</li> <li>■ Proximity to the new A421, Junction 13 of the M1 and relative close proximity to Ridgmont (East-West Rail).</li> <li>■ Strategic development in this growth location will be required to provide significant highway infrastructure improvements.</li> <li>■ Potential of the site to help establish the new Bedford-Milton Keynes canal route.</li> </ul>	<p>Progressed as a reasonable strategic alternative.</p> <p>Approximately 5,000 new homes.</p>
D	Meppershall	<ul style="list-style-type: none"> <li>■ Impact of large scale development on the character of the village.</li> <li>■ Opportunities for limited allocations depending on the location and impact on the character and settlement pattern of the village.</li> </ul>	<p>✗</p> <p>Not progressed as a reasonable strategic alternative. Could potentially be considered for small to medium scale allocations - to be decided at Regulation 19.</p>
B	Potton South	<ul style="list-style-type: none"> <li>■ Poor relationship with Potton.</li> <li>■ Impact on the character of the village.</li> <li>■ Opportunities for limited allocations depending on the location and impact on the character and settlement pattern of the village.</li> </ul>	<p>✗</p> <p>Not progressed as a reasonable strategic alternative. Could potentially be considered for small to medium scale allocations - to be decided at Regulation 19.</p>
B	Potton West	<ul style="list-style-type: none"> <li>■ Poor relationship with Potton.</li> </ul>	<p>✗</p>

Area (A-D)	Strategic Growth Location	Comments	Progression as Strategic Growth Option?
		<ul style="list-style-type: none"> <li>Impact on the character of the village, landscape and ecology concerns.</li> <li>Opportunities for limited allocations depending on the location and impact on the character and settlement pattern of the village.</li> </ul>	Not progressed as a reasonable strategic alternative. Could potentially be considered for small to medium scale allocations - to be decided at Regulation 19.
C	Salford (Land East of M1)	<ul style="list-style-type: none"> <li>Potential for coalescence of Hulcote, Salford and Milton Keynes.</li> <li>Poor relationship with strategic road network including the road network within Milton Keynes.</li> <li>Strategic scale development would have significant environmental impacts including impacts on the landscape and significant impacts upon the character and appearance of the area.</li> <li>Opportunities related to the EWR and proposed EW Expressway and Cambridge-Oxford Growth Corridor</li> <li>Opportunities for limited allocations depending on the location and impact on the character, settlement pattern and landscape of the village.</li> </ul>	<p>✗</p> <p>Not progressed as a reasonable strategic alternative.</p> <p>Could potentially be considered for small to medium scale allocations - to be decided at Regulation 19.</p>
B	Sandy East	<ul style="list-style-type: none"> <li>Separation by the railway line leads to a poor relationship with Sandy.</li> <li>Proximity of the growth location to a historic park.</li> <li>Ecological concerns with large scale development.</li> <li>Opportunities for limited allocations depending on the location and impact on the local historic assets.</li> <li>Concentrating growth along key transport corridors (A1 and East Coast Main Line Rail)</li> </ul>	<p>✗</p> <p>Not progressed as a reasonable strategic alternative.</p> <p>Could potentially be considered for small to medium scale allocations - to be decided at Regulation 19.</p>

Area (A-D)	Strategic Growth Location	Comments	Progression as Strategic Growth Option?
B	Sandy – North	<ul style="list-style-type: none"> <li>Impact on the landscape.</li> <li>Congestion issues at access points to the A1 network.</li> <li>Proximity of development from the central core of Sandy.</li> <li>Opportunities for limited allocations depending on the location and impact on the landscape.</li> <li>Concentrating along growth along key transport corridors (A1 and East Coast Main Line Rail).</li> </ul>	<p>✗</p> <p>Not progressed as a reasonable strategic alternative.</p> <p>Could potentially be considered for small to medium scale allocations - to be decided at Regulation 19.</p>
B	Tempsford South and Tempsford Airfield	<ul style="list-style-type: none"> <li>Potential to develop a new sustainable settlement with the required infrastructure along a key sustainable transport corridor.</li> <li>Opportunity to provide direct connections to the A1, and potential to connect to a re-routed A428 to the north beyond the plan period.</li> <li>Potential to incorporate the new EWR interchange with the East Coast Main Line, within the area.</li> <li>Opportunity of the site to support the Cambridge-Oxford Growth Corridor.</li> </ul>	<p>✓</p> <p>Progressed as a reasonable strategic alternative.</p> <p>Approximately 7,000 new homes.</p>
D	Shefford South & West	<ul style="list-style-type: none"> <li>Impact on the character of the settlements and villages.</li> <li>Opportunities for limited allocations depending on the location and impact on the character and settlement pattern of the village.</li> </ul>	<p>✗</p> <p>Not progressed as a reasonable strategic alternative.</p> <p>Could potentially be considered for small to medium scale allocations - to be decided at Regulation 19.</p>



Area (A-D)	Strategic Growth Location	Comments	Progression as Strategic Growth Option?
A	Slip End (M1 J10)	<ul style="list-style-type: none"> <li>Green belt designation - opportunities for limited allocations depending on the location and impact on the green belt.</li> <li>Constrained by strategic network.</li> <li>Draft Neighbourhood Plan could support allocations in this area.</li> <li>Opportunities for limited allocations depending on the location and impact on green belt.</li> <li>Promoting sustainable development in areas that have seen little growth due to Green Belt restrictions.</li> <li>Delivering unmet housing need from Luton close to where it arises where there is the capacity to do so sustainably.</li> </ul>	<p>✗</p> <p>Not progressed as a reasonable strategic alternative.</p> <p>Could potentially be considered as part of a collective of settlements in the green belt for allocations - to be decided at Regulation 19.</p>
B	Stotfold	<ul style="list-style-type: none"> <li>Poor relationship with Stotfold and impact on the settlement character and pattern.</li> <li>Opportunities for limited allocations depending on the location and impact on the character, settlement pattern and landscape of the village.</li> <li>Concentrating along key transport corridors (A1 and A507).</li> </ul>	<p>✗</p> <p>Not progressed as a reasonable strategic alternative.</p> <p>Could potentially be considered for small to medium scale allocations - to be decided at Regulation 19.</p>
A	Toddington	<ul style="list-style-type: none"> <li>Green belt designation - opportunities for limited allocations depending on the location and impact on the green belt.</li> <li>Landscape concerns in the south east of the village with large scale development.</li> <li>Emerging Neighbourhood Plan could support allocations in the area.</li> </ul>	<p>✗</p> <p>Not progressed as a reasonable strategic alternative.</p> <p>Could potentially be considered as part of a collective of settlements in the green belt for allocations - to be decided at Regulation 19.</p>

Area (A-D)	Strategic Growth Location	Comments	Progression as Strategic Growth Option?
		<ul style="list-style-type: none"> <li>Concentrating growth along key transport corridors (M1 corridor).</li> <li>Promoting sustainable development in areas that have seen little growth due to Green Belt restrictions.</li> <li>Delivering unmet housing need from Luton close to where it arises where there is the capacity to do so sustainably.</li> </ul>	
A	Westoning	<ul style="list-style-type: none"> <li>Green belt designation - opportunities for limited allocations depending on the location and impact on the green belt.</li> <li>Concentrating growth along key transport corridors (M1 corridor).</li> <li>Promoting sustainable development in areas that have seen little growth due to Green Belt restrictions.</li> </ul>	<p>✗</p> <p>Not progressed as a reasonable strategic alternative. Could potentially be considered as part of a collective of settlements in the green belt for allocations - to be decided at Regulation 19.</p>
C	Wharley End West (Land W of Cranfield University)	<ul style="list-style-type: none"> <li>Poor relationship with Cranfield village.</li> <li>Opportunities for limited allocations depending on the location and relationship with Cranfield village.</li> </ul>	<p>✗</p> <p>Not progressed as a reasonable strategic alternative. Could potentially be considered for small to medium scale allocations - to be decided at Regulation 19.</p>
C	Wixams South	<ul style="list-style-type: none"> <li>Opportunity to integrate the growth location with an existing housing allocation (Policy MA3) and the planned Wixams Main Settlement in the north into a sustainable new settlement.</li> <li>Opportunities for the wider community through the provision of a country-side park to maintain separation between Wixams and Houghton Conquest.</li> </ul>	<p>✓</p> <p>Progressed as a reasonable strategic alternative. Approximately 500 new homes.</p>

Area (A-D)	Strategic Growth Location	Comments	Progression as Strategic Growth Option?
		<ul style="list-style-type: none"><li>■ Opportunity to connect to the heat network that may be associated with the Energy Recovery Facility at Rookery Pit South.</li><li>■ Potential for coalescence between Wixams South and Houghton Conquest.</li></ul>	

5.82 Each potential Growth Location progressed as a reasonable strategic alternative was subject to full SA using the Strategic SA Framework and the findings are detailed in Appendix V of this SA Report. Initially, the plan-making and the SA has considered only strategic growth locations and a generic consideration of growth in villages (up to 2,000 in total for both Area A and D). The findings of the strategic SAs of strategic growth location options are summarised in the following tables (5.8-5.11) and categorised according to each of the four Areas A-D:

### Strategic Growth Location Options Area A

**Table 5.8: Area A Strategic Growth Location Options Summary SA**

SA Objective	Summary: Strategic Sustainability Appraisal					
	North of Luton (4000 homes)		West of Luton (2000 homes)		Villages (up to total of 2000 new homes)	
1 Housing	++		++		+?	
2 Communities <sup>82</sup>	--	-?	--?	-?	--?	--?
3 Accessibility - Services & Facilities	++		++		+?	
4 Economy & Employment	0	+	0	+	0	+
5 Health & Equality	0	++	++?	++	+	+
6 Highways AQ <sup>83</sup> & GHGs	0?		-?		-	
7 Sustainable Transport	+		+		+?	
8 Energy & Climate Change	+?		+?		+?	
9 Water Resources & Quality	0		0		0	
10 Reduce Flood Risk	0		0		0	
11 Soils	-?		-?		-?	
12 Biodiversity & Geodiversity	+		+?		+?	
13 Landscape & Townscape	--?		--		--?	
14 Historic Environment	0?		0?		0?	

<sup>82</sup> Please note that first symbol relates to location in/out of Green Belt designation; second symbol relates to effects on integration & identity for existing settlements

<sup>83</sup> Please note Air Quality & Green House Gas emissions are essentially associated with emissions from road vehicles for the purposes of this SA and as explained in the SA Scoping Report

- 5.83 **Strategic Growth Location Options Area A:** The two options for strategic growth locations around Luton can help to meet the objectively identified housing needs of the plan area with major positive effects, including contributing to the unmet housing needs for Luton Borough with further major positive effects for the SA objective relating to Duty to Cooperate. Both options will result in loss of Green Belt with potential major negative effects that may be reduced for the West of Luton option as the Green Belt Study<sup>84</sup> has indicated that some land may make a relatively weak contribution to Green Belt purposes – thus providing some mitigation. Both options will expand the urban area of Luton with likely negative effects for coalescence and/or loss of identity for nearby settlements such as Sundon to the north and Caddington and Chaul End to the west. However, with landscape buffering and by focusing development growth adjacent to the existing urban area of Luton, there is the potential for good integration with likely positive effects.
- 5.84 The scale and concentration of two growth locations for development around Luton is more likely to deliver significant positive effects in terms of provision and accessibility to services and facilities for both new and existing residents. Mixed-use development may be possible and with Luton as a major employment source for Central Bedfordshire, positive effects that may be synergistic and cumulative are indicated for economy/employment SA objectives – helping to resolve a known sustainability problem of out-commuting. West of Luton is close to areas of higher deprivation (Dunstable Manshead and Caddington) – new development could improve accessibility, promote investment and reduce inequalities with the potential for major long-term and cumulative positive effects. Both options have the potential to support green infrastructure priorities with major long-term positive effects for health/well-being and biodiversity SA objectives.
- 5.85 Early transport modelling<sup>85</sup> identifies congestion for routes into Luton and other urban roads as well as links to the strategic highway network. This could be mitigated to some extent through enhanced access to, and provision of, sustainable transport networks including the Midland Main railway line. Uncertainty at this stage of assessment until further studies undertaken, precise locations identified and likely development requirements identified to provide mitigation/enhancement measures.
- 5.86 Both options are adjacent to or partially within (precise boundary unclear at this stage) the nationally designated AONB landscape. Development at this scale has significant potential to negatively affect the AONB setting through urbanisation in a previously undeveloped area with major negative effects without careful buffering and consideration of the effects on setting. However, some uncertainty at this stage of assessment since the precise locations are not known further detailed studies will investigate mitigation measures at the next stage of plan-making.
- 5.87 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

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<sup>84</sup> LUC for Central Bedfordshire Council Green Belt Study (October 2016)

<sup>85</sup> Aecom (2016) Technical Note Stage 1A Growth Area Analysis

that have services and facilities. Although this would require release of Green Belt (GB) land, recent evidence<sup>86</sup> indicates that some parcels of land only contribute weakly to GB aims such that likely effects would be mitigated by directing new development accordingly. Negative effects were indicated for cumulative effects on integration/identity with existing communities, landscape, and the highways network as Area A is characterised by rural roads with limited sustainable transport modes. However, these effects could be mitigated by reducing the level of potential development to small-medium (100-500 new homes) and these non-strategic options were further investigated (please see later in this section 5 of the SA Report).

## Strategic Growth Location Options Area B

**Table 5.9: Area B Strategic Growth Locations Summary SA**

SA Objective	Summary: Strategic Sustainability Appraisal							
	Temptford Airfield (2000-3000 homes)		Arlesey (2000 homes)		East of Biggleswade (3000 homes)		Villages (up to total of 2000 new homes)	
1 Housing	++		++		++		+?	
2 Communities <sup>87</sup>	0	+	0?	-	0?	+	0	-?
3 Accessibility - Services & Facilities	++		++		++		+?	
4 Economy & Employment	0	+	0	+	0	+	0	+
5 Health & Equality	++?	++	0	++	0	++	0	+
6 Highways AQ <sup>88</sup> & GHGs	0?		0?		-?		-?	
7 Sustainable Transport	-?		+		+		+?	
8 Energy & Climate Change	+?		+?		+?		+?	
9 Water Resources & Quality	0		0		0		0	
10 Reduce Flood Risk	0		0		0		0	
11 Soils	-?		-?		-?	+	-?	
12 Biodiversity & Geodiversity	+?		+		+		+?	
13 Landscape & Townscape	-		+		+		-?	

<sup>86</sup> LUC for Central Bedfordshire Council Green Belt Study (October 2016)

<sup>87</sup> Please note that first symbol relates to location in/out of Green Belt designation; second symbol relates to effects on integration & identity for existing settlements

<sup>88</sup> Please note Air Quality & Green House Gas emissions are essentially associated with emissions from road vehicles for the purposes of this SA and as explained in the SA Scoping Report

14 Historic Environment	0?	0?	0?	0?
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- 5.88 **Strategic Growth Location Options Area B:** All the options for strategic growth locations can help to meet the objectively identified housing needs of the plan area with major positive effects. The concentration of development around Biggleswade is likely to deliver significant positive effects for provision of and improved accessibility to services and facilities. Tempsford is less well connected to the existing urban areas than the other options and as such is less likely to support accessibility to existing public transport connections and a modal shift with the potential for minor negative effects on sustainable transport. All options have the potential to support green infrastructure priorities with major long-term positive effects for health/well-being and biodiversity SA objectives.
- 5.89 Development in the east of Biggleswade may regenerate areas of previously developed land with positive effects. However, it is also an option that has the potential to result in the loss of best and most versatile agricultural land with negative effects. The options have the potential for minor negative effects on sensitive landscapes associated with long open views and high levels of tranquillity in this area. The possibilities for mitigation are not known at this stage of assessment until further details studies are undertaken.
- 5.90 Development in villages would have positive effects on housing availability, access to employment and enable improvement of services, but given the rural nature of these locations could also have negative effects on soils, transport and associated emissions, landscape and settlement identities, depending on the scale, location and design. Development would generally be at the edge of settlements and so effects on historic heritage are likely to be mitigated, while areas of high flood probability and risk could also be avoided and opportunities for biodiversity enhancement delivered.

### Strategic Growth Location Options Area C

**Table 5.10: Area C Strategic Growth Locations Summary SA**

SA Objective	Summary Strategic Sustainability Appraisal							
	Marston Vale (4000 - 5000 homes)		Aspley Guise (up to 3000 homes)		Wixams South (1000 homes)		Villages (up to total 2000 new homes)	
1 Housing	++		++		++		+?	
2 Communities <sup>89</sup>	0	-?	0	-?	0	-?	0	-?
3 Accessibility - Services & Facilities	++		++		++		+?	

<sup>89</sup> Please note that first symbol relates to location in/out of Green Belt designation; second symbol relates to effects on integration & identity for existing settlements



4 Economy & Employment	0	+	0	+	0	+	0	+
5 Health & Equality	0	++	0	++	0	++	0	+
6 Highways AQ <sup>90</sup> & GHGs	0?	0?	0?	0?	0?	0?	0?	-?
7 Sustainable Transport	+	+	+	+	+	+	+	+
8 Energy & Climate Change	+	+	+	+	+	+	+	+
9 Water Resources & Quality	0	0	0	0	0	0	0	0
10 Reduce Flood Risk	0	0	0	0	0	0	0	0
11 Soils	-?	-?	-?	-?	-?	-?	-?	-?
12 Biodiversity & Geodiversity	+	+	+	+	+	+	+	+
13 Landscape & Townscape	+	+	+	+	+	+	+	-?
14 Historic Environment	0?	0?	0?	0?	0?	0?	0?	0?

- 5.91 **Strategic Growth Location Options Area C:** All the options can help to meet the objectively identified housing needs of the plan area, with good accessibility to existing services and facilities and significant potential for new provisions to support improved accessibility. Development in Marston Vale could lead to the direct coalescence of Marston Moretaine and Lidlington without buffering, with the potential for significant negative effects on community identities. However, a new settlement offers opportunities for exemplar design and the extent of mitigation possibilities for community integration is not known at this stage so uncertainty of effects remains. The size and scope of a new settlement also offers strong opportunities through early masterplanning and creative design to provide exemplar opportunities for sustainable transport with positive effects and the integration with EWR at nearby Ridgmont Station.
- 5.92 The expansion north of the settlement for the option at Aspley Guise is less likely to effectively integrate since the existing railway line provides a barrier for movement and connection with the existing urban form. Development in this area would require significant infrastructure investment to overcome this barrier with the potential for a minor negative effect. All options have the potential to support green infrastructure priorities with major long-term positive effects for health/well-being and biodiversity SA objectives.
- 5.84 Development in villages would have positive effects on housing availability, access to employment and potentially enable improvement of services, but given the rural nature of these locations could also have negative effects on soils, transport and associated emissions, landscape and settlement identities, depending on scale, location and design. Development would generally be

<sup>90</sup> Please note Air Quality & Green House Gas emissions are essentially associated with emissions from road vehicles for the purposes of this SA and as explained in the SA Scoping Report

at the edge of settlements and so effects on historic heritage are likely to be mitigated, while areas of high flood probability and risk could also be avoided and opportunities for biodiversity enhancement delivered.

### Strategic Growth Location Options Area D

**Table 5.11: Area D Strategic Growth Locations Summary SA**

SA Objective	Summary: Strategic Sustainability Appraisal			
	Henlow Camp (up to 1000 homes)		Villages (up to 1500)	
1 Housing	++		+?	
2 Communities <sup>91</sup>	0?	-	0	-?
3 Accessibility - Services & Facilities	++		+	
4 Economy & Employment	0	+	0	+?
5 Health & Equality	0	+	0	+?
6 Highways AQ <sup>92</sup> & GHGs	0?		-	
7 Sustainable Transport	+		+?	
8 Energy & Climate Change	+?		+?	
9 Water Resources & Quality	0		0	
10 Reduce Flood Risk	0		0	
11 Soils	-	+	-?	
12 Biodiversity & Geodiversity	+		+?	
13 Landscape & Townscape	+		-?	
14 Historic Environment	?		0?	

**5.93 Strategic Growth Location Options Area D:** Development at both options can help to meet the objectively assessed housing needs of the plan area. However, the potential for significant positive effects is more likely at this stage at RAF Henlow given both the scale and determined location. Housing

<sup>91</sup> Please note that first symbol relates to location in/out of Green Belt designation; second symbol relates to effects on integration & identity for existing settlements

<sup>92</sup> Please note Air Quality & Green House Gas emissions are essentially associated with emissions from road vehicles for the purposes of this SA and as explained in the SA Scoping Report

growth in this broad location will develop the land between Henlow and Henlow Camp. While it is assumed that these two areas share connected identities to some extent, given the scale of development in comparison to the small scale of the existing settlements, negative effects are likely on the community identities.

- 5.94 The dispersal of development across various villages is less likely to deliver infrastructure, and service and facility improvements, and the villages are less well connected by viable public transport services. There is also the potential for cumulative negative effects on landscape but uncertain at this stage of assessment.
- 5.95 Development at RAF Henlow can support SA objectives for the soils resource through the regeneration of previously developed land. However, development in this location also has the potential to negatively affect designated heritage settings of aircraft hangers and associated airfield Listed Buildings – uncertainty of significance and effectiveness of mitigation possibilities at this stage until further studies undertaken. The Council has now progressed RAF Henlow for strategic employment only.

### Strategic Options: Locations for Development Growth – Employment

- 5.96 The Council commissioned PBA to undertake an employment land review to review existing employment land in Central Bedfordshire and subsequently assess sites put forward through the call for sites to identify reasonable options for further consideration. Nine of these options were identified as having potential for some employment land to be delivered if the location is taken forward as a Mixed-Use scheme (to be determined at the next stage of plan-making) – these had already been investigated through SA as options for Growth Locations for Housing.
- 5.97 There were 3 additional strategic employment options that were subject to SA using the full SA Framework and the detailed findings of the SA are presented at the end of Appendix V SA of Growth Location Options. The strategic employment site options considered and the reasons for their progression or non-progression is summarised in the following table:

**Table 5.12: Summary Reasons for Selection or Non-Progression of Strategic Employment Growth Options**

Area (A-D)	Strategic Employment Growth Location Option	Summary Reasons for Selection or Non-Progression of Strategic Employment Growth Options
<b>Employment</b>		
<b>C</b>	Land at Bedford Road, Husborne Crawley	Potential for some employment land to be delivered if the location is taken forward as a mixed-use scheme.

<b>A</b>	Sundon Rail Freight Interchange, Luton	Included within the Local Plan as a potential standalone strategic employment allocation.
<b>C</b>	Land either side of Beancroft Road, Marston Moretaine MK43 0QE, Marston Moretaine and Lower Shelton	Potential for some employment land to be delivered if the location is taken forward as a mixed-use scheme.
<b>C</b>	Land at Ridgmont, Land to the north of A507, MK43 0XP	Included within the Local Plan as a potential standalone strategic employment allocation, Ridgmont, M1 Junction 13.
<b>B</b>	Land adjacent to Popes Farm Georgetown Sandy, SG19 2AE	Potential for some employment land to be delivered if the location is taken forward as a mixed-use scheme.
<b>A</b>	Land east of Junction 11A and north of Vauxhall Plant Land adjacent to Luton Rd, Sundon RD and Sundon Park Rd, LU3 3AN	Potential for some employment land to be delivered if the location is taken forward as a mixed-use scheme.
<b>B</b>	West Sunderland Farm East of Biggleswade, SG18 8SD	Potential for some employment land to be delivered if the location is taken forward as a mixed-use scheme and if significant infrastructure is provided.
<b>B</b>	Land west of the A1, Biggleswade SG18 9ST	Included within the Local Plan as a potential standalone strategic employment allocation, Biggleswade, West of A1.
<b>N</b> <b>C</b>	Aspley Guise Triangle Area Land to the east of Milton Keynes defined by the A421/M1 to the north, the Bedford Bletchley Railway line to the south and Cranfield Rd to the west, MK17 8HS	Potential for some employment land to be delivered if the location is taken forward as a mixed-use scheme.

5.98 The summary SA findings for the 3 strategic employment locations are set out in the table following:

**Table 5.13: Strategic Employment Options Summary SA**

SA Objective	Summary Strategic SA					
	1. Sundon Rail Freight Interchange		2. Biggleswade, West of A1		3. Ridgmont, M1 Junction 13	
1 Housing	0		0		0	
2 Communities <sup>93</sup>	--	0	0	0	0	0
3 Accessibility - Services & Facilities	0		0		0	
4 Economy & Employment	++	++	++	++	++	++
5 Health & Equality	0	++	0	++	0	++
6 Highways AQ <sup>94</sup> ; GHGs	0?		0?		0?	
7 Sustainable Transport	++		++		++	
8 Energy & Climate Change	+?		+?		+?	
9 Water Resources & Quality	0		0		0	
10 Reduce Flood Risk	0		0		0	
11 Soils	-?		-?		-?	
12 Biodiversity & Geodiversity	0		+		+	
13 Landscape & Townscape	-?		+		+	
14 Historic Environment	0		0?		0?	

5.99 Each strategic employment option was found to have likely neutral effects for SA objectives on housing, accessibility to services & facilities, health, water, and the historic environment – principally due to mitigation associated with the nature of the likely development, by avoidance of sensitive receptors, and the draft Development Management Policies that provide mitigation measures to control and guide proposed development.

5.100 The Sundon RFI is located in the Green Belt with potential for major negative effects against this SA objective – however, mitigation may be possible since the site is already adjacent to major transport infrastructure. Neutral effects in

<sup>93</sup> Please note that first symbol relates to location in/out of Green Belt designation; second symbol relates to effects on integration & identity for existing settlements

<sup>94</sup> Please note Air Quality & Green House Gas emissions are essentially associated with emissions from road vehicles for the purposes of this SA and as explained in the SA Scoping Report

this respect for the other two options. Minor positive effects are indicated for each option for energy & climate change objectives since they are associated with major transport routes and the possibilities for sustainable transport for more significant positive effects – some uncertainty still at this strategic stage of assessment until further studies at the next stage of plan-making.

- 5.101 Each option will take land with minor negative effects for loss of the soil resource. The Sundon RFI option is close to the designated AONB and there is the potential for minor negative effects on the AONB setting – although there is existing development between the site and the AONB reducing sensitivity and providing buffering. Opportunities to enhance green infrastructure and biodiversity objectives could give minor positive effects for Options 2 & 3. All three options are likely to have major positive effects that could be synergistic and cumulative in the longer-term for SA objectives on economy and employment.

### Developing the Spatial Strategy Approach

- 5.102 The Council considered the responses to the Shaping Central Bedfordshire public consultation and the findings of various technical studies<sup>95</sup>, including the SA, to develop the preferred option for the Draft Local Plan Spatial Strategy. Planning development growth for Central Bedfordshire is complex since the area is strongly affected by its relationships with surrounding major centres, especially Luton, Milton Keynes, Bedford and London. This has influenced key characteristics such as out-commuting for employment and major transport corridors north-south M1 & A1, east-west A5-M1 J11a Milton Keynes to Dunstable, and the East West Rail Link Oxford-Milton Keynes-Bedford- Cambridge. Development growth in recent years has tended towards the north of the area and avoided the major south-western part of the area that is designated Green Belt.
- 5.103 The four Areas A-D recognise the different characteristics of the Central Bedfordshire area – they are not intended as four alternatives *per se* but rather as distinct areas to help guide plan-making. The key positive effects and the key issues with potential negative effects that inform continuing plan-making for each of the four Areas may be further explained (and as presented in the Non-Technical Summary June 2017) as follows:
- 5.104 **Area A – South of Central Bedfordshire (predominantly Green Belt):** This area is constrained by the Green Belt and Chilterns AONB designations. Large scale developments are underway at Leighton Linlade and to the north of Houghton Regis. Smaller settlements have limited capacity to grow due to Green Belt designations. The area is served by major transport routes, for example the M1 and Midland Mainline Railway Line, as well as the recently completed A5-M1 link. The key likely significant effects found by the SA for development growth in Area A may be summarised as follows:

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<sup>95</sup> <http://www.centralbedfordshire.gov.uk/planning/policy/local-plan/tech-supporting-studies.aspx>

Key Positive Effects:

- Growth in this area will offer opportunities associated with new development which Green Belt designation restricts.
- Allowing some development in the Green Belt releases the pressure on non-Green Belt settlements and help avoid the coalescence of settlements in non-Green Belt areas
- Appropriately located housing and supporting infrastructure around Houghton Regis and Luton could have major positive effects for these areas with high deprivation
- Growth in this area will support the provision of housing supply for the Luton HMA.
- The location of key transport corridors here provides employment benefits for this area.
- There is good access to open space, recreation and green infrastructure, which would benefit existing and new communities.

Issues & Potential Key Negative Effects:

- The loss of green belt designations could result in the coalescence of small settlements.
- Growth along the transport corridors, namely along the M1 corridor around Dunstable and the AQMA, could result in poorer air quality.
- 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.
- Increased development will result in loss of soil resources.

5.105 **Area B – A1 Corridor Area to the East:** This is a broad corridor running north-south along the A1 and the East Coast Main Railway Line in the eastern section of Central Bedfordshire. Area B includes the towns of Sandy and Biggleswade. Area B is well served with regard to transport north-south, and east-west with the delivery of the Central Section of East West Rail and the Expressway. The key likely significant effects found by the SA for development growth in Area B may be summarised as follows:

Key Positive Effects:

- Large scale growth will have major positive effects for housing supply and provision of supporting infrastructure in the longer term.
- There is good access to existing services and facilities in Area B.
- There are employment opportunities along the A1 corridor which will have positive effects for the wider area.
- Large scale development has the potential for Green Infrastructure enhancements.

Issues & Potential Key Negative Effects:

- It will be important that the transport corridor here is maintained and improved to support additional growth.
- The effect of the growth on settlements will depend on the scale and design of the development proposed.
- 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.
- Increased development in this area will result in loss of soil resources.

5.106 **Area C – East West Corridor to North:** This is the area in the north of Central Bedfordshire between Milton Keynes in the west and Bedford in the east. Area C includes a section of the Oxford to Cambridge corridor. Future upgrading of this corridor through the East/West Rail and Expressway could support access and economic opportunities. The key likely significant effects found by the SA for development growth in Area C may be summarised as follows:

Key Positive Effects:

- Large scale growth will have major positive effects for housing supply and provision of supporting infrastructure in the longer-term.
- There is good access to existing services and facilities in Area C.
- There will be positive effects for employment in Area C as the area is well connected to existing and proposed transport links (A421, M1 and planned upgrading for the East West Rail) and has close links to Milton Keynes and Bedford.
- Large scale development has the potential for Green Infrastructure enhancements and opportunities to promote sustainable transport that could be synergistic and cumulative in the longer-term.

Issues & Potential Key Negative Effects:

- The effect of the growth on settlements will depend on the scale and design of the development proposed.
- 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 impacts are mitigated.
- The effect of the growth on settlements will depend on the scale and design of the development proposed.
- Increased development in this area will result in loss of soil resources.

5.107 **Area D – Central Section:** Area D is located centrally and is characterised by small towns and villages. The infrastructure in this area has limited potential to be upgraded, such as roads, thus limiting the possibilities for mitigation measures to minimise potential negative effects or provide enhancement. The key likely significant effects found by the SA for development growth in Area D may be summarised as follows:



Key Positive Effects:

- There is a reasonable level of services and facilities to support some small scale growth in this area.
- The effect of the growth on settlements will depend on the scale and design of the development proposed.

Issues & Potential Key Negative Effects:

- The effect of the growth on settlements will depend on the scale and design of the development proposed.
- Due to the character of Area D, growth is likely to be small to medium scale and thus be able to contribute less to the housing need in Central Bedfordshire with less positive effects.
- As growth is likely to be small to medium scale there is less possibility for delivering GI enhancements.
- Small to medium scale growth is less likely to support upgrades to roads and the delivery of more sustainable modes of travel.
- Increased development in this area will result in loss of soil resources.

5.108 Similarly, the seven approaches to distributing growth are not necessarily alternatives such as either/or but rather approaches that might be suitable and sustainable depending upon the likely effects for each of the four Areas. A summary of the key negative and key positive effects found by the SA is shown in the following table:

**Table 5.14: Approaches to Distributing Growth – SA Summary**

Potential Approaches for Distributing Development Growth		Key Significant Negative and Positive Effects
<b>1</b>	<b>New Settlement (small scale)</b> – considers greater emphasis on delivering growth in village assumed to be between 2,000 to 5,000 new homes	Positive effects in Area C as supports economic focus with good access to major transport corridors; maximises opportunities for enabling/supporting infrastructure including sustainable transport & Green Infrastructure. Potential for exemplar design. Also, east of Biggleswade in Area B. Negative effects indicated in Area A with Green Belt restrictions or Area D with transport constraints – both with dispersed rural small settlement characteristics.
<b>2</b>	<b>New Settlement (town scale)</b> – considers greater emphasis on delivering growth in village assumed to be between 7,000 to 10,000 new homes	Positive effects in Area B at Tempsford as major transport corridors north-south & east-west and opportunities to maximise supporting infrastructure and economic objectives; maximises opportunities for enabling/supporting infrastructure including sustainable transport & Green Infrastructure; avoids Green Belt in Area A. Potential for exemplar design.

<b>3</b>	<b>Village Extensions</b> considers greater emphasis on extending villages – especially those with services & facilities	Potential positive effects as small-medium scale development (100-500 new homes) only & focused on settlements with existing services & facilities, and sustainable transport opportunities – in Areas A & D so that these areas can benefit from some new development whilst minimising the scale such that the rural characteristics & assets are protected, and recognising the limited scope for sustainable transport in these areas.
<b>4</b>	<b>Growth in Transport Corridors</b> considers greater emphasis on distributing growth along key transport corridors – north-south ((A1 & East Coast Main Railway Line); north-south (M1 & Midland Main Railway Line); east-west (A421 & proposals for East-West Rai)	<p>Potential positive effects from major development at the strategic level (&gt;1,500 new homes) in Areas B &amp; C to maximise opportunities for accessibility and movement.</p> <p>Potential negative effects in Areas A &amp; D recognising the limits to the transport networks &amp; less opportunity for enabling/supporting major infrastructure, including sustainable transport &amp; Green Infrastructure.</p>
<b>5</b>	<b>Urban Extensions</b> – considers greater emphasis on extensions assumed to be around 1,500-2000 new homes & for the larger settlements	<p>Positive effects as West &amp; North of Luton in Area A since development would be well-integrated with the existing urban form &amp; would contribute to the unmet housing need for Luton &amp; the Duty to Cooperate for the Councils.</p> <p>Positive effects as East of Arlesey in Area B as opportunities to integrate with the existing urban areas &amp; to maximise development in transport corridors, including sustainable transport; also, opportunities for enhancements promoting aims of the Environmental Framework &amp; Green Infrastructure. Also, potential positive effects for Wixams in Area C.</p> <p>Major growth not progressed in Area D recognising the limits to the transport networks &amp; less opportunity for enabling/supporting major infrastructure, including sustainable transport &amp; Green Infrastructure, with potential negative effects.</p>
<b>6</b>	<b>Urban Intensification around Transport Hubs</b> – considers greater emphasis for intensifying development	<p>Major growth progressed in Areas A (to south-east &amp; Luton), B &amp; C to maximise opportunities for more sustainable transport with potential positive effects.</p> <p>Development growth limited in Areas A (except south-east &amp; Luton) &amp; D with their rural</p>

	around hubs especially for settlements with railway stations, bus stations, and park & ride	characteristics and reliance on car transport, to reduce likely negative effects.
7	<b>Higher Densities</b> – placing greater emphasis on development offering from 75 to 130 dwellings per hectare (compared to typical densities in England of 30-40 dph)	To be investigated in more detail at the next stage of plan-making when precise locations & specific requirements for Strategic Allocation Policies are considered.

5.109 This may be explained further, including the key positive effects and issues with potential key negative effects that will inform decision-making and further development of the draft Plan, and as presented in the Non-Technical Summary June 2017:

5.110 **Option 1: New settlement (village scale):** This option looks at greater emphasis on delivering growth in new settlements on a village sized scale across Central Bedfordshire, in developments of between 2,000 to 5,000 new homes.  
**Option 2: New settlement (town scale):** This option looks at greater emphasis on delivering growth in new settlements on a town sized scale across Central Bedfordshire, in developments of between 7,000 to 10,000 new homes.

The likely significant effects found by the SA for these two Options 1 & 2 are similar and may be summarised as follows:

Key Positive Effects:

- Strategic scale developments can support highway infrastructure, minimise the impacts on existing transport networks and contribute to resolving existing problems.
- Strategic scale developments have the scope for effective design and implementation of sustainable transport modes and could be more contained thus reducing the need to travel.
- There is potential for improving health and well-being through provision of Green infrastructure (GI), open space and recreation and a rethinking in how health/care services can be delivered.
- Larger developments tend to provide more sustainable employment to meet the needs of existing businesses, attract future inward investment, and to be more resilient to change.
- New settlements can promote new thriving and inclusive communities through good, early design and the provision of good quality housing, services and facilities and employment opportunities.

Issues & Potential Key Negative Effects:

- There is an identified loss of soils/greenfield due to the scale of growth with potential for residual cumulative effects.
- Potential for negative effects on the predominantly rural landscape that could be cumulative. However, there is the opportunity for more creative design and mitigation through master planning due to the scale of development – providing mitigation measures.
- Major development in Area A will result in loss of the Green Belt.

5.111 **Option 3: Village extensions:** This option looks at greater emphasis on extending villages with good services and facilities. The likely significant effects found by the SA for Option 3 may be summarised as follows:

Key Positive Effects:

- There is potential for improving health and well-being through provision of Green infrastructure (GI), open space and recreation.
- There is potential for the provision of good quality housing, employment, with accessibility to services and facilities but this would be limited as growth potential is more limited.

Issues & Potential Key Negative Effects:

- Potential for negative effects on the predominantly rural landscape that could be cumulative. However, there is the opportunity for more creative design and mitigation through master planning due to the scale of development – providing mitigation measures.
- Additional growth is likely to have effects on the transport network of villages due to their rural nature and limited sustainable transport services, and limited possibilities for mitigation measures.
- Development in Area A will result in loss of the Green Belt.
- There is limited scale for employment land opportunities through village extensions.
- It is less clear whether this option alone could deliver the scale of the identified need in Central Bedfordshire.

5.112 **Option 4: Growth in transport corridors:** This option looks at greater emphasis on distributing growth along the key transport corridors in Central Bedfordshire. These include both road and rail networks. The likely significant effects found by the SA for Option 4 may be summarised as follows:

Key Positive Effects:

- Appropriately located housing and supporting infrastructure around Houghton Regis and Luton could provide major positive effects for these areas with high deprivation as well as the provision of housing supply for the Luton HMA.
- There is potential for the provision of good quality housing, employment, with accessibility to services and facilities.

- There is the potential for positive effects in Area C to the north west, Area B with the north-south corridor to the east, and Area A to the south east with London Luton Airport due to the existing and proposed transport links that could be synergistic and cumulative in the longer-term.
- Larger developments tend to provide more sustainable employment to meet the needs of existing businesses, attract future inward investment, and to be more resilient to change.
- Large scale developments along transport corridors have the scope for effective design and implementation of sustainable transport modes.

Issues & Potential Key Negative Effects:

- Potential for negative effects on the predominantly rural landscape that could be cumulative. However, there is the opportunity for more creative design and mitigation through master planning due to the scale of development.
- Major development in Area A will result in loss of the Green Belt.

5.113 **Option 5: Urban extensions:** This option looks at greater emphasis on delivering growth as urban extension of the larger settlements. This would be for extensions of up to 4,000 new homes. The likely significant effects found by the SA for Option 5 may be summarised as follows:

Key Positive Effects:

- Urban Extensions have the potential to mitigate effects on the transport networks through masterplanning that minimises the need to travel by car.
- Area A, with its' communities of high deprivation around Houghton Regis and the boundary with Luton, will have the potential for positive impacts.
- There is potential for the provision of good quality housing, employment, with accessibility to services and facilities.
- Urban extensions can promote new thriving and inclusive communities through good design.
- Larger developments tend to provide more sustainable employment to meet the needs of existing businesses, to attract future inward investment, and to be more resilient to change.
- Large scale developments have the scope for effective design and implementation of sustainable transport modes and could be more contained thus reducing the need to travel.

Issues & Potential Key Negative Effects:

- There is an identified loss of soils/greenfield due to the scale of growth with potential for residual cumulative effects.
- Potential for negative effects on the predominantly rural landscape. However, there is the opportunity for more creative design and mitigation through master planning due to the scale of development.
- Major development in Area A will result in loss of the Green Belt.

5.114 **Option 6: Urban intensification around transport hubs:** This option looks at greater emphasis on intensifying development around transport hubs in the urban area. This would include settlements with railway stations, bus stations and park and rides. The likely significant effects found by the SA for Option 6 may be summarised as follows:

Key Positive Effects:

- Urban intensification around transport hubs should reduce the need to travel by car and have the scope for effective design and implementation of sustainable transport modes.
- There is potential for improving health and well-being through provision of Green infrastructure (GI), open space and recreation and a rethinking in how health/care services can be delivered.
- Area A, with its' communities of high deprivation around Houghton Regis and the boundary with Luton, will have the potential for major positive effects.
- There is potential for the provision of good quality housing, employment, with accessibility to services and facilities.
- Larger developments tend to provide more sustainable employment to meet the needs of existing businesses, to attract future inward investment, and to be more resilient to change.

Issues & Potential Key Negative Effects:

- Potential for negative effects on the predominantly rural landscape that could be cumulative. However, there is the opportunity for more creative design and mitigation through master planning due to the scale of development.
- Major development in Area A will result in loss of the Green Belt.

5.116 **Option 7: Higher densities:** This option looks at placing greater emphasis on providing developments with high densities, of around 75 to 130 dwellings per hectare. The likely significant effects found by the SA for Option 7 may be summarised as follows:

Key Positive Effects:

- Reduced land take through higher densities will result in less of a loss of soils/greenfield providing strong mitigation measures.
- Higher density strategic scale developments can support highway infrastructure, minimise the impacts on existing transport networks and contribute to resolving existing problems and provide effective design and implementation of sustainable transport modes.
- There is potential for the provision of good quality housing, employment, with accessibility to services and facilities.
- Area A, with its' communities of high deprivation around Houghton Regis and the boundary with Luton, will have the potential for major positive effects.

- Higher density development can promote new thriving and inclusive communities through good, early design with positive effects.
- Open space and GI can be used more creatively in higher density development.

Issues & Potential Key Negative Effects:

- Potential for negative effects on the predominantly rural landscape that may be less through the reduced land take. However, there is the opportunity for more creative design and mitigation through master planning due to the scale of development.
- Major development in Area A will result in loss of the Green Belt.
- It is uncertain how this option will result in maintaining the highway network, although it should reduce the need to travel.

5.117 The Council considered the emerging findings from the technical studies, including the Growth Locations studies, the Site Assessments, and the SAs, to identify five potential options for Growth Scenarios. The findings from the strategic SAs contributed to identifying and refining the reasonable alternatives that should be investigated and tested through SA. The Council decided not to progress a preferred scenario from the five scenarios investigated until after the Regulation 18 consultation so that the views of consultees can be taken into consideration at the next stage of developing the Local Plan. Thus, the Regulation 18 draft Local Plan presents a Spatial Strategy Approach that offers a range of housing and job numbers. The key negative and positive effects for each housing growth scenario are outlined in the following paragraphs.

5.118 Similarly, the Council considered the two scenarios for strategic employment land and will identify a preferred approach after the Regulation 18 consultation. The Regulation 18 draft Local Plan includes a range of new jobs that could be provided through an approach that is similar to the Scenario 1 option. The difference between the two scenarios is the inclusion of a strategic employment area for Scenario 1 at the M1J11 in Area A – within the Green Belt with potential for negative effects but could be mitigated as adjacent to existing major infrastructure.

### **Reasons for Progressing a Spatial Growth Approach Reflected in Scenario 1**

5.119 The Council considered the potential benefits and issues arising from each of the five Growth Scenarios and decided that that an approach similar to Scenario 1 offers most development benefits and possibilities for resolving potential issues – at the Regulation 18 consultation stage. The housing numbers relate to the likely capacities identified from evidence to date, including the growth locations study, and therefore, represent alternatives that are reasonable to test through SA. The development benefits and issues identified that informed this decision-making and provide reasons for selecting a proposed approach at this stage may be summarised as follows:



- 5.120 **Scenario 1: Higher levels of growth across all Central Bedfordshire with a mixed approach to distribution.** Scenario 1 proposes the distribution of growth across all areas, using a range of distribution types. It limits growth in Area D but proposes high levels of growth in Areas A, B and C. At this stage, the development locations are strategic in scale for the purposes of testing the scenarios. This scenario matches most closely the growth location options set out in the Draft Local Plan.

**Table 5.15: Growth Scenario 1**

Area	Strategic Growth Location	Housing Number
<b>A</b>	North of Luton	4,000
	Green Belt Villages	2,000
	West of Luton	2,000
<b>B</b>	Tempsford	7000
	East of Biggleswade	3,000
	East of Arlesey	2,000
	Villages	0
<b>C</b>	Marston Vale	5,000
	Apsley Guise	3,000
	Wixams South	1,000
	Villages	0
<b>D</b>	RAF Henlow	1,000
	Villages	500
<b>Total</b>		30,500

**Potential Benefits & Issues for Scenario 1:**

- Distributes growth in a manner which seeks to capitalise on opportunities to improve East-West connections (delivered by East West Rail and the Expressway) as well as supporting existing strategic connections to the Midland Main railway line and Luton and Milton Keynes
- The greater the total number of dwellings (and therefore the delivery of housing to meet the needs of all residents and communities) the more significant the positive effects for social sustainability.
- New settlements offer the opportunity for creating thriving & inclusive communities through good & early design, as well as enabling the delivery of key infrastructure such as highway infrastructure.
- Capitalises on opportunities to support modal shift.
- Offers major positive impacts on the economy & employment for CBC.
- Offers opportunities for exemplar design and construction to support energy and water efficiencies.
- Growth within the Green Belt could lead to cumulative negative impacts in the longer-term.
- Appropriate mitigation, such as sizing and siting of development, can avoid potential negative impacts on loss of identity and integration for new and existing communities.



- With the higher amount of development, strong planning requirements will be needed in specific policy at the next stage of the plan to ensure timely & good provision of services & facilities to guide masterplanning

5.121 **Scenario 2: No growth to the west of Luton and east of Biggleswade.**

Scenario 2 is similar to Scenario 1, without growth to the West of Luton and East of Biggleswade. This enables sensitivity testing of scenario 1 by removing two sites with high levels of growth in different geographical areas (A & B) and judging the difference in the appraisal.

**Table 5.16: Growth Scenario 2**

Area	Strategic Growth Location	Housing Number
<b>A</b>	North of Luton	4,000
	Green Belt Villages	2,000
	West of Luton	0
<b>B</b>	Tempsford	7,000
	East of Biggleswade	0
	East of Arlesey	2,000
	Villages	0
<b>C</b>	Marston Valley	5,000
	Apsley Guise	3,000
	Wixams South	1,000
	Villages	0
<b>D</b>	RAF Henlow	1,000
	Villages	500
<b>Total</b>		25,500

**Potential Benefits & Issues for Scenario 2:**

- Without East of Biggleswade/West of Luton, growth is still distributed in a manner which seeks to capitalise on opportunities to improve East-West connections, as well as supporting existing strategic connections to the Midland Main railway line and Luton and Milton Keynes
- New settlements offer the opportunity for creating thriving & inclusive communities through good & early design, as well as enabling the delivery of key infrastructure such as highway infrastructure.
- Capitalises on opportunities to support model shift.
- Offers major positive effects for the economy & employment for CBC
- Growth within the Green Belt could lead to cumulative negative impacts in the longer-term but this is lessened with this option which includes only one strategic scale site in the Green Belt.
- With the higher amount of development, strong planning requirements will be needed in specific policy at the next stage of the plan to ensure timely & good provision of services & facilities to guide masterplanning

5.122 **Scenario 3: No strategic transport infrastructure delivered in the A1 corridor**

**(Area B):** Scenario 3 proposes no high growth in Area B (along the A1 corridor) assuming no new strategic transport infrastructure is delivered in this area.

**Table 5.17: Growth Scenario 3**

Area	Strategic Growth Location	Housing Number
<b>A</b>	North of Luton	4,000
	Green Belt Villages	2,000
	West of Luton	2,000
<b>B</b>	Tempsford	0
	Biggleswade	500
	East of Arlesey	2,000
	Villages	500
<b>C</b>	Marston Vale	5,000
	Apsley Guise	3,000
	Wixams South	1,000
	Villages	0
<b>D</b>	RAF Henlow	1,000
	Villages	500
<b>Total</b>		<b>21,500</b>

**Potential Benefits & Issues for Scenario 3:**

- This scenario does not support the delivery of East West Rail and the East West Expressway and the benefits for sustainable transport and social sustainability that increased east-west connectivity will bring.
- The lower overall housing numbers will reduce the likelihood of significant negative effects on integration & identity compared to the other options.
- Appropriate sizing and siting of development can avoid potential negative effects on loss of identity and integration for new and existing communities
- Growth within the Green Belt could lead to cumulative negative impacts in the longer-term.

5.123 **Scenario 4: No growth in the Green Belt (Area A):** Scenario 4 proposes no growth in Area A which is the Green Belt, and therefore all growth is concentrated in Area B, C and D. At this strategic stage, the development locations are of a strategic scale for the purposes of testing the scenarios.

**Table 5.18: Growth Scenario 4**

Area	Strategic Growth Location	Housing Number
<b>A</b>	North of Luton	0
	Green Belt Villages	0
	West of Luton	0
<b>B</b>	Tempsford (New settlement)	7,000
	East of Biggleswade	3,000
	East of Arlesey	2,000
	Villages	0
<b>C</b>	Marston Vale	5,000

	(new settlement)	
	Apsley Guise	3,000
	Wixams South	1,000
	Villages	0
<b>D</b>	RAF Henlow	1,000
	Villages	500
<b>Total</b>		<b>22,500</b>

#### Potential Benefits & Issues for Scenario 4:

- Communities in Area A would not benefit from the positive effects of development – new residents can revitalise communities.
- This scenario fails to meet the housing needs where they are arising of the residents and communities located in the southern half of Central Bedfordshire (the Green Belt) and fails to address any unmet need from adjoining authority areas.
- There would be strong negative impacts on social sustainability and also on environmental sustainability if all growth 'leapfrogged' the Green Belt to be delivered in the north of the area.
- Appropriate mitigation measures, such as sizing and siting of development, can avoid potential negative effects on loss of identity and integration for new and existing communities.
- A new settlement offers the opportunity for creating thriving & inclusive communities through good & early design, as well as enabling the delivery of key infrastructure such as highway infrastructure.

5.124 **Scenario 5: A mixed approach with higher growth in villages:** Scenario 5 proposes higher levels of growth in the villages across all areas and excludes growth in West of Luton and East of Biggleswade. The sites removed from this scenario to allow for increased levels of growth in villages and have been selected as they represent sites in different geographical areas with high levels of growth.

**Table 5.19: Growth Scenario 5**

Area	Strategic Growth Location	Housing Number
<b>A</b>	North of Luton	4,000
	Green Belt Villages	3,000
	West of Luton	0
<b>B</b>	Tempsford	0
	East of Biggleswade	0
	East of Arlesey	2,000
	Villages	2,500
<b>C</b>	Marston Vale	5,000
	Apsley Guise	0
	Wixams South	1,000
	Villages	650
<b>D</b>	RAF Henlow	1,000
	Villages	1,500
<b>Total</b>		<b>20,650</b>

**Potential Benefits & Issues for Scenario 5:**

- Scenario 5 includes significantly higher village growth in Area B with the potential for negative impacts.
- This scenario is unlikely to support sustainable transport by delivering viable public transport schemes.
- Less strategic locations and more growth in villages may offer less opportunities to contribute to strategic scale ecological networks and overall biodiversity connectivity.
- Scenario 5 has more village growth in Area A compared to other options - this significant growth within the Green Belt could lead to cumulative negative impacts in the longer-term.

## 6.0 SUSTAINABILITY APPRAISAL OF THE REGULATION 18 DRAFT CENTRAL BEDFORDSHIRE LOCAL PLAN: Development Management Policies

### Introduction

- 6.1 The Sustainability Appraisal (SA) of the emerging Draft Local Plan (and please see section 7 following) is structured under topic headings that have been linked to Objectives in the SA Framework as well as topics in the SEA Directive and paragraphs in the NPPF (as previously explained in section 2 of this SA Report). This provides a robust framework and structure to evaluate the likely significant effects of the Plan against these key topics for sustainable development. It is important to note that the draft DM Policies were tested through SA at an early stage of plan-making when there were not yet any spatial or locationally specific strategy or policies. The DM Policies effectively provide potential mitigation measures for negative effects identified through the SA process.
- 6.2 The emerging draft Development Management (DM) Policies were tested through SA at an early stage of plan-making and, as such, they did not have final numbering but did have draft titles. This initial working numbering of the draft Development Management Policies did not distinguish between topics/chapters for the developing Draft CBLP (with each chapter's policies in simple numerical sequence 1,2,3 etc) and so only the full title of each policy is cited here in this initial SA Report. The SA of the DM policies at this early stage helped to inform CBC in refining the DM policies for inclusion in the Draft Plan (Reg 18). Following the initial appraisal of DM policies, some policy numbers and titles have changed and additional policies have been included in the Draft Plan. These will be subject to further SA prior to submission. The SA topics and the corresponding relevant DM Policies/Draft CBLP Chapters may be summarised as follows:

**Table 6.1: SA Topics and DM Policies/Draft CBLP Chapters**

SA Topic	Relevant Policies/Policy Chapters considered in Sustainability Appraisal
<b>Communities</b>	Housing Social Infrastructure, Communication & Transport Green Belt Development in the Countryside
<b>Economy &amp; Employment</b>	Employment & Economy Town Centres & Retail
<b>Health and Inequalities</b>	Housing High Quality Places Green Belt Environment

<b>Transport &amp; Movement</b>	Social Infrastructure, Communication & Transport High Quality Places Town Centres & Retail
<b>Energy and Climate Change</b>	Environment High Quality Places Housing
<b>Water – Resources, Quality &amp; Flooding</b>	High Quality Places Environment
<b>Soil and Land</b>	Development in the Countryside Green Belt Environment
<b>Biodiversity &amp; Geodiversity</b>	Environment Housing Employment & Economy
<b>Landscape &amp; Townscape</b>	Environment Town Centres & Retail Historic Environment High Quality Places
<b>Historic Environment</b>	Historic Environment

## Communities

### Communities

SEA Directive Topics: Population & Human Health

Relevant SA Objectives:

- SA Objective 1: To ensure that the housing needs of all residents and communities are met.
- SA Objective 2: To maintain and enhance community and settlement identities.
- SA Objective 3: To improve accessibility to services and facilities

- 6.3 The plan makes provision for housing that reflects the objectively assessed need (SHMA) and includes provision for unmet needs originating in adjacent areas. The provision for a mix of types, sizes and tenure (*Housing Mix*) aims to provide flexibility and for a mix of needs to be met, supported by *Housing Standards* and *Supporting Older People* requiring accessibility standards to provide for disabled people and an ageing population. The requirement for 30% of housing to be affordable (*Affordable Housing*), for rural exception sites (*Rural Exception Sites*) starter homes (*Starter Homes*) and self- and custom-build (*Self & Custom Build Housing*) will help improve accessibility to housing.

The provisions for viability appraisal and testing should ensure the requirements do not hinder housing delivery. The policy for rural exception sites will enable housing to meet local needs while preserving the character of settlements. Together these policies will help to achieve SA Objective 1.

- 6.4 The focusing of new development adjacent to existing settlements should help to enable accessibility to services (SA Objective 3), as long as connectivity is good or improved, but will in turn place additional pressure on existing services and enhancement be needed in tandem with new development. *Provision of Social and Community Infrastructure* seeks to ensure timely delivery of social and community infrastructure, and an integrated approach to housing location, economic development and community facilities and services. *Indoor Sport and Leisure Facilities* requires new facilities to be provided in line with standards.
- 6.5 *Mitigation of Transport Impacts on the Network* seeks to ensure that the impact on the transport network is considered and mitigated in new developments, including through demonstration of reducing the need to travel, securing sustainable modes, and use of travel plans with developer contributions towards sustainable transport (non-car) options. *Connectivity and Accessibility* and *Policy 8 Development & Public Transport Interchanges* require that walking and cycling, and links to local services, are given priority in major developments. *Highway Safety and Design* also seeks to ensure that development does not have a detrimental effect on the transport network. Through improving provision of and accessibility to services including transport, these policies will help achieve SA Objective 3.
- 6.6 Housing development on a larger scale could result in loss of settlement identity, and so the design and location will need to be planned and delivered carefully in order to achieve SA Objective 2. *Back-land Development* resists development in gardens where these would adversely affect character of an area, and so would help to maintain settlement character which will help to achieve this objective. *Larger Sites* requires implementation of Development Briefs and Design Codes to ensure design and delivery of development addresses issues in an integrated way. *Modern Methods of Construction* also encourages use of these measures to improve the sustainability, delivery and satisfaction with new development. These will help to achieve Objective 1.
- 6.7 Some loss of green field and Green Belt land (where justified through very special circumstances and consistency with *Development in the Green Belt*) may occur as indicated in the outline spatial strategy<sup>96</sup>, with loss of soils conflicting with SA Objective 11 and potentially SA Objectives 12 and 13, but resultant harm may be mitigated and compensated for to an extent through sensitive design and improvements to green infrastructure and its accessibility (as encouraged by *Development in the Green Belt*). New settlements will need to be of sufficient scale in order to support viable new local services and to create distinct identity.

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<sup>96</sup> Four Areas identified on CBC LP Website *Shaping Central Bedfordshire consultation*

- 6.8 *New Dwellings in the Countryside* seeks to manage new residential development in the countryside, and *Rural Workers' Dwellings* manage development to that required for agricultural and forestry workers. The policies for *Gypsy and Traveller Sites* and *Travelling Showpeople Sites* provide for provision of sites for these communities where demand is demonstrated and site location and design are appropriate, and so would help to contribute to achievement of Objective 1.
- 6.9 **Synergistic and Cumulative Effects:** Cumulative provision and delivery of housing at the levels planned will help to meet housing need over the Plan period, with resultant social and economic benefits. Potential negative effects of increasing urbanisation, traffic and associated congestion, noise and air quality effects will need to be mitigated through design and locational choices, which the spatial strategy and policies seek to achieve.
- 6.10 **Interrelationships with other Topics:** Provision of additional housing of a mix of sizes and tenures in sustainable locations where there is housing need and demand will benefit the economy and result in social benefits through enabling growth in employment, improving viability of services (particularly in smaller settlements) and catering for different and changing needs. The provision of housing and new developments to the standards proposed has strong inter-relationship with SA Objective 5 *To improve the health and wellbeing of communities and reduce inequalities*.
- 6.11 Increasing housing provision and delivery to meet the needs of a growing and changing population will result in negative environmental impacts including increased consumption of resources (water, energy, minerals), generation of waste and pollution including greenhouse gas emissions, loss of green space and countryside and increased traffic and movements. The policies of the Plan seek to mitigate these effects through the spatial strategy, locational policy and requirements for high standards in design and performance. The spatial strategy, identifying in general terms four broad Areas, aims to direct growth to areas with good transport links and services, focusing on the areas larger settlements and adjoining urban areas (Luton in Area A) where green belt release can be justified, but also providing for consideration of new settlements (Area B and C) and smaller-scale growth around settlements (Area D). Development to high environmental standards will help to reduce consumption of energy and resources, and greenhouse gas emissions per unit, and prioritise use of brownfield land and wider regeneration.
- 6.12 Overall, the Plan is assessed as having significant positive effect on these SA Objectives through delivery of much needed housing with associated improvements to services. Potentially negative effects of new housing can be mitigated to an extent through design and location. Although the Plan identifies that there is a lack of land within urban areas, policies could seek to prioritise previously developed land where possible.



## Economy & Employment

### Economy and Employment

SEA Directive Topics: Population & Human Health

Relevant SA Objectives:

- SA Objective 4: To support the economy and ensure that there are suitable opportunities for employment.

- 6.13 The Employment Land Review identifies that there is a substantial amount of employment land, some of which may be suitable for release for other uses. However, the Plan identifies that the quality and distribution is not satisfactory and that there is a need for the employment land and premises stock to be expanded and diversified (to be suitable for an expanded range of sectors). It identifies the need for additional allocations and additional Strategic Sites, particularly in the south of the Plan area, including north of Luton/Dunstable/Houghton Regis, including to cater for economic growth associated with expansion of London-Luton Airport. *Strategic Warehousing & Logistics* provides specifically for development of one of the Council's priority sectors, while *Employment Sites and Uses* provides for additional B-class uses but also flexibility for other types of employment uses while safeguarding these from retail use (to direct this to town centres). *Change of Use to Non-Employment Uses* also safeguards employment land unless clearly justified. Together with *Employment proposals outside Settlement Envelope*, these help to protect existing sites and provide a degree of flexibility to encourage diversification of stock, and will contribute to achievement of SA Objective 4. The Retail and Town Centre policies seek to retain and enable new retail uses in town centres and minor service/rural centres, and so support employment in this sector and economic benefits associated with retail spend.
- 6.14 The policies are not explicitly spatial at this stage and so do not reflect the emphasis in the supporting text. While performing adequately against the SA Objective, they would be improved through being more spatial and so demonstrating that employment land is planned for where it is most required to meet the Plan's and the SA's economic objectives.
- 6.15 *Rural and Visitor Economy and Tourism and Significant Facilities in the Countryside and Green Belt* provide for employment land within the countryside, reflecting the fact that around half of employment is in rural wards. *Development in the Green Belt* identifies specific facilities where significant expansion may be encouraged subject to meeting criteria including provision of sustainable transport and compatibility with Green Belt. These criteria are important in ensuring potential impacts are addressed and where necessary mitigated.

- 6.16 **Synergistic and Cumulative Effects:** The expansion and diversification of employment land will have social benefits, particularly through providing greater choice for investors and in turn leading to a wider range of employment opportunities for current and future residents, helping to address the high (50%) out-commuting rate and capturing more economic benefit within the Plan area.
- 6.17 **Interrelationships with other Topics:** Greater employment opportunities are likely to result in greater economic well being of the population, and through reducing the need for out-commuting may result in greater capture of economic benefit and associated spending within the Plan area. This may have positive effects on a number of SA Objectives including 1 and 3 relating to *Communities*, Objective 5 *Health*, and Objective 7 *Transport and Movement* with associated benefits for air quality and greenhouse gas emissions.
- 6.18 Overall, the Plan is assessed as having a significant positive effect against this objective.

## Health & Equalities

### Health and Equalities

SEA Directive Topics: Population & Human Health

Relevant SA Objectives:

- SA Objective 5: To improve the health and wellbeing of communities and reduce inequalities.

- 6.19 The lack of explicit spatial strategy means that it is not clear that the Plan will particularly address deprivation, and the health effects of living in areas of multiple deprivation. Luton and areas of Sandy and Houghton Regis in particular are identified as having high levels of multiple deprivation, but also is constrained with a lack of suitable large-scale development sites within the town. The identification of the potential for strategic scale growth adjacent to Luton in Area A may help address aspects of deprivation in this area if it provides regeneration, employment and connectivity to the town and its existing population.
- 6.20 The provision for a mix of types, sizes and tenure of housing (*Housing Mix*) aims to provide flexibility and for a mix of needs to be met, supported by *Housing Standards* and *Supporting Older People* requiring accessibility standards to provide for disabled people and an ageing population. The requirement for 30% of housing to be affordable (*Affordable Housing*), for rural exception sites (*Rural Exception Sites*) starter homes (*Starter Homes*) and self- and custom-

build (*Self & Custom Build Housing*) will help improve accessibility to housing particularly for those with particular needs.

- 6.21 High quality development with good access to services and recreational opportunities will help to enable people to live healthy lives. *Successful and Sustainable Places* requires high quality design in all developments which will help to ensure that consideration is given to a range of factors that may affect and contribute to health, and so help achieve this SA Objective. *Health Impact Assessment* requires a proportionate HIA to be undertaken for different scales of development, which will assist in ensuring that development is designed so as to mitigate potential adverse effects and realise opportunities to improve health.
- 6.22 *Climate Change & Sustainability* sets out requirements for developments to be resilient to the effects of climate change and also to be more resource-efficient and so potentially more affordable to run, and to be more comfortable with associated health and wellbeing benefits. *Pollution* requires development to minimise impacts of pollution to protect health and environmental quality and amenity. *Tranquillity* seeks to protect the tranquillity of areas to reduce impacts of visual intrusion, noise and light pollution. These should contribute to the achievement of the objective through helping to maintain and improve health and wellbeing.
- 6.23 *Development in the Green Belt* encourages enhancement and beneficial use of the Green Belt, which may be assumed to include improving accessibility to the countryside and its functioning as green infrastructure with potential benefits to health. Access to recreational assets is encouraged through *Outdoor Sport, Leisure and Open Space* that protects assets and requires additional provision in line with Leisure Strategy standards. Access to the wider countryside will also benefit through implementation of *Green Infrastructure, Public Rights of Way*, and specific proposals for The Greensand Ridge NIA, The Forest of Marston Vale and The Bedford and MK Waterway Park.
- 6.24 **Synergistic and Cumulative Effects:** The policies of the Plan implicitly seek to improve the quality of life of all residents – through increasing employment and housing opportunities, managing potentially negative impacts of development while seeking to enhance the quality of development, the environment, and access to recreation opportunities. The overall cumulative effect of these policies taken as a whole over the Plan period should therefore have a positive effect and help to achieve this SA Objective.
- 6.25 **Interrelationships with other Topics:** As described above, while the policies do not explicitly refer to health or reducing inequalities, and health is influenced by much wider factors collectively, through enabling high quality development while protecting and enhancing the environment would be expected to have an overall positive effect on health over the Plan period.

## Transport & Movement

### Transport & Movement

SEA Directive Topics: Population & Human Health

Relevant SA Objectives:

- SA Objective 6. To maintain and improve the existing highway network and reduce associated indirect impacts on air quality and greenhouse gas emissions.
- SA Objective 7: To encourage a modal shift and reduce the need to travel.

- 6.26 *Strategic Transport Improvements* seeks to facilitate delivery of strategic road and rail schemes and safeguard routes from other development, while *Mitigation of Transport Impacts on the Network* seeks to ensure that capacity of the network is maintained and encourages modal shift towards walking and cycling which will help achieve SA Objectives 6 and 7. *Successful and Sustainable Places* similarly seeks to ensure that development provides for safe and convenient access, including for pedestrians and cyclists. *Connectivity and Accessibility* requires major residential development to include links to local services and bus and rail services, while *Development and Public Transport Interchanges* also require major development in proximity to bus and rail interchanges to include enhanced access to these to encourage public transport use. *Highway Safety and Design* also seeks to ensure that development does not have a detrimental effect on the transport network. *Parking* requires provision of appropriate parking spaces (in line with standards) and also for cycle parking in new developments, recognising that although modal shift is encouraged this does not mean no car ownership and the need to provide adequate space to accommodate cars and bicycles. These policies will have a positive effect and help to deliver SA Objective 7 in particular although this is uncertain until the spatial strategy is better refined and defined.
- 6.27 *Town Centre Uses* directs retail development primarily to town centres, which will have urban catchments and generally good accessibility via public transport and walking, and so will help to achieve these SA objectives. *Town Centre Development* also encourages retail in Dunstable town centre and development in accordance with design briefs and masterplans in other town centres, again helping to focus development to locations accessible by public transport, walking and cycling.
- 6.28 **Synergistic and Cumulative Effects:** The policies will help to ensure that, as new housing and other development is delivered, the impact on the transport network is properly considered and walking, cycling and use of public transport is encouraged and enabled. Inevitably, even where connectivity and

links are improved and provided, additional housing and economic development will generate additional traffic movements, but the Transport policies together with the spatial strategy and housing policies seek to manage and reduce these impacts. Improvements to the transport network and public transport will be necessary to help ensure that the Employment and Economy policies are delivered as planned, enabling employees to access opportunities at employment sites within the Plan area.

- 6.29 **Interrelationships with other Topics:** The Transport policies of the Plan will help achievement of other SA objectives, in particular Communities (Objective 1) through improving accessibility to employment and services, and seeking to reduce reliance on the car with associated environmental (pollution), social (health, congestion) and economic benefits. Through encouraging improvements to the network and modal shifts, they will also help to achieve SA Objective 8 through reducing growth, if not reducing the totality of, in greenhouse gas emissions from transport.
- 6.30 There is inevitably some internal conflict between the policies, as expanding the capacity of the network relates to the Local Transport Plan priorities, and the road schemes will cater for increased vehicle movements and volumes which will be likely to increase transport-related greenhouse gas and other (NO<sub>x</sub>, SO<sub>x</sub>) emissions. Such schemes are likely to be necessary to reduce congestion and encourage economic development through improving reliability and accessibility to employment, housing and leisure facilities. However, improving connectivity may also enable continued out-commuting and so the Employment and Economy policies need to be delivered in tandem with the transport policies.
- 6.31 Overall therefore the appraisal is that the policies will have a positive effect on achievement of these SA Objectives, but much depends on the definition and implementation of the spatial strategy, location of development and improvements to transport occurring in tandem with development.

## Energy & Climate Change

### Energy and Climate Change

SEA Directive Topics: Climatic Factors

Relevant SA Objectives:

- SA Objective 8: To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built environment and its communities can withstand the effects of climate change.

- 6.32 A suite of measures required to reduce vulnerability to climate effects and reduce energy consumption and greenhouse gas emissions are set out in *Climate Change and Sustainability*, including through building design and incorporation of renewable energy, energy and water efficient measures as well as resilience to flooding and overheating. *Successful and Sustainable Places* also requires a range of sustainable design and locational criteria to be met that will improve the performance of new buildings and reduce their environmental impact.
- 6.33 The location of new development so as to reduce the need to travel and reliance on the private car, while improving viability of public transport, will be important in mitigating potential increases in greenhouse gas emissions from transport. The policies for transport, and social and community infrastructure, will also therefore contribute to achievement of the objective.
- 6.34 *Renewable Energy Development* provides a positive framework to encourage and consider renewable energy developments, but does not yet identify indicative amounts/targets for installations. It does provide for favourable consideration of proposals in areas that may be most suitable for development of different technologies which are less sensitive to potential impacts, which will apply particularly large-scale wind and free standing photovoltaics.
- 6.35 Increasing flood risk is one of the most significant hazards posed by climate change. Implementation of *Green Infrastructure*, *Flood Risk Management* and *Sustainable Drainage*, in encouraging enhancements that include where appropriate sustainable drainage and improved flood storage capacity, will be important in the achievement of the objective.
- 6.36 **Synergistic and Cumulative Effects:** As well as performing better in terms of environmental impact, well designed resource efficient buildings will be likely to be cheaper to run and more comfortable, with benefits for health, wellbeing and reducing inequalities (SA Objective 5). Improving resilience to the effects of climate change, especially increasing flood risk, clearly has synergies with SA Objective 10 *To reduce the risk of flooding from all sources and Plan Policies Flood Risk Management and Sustainable Drainage*.
- 6.37 **Interrelationships with other Topics:** A number of other topics are relevant to addressing climate change, both affecting greenhouse gas emissions and resilience and adaptation to its effects, as already described above. Of particular relevance are SA Objectives 3, 6, 7, 9, 10, 11, and the relevant Plan policies that will contribute to their achievement. Much will depend on the spatial location of development and expression of policies, as this will influence patterns of movement, accessibility to services and more sustainable transport modes, and vulnerability of development, especially to flooding.
- 6.38 Overall, the policies are judged to have a positive effect and will help to achieve this Objective.

## Water Resources, Quality & Flood Risk

### Water: Resources, Quality and Flood Risk

SEA Directive Topics: Water

Relevant SA Objectives:

- SA Objective 9: To minimise the demand for water and maintain or improve water quality
- SA Objective 10: To reduce the risk of flooding from all sources.

- 6.39 Delivery of housing over the Plan period will lead to an increase in demand for water supply and treatment, and so the minimisation of demand is taken as applying to minimising the increase in demand due to new development. This will be influenced by high standards of efficiency in new developments and the type and size of dwellings, their occupancy and the behaviour of residents. The Plan and its policies can only influence new development and the impact this has on achieving the objective. *Successful and Sustainable Places*, and *Climate Change and Sustainability* require development to incorporate water efficiency measures which is appropriate in terms of helping to achieve the objective.
- 6.40 Water Quality requires developers to demonstrate that water quality will be maintained and enhanced. However, although the policy refers to the River Basin Management Plan objectives, it is likely that in defining spatial distribution of development in more detail the Council will need to consult with Anglian Water in order to ensure that sufficient water supply and sewage treatment capacity (physical, technical and environmental) exists or can be provided in a timely manner to cater for the planned growth.
- 6.41 *Flood Risk Management* is positive in safeguarding land for future flood management needs, although such areas are not identified. It reflects NPPF and PPG in directing development to areas of low risk and avoiding causing flooding elsewhere, including through incorporation of sustainable drainage schemes. This is complemented by *Development Close to Watercourses* in providing for enhanced natural flood storage and providing detailed guidance on SuDS requirements, which together will help achieve SA Objective 10. *Successful and Sustainable Places*, *Green Infrastructure*, and *Climate Change and Sustainability* also include requirements for incorporation of SuDS and water efficiency into developments, also helping to achieve these SA objectives.
- 6.42 **Synergistic and Cumulative Effects:** There are clear synergies with delivery of SA Objective 8, given that the effects of climate change are likely to be most severe on the water environment, including availability, quality and flood risk.



There are also strong synergies with management of flood risk through wider landscape measures and provision of green infrastructure, and so with SA Objectives 12, 13.

- 6.43 **Interrelationships with other Topics:** In addition to the synergistic effects, there is clearly an interrelationship with the scale and location of new housing (SA Objective 1 and relevant Plan policies). Even if all development incorporates water efficiency measures, there will be an increase in demand for water supply and treatment. The location and timing of delivery of housing may be important in terms of ensuring that infrastructure capacity is adequate and planned for, which will require cooperation with Anglian Water and the Environment Agency.
- 6.44 Overall the Plan is likely to have a negative effect on SA Objective 9 as demand for water will increase as a result of development, even if this is water efficient. It is concluded that there is likely to be a positive effect on SA Objective 10 as improvement in flood management and drainage would have a net beneficial result.

## Soil & Land

### Soil and Land

SEA Directive Topics: Soil

Relevant SA Objectives:

- SA Objective 11: To protect and conserve soil

- 6.45 The Plan does not have a policy that specifically seeks to conserve soils but *Agricultural Land* restricts development on the Best and Most Versatile agricultural land, which will afford protection to the highest grade agricultural soils.
- 6.46 The wider *Development in the Countryside* policies that seek to manage development will in effect also help to protect soils on undeveloped land, while the other protective policies, particularly for Biodiversity will in effect afford protection to other soils that are likely to be of lower agricultural value but important for maintaining or enhancing nature conservation interest, including habitat creation.
- 6.47 *Development in the Green Belt* that seeks to restrict inappropriate development in the Green Belt which in turn will provide protection of undeveloped land and soils, although soil quality and conservation is not an objective of Green Belt designation. *Applications for Minerals and Waste Development*, through requiring development to preserve agricultural quality of land and for restoration to be of high quality and progressive, will contribute towards achieving this objective.



- 6.48 **Synergistic and Cumulative Effects:** The protection of soils may have associated benefits for the wider natural environment and rural economy, including protection of the countryside, for the water environment (reducing soil erosion), and to an extent, biodiversity. The focus on Best and Most Versatile soils is an agricultural objective and there may be scope for a wider soils policy that recognises the importance of conserving soils for the range of functions they provide.
- 6.49 **Interrelationships with other Topics:** Achievement of this SA Objective will also be helped through policies for protection of the countryside and biodiversity, and Green Belt policy. The levels of growth and development planned, particularly Strategic Developments adjoining urban areas, New Settlements, and Strategic Employment Locations will result in development of green field undeveloped land, and so have the potential to have a negative impact on this Objective, given the stated lack of previously developed sites within urban areas.

## Biodiversity & Geodiversity

### Biodiversity and Geodiversity

SEA Directive Topics: Biodiversity, Flora and Fauna

Relevant SA Objectives:

- SA Objective 12: To protect, enhance and manage biodiversity & geodiversity.

- 6.50 *Green Infrastructure and Enhancing Ecological Networks* provide a positive framework in requiring developments to demonstrate net gain in Green Infrastructure and biodiversity through integrating within developments, protecting existing assets and improving connectivity. *Nature Conservation* provides for protection of important nationally designated and locally important wildlife and geological and geomorphological sites. *Trees, Woodlands and Hedgerows* affords protection to and encourages enhancement of these features, which will benefit biodiversity – the criteria in that landscaping schemes should take into account local character and ecological enhancement being important. *Greensand Ridge Nature Improvement Area (NIA)* provides specific requirements for development to deliver net biodiversity gain in this area.
- 6.51 Together these policies provide an appropriate level of protection of important assets, and encouragement for enhancement of biodiversity and achievement of the SA objective, and should ensure that the levels of development (particularly housing and employment land) proposed in the Plan are delivered without significant adverse effects on biodiversity and geodiversity, and where possible deliver enhancements. *Applications for Minerals and Waste Development*, through requiring high quality progressive

restoration, particularly for biodiversity, has the potential to make a large contribution towards this objective. *Small Open Spaces*, through safeguarding verges, strips and other areas that contribute to ecological networks and amenity, will also contribute to achieving this objective.

- 6.52 **Synergistic and Cumulative Effects:** There are clear synergies with SA Objectives 13 (landscape) and potentially with Objective 9 (water) and Objective 11 (soil and land) in terms of protection and management of the countryside and of environmental impacts of development that may benefit biodiversity. The cumulative effect of these policies should improve biodiversity, and the quality and people's enjoyment of the countryside, over the Plan period.
- 6.53 **Interrelationships with other Topics:** The delivery of significant biodiversity enhancements is likely to be through mechanisms other than planning, such as through changing agricultural practice. However, the location of new development proposed in the Plan will be critical in ensuring that the SA Objective is achieved, with important sites and areas avoided and protected (including from indirect effects such as recreational disturbance) and opportunities taken to use development and planning to leverage improvements through habitat creation and enhancement of ecological networks, which may include wider green infrastructure delivery.
- 6.54 Overall, the Plan policies provide appropriate protection and provision for mitigation and compensation where there may be negative effects of accommodating development, to have a positive effect on this Objective.

## Landscape & Townscape

### Landscape and Townscape

SEA Directive Topics: Landscape

Relevant SA Objectives:

- SA Objective 13: Protect and enhance the landscape and townscape.

- 6.55 *Town Centre Uses* applies a sequential approach to directing retail development to town centres and Policy R3 *Town Centre Development* encourage town centre development, which will improve their vitality and viability and if sensitively developed, will help to achieve SA Objective 13 regarding townscape.
- 6.56 *Re-use and Replacement of Buildings in the Countryside* constrains it to that which replaces existing buildings or enhances the setting, while *Redundant sites within the Countryside* encourages appropriate development of redundant agricultural sites. *Equestrian & Livestock Related Development*

provides for these developments, as long as negative effects on landscape and transport are acceptable.

- 6.66 *Historic Parks and Gardens* and *Built Heritage* will also assist in delivery of this objective through providing protection to historically important landscapes and buildings and their settings.
- 6.67 The Plan encourages high standards of new development. *Successful and Sustainable Places* requires that character and local distinctiveness are enhanced, and that development takes account of landscape setting and character. The environmental enhancement policies also require protection and enhancement of the countryside and biodiversity. *Trees, Woodlands and Hedgerows* seeks protection of existing features and incorporation of landscaping and new planting within new development. *Landscape Character* specifically seeks to safeguard landscape character, beauty and tranquillity, while *The Chilterns AONB* specifically provides for protection and enhancement of the designated area.
- 6.68 **Synergistic and Cumulative Effects:** There are synergies with SA Objectives 11 (soils), 12 (biodiversity and geodiversity) and to an extent 10 (flood risk), 12 (heritage) and 5 (in relation to health including provision of green infrastructure). There are also synergies between SA Objectives 2 (community and settlement identity), 3 (access to services) and 4 (economy and employment) and enhancement of townscape. Over the Plan period the cumulative effect would be continued protection of landscape and townscape character, and enhancements, particularly increased tree cover and accessibility.
- 6.69 **Interrelationships with other Topics:** The policies for the protection and enhancement of biodiversity, including for the enhancement of ecological networks, the Chilterns AONB, Greensand Ridge NIA, and Forest of Martson Vale will also result in protection and enhancement of the landscape and in turn the setting of urban areas.
- 6.70 The scale of growth planned over the Plan period could have an adverse impact on landscape and townscape. Although the housing and economic development policies are not explicitly spatial in terms of distribution, areas or sites, the spatial strategy refers to potential 'strategic scale' growth in Areas A (potentially with Green Belt release) and C, and 'new settlements' in Areas B and C. In addition with smaller scale development this could, over the Plan period, result in loss of landscape area, quality and character. The housing and employment policies themselves do not make reference to prioritisation of previously developed land, which may be due to the reported lack of availability of land within urban areas, but this would reflect national policy and help to contribute to achievement of the objective, as well as other SA objectives.
- 6.71 The policies that provide for employment and housing development in the countryside, contain criteria against which proposals will be considered including protection of countryside character and heritage assets as well as

impact on transport, and so their implementation should also ensure that there is a positive effect on the achievement of the Objective.

- 6.72 Overall, therefore, although there is a lack of spatial detail in terms of location of new development, it can be concluded that the growth planned may have a negative effect on the SA Objective, but the policies for the protection of the countryside should ensure that growth is managed to avoid significant harm while delivering enhancements where possible.

## Historic Environment

### Historic Environment

SEA Directive Topics: Cultural Heritage

Relevant SA Objectives:

- SA Objective 14: To ensure the protection and enhancement of heritage assets, the historic

- 6.73 *Archaeology, Historic Parks and Gardens, and Built Heritage* provide for protection, reflecting national policy, requiring assessments of the significance of the asset and level of potential impact of development including on their setting. Implemented together these will help achieve the SA Objective.
- 6.74 As with the appraisal against the other SA topics, the degree to which other policies may negatively or positively impact on this objective depend primarily on location of development (housing, employment, transport) and also design of developments. The lack of spatial specificity at this stage, including for Strategic Development and New Settlements, means that the appraisal of effects is uncertain, but if the Historic Environment policies of the Plan are implemented then they should provide appropriate protection and mitigation for potential negative effects.
- 6.75 **Synergistic and Cumulative Effects:** The protection of archeological and historic assets and their settings will be likely to help to deliver other SA objectives, including protection and enhancement of townscape where these assets occur.
- 6.76 **Interrelationships with other Topics:** The growth and development proposed in the Plan, particularly its housing, transport and employment policies, have the potential to negatively impact on this Objective. However, the lack of spatial detail, in terms of locations for development and proximity to heritage assets, means that the appraisal of effects is uncertain. However, the Historic Environment policies provide appropriate provisions for protection, mitigation

and enhancement that should contribute to the achievement of the objective.

- 6.77 Policies for the protection of biodiversity, landscape and townscape also have the potential to contribute to the achievement of this objective, depending on location of historic assets. Policies that provide for development in the countryside also contain criteria for the protection of heritage assets. Overall, therefore, it can be concluded that taken as a whole the policies of the Plan should perform well and have a positive effect against this Objective.

### **Summary, Conclusions & Recommendations for the Draft Development Management Policies**

- 6.78 Sustainability Appraisal is a deliberately iterative process, and so it would be expected that policies have been formulated to reflect and help achieve the SA Objectives set out in the SA Scoping Report. The policies of the Plan are explicitly spatial, with the broad spatial strategy implied in the consultation document *Shaping Central Bedfordshire*. Overall, the appraisal recognises that there is an inevitable tension between planning for the housing needs of the Plan area as well as that of Luton, and delivery of a wider range and new, better quality employment land and premises, and the protection of the countryside and conservation of resources.
- 6.79 A more developed spatial strategy, identifying areas where growth is to be focused, will enable more detailed appraisal of the potential effects of development in subsequent versions of the Plan. In turn, the SA will inform selection of options through identifying potential positive and negative effects, and enabling priorities and choices to be made.
- 6.80 Given that the effects of policies, and the appraisal of these, depends to a large extent on the location and also design of new development, as well as the timing of delivery of supporting infrastructure and services, at this stage only preliminary appraisal is possible. This assumes that the criteria in many policies that seek to restrict development and mitigate its potentially negative effects, are implemented.
- 6.81 At this initial stage of SA and plan-making, the SA found mostly positive effects of policies on the SA objectives. Potentially negative effects were identified against certain SA Objectives & some recommendations were made by the SA as follows:
- SA Objective 9 (water) due to increasing demand even with efficiency measures; the policies encouraging sustainable construction and design will, together with Building Regulations, should help to reduce water consumption per dwelling, and contribute to the objective, but the large increase in housing and resident population will inevitably increase overall demand for water.

The Plan should ensure that there is ongoing cooperation with Anglian and Affinity Water to ensure that the levels and distribution of growth are understood and that potential constraints are identified and planning and funding is in place so that necessary infrastructure is delivered in a timely manner

- SA Objective 11 (soils) due to inevitable loss of soils, although not necessarily the Best and Most Versatile; policies seeking to protect the best and most versatile agricultural land will steer development to areas of lower grade land. The biodiversity and green infrastructure policies will also help to protect soils that have ecological importance (for specific habitats).

Although a lack of previously developed land is identified, the Plan could helpfully make redevelopment of this a priority to help to address the potential negative effects of the scale of proposed development on the countryside, landscape and soils through development of undeveloped land.

- Objective 13 (landscape) due to the scale of development planned there will be some impact on landscape at local level, although the protection of valued and designated landscapes should be achieved through the implementation of the Plan's *Countryside* policies, directing development to areas of lower landscape value

- 6.82 It should be noted that the emerging drafts of the Development Management Policies were taken into account during the Sustainability Appraisal of the strategic options (and as reported in the previous section 5) and in consideration of the Draft CBLP as presented for Regulation 18 public consultation with a proposed Spatial Strategy – and as reported in the next section 7 of this Initial SA Report.

## 7.0 SA OF THE REGULATION 18 DRAFT CENTRAL BEDFORDSHIRE LOCAL PLAN: Strategic Approach & Policies

### Introduction

- 7.1 Sustainability Appraisal is an iterative process that is ongoing with the iteration of the plan-making process and as shown previously in Figure 1.1. Plan-making develops as technical studies are completed and responses to consultations are considered. Good practice SA seeks to test emerging elements of the draft plan at an early stage so that any recommendations from the SA can be considered effectively. The SA has a particular role to inform plan-making with regard to helping identify and refine alternatives – and as reported in the previous sections 4 and 5 of this Initial SA Report.
- 7.2 The proposed approach for this Regulation 18 draft of the CBLP has been developed with five core components:
- Urban extensions around Luton Area A – contributes to meeting unmet need arising from Luton Borough
  - Concentrating growth in the rail corridor between Luton & Flitwick – promotes sustainable development in an area that has been constrained by Green Belt
  - Balanced growth to the west & Milton Keynes Area C
  - Village extensions in Area D – limited growth due to rural nature & limited sustainable transport
  - Urban extensions along A1 corridor with regeneration in Area B & east
- 7.3 The draft of the CBLP comprises the following elements:
- Vision & 13 Strategic Objectives within 6 Themes: Growth & Infrastructure; Local character; Jobs & Business; Homes; Transport; & Environment
  - A Spatial Strategy Approach with Proposed Growth Locations that delivers homes to support new infrastructure and meet identified housing need close to key transport corridors; balancing growth with protection of existing communities and environment; some release of Green Belt; and delivery of some unmet housing need from Luton
  - Strategic Policies: Growth Strategy; Sustainable Development; Green Belt, Coalescence and Settlements; Gypsies and Travellers
  - Core and Development Management Policies
- 7.4 The Growth Strategy Approach comprises possible numbers of homes and jobs in strategic locations (mostly more than 2,000 homes) for the Areas A-D. It also includes some reference to medium and small scale sites that will be set out at the next stage of plan-making – the Pre-Submission Local Plan



(Regulation 19 and subject to public consultation). It is explained in the proposed Growth Strategy Approach that the Policy shows the full capacity of the preferred Growth Locations but that only a proportion of the capacity may be taken forward for those strategic locations that require significant enabling infrastructure that might not be possible in the current timescale of the Plan.

- 7.5 Thus, this first draft CBLP only considers Growth Locations that are typically of a strategic scale. However, small and medium 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 SA at this stage as these smaller growth areas are integral to the overall preferred Spatial Strategy.
- 7.6 The Spatial Strategy Approach includes those Growth Locations that are being considered in each of the Areas A-D. Development growth potential is explained and important environmental assets listed together with any opportunities for improvement. Chapter 8 of the CBLP sets out general requirements that will be required from promoters with a comprehensive masterplan. Proposals are expected to include the following:
- Indicative Masterplan
  - Phasing & Infrastructure Plan
  - Sustainable Transport Strategy
  - Provision of new local community and health hubs
- 7.7 A long list of Housing Growth Locations, that will be refined to form a shortlist of preferred site allocations in the next version of the plan, is provided. For each potential growth location, the provisional capacity for homes and jobs is indicated together with the context and a proposed vision for the location. Locationally specific key characteristics are provided and include details such as Green Belt, AONB, best & most versatile agricultural land, biodiversity & blue/green infrastructure, flood risk, heritage, coalescence, transport, pollution, and utilities. The local infrastructure and improvements that are considered essential to support development at this scale are listed and it is noted that additional items may be identified as a result of more detailed site analysis.
- 7.8 As further detailed studies are undertaken, the sensitivity of the receiving communities and environment, requirements for community and green infrastructure, and possibilities for enhancement will be further investigated to help develop the specific planning requirements for proposed Site Allocations. The emerging draft requirements will be subject to SA and the findings reported in the next SA Report that will accompany the Pre-Submission CBLP on Regulation 19 public consultation.
- 7.9 The effects of Development Management (DM) Policies (and their appraisal) depends to a large extent on the location and also the design of new development, as well as the provision and timing of delivery of supporting infrastructure and services. So, this SA has assumed that the criteria in many DM policies that seek to restrict development and mitigate its potentially



negative effects, are implemented. However, effects will be particularly significant from the Strategic Allocations and the effectiveness of mitigation measures (as to be set out in the locationally specific requirements for each site in the Site Allocations Policies) is unknown at this stage of SA. Therefore, there are gaps in information and uncertainties of effects – and these have been reported where found in this Initial SA Report. Many of the information gaps and uncertainties will be resolved at the next stage of plan-making and SA.

- 7.10 As with the approach taken for the SA of the draft DM Policies (please see previously Section 6 of this SA Report), the Sustainability Appraisal of the emerging draft Local Plan is structured under topic headings that have been linked to Objectives in the SA Framework as well as topics in the SEA Directive and paragraphs in the NPPF to provides a robust framework and readability.
- 7.11 The appraisal under each topic considers the potential effects of the relevant policies against the objectives as well as the interrelationships between topics and cumulative effects of implementing the Plan overall. This method enables the SA to focus on the policies that are likely to have significant effects and provide further detail. It also allows for the consideration of mitigation that may be provided through other policies in the Plan.
- 7.12 The SA was undertaken using professional judgment, supported by the baseline information and evidence for the Plan, as well as any other relevant information sources available. The nature of the likely sustainability effects (including positive/negative, major/minor, duration, permanent/ temporary, secondary, cumulative and synergistic) are described, together with any uncertainty noted. SA is informed by the best available information and data; however, data gaps and uncertainties exist and it is not always possible to accurately predict effects at the strategic level of assessment. The key negative and positive significant effects were identified and recommendations or suggestions made to improve sustainability for mitigation or enhancement, where possible and relevant.
- 7.13 The contents of the draft Regulation 18 Local Plan comprise the following:
- Introduction
  - Key Themes
  - Consultation
  - Community Planning
  - Developing the Strategy
  - Vision & Objectives
  - The Spatial Strategy
  - Implementation
  - Green Belt, Coalescence, & Settlements
  - Settlement Envelopes & Settlement Hierarchy
  - Planning for Gypsies & Travellers
  - Housing

## Draft CBLP Vision & Strategic Objectives

### Vision:

*Central Bedfordshire has taken full advantage of its exceptional strategic position as the central hub of the East-West Oxford to Cambridge growth corridor and its existing strategic north-south routes (M1/A1/East Coast Mainline/Thameslink) to deliver new high tech employment supported by sustainable new homes in a number of new village clusters and market town extensions which are well integrated into the existing high quality landscape. The heritage and distinctiveness of the market towns and villages has been preserved and enhanced by moderate growth ensuring a high quality environment for all residents. The new businesses and population are served by excellent community, transport and communications infrastructure. Multi-service hubs have been delivered to support strong communities and new rail stations at Wixams and Tempsford New Market Town and the Oxford to Cambridge Expressway have ensured excellent connectivity.*

7.14 The Draft CBLP Vision will promote positive effects for SA Objectives on housing, communities - and especially the economy/employment - since it recognises the exceptional position of the area as part of a major growth opportunity with the potential for major positive effects that will be cumulative in the longer term. The draft Vision acknowledges the need to preserve the special quality of small towns and villages and the high quality environment – with likely positive effects for SA Objectives on communities, health and well-being, and at least no significant negative effects on environmental assets. The Vision seeks to take full advantage of the area's exceptional position and, as such, will help resolve an existing sustainability issue for out-commuting. The focus on major growth opportunities implies major development that will be of a scale and scope that can support infrastructure, services and facilities, including Green Infrastructure, that will benefit new and existing communities with positive effects.

7.15 The Draft CBLP Strategic Objectives are set out in the table following:

**Table 7.1: Draft CBLP Strategic Objectives**

No.	Theme/ Strategic Objectives
<b>Growth &amp; Infrastructure</b>	
<b>SO1</b>	Ensure sustainable growth and associated infrastructure including the continued regeneration of town and neighbourhood centres to deliver the annual target for new homes and the provision of diverse community hubs.
<b>SO2</b>	Delivering enough homes and jobs to meet our needs. Promote and demand good urban design practices throughout all types and scale of development across Central Bedfordshire.

<b>Local Character</b>	
<b>SO3</b>	Conserve and enhance the area's heritage and their settings by ensuring new development, including changes to the public realm, are of high quality design, appropriate to the significance of the heritage asset, and seek to maintain and enhance the contribution of built, landscaped and buried heritage.
<b>SO4</b>	Create high quality neighbourhoods that have regard for local character and use sustainability principles which are sensitive and responsive to the significance of the local environment, are distinctive, safe, functional and accessible and which reinforce the identity of the area's townscapes, landscape and public places.
<b>Jobs &amp; Business</b>	
<b>SO5</b>	Provide a minimum of 24,000 new jobs by 2035, accommodating new economic growth along strategic and sustainable transportation routes, new mixed use developments and existing established sites.
<b>SO6</b>	Recognise the contribution of land for employment uses to meet the needs of different sectors of the economy and manage the release of surplus employment land for other uses where appropriate. .
<b>SO7</b>	Link deprived areas with employment benefits arising from the development of major sites and existing key locations.
<b>Homes</b>	
<b>SO8</b>	Address housing needs in Central Bedfordshire using appropriate affordable housing targets and policies to encourage quality and choice.
<b>Transport</b>	
<b>SO9</b>	Reduce the reliance on the use of the car by improving facilities at bus and train stations, delivering transport interchanges and by promoting safe and sustainable forms of transport, such as improved walking and cycling routes.
<b>SO10</b>	Ensure a reliable network of east/west and north/south public transport routes to improve access to local services and facilities, especially for those without a car, through well planned routes and integrated public transport. Encouraging the shift from road to freight to reduce demands on the highway network.
<b>Environment</b>	
<b>SO11</b>	Promote healthier and more active lifestyles by Improving the quality of, and accessibility to, the area's open spaces, as areas for sports, recreation, visual interest, biodiversity, education, health and well being.
<b>SO12</b>	Encourage the development of wildlife corridors and networks and provide new opens paces in line with the requirements identified in Central Bedfordshire's Leisure Strategy.
<b>SO13</b>	Support the necessary changes to adapt to climate change by minimising emissions of carbon and local air quality pollutants, protecting and enhancing biodiversity. Improving and protecting air and water quality, reducing flood risk and adverse impacts from noise including the safeguarding of quiet areas and reducing the impacts of contaminated land.

7.16 All the strategic objectives are compatible with and support the progression of at least one of the sustainability objectives. As would be expected there is incompatibility in the strategic objectives to deliver new housing and employment growth with the sustainability objectives to conserve water resources and protect soil quality. Increased water supply and loss of

greenfield land are inevitable consequences of growth in the Plan area that cannot be avoided. Other strategic objectives however do seek to minimise the effects and protect these resources in so far as possible. Without precise locational and lower level details, the compatibility of strategic objectives for growth with sustainability objectives for environmental protection are also largely uncertain.

7.17 The SA made suggestions for improving the sustainability as follows:

- The opportunities for positive effects on equalities could be enhanced by expanding Strategic Objective 7 to link deprived areas with both employment and housing major development site benefits
- Settlement identities could be further protected by a Strategic Objective relating to the protection of essential areas of Green Belt land
- Environmental protection could be enhanced by the inclusion of soil quality in Strategic Objective 13, this would provide enhanced protection for best and most versatile agricultural land
- Environmental protection could be enhanced by the inclusion of a strategic water efficiency objective for new development in a water stressed plan area, this would support the objectives of Water Resource Management Plans in the area.

**The Draft Spatial Strategy Approach & Growth Strategy:  
The Strategic Policies: Sustainable Development; Green Belt,  
Coalescence & Settlements; Gypsies & Travellers  
Implementation: Proposed Growth Locations**

7.18 The Strategic Policies aim to contribute to the Vision and Strategic Objectives and seek to promote the Spatial Strategy Approach - thus they are inter-related. The SA considered each emerging draft Strategic Approach/Policy separately using the full Strategic SA Framework and the detailed findings are provided in Appendix VI of this Initial SA Report. The findings of these SAs were considered by the Council as it developed the Spatial Strategy Approach proposed in the draft Regulation 18 Local Plan.

7.19 The Spatial Strategy Approach reflects the approach investigated through Scenario 1 and previously reported in Section 5 of this SA Report (see also Appendix IV). This approach seeks to maximise positive effects from the potential benefits from development growth whilst minimising potential negative effects through suggestions for Growth Locations and specific development requirements as mitigation measures.

7.20 The proposed Growth Locations were tested through SA and as previously reported in Section 5 of this SA Report (see also Appendix V). Not all locations that were found reasonable have been taken forward as suitable for strategic growth locations and therefore have not been subject to SA now. However, these locations have not been discounted by the Council. At the

next stage of Local Plan preparation, parts of the locations could potentially be considered for small to medium scale growth, to be determined as part of the site allocations assessment. At the next stage of plan-making, and taking into account comments received through the Regulation 18 consultation, further studies will be undertaken and further detailed SA to inform the selection of proposed Site Allocations.

- 7.21 The detailed findings of the SA of the emerging draft Strategic Policies are presented in Appendix VI and a summary of the key significant effects found is discussed by sustainability theme in the following paragraphs:

### **Communities; Economy & Employment; Health & Equality**

SEA Directive Topics: Population & Human Health

Relevant SA Objectives:

- SA Objective 1: To ensure that the housing needs of all residents and communities are met
- SA Objective 2: To maintain and enhance community and settlement identities
- SA Objective 3: To improve accessibility to services and facilities
- SA Objective 4: To support the economy and ensure that there are suitable opportunities for employment
- SA Objective 5: To improve the health and wellbeing of communities and reduce inequalities

- 7.22 The Growth Strategy Policy makes provision for the identified need for new homes and jobs supported by new infrastructure, and designed within large scale development that is located close to key transport corridors. Supported by the other Strategic and Development Management Policies, this policy is likely to lead to major positive effects against SA Objectives for housing, services & facilities, economy & employment, and health & equality.
- 7.23 The policy identifies that a proportion of the planned growth will be development within the Green Belt with the potential for major long term negative effects. It is assumed that this development will be guided by the Green Belt study which has identified areas of land that make weaker contributions to Green Belt purposes to reduce the extent of the identified effects where possible. Mitigation measures have also been integrated by proposing major development to the north and west of Luton, adjacent to the existing urban form – and this reduces the significance of the negative effects. However, at this stage of SA and plan-making, minor negative effects are indicated for growth in the Green Belt.
- 7.24 The policy identifies growth that will extend several settlements in the Plan area. It is assumed that this growth will be appropriately located around the settlements to avoid or minimise any potential coalescence, and negative

effects on settlement identities. The SA of strategic Growth Locations has identified where these negative effects may occur and potential mitigation measures that may be applied. The Summary of Housing Growth Locations in the draft Regulation 18 Plan (Section 8 Implementation) includes Context, Vision, Specific Details and Likely Infrastructure Requirements that indicate the likely positive effects and possibilities for mitigating any negative effects. Further details will be available at the next stage of plan-making and assessment; these will include requirements that will confirm mitigation and enhancement possibilities. Nonetheless, at this stage, there is uncertainty of effects for integration and identity until precise location details emerge and further locationally specific studies are completed for the next stage of plan-making.

- 7.25 The scale and scope of the strategic developments, especially the new settlements proposed at Tempsford and Marston Vale, offer strong opportunities for services, facilities, green infrastructure and health objectives but this will depend upon specific policy requirements at the next stage, so uncertainty remains at this stage. New settlements offer opportunities for creating thriving and inclusive communities through good and early design with positive effects for community identity and health/well-being.

## Transport & Movement

SEA Directive Topics: Population & Human Health

Relevant SA Objectives:

- SA Objective 6: To maintain and improve the existing highway network and reduce associated indirect impacts on air quality and greenhouse gas emissions
- SA Objective 7: To encourage a modal shift and reduce the need to travel

- 7.26 The Strategic Policies have the potential for negative effects on the highways network & air quality, that are likely to be synergistic and cumulative but these effects and the possibilities for mitigation measure are uncertain until further studies are completed. There is the potential for greater negative effects in and around areas with a designated AQMA (Luton, Dunstable, Sandy and Ampthill), i.e. growth locations north of Luton, west of Luton, and Tempsford. Further studies will identify requirements for mitigation in the Masterplanning Policy at the next stage of plan-making.
- 7.27 The scale and scope of strategic level developments, and especially new settlements, should facilitate positive effects for sustainable transport such as new cycleways and footpaths. The Growth Strategy Policy proposes growth locations that are within transport corridors including rail and adjacent to existing urban areas such that the need to travel should be less and it will encourage a modal shift in transport with positive effects.



## Energy & Climate Change

SEA Directive Topics: Climatic Factors

Relevant SA Objectives:

- SA Objective 7: To encourage a modal shift and reduce the need to travel
- SA Objective 8: To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built environment and its communities can withstand the effects of climate change

- 7.28 Large scale development schemes have the greatest potential to deliver positive effects for energy and climate change, and it is noted in the SA of the strategic policy Master Planning for Strategic Growth Locations that policy could be strengthened to maximise these opportunities and support ambitious targets for new large scale projects e.g. carbon neutral development. At this stage of assessment, at least neutral effects are indicated but with some uncertainty.

## Water; Soils; Biodiversity & Geodiversity

SEA Directive Topics: Water; Soil; Biodiversity, Flora and Fauna

Relevant SA Objectives:

- SA Objective 9: To minimise the demand for water and maintain or improve water quality
- SA Objective 10: To reduce the risk of flooding from all sources
- SA Objective 11: To protect and conserve soil
- SA Objective 12: To protect, enhance and manage biodiversity & geodiversity

- 7.29 The Approach and Policies propose high levels of growth that are likely to significantly increase the demand for water resources in a largely water stressed Plan area. There are no strategic limitations on development growth as Water Companies have a statutory duty to supply water; however, capacity for providing additional supply varies and any new infrastructure requirements will have to align with Water Resources Management Plans. The additional growth is therefore considered to have the potential for cumulative negative effects on water resources and water quality that should be mitigated to neutral by the Development Management Policies but there is uncertainty until the Water Cycle Study Phase 2 is undertaken.
- 7.30 Most watercourses in the Plan area are not currently meeting 'good' classification and the most common reason for this is 'pollution from waste water'. The study identifies that all WwTWs have some capacity within their existing quality permits to accommodate future development without

causing a class of 10% deterioration, however in some settlements the available capacity is quite small, and in some cases development may also require WwTW upgrades. It is assumed that development would largely avoid areas of flood risk within the locations and mitigation is provided through supporting draft DM Policy Flood Risk Management.

- 7.31 The level of growth in the Growth Strategy Policy and identified across the growth locations will inevitably lead to loss of greenfield land with the potential for major long term cumulative negative effects against this SA Objective. The SA of strategic growth locations has identified where there is best and most versatile agricultural land at each of these locations and whether the loss of this can be avoided. A significant area of good quality agricultural land is identified within the Marston Vale and around the A1 corridor in Area B location for a new settlement with potential for negative effects but uncertainty until further detailed studies have been completed.
- 7.32 New development across the Plan area, particularly large scale developments, is likely to deliver new Green Infrastructure and support biodiversity and ecological connectivity with the potential for major long term positive effects. Development is likely to be appropriately located to avoid the loss of any designated biodiversity and geodiversity. The SA of strategic growth locations has identified that some of these locations are within priority GI corridors where investment and project delivery can make most impact in securing multi-functional green infrastructure and long term positive biodiversity enhancements. Some uncertainty at this stage of assessment until further detailed studies completed for the next draft Plan.

### **Landscape, Townscape & the Historic Environment**

SEA Directive Topics: Landscape; Cultural Heritage

Relevant SA Objectives:

- SA Objective 13: Protect and enhance the landscape and townscape
- SA Objective 14: To ensure the protection and enhancement of heritage assets, the historic environment & its setting

- 7.33 The level of growth identified in the Growth Strategy Policy and across the growth locations will inevitably change the landscape and character of these areas to some degree with the potential for long term cumulative negative effects. These effects are likely to be most significant in areas of high landscape sensitivity such as in Area A in the south of the Plan area around the Chilterns AONB. Mitigation is provided through strong Development Management Policies but the additional of new development in previously undeveloped areas is likely to cumulatively lead to minor long term negative effects overall.
- 7.34 The SA of strategic growth locations has identified the potential for both positive and negative effects on the historic environment at each of the locations in the Growth Strategy Policy, as well as potential mitigation and



enhancement measures. It is assumed that development at any of the locations will avoid the loss of designated heritage assets, and mitigation is provided through supporting draft Development Management Policies Archaeology and Built Heritage to ensure that development does not significantly affect any heritage assets or their settings. Successful design also has the potential to positively affect heritage settings in the long term, particularly through public realm improvements and improvements to access and signage. Therefore, some uncertainty of significance of effects remains at this stage.

### SA Recommendations

- 7.35 Only a limited number of recommendations were made by the SA on the Strategic Policies at this stage of the assessment and plan-making as follows:
- The Masterplanning Policy wording could be more explicit with regard to requirements for infrastructure measures to support a modal shift and increase connectivity to sustainable transport networks with more positive effects
  - The Masterplanning Policy wording could make more explicit the requirements with regard to Green (and Blue) Infrastructure
  - Consider including explanation of the ecosystems approach in the supporting text to encourage GI with more positive effects for human health and well-being
  - Policy could be strengthened to maximise opportunities and support ambitious targets for new large scale projects e.g. carbon and/or water neutral development
- 7.36 It is noted that after more detailed technical work, the next stage of the Plan will include more locationally specific key characteristics, provisional capacities for homes and employment, and requirements for development to inform development of potential Site Allocation Policies. These matters will more clearly define sensitivities of communities and the receiving environment such that there can be more certainty of the significance of effects. They can also help confirm implementation of mitigation measures and possibilities for enhancement.

## 8.0 SUSTAINABILITY APPRAISAL OF REGULATION 19 CENTRAL BEDFORDSHIRE LOCAL PLAN

### Introduction & Developing the Plan from Regulation 18 to Pre-Submission Regulation 19

- 8.1 The Regulation 18 Draft Local Plan was published for consultation 4 July to 29 August 2017 on the Council's website<sup>97</sup>, accompanied by various evidence studies including the Initial SA Report (June 2017). The feedback from this consultation has been analysed and the comments made, together with ongoing technical studies, have informed the development of the next stage of plan-making – the Pre-Submission Regulation 19 Plan. Comments made and responses will be available on the Council's website in due course. Comments made on the Initial SA report were also collated and reviewed and taken into account in this next stage of appraisal.
- 8.2 In September 2017, the government published Planning for the right homes in the right places<sup>98</sup> - consultation proposals for reforming the planning system to increase the supply of new homes and increase local authority capacity to manage growth. The consultation period was 14 September - 9 November 2017 and feedback is still being analysed as this SA Report is being prepared. The proposals included a standard method for calculating local authorities' housing need and the government is proposing to implement this new method on 31 March 2018. Local authorities who submit a Local Plan for examination before this date will be allowed to use their existing objectively assessed housing need; any authority submitting their plan after this date will be expected to use the new method in calculating their local housing need.
- 8.3 Currently, Central Bedfordshire's local housing need has been calculated as 32,000 new homes over the Local Plan period to the year 2035. Using the government's proposed method, Central Bedfordshire's housing need becomes 51,060 new homes over this period (2,553 homes per year). Central Bedfordshire's Councillors voted unanimously<sup>99</sup> to challenge the proposals through the national consultation. This represented a substantial 60% increase on the current OAN of 1600 homes per annum and was far in excess of the average increase of 35% across local authority areas nationally.
- 8.4 Currently delivery rates in Central Bedfordshire are nearly 1800 homes a year so this would represent a very significant step change where indeed even if this number of homes were planned for in a Local Plan, they could not practically be delivered on the ground due to lack of skilled labour, materials and potentially land banking by developers. There are also very grave implications for five year housing land supply if this new OAN were to be in place. The Council would not be able to demonstrate a five year housing land supply and so consequently it would be more difficult to resist

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<sup>97</sup> <http://www.centralbedfordshire.gov.uk/planning/policy/local-plan/local-plan.aspx>

<sup>98</sup> <https://www.gov.uk/government/consultations/planning-for-the-right-homes-in-the-right-places-consultation-proposals>

<sup>99</sup> <http://www.centralbedfordshire.gov.uk/planning/policy/local-plan/government-consultation.aspx>

speculative planning applications leading to unplanned and unsustainable development.

- 8.5 In view of this, the Council's own published OAN of 32,000 homes is being retained. This has been used as the baseline for developing a 'plan target' which is an overall housing requirement figure that includes the OAN, together with any contingency and any agreed unmet need. This represents the lower end of the range set out in the first consultation draft has been planned for. The overall plan target is 39,350 homes; this is comprised of the OAN (32,000 homes) and Luton's residual 'unmet need' (7350 homes). This gives rise to the need to plan for up to 20,000 new homes at a range of scales in addition to delivering the growth that is already committed.
- 8.6 Further, the Council recognises that as a responsible local authority, it needs to anticipate the possibility that the new method will be imposed. Therefore, the Council has updated its Local Plan timetable to allow submission of the Central Bedfordshire Local Plan before 31 March 2018 – and thus allowing the use of the current housing need figure (32,000 new homes) as the basis for plan-making.
- 8.7 Planning development growth for Central Bedfordshire is complex since the area is strongly affected by its relationships with surrounding major centres, especially Luton, Milton Keynes, Bedford and London. This has influenced key characteristics such as out-commuting for employment and the major transport corridors. A higher volume of development sites has delivered growth in recent years in the north of the area, with growth in the south delivered through a smaller number of significant urban extensions in Green Belt.
- 8.8 The four Areas A-D published in the Regulation 18 consultation recognise the different characteristics of the Central Bedfordshire area – they were not intended as four alternatives *per se* but rather as distinct areas to help guide plan-making. Similarly, the seven approaches to distributing growth were not necessarily alternatives such as either/or but rather approaches on which greater emphasis might be suitable and sustainable depending upon the likely effects for each of the four Areas. Therefore, the reasons for selecting/rejecting the approaches to distributing growth as set out in the Spatial Strategy at Regulation 19 are confirmed, and may be outlined in Table 8.1, as follows:

**Table 8.1: Approaches to Distributing Growth – Reasons for Selection or Rejection**

Potential Approaches for Distributing Development Growth	Summary Reasons for Selection or Rejection in Plan-Making & as confirmed in the proposed Spatial Strategy
<b>1 Greater emphasis on a New Settlement (small scale) –</b> assumed to be between 1,500 to 5,000 new homes	Progressed in Area C (East/West) and Area B (A1 Corridor) as supports economic focus with good access to major transport corridors; maximises opportunities for enabling/supporting infrastructure including

		sustainable transport & Green Infrastructure. Potential for exemplar design. Not progressed in Area A (South) with Green Belt restrictions or Area D (Central) with transport constraints – both with dispersed rural small settlement characteristics.
<b>2</b>	<b>Greater Emphasis on a New Settlement (town scale)</b> – assumed to be between 7,000 to 10,000 new homes	Not progressed in any Area due to insufficient supporting infrastructure.  Temsford is included as an Identified Location for Future Growth.
<b>3</b>	<b>Greater emphasis on Village Extensions</b> – especially those with services & facilities	Progressed as small-medium scale development (10-700 new homes) & focused on settlements with existing services & facilities, and sustainable transport opportunities – in all areas but particularly in Areas A & D so that these areas can benefit from some new development whilst minimising the scale such that the rural characteristics & assets are protected.
<b>4</b>	<b>Greater emphasis on Growth in Transport Corridors</b> – north-south ((A1 & East Coast Main Railway Line); north-south (M1 & Midland Main Railway Line); east-west (A421 & proposals for East-West Railway)	Progressed as major development at the strategic level (1,500 new homes or more) in Areas B (A1/East Coast Mainline) and C (East West Rail/A421) and Area A (A6/M1) to maximise opportunities for accessibility and movement.  Progressed as small and medium scale development along the Thameslink line in Area A at Flitwick and Harlington.  Major growth not progressed in Area D recognising the lack of transport corridors and the resulting limits to the transport networks.
<b>5</b>	<b>Greater emphasis on Urban Extensions</b> – assumed to be around 1,500-2000 new homes & for the larger settlements	Progressed North of Luton in Area A since development would be well-integrated with the existing urban form & would contribute to the unmet housing need for Luton & the Duty to Cooperate for the Councils.  East of Arlesey in Area B offers opportunity to integrate with the existing urban area & to maximise development in a transport corridor, including sustainable transport; also, opportunities for enhancement promoting aims of the Environmental Framework & Green Infrastructure.

		Major growth as an urban extension has not been progressed in Areas C & D, recognising the limits to the transport networks in Area D
<b>6</b>	<b>Greater emphasis on Urban Intensification around Transport Hubs</b> – especially for settlements with railway stations, bus stations, and park & ride	Major growth progressed in Areas A, B & C to maximise opportunities for more sustainable transport.  Development growth limited in Area D due to the rural characteristics and reliance on car transport.
<b>7</b>	<b>Greater emphasis on Higher Densities</b> – development offering from 75 to 130 dwellings per hectare (compared to typical densities in England of 30-40 dph)	The Council will generally support higher densities within urban locations and along existing and potential new public transport corridors. For edge of urban sites and those within or adjoining smaller towns and villages within the rural area, the density of the scheme will be expected to reflect the existing character of the surrounding area.

8.9 The Regulation 18 plan considered a range of scenarios for the amount of housing and the distribution of housing between the four identified Areas. The Plan is required to meet the Council's objectively assessed need (OAN) for housing for the plan period together with any agreed unmet need from neighbouring authorities, identified through Duty to Cooperate discussions. Whilst a range of housing number options were considered for Regulation 18, when the first draft of the Local Plan was released for consultation over the summer, the Council was aware that the government were due to consult on a standardised methodology for calculating the level of housing need by local authority area. In view of this, it planned for a range of between 20-30,000 new additional homes and 24 – 30,000 new jobs.

8.10 In developing the Regulation 19 Plan, as explained above, the Council's own published OAN of 32,000 homes is being retained. This represents the lower end of the range set out in the first consultation Regulation 18 draft Plan. The options for levels and distribution of housing growth were tested through five Scenarios based on the preferred approaches at the Regulation 18 stage. Taking into account consultation comments received and updated evidence, the Council has decided to progress an approach to the Spatial Strategy, confirmed with the proposed SP1: Growth Strategy that aligns with Scenarios 3 and 5. The reasons for selection/rejection of scenarios may be outlined in table 8.2, as follows:

**Table 8.2: Options for Housing Growth Scenarios – Numbers & Distribution – Reasons for Selection or Rejection**

Options for Housing Growth Scenarios		Summary Reasons for Selection or Rejection in Plan-Making
<b>1</b>	Higher levels of growth across all Central Bedfordshire: A 8,000; B 12,000 C 9,000; D 1,500  <b>Total: 30,500 homes</b>	This has not been progressed as it proposes high levels of growth in Area B and C which are reliant on significant infrastructure delivery.
<b>2</b>	No growth to the west of Luton and east of Biggleswade: A 6,000 (no W of Luton); B 9,000; C 9,000; D 1,500  <b>Total: 25,500 homes</b>	This has not been progressed as it proposes high levels of growth in Area B and C which are reliant on significant infrastructure delivery.
<b>3</b>	No strategic transport infrastructure delivered in the A1 corridor (Area B) A 8,000; B 3,000 ; C 9,000; D 1,500  <b>Total: 21,500 homes</b>	A combination of scenario 3 and 5, has been progressed. These scenarios provide more development opportunities for the Green Belt villages which the SA supports. In addition, this avoids high levels of development in areas reliant on significant infrastructure delivery.
<b>4</b>	No growth in the Green Belt (Area A) A 0; B 12,000; C 9,000; D 1,500  <b>Total: 22,500 homes</b>	Not progressed as would not contribute to the unmet housing needs for Luton within the Duty to Cooperate for the Councils; nor provide opportunities from limited new development in the Green Belt in Area A. Development in the Green Belt will take pressure away from non Green Belt areas to help avoid the coalescence of settlements in non Green Belt areas.
<b>5</b>	A mixed approach with higher growth in villages A 7,000 ; B 4,500; C 6,650; D 1,500  <b>Total: 20,650 homes</b>	A combination of scenario 5 and 3, has been progressed. These scenarios provide more development opportunities for small to medium sites in villages, spread across Central Bedfordshire. In addition, this avoids high levels of development in areas reliant on significant infrastructure delivery.

- 8.11 Similarly, the Council considered the two scenarios for strategic employment land and identified a preferred option. The reasons for progressing or not progressing these options in plan-making may be summarised as follows:

**Table 8.3: Options for Employment Growth Scenarios – Reasons for Selection or Rejection**

Options for Employment Growth Scenarios		Summary Reasons for Selection or Rejection in Plan-Making
<b>1</b>	A Sundon RFI; B Biggleswade, West of A1; C Ridgmont, M1 Junction 13; D 0  <b>Total: 6000 jobs</b>	The approach in this scenario has been progressed. This scenario, with the addition of a specialist high technology employment site at RAF Henlow, provides a distribution of employment sites across Central Bedfordshire; utilising existing strategic road and rail infrastructure; offering employment opportunities near to existing towns and villages to provide opportunities for local working, therefore addressing the high out commuting rates in Central Bedfordshire.
<b>2</b>	A 0; B Biggleswade, West of A1; C Ridgmont, M1 Junction 13; D 0 <b>Total: 3700 jobs</b>	This approach has not been progressed. This scenario did not provide employment in Area A.

- 8.12 This section of the SA Report considers the changes made to the Draft Local Plan as a result of the consultation feedback and ongoing technical studies. The Vision and Objectives have been refined; the approach to the Spatial Strategy has been confirmed and the Council has identified the most sustainable strategic housing and employment allocations to progress from the Growth Locations proposed in the Regulation 18 consultation. In addition to the strategic sites, the Plan also allocates small and medium sites for residential development, ranging in size from 12 up to 650 dwellings and spread throughout Central Bedfordshire. These aid delivery as they can be brought forward for development more quickly than the larger sites.
- 8.13 The Council has also put in hand further assessment of four Identified Areas for Future Growth to investigate the potential of strategic sites on the East West Rail/Expressway and the A1/East Coast Mainline Corridor in line with emerging decisions on this strategic infrastructure and in recognition of the core role for Central Bedfordshire in relation to the Cambridge-Milton Keynes-Oxford Arc. This assessment will inform a Partial Review of the Local Plan and it will consider three scenarios for growth:
- Base Scenario: strategic site allocations as set out in the Pre-Submission Plan based on committed strategic infrastructure



- Medium Growth Scenario: growth potential if some but not all the strategic infrastructure is delivered
- High Growth Scenario: growth potential if strategic infrastructure is delivered by 2025-30, improved viability, and high level of local and developer funded infrastructure

The Partial Review is proposed to start within six months of the adoption of the Local Plan; the scenarios will be subject to SA to help inform decision-making.

- 8.14 The Council has further investigated options for the small and medium non-strategic sites and the Regulation 19 Plan includes selected smaller site allocations to complement the major developments and promote the approach for expanding existing towns and allowing growth in existing villages where services can support such development or where development can contribute to services. The core/development management policies have been refined to reflect comments received, particularly from the environmental regulators.
- 8.15 In confirming the spatial strategy approach, the Council has drawn upon the characterisation of Central Bedfordshire into component areas according to their main spatial, settlement, environmental, and infrastructure features, as follows:
- South Area: close to Luton and extending west to Leighton Linlade and north to Flitwick
  - The A1 Corridor: Arlesey, Biggleswade, Sandy and north to Tempsford
  - The East-West Axis: from the M1 through Marston Valley to Wixams
  - The Central Area: small towns and villages, from Ampthill to Moggerhanger
- 8.16 **South Area:** The Plan identifies a requirement to accommodate unmet need as Luton is a highly constrained urban area. Some of these need is being met by North Hertfordshire District Council' through Duty to Cooperate discussions the Council has committed to providing for 7350 homes within the Central Bedfordshire and within the Luton Housing Market Area (HMA). As the Luton HMA is largely comprised of Green Belt land, this has necessitated proposals that require some release of land within the Green Belt as 'exceptional circumstances' can be demonstrated. Small villages washed over by Green Belt generally have limited capacity to grow but there is the potential for medium scale growth along the major transport corridors of the M1, A5 and Midland Main Line, or large-scale growth for sites close to Luton. Consultation told the Council that growth in the south was supported because of the proximity to key services in the urban centres of Dunstable, Houghton Regis and Luton.

8.17 The proposed allocations in this area are:

- North of Luton – around 4000 homes
- Extensions to Barton le Clay, Chalton, Eaton Bray, Flitwick, Harlington, Hockliffe, Houghton Regis, Leighton Linlade, Toddington and Westoning.
- M1 Junction 11a (around 40 hectares for employment)

Land West of Luton is an Identified Location for future development with a potential capacity for around 2,000 homes, but this does not contribute to the Plan target of 39,350 homes.

8.18 **A1 Corridor Area:** While there is great future potential for large scale growth in this area as a result of service improvements on the East Coast Mainline shown by the allocation of a new village East of Biggleswade and an extension to Arlesey, it is recognised that to take forward further significant growth in this area, there has to be greater clarity on the routing of both the Expressway and the Central Section of East West Rail. This will enable an informed approach to the siting and planning of new settlement scale strategic sites and will be addressed in the Partial Plan Review. Investments to increase the capacity of the A1 through Central Bedfordshire will be critical in moving forward with multiple strategic scale growth in this eastern area. Wider growth is identified recognising the potential in the longer term for greater levels of growth if the required infrastructure is delivered.

8.19 The proposed allocations in this area are:

- East of Biggleswade (around 1500 homes)
- East of Arlesey (around 2000 homes)
- Extensions to Arlesey, Biggleswade, Dunton, Everton, Langford, Pottton and Sutton.
- A1 Corridor – Biggleswade South (around 60 hectares for employment)

8.20 Land at the North, South & East of Tempsford is safeguarded for future development, to be assessed further in the Partial Plan Review. Land East of Biggleswade is an Identified Location for Future Growth. These sites do not contribute to this Plan's target of 39,350 homes.

8.21 **East-West Area:** This is an important economic area with advanced research and development at Cranfield Technology Park and close links with Milton Keynes. It is well connected with the A421, the M1, and planned upgrading to East West Rail. Much of the landscape has been restored and the Forest of Marston Vale is an important asset. Extending the Forest of Marston Vale and the delivery of the Bedford to Milton Keynes Waterway are critical to the delivery of growth with a strong design and environmental focus in this area. A series of linked villages with appropriate landscape buffering to protect existing communities is therefore proposed. Future opportunities are related to the proposed investment for East-West Rail and the Expressway. Consultation and evidence told the Council that villages around Woburn including Aspley Guise must be protected due to their unique character, heritage assets and natural environment.

8.22 The proposed allocations in this area are:

- Marston Vale New Villages (around 5000 homes) plus a business park
- Extensions to Aspley Guise, Cranfield, Wixams and Marston Moretaine
- M1 Junction 13 (around 40 hectares for employment)

There is some potential north of the railway line known as the Aspley Guise Triangle and this has been safeguarded for consideration in the Partial Plan Review when the route of the Expressway has been finalised.

8.23 **Central Area:** The settlement pattern and constrained infrastructure, particularly along the A507, limit options for strategic growth. Therefore, small and medium allocations are proposed around settlements that have good access to services and facilities. However, the mixed used development at RAF Henlow exploits this unique existing asset and its strategic location at the heart of the Oxford-Cambridge Arc.

8.24 The proposed allocations in this area are:

- RAF Henlow (mixed use specialist employment)
- Extensions to Campton, Clifton, Haynes, Henlow, Lower Stondon, Maulden, Meppershall, Moggerhanger, Northill, Shefford, Shillington and Upper Gravenhurst

8.25 The SA has considered the changes to each element of the Local Plan. The proposed strategic allocations were subject to full SA using the strategic SA framework and building upon the earlier SA work done on the potential growth locations. A similar approach was taken with the proposed Broad Locational options and reasonable alternatives for proposed Strategic Allocations and Identified Locations for Future Growth.

8.26 As previously explained in this report in Section 2 Methods, paragraph 2.7, the Sites SA Framework (Table 2.3) was developed alongside the Council's site assessment criteria to ensure that they are consistent and effectively inform one another. The appraisal of the small and medium site options built upon the sites assessment method and to avoid duplication or an excessive number of matrices, the site options were clustered by settlement. The SA considered each option individually and summary findings were reported through symbols and colours. Any significant effects were reported in the commentary to the matrix, including the implications for synergistic and cumulative effects. The reasoning for selecting or rejecting non-strategic options is outlined and discussed later in this section 8 – and in accordance with the requirements of the SEA Regulations – and outlined in Appendix VIId. It should be noted that the SA is not the sole source of evidence for decision-making which is informed by other factors including other technical studies and consultation responses.

8.27 The changes to the strategic and core/development management policies were reviewed for their significance with regard to the SA process – do the

changes affect the SA findings and/or do they give rise to significant sustainability/environmental effects. Significant changes were subject to SA using a themed approach and discussion – as previously applied during the SA of the Regulation 18 Draft Plan. The SA then considered the effects of implementing the Plan as a whole, and as required by the SEA Regulations.

### **Representations to the Regulation 18 Initial SA Report (June 2017)**

- 8.28 The details of comments made on the Initial SA Report are provided here in this SA Report in Appendix IX. Comments were received from the statutory environmental regulators. The Environment Agency (EA) had various comments on the draft Policies but no specific comments on the SA. Historic England (HE) had some concerns with some of the policies and did not agree with the SA that objectives would be met and that the plan might produce some negative effects. HE was further concerned that the evidence base lacks up-to-date evidence on landscape and the historic environment, including the archaeological potential. The SA and plan-making share the evidence base and as in accordance with Government guidance. SA is ongoing and iterative and is updated as further evidence is gathered.
- 8.29 Natural England noted that the Initial SA Report provides an overview and that further SA work will be prepared to include details for each proposed strategic allocation and the smaller non-strategic sites. As such, it was difficult for NE to comment on the HRA and how its findings have been incorporated into the SA since the HRA had had only limited progression until the locational specificity of the site allocations was more developed. This was noted and explained that the HRA will be progressed at this Regulation 19 stage and the summary findings will be reported in the SA Report (this report, December 2017).
- 8.30 NE was concerned that the SA cannot rely alone on the emerging development management policies to mitigate the potential adverse effects on the natural environment, including designated sites and landscapes. Evidence will be needed and NE advised that studies are needed on transport, air quality, the water cycle, landscape, agricultural land quality and recreational pressures on designated sites and landscapes. The Council has a number of existing studies, including the Landscape Character Assessment and Green Infrastructure studies, and continues to gather information on natural environmental factors, including further transport modelling and associated impacts on air quality and the water cycle study Stage 2, including those undertaken by site promoters. As explained above, the SA and plan-making share the same evidence base and the SA will be updated as further evidence is completed. In the meantime, the SA describes any gaps in information and records uncertainty – and as in accordance with the SEA Regulations.
- 8.31 NE was further concerned that the Spatial Strategy should be carefully chosen against reasonable alternatives, in particular the alternative of directing all strategic development away from the Green Belt and using more greenfield land in the north of the CBC area near planned transport infrastructure. This alternative approach had been tested at the Regulation 18

stage – Scenario A distributed growth across CBC and avoided any growth in Area A (green belt designation). This was tested through SA and a comparative assessment was undertaken of four scenarios A-D and as reported in detail in Appendix IV of the SA Report (June 2017), including again in this SA Report (December 2017) and discussed in Section 7 Preferred Approach of this SA Report.

- 8.32 A resident was concerned that green spaces do not deliver for wildlife if they have open public access, cycling and dog walking. It was explained that the SA recognises this differentiation – SA Objective No 5 considers green space for people & their health; No 12 considers protecting & enhancing biodiversity. The Village Focus Groups were concerned that the implications for gypsy and traveller sites had not been investigated or reported through the SA. It was explained that the plan-making process will determine if any policies on Gypsy, Traveller & Travelling Showpeople, such as SP7 & H8 are amended and the SA will assess these policies as part of the Regulation 19 SA. One Parish Council commented that they agreed with the SA to date.
- 8.33 The CPRE asserted that the SA was fundamentally flawed by the need to accommodate the high growth rate and housing numbers that are in excess of what CBC should be planning for the future. It was explained that 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.
- 8.34 The Bedfordshire Local Nature Partnership was concerned that the SA had identified environmental problems that do not appear to have solutions proposed in the Plan – including loss of green infrastructure, a need to reduce excess weight in adults, and increased pressure on water resources in an area of low rainfall. It was explained that 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.
- 8.35 Some twelve land promoters submitted comments on the SA, most with specific details supporting or disputing the findings of the appraisals for the development land that is being promoted. These comments and further details were noted, with thanks, and responses are provided in Appendix IX. The next stage of appraisal considers in more detail the strategic options for allocation in the plan period to 2035 and the potential broad locational areas for consideration beyond the plan period after 2035. The previous SA had been a high-level assessment considering growth locations without locational site specificity. The Regulation 19 Draft Plan includes locationally specific Strategic Allocations; this SA has built upon the previous SA and taken into account more detailed information provided by land promoters where provided.

## **Strategic Allocations & Broad Locational Options for Identified Locations for Future Growth**

- 8.36 The Council has considered the comments received through consultation and the findings from ongoing technical studies to identify preferred sites for development as Strategic Allocations or Identified Locations for Future Growth. These have been developed from the potential Growth Locations published in the Regulation 18 Draft Plan and subject to SA (and as reported here previously in Section 5 & Appendix V). Options for Strategic Allocations were developed in recognition of the lead-in time for such major development and a phased delivery was identified typically commencing in the year 2023-2024 and some extending beyond the plan period to 2035; the Strategic Allocations have a red-line boundary. Options for Identified Locations for Future Growth were developed as potential areas for growth to be further investigated as part of any early Partial Plan review; they do not have a red line boundary but remain as a broad growth location.
- 8.37 The chronology of the decision-making and associated SA of strategic alternatives, together with the outline reasons for selection or non-progression of strategic alternatives at each stage of plan-making is set out in Table 8.4, as follows:

**Table 8.4: Strategic Site Options - Reasons for Selection or Rejection**

<p><b>Potential Strategic Growth Location</b> Regulation 18 consultation (Policy SP1 minimum of 20,000 new homes &amp; 24,000 new jobs)</p> <p><b>Initial SA Report</b> (June 2017)</p>	<p><b>Proposed Site Allocation or Identified Location for Future Growth: name &amp; development capacity at Regulation 19</b> (Policy SP1 39,350 homes (around 23,845 already planned for or built) and a minimum of 24,000 new jobs over period 2015-2035)</p> <p><b>SA Report (December 2017)</b></p>	<p><b>Summary reasons for selection or non-progression to Regulation 19 consultation</b></p>
<p><b>Strategic Options for Housing</b></p>		
<p><b>Potential Growth Location: Arlesey</b> Up to 2000 homes</p> <p>Subject to SA (Appendix V- Growth Locations, pages 3-9)</p>	<p><b>Policy SA3 Strategic Allocation: East of Arlesey</b> Up to 2000 homes (commencing phased delivery in 2023-2024)</p> <p>Subject to SA (Appendix VIIa- Strategic Allocations SA, pages 15-25)</p>	<p><b>Progressed as Strategic Allocation</b> for outlined reasons:</p> <ul style="list-style-type: none"> <li>Existing sustainability problem resolved - high levels of congestion and traffic along Arlesey High Street could be alleviated through the provision of relief road in the growth location connecting from south of Hitchin Road to the new A507/High Street link road.</li> <li>Promotes sustainable transport use with proximity to Arlesey Train Station.</li> <li>Provision of a mixed-use housing location – mix of housing types, school provision, open space provision, community facilities and a country park.</li> <li>Provision of a country park between Arlesey and Fairfield to mitigate coalescence and provide open space.</li> <li>Net gain for biodiversity through the enhancement of Blue Lagoon and Green Lagoon.</li> </ul>

<p><b>Potential Strategic Growth Location</b> <b>Regulation 18 consultation</b> <b>(Policy SP1 minimum of 20,000 new homes &amp; 24,000 new jobs)</b></p> <p><b>Initial SA Report</b> <b>(June 2017)</b></p>	<p><b>Proposed Site Allocation or Identified Location for Future Growth: name &amp; development capacity at Regulation 19</b> <b>(Policy SP1 39,350 homes (around 23,845 already planned for or built) and a minimum of 24,000 new jobs over period 2015-2035)</b></p> <p><b>SA Report (December 2017)</b></p>	<p><b>Summary reasons for selection or non-progression to Regulation 19 consultation</b></p>
		<ul style="list-style-type: none"> <li>Increased access for existing residents of Arlesey and Fairfield for recreational open space and sport pitch provision within the country park.</li> </ul>
<p><b>Potential Growth Location: Aspley Guise</b> Up to 3000 homes</p> <p>Subject to SA (Appendix V- Growth Locations, pages 9-15)</p>	<p><b>Identified Location for Future Growth:</b> <b>Aspley Guise Triangle:</b> Up to 3500 homes (commencing phased delivery in 2030 to post Plan period)</p> <p>Subject to SA (Appendix VIIIb- Broad Locations SA, pages 3-13)</p>	<p><b>Progressed as Identified Location for Future Growth</b> for outlined reasons:</p> <ul style="list-style-type: none"> <li>Proximity to the EW Railway &amp; Ridgmont Station, proposed Expressway, and its location in the Cambridge–Oxford Growth Corridor.</li> <li>Opportunity to support travel to work due to proximity to strategic road network and sustainable transport options.</li> <li>Potential of the Broad Location to help establish the new Bedford-Milton Keynes Waterway and opportunities for increased biodiversity and open space and leisure opportunities along the waterway, including cycle routes</li> <li>Opportunity to create a buffer to protect the setting of Aspley Guise</li> <li>Opportunity to designate Green Belt to protect the setting of Aspley Guise.</li> <li>Potential for the provision of a Park and Ride to serve Milton Keynes.</li> </ul>



<p><b>Potential Strategic Growth Location</b> <b>Regulation 18 consultation</b> <b>(Policy SP1 minimum of 20,000 new homes &amp; 24,000 new jobs)</b></p> <p><b>Initial SA Report</b> <b>(June 2017)</b></p>	<p><b>Proposed Site Allocation or Identified Location for Future Growth: name &amp; development capacity at Regulation 19</b> <b>(Policy SP1 39,350 homes (around 23,845 already planned for or built) and a minimum of 24,000 new jobs over period 2015-2035)</b></p> <p><b>SA Report (December 2017)</b></p>	<p><b>Summary reasons for selection or non-progression to Regulation 19 consultation</b></p>
		<p>Not progressed as a Strategic Allocation to allow time for identification of the proposed Expressway and associated road and junction improvements.</p>
<p><b>Potential Growth Location: Biggleswade East</b> Up to 3000 homes</p> <p>Subject to SA (Appendix V- Growth Locations, pages 15-22)</p>	<p><b>Policy SA4 Strategic Allocation: East of Biggleswade Phase 1</b> Up to 1500 homes (commencing phased delivery)</p> <p>Subject to SA (Appendix VIIa- Strategic Allocations SA, pages 51-60)</p>	<p><b>Progressed as Strategic Allocation</b> for outlined reasons:</p> <ul style="list-style-type: none"> <li>■ Provision of a stand-alone development providing a significant number of homes with infrastructure, services and facilities to meet the needs of future residents.</li> <li>■ Development of Phase 1 (western village) will provide cycle and walking routes to services in Biggleswade.</li> <li>■ Opportunity for enhancement and extension of the Biggleswade Green Wheel.</li> <li>■ Concentrating growth along key transport corridors (A1 and East Coast Main Line Rail).</li> </ul>
<p><b>Potential Growth Location Biggleswade East:</b> Up to 3000 homes</p> <p>Subject to SA (Appendix V- Growth Locations, pages 15-22)</p>	<p><b>Identified Location for Future Growth:</b> <b>East of Biggleswade Phase 2</b> Up to 1500 homes (commencing phased delivery post Plan period after 2035)</p>	<p><b>Progressed as Identified Location for Future Growth</b> for outlined reasons:</p> <ul style="list-style-type: none"> <li>■ For reasons outlined above</li> </ul> <p>Not progressed as a Strategic Allocation to allow time for implementation of the transport infrastructure improvements that are necessary, including improvements to the A1.</p>

<p><b>Potential Strategic Growth Location</b> <b>Regulation 18 consultation</b> <b>(Policy SP1 minimum of 20,000 new homes &amp; 24,000 new jobs)</b></p> <p><b>Initial SA Report</b> <b>(June 2017)</b></p>	<p><b>Proposed Site Allocation or Identified Location for Future Growth: name &amp; development capacity at Regulation 19</b> <b>(Policy SP1 39,350 homes (around 23,845 already planned for or built) and a minimum of 24,000 new jobs over period 2015-2035)</b></p> <p><b>SA Report (December 2017)</b></p>	<p><b>Summary reasons for selection or non-progression to Regulation 19 consultation</b></p>
	<p>Subject to SA (Appendix VIIa-Strategic Allocations SA, pages 51-60)</p>	
<p><b>Potential Growth Location: Henlow Airfield &amp; Camp:</b> Up to 1000 homes</p> <p>Subject to SA (Appendix V-Growth Locations, pages 22-30)</p>	<p><b>Reasonable alternative: RAF Henlow</b> 1000 Homes</p> <p>Subject to SA (Appendix VIIa-Strategic Allocations SA, pages 51-60) (please note as an employment site appraised separately)</p>	<p><b>Considered as a reasonable alternative</b> for outlined reasons:</p> <ul style="list-style-type: none"> <li>■ Redevelopment of Brownfield Land.</li> <li>■ Impact on the highway network (A507)</li> <li>■ Potential for contaminated land.</li> </ul> <p>Not progressed as a Strategic Allocation for housing as the site being allocated as a strategic employment site.</p>
<p><b>Potential Growth Location: Luton North</b> Up to 4000 homes</p> <p>Subject to SA (Appendix V-Growth Locations, pages 31-37)</p>	<p><b>Policy SA1 Strategic Allocation: North of Luton</b> 3500-4000 homes and up to 20 hectares of employment land (commencing phased delivery 2022-23 to post Plan period 2035)</p> <p>Subject to SA (Appendix VIIa-Strategic Allocations SA, pages 3-14)</p>	<p><b>Progressed as Strategic Allocation</b> for outlined reasons:</p> <ul style="list-style-type: none"> <li>■ Delivers unmet housing need from Luton close to where it arises where there is capacity to do so sustainably.</li> <li>■ Resolving an existing sustainability problem by delivery of the A6/M1 Link Road relieving congestion for surrounding settlements and providing economic benefits.</li> <li>■ Concentrating growth along key corridor routes (M1 and Midland Main Line Rail) providing mitigation and promoting sustainable transport.</li> <li>■ Promoting sustainable development in areas that have seen little growth due to Green Belt restrictions.</li> </ul>

<p><b>Potential Strategic Growth Location</b> <b>Regulation 18 consultation</b> <b>(Policy SP1 minimum of 20,000 new homes &amp; 24,000 new jobs)</b></p> <p><b>Initial SA Report</b> <b>(June 2017)</b></p>	<p><b>Proposed Site Allocation or Identified Location for Future Growth: name &amp; development capacity at Regulation 19</b> <b>(Policy SP1 39,350 homes (around 23,845 already planned for or built) and a minimum of 24,000 new jobs over period 2015-2035)</b></p> <p><b>SA Report (December 2017)</b></p>	<p><b>Summary reasons for selection or non-progression to Regulation 19 consultation</b></p>
<p><b>Potential Growth Location: Luton West:</b> Up to 2000 homes</p> <p>Subject to SA (Appendix V- Growth Locations, pages 38-45)</p>	<p><b>Identified Location for Future Growth: West Luton</b> Up to 4000 homes (commencing phased delivery post Plan period after 2035)</p> <p>Subject to SA (Appendix VIIb- Broad Locations SA, pages 14-25)</p>	<p><b>Progressed as Identified Location for Future Growth</b> for outlined reasons:</p> <ul style="list-style-type: none"> <li>■ Deliver unmet housing need from Luton close to where it arises where there is capacity to do so sustainably.</li> <li>■ Potential for the delivery of sustainable transport infrastructure benefits through connections to the Guided Busway.</li> <li>■ Promoting sustainable development in areas that have seen little growth due to Green Belt restrictions.</li> <li>■ Opportunity to provide a new secondary school to meet the needs of the growth location and opportunity to provide land for a secondary school to meet the shortage within Luton.</li> </ul> <p>Not progressed as a Strategic Allocation to allow time for implementation of the significant transport infrastructure improvements that are necessary and the need to consider the impact of aircraft noise and noise from the M1 for the growth location.</p>

<p><b>Potential Growth Location: Marston Vale</b> Up to 5000 homes</p> <p>Subject to SA (Appendix V- Growth Locations, pages 46-53)</p>	<p><b>Policy SA2 Strategic Allocation: Marston Vale</b> Up to 5000 homes and up to 40ha of employment land</p> <p>Subject to SA (Appendix VIIa- Strategic Allocations SA, pages 26-38)</p>	<p><b>Progressed as Strategic Allocation</b> for 5,000 homes outlined reasons:</p> <ul style="list-style-type: none"> <li>■ Opportunity to strengthen landscape character, contributing to the Forest of Marston Vale and improvements to existing water bodies.</li> <li>■ Opportunity to connect to heat network that may be associated with the Energy Recovery Facility Planned at Rookery Pit South.</li> <li>■ Opportunity to support the Cambridge – Oxford Growth Corridor.</li> <li>■ Proximity to Ridgmont railway station (East-West Rail)</li> <li>■ Opportunity to support travel to work due to proximity to strategic road network and sustainable transport options.</li> <li>■ Growth location not located on the best or most versatile agricultural land.</li> <li>■ Potential of the site to help establish the new Bedford-Milton Keynes Waterway and opportunities for increased biodiversity opportunities and open space and leisure opportunities along the waterway, including cycle routes.</li> <li>■ Opportunity to contribute to a net gain in biodiversity supporting the Forest of Marston Vale and Greensand Ridge NIA.</li> <li>■ Potential of the site to provide significant opportunities for leisure and recreational activities along the waterway and lakes and country park proposals.</li> <li>■ Opportunity to address the healthcare provision issues in the wider area, including a potential hub.</li> </ul>
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<p><b>Potential Strategic Growth Location</b> <b>Regulation 18 consultation</b> <b>(Policy SP1 minimum of 20,000 new homes &amp; 24,000 new jobs)</b></p> <p><b>Initial SA Report</b> <b>(June 2017)</b></p>	<p><b>Proposed Site Allocation or Identified Location for Future Growth: name &amp; development capacity at Regulation 19</b> <b>(Policy SP1 39,350 homes (around 23,845 already planned for or built) and a minimum of 24,000 new jobs over period 2015-2035)</b></p> <p><b>SA Report (December 2017)</b></p>	<p><b>Summary reasons for selection or non-progression to Regulation 19 consultation</b></p>
	<p><b>Strategic Allocation Reasonable Alternative:</b> <b>Marston Thrift:</b> Up to 2000 homes</p> <p>Subject to SA (Appendix VIIb- Strategic Broad Locational Options SA, pages 31-66)</p>	<p>Not progressed as a Strategic Allocation or an Identified Location for Future Growth as concern about over development in the Marston Vale area.</p>
<p><b>Potential Growth Location:</b> <b>Tempsford South &amp; Tempsford Airfield</b> New settlement up to 7000 homes</p> <p>Subject to SA (Appendix V- Growth Locations, pages 54-59)</p>	<p><b>Identified Location for Future Growth Tempsford:</b> Up to 10000 homes</p> <p>Subject to SA (Appendix VIIb- Broad Locations SA, pages 58-67)</p>	<p><b>Progressed as Identified Location for Future Growth</b> for outlined reasons:</p> <ul style="list-style-type: none"> <li>■ Potential to develop a new sustainable settlement with the required infrastructure along a key sustainable transport corridor.</li> <li>■ Opportunity to provide direct connections to the A1, and potential to connect to a re-routed A428 to the north beyond the plan period.</li> <li>■ Potential to incorporate the new EWR interchange with the East Coast Main Line, within the area.</li> <li>■ Opportunity of the site to support the Cambridge-Oxford Growth Corridor.</li> </ul>

<b>Potential Strategic Growth Location</b> <b>Regulation 18 consultation</b> <b>(Policy SP1 minimum of 20,000 new homes &amp; 24,000 new jobs)</b>  <b>Initial SA Report</b> <b>(June 2017)</b>	<b>Proposed Site Allocation or Identified Location for Future Growth: name &amp; development capacity at Regulation 19</b> <b>(Policy SP1 39,350 homes (around 23,845 already planned for or built) and a minimum of 24,000 new jobs over period 2015-2035)</b>  <b>SA Report (December 2017)</b>	<b>Summary reasons for selection or non-progression to Regulation 19 consultation</b>
		Not progressed as a Strategic Allocation to allow time for implementation of the significant transport infrastructure improvements that are necessary.
<b>Potential Growth Location:</b> <b>Wixams South</b> Up to 1000 homes  Subject to SA (Appendix V- Growth Locations, pages 60-65)	Not progressed further.	Not progressed further at this stage for outlined reasons:  <ul style="list-style-type: none"> <li>■ Due for resolution to grant planning permission for 650 dwellings in January 2018.</li> </ul>
<b>Potential Growth Location:</b> <b>Area A Villages</b> Up to 2000 homes dispersed through villages  Subject to SA (Appendix V- Growth Locations, pages 66-69)	<b>Policy HA1</b> Progressed as small and medium site options & allocations.	Non-strategic site options considered and subject to SA (please see later in Section 8 of this report and details in Appendix VIIc SA findings & Appendix VIId reasons for selection/rejection of options.
<b>Potential Growth Location:</b> <b>Area B Villages</b>	<b>Policy HA1</b> Progressed as small and medium site options & allocations.	Non-strategic site options considered and subject to SA (please see later in Section 8 of this report and details in

<p><b>Potential Strategic Growth Location</b> <b>Regulation 18 consultation</b> <b>(Policy SP1 minimum of 20,000 new homes &amp; 24,000 new jobs)</b></p> <p><b>Initial SA Report</b> <b>(June 2017)</b></p>	<p><b>Proposed Site Allocation or Identified Location for Future Growth: name &amp; development capacity at Regulation 19</b> <b>(Policy SP1 39,350 homes (around 23,845 already planned for or built) and a minimum of 24,000 new jobs over period 2015-2035)</b></p> <p><b>SA Report (December 2017)</b></p>	<p><b>Summary reasons for selection or non-progression to Regulation 19 consultation</b></p>
<p>Up to 2000 homes dispersed through villages</p> <p>Subject to SA (Appendix V- Growth Locations, pages 70-73)</p>		<p>Appendix VIIc SA findings &amp; Appendix VIId reasons for selection/rejection of options.</p>
<p><b>Potential Growth Location: Area C Villages</b> Up to 2000 homes dispersed through villages</p> <p>Subject to SA (Appendix V- Growth Locations, pages 74-77)</p>	<p><b>Policy HA1</b> Progressed as small and medium site options &amp; allocations.</p>	<p>Non-strategic site options considered and subject to SA (please see later in Section 8 of this report and details in Appendix VIIc SA findings &amp; Appendix VIId reasons for selection/rejection of options.</p>
<p><b>Potential Growth Location: Area D Villages</b> Up to 2000 homes dispersed through villages</p> <p>Subject to SA (Appendix V- Growth Locations, pages 78-81)</p>	<p><b>Policy HA1</b> Progressed as small and medium site options &amp; allocations.</p>	<p>Non-strategic site options considered and subject to SA (please see later in Section 8 of this report and details in Appendix VIIc SA findings &amp; Appendix VIId reasons for selection/rejection of options.</p>

<p><b>Potential Strategic Growth Location</b> <b>Regulation 18 consultation</b> <b>(Policy SP1 minimum of 20,000 new homes &amp; 24,000 new jobs)</b></p> <p><b>Initial SA Report</b> <b>(June 2017)</b></p>	<p><b>Proposed Site Allocation or Identified Location for Future Growth: name &amp; development capacity at Regulation 19</b> <b>(Policy SP1 39,350 homes (around 23,845 already planned for or built) and a minimum of 24,000 new jobs over period 2015-2035)</b></p> <p><b>SA Report (December 2017)</b></p>	<p><b>Summary reasons for selection or non-progression to Regulation 19 consultation</b></p>
	<p><b>Reasonable Alternative:</b> <b>North and North East Sandy</b></p> <p>Approximately 4,700 new homes</p> <p>Subject to SA (Appendix VIIb- Broad Locations SA, pages 48-56)</p>	<p><b>Considered as a reasonable alternative for outlined reasons:</b></p> <ul style="list-style-type: none"> <li>■ Opportunity for the proposed urban extension to provide direct access to the A1 corridor.</li> </ul> <p>Not progressed as a Strategic Allocation due to the impact of the site on Sandy and its separation from existing built up area.</p>
	<p><b>Policy SA5 Houghton Regis North Strategic Allocation</b></p> <p>Two sites set out in adopted Framework Plan &amp; options previously subject to SA (2011); Site 1 comprises eastern side from M1 to the A5120 &amp; Site 2 is located to the east of the A5 to the A5120. Outline planning permissions granted for up to 5,150 dwellings (Site 1 June 2014) &amp; up to 1,850 dwellings (Site 2 November 2015).</p>	<p><b>Progressed as Strategic Allocation</b> for outlined reasons:</p> <ul style="list-style-type: none"> <li>■ Delivery over two sites allows are more detailed approach to phasing</li> <li>■ Timely delivery of supporting infrastructure will complement and enhance existing services and facilities as well as assisting in the regeneration of the existing urban area</li> <li>■ The two sites will be more fully integrated with each other as well as with the urban area of Houghton Regis</li> </ul>



<b>Potential Strategic Growth Location</b> <b>Regulation 18 consultation</b> <b>(Policy SP1 minimum of 20,000 new homes &amp; 24,000 new jobs)</b>  <b>Initial SA Report</b> <b>(June 2017)</b>	<b>Proposed Site Allocation or Identified Location for Future Growth: name &amp; development capacity at Regulation 19</b> <b>(Policy SP1 39,350 homes (around 23,845 already planned for or built) and a minimum of 24,000 new jobs over period 2015-2035)</b>  <b>SA Report (December 2017)</b>	<b>Summary reasons for selection or non-progression to Regulation 19 consultation</b>
<b>Strategic Options for Employment</b>		
<b>Potential Growth Location:</b> <b>Sundon Rail Freight Interchange</b> Up to 2300 new jobs  Subject to SA (Appendix V- Growth Locations, pages 83-88)	<b>Policy SE1 Strategic Allocation:</b> <b>Sundon Rail Freight Interchange</b> Up to 2300 new jobs  Subject to updated SA (Appendix VIIa Strategic Allocations pages 64-71)	<b>Progressed as Strategic Allocation</b> for outlined reasons: <ul style="list-style-type: none"> <li>■ Opportunity for standalone strategic employment site adjacent to the RFI development.</li> <li>■ Proximity to M1 J11a.</li> <li>■ Opportunities to enhance and manage Sundon Chalk Pits CWS and Sundon Quarry SSSI.</li> </ul>
<b>Potential Growth Location:</b> <b>Biggleswade, West of A1</b> Up to 2000 new jobs  Subject to SA (Appendix V- Growth Locations, pages 89-94)	<b>Policy SE3 Strategic Allocation:</b> <b>Holme Farm Biggleswade, A1 Corridor</b> Up to 2000 new jobs Subject to updated SA (Appendix VIIa Strategic Allocations pages 72-79)	<b>Progressed as Strategic Allocation</b> for outlined reasons: <ul style="list-style-type: none"> <li>■ Opportunity for standalone strategic employment site close to Biggleswade.</li> <li>■ Proximity to A1 corridor.</li> </ul>
<b>Potential Growth Location:</b> <b>Ridgmont, M1 Junction 13</b> Up to 1700 new jobs	<b>Policy SE2 Strategic Allocation:</b> <b>M1 Junction 13 Marston Gate Expansion</b> Up to 1700 new jobs	<b>Progressed as Strategic Allocation</b> for outlined reasons: <ul style="list-style-type: none"> <li>■ Opportunity for standalone strategic employment site close to the M1 J13.</li> </ul>

<p><b>Potential Strategic Growth Location</b> <b>Regulation 18 consultation</b> <b>(Policy SP1 minimum of 20,000 new homes &amp; 24,000 new jobs)</b></p> <p><b>Initial SA Report</b> <b>(June 2017)</b></p>	<p><b>Proposed Site Allocation or Identified Location for Future Growth: name &amp; development capacity at Regulation 19</b> <b>(Policy SP1 39,350 homes (around 23,845 already planned for or built) and a minimum of 24,000 new jobs over period 2015-2035)</b></p> <p><b>SA Report (December 2017)</b></p>	<p><b>Summary reasons for selection or non-progression to Regulation 19 consultation</b></p>
<p>Subject to SA (Appendix V- Growth Locations, pages 94-100)</p>	<p>Subject to updated SA (Appendix VIIa Strategic Allocations pages 80-87)</p>	
	<p><b>Policy SE4 Strategic Allocation:</b> <b>Former RAF Base Henlow</b> 135ha mixed-use employment land</p>	<p><b>Progressed as a Strategic Allocation for outlined reasons:</b></p> <ul style="list-style-type: none"> <li>■ Opportunity for specialist high-technology, science, research and development uses.</li> <li>■ Redevelopment of Brownfield Land.</li> </ul>

- 8.38 Each of the **strategic site options** now defined by boundaries as an allocation was tested again through SA, building upon the previous SA work and taking into account more detailed information that was available, for example, from development promoters. Details of the SA findings are provided in Appendix VIIa, including any recommendations made, and summary findings for housing sites are set out in Table 8.5a, as follows:

**Table 8.5a: Summary SA of Strategic Allocations - Housing**

SA Objective	Summary SA Strategic Housing Allocations							
	Luton North		East of Arlesey		Marston Vale		Biggleswade East	
1 Housing	++		++		++		++	
2 Communities <sup>100</sup> G Belt; Identity	--	-	0	-	0	-	0	-
3 Accessibility - Services & Facilities	++		++		++		++	
4 Economy & Employment <sup>101</sup>	++	+	++	+	++	+	0	+
5 Health & Equality <sup>102</sup>	++	0	++	++	0	++	0	++
6 Highways Air Quality <sup>103</sup> ; GHGs	0?		0?		-?		0?	
7 Sustainable Transport	+		+		++		+	
8 Energy & Climate Change	+?		+?		+?		+?	
9 Water Resources & Quality	0?		0?		0?		0?	
10 Reduce Flood Risk	0		0		0?		-	
11 Soils <sup>104</sup>	--	0	--	0	--?	0	--	0
12 Biodiversity & Geodiversity	+?		+		+		+?	
13 Landscape & Townscape	--?		+		+		+	
14 Historic Environment	0?		0?		-?		-?	

<sup>100</sup> Please note that first symbol relates to location in/out of Green Belt designation; second symbol relates to effects on integration & identity for existing settlements

<sup>101</sup> Please note that first symbol refers to employment land; second symbol refers to vitality & viability of town centres

<sup>102</sup> Please note that first symbol refers to deprived areas; second symbol refers to Green Infrastructure

<sup>103</sup> Please note Air Quality & Green House Gas emissions are essentially associated with emissions from road vehicles for the purposes of this SA and as explained in the SA Scoping Report

<sup>104</sup> Please note that first symbol refers to loss of greenfield/agricultural land; second symbol refers to previously developed land

- 8.39 Generally, the refreshed SA confirmed previous SA findings with positive effects for SA Objectives on housing, employment (where relevant), town centres, sustainable transport, and energy & climate change. For the initial element of the SA Objective No 2 on communities, previous uncertainty was removed for locations within or without the Green Belt as a red line boundary is now available. For Biggleswade East, minor positive changed to minor negative as the location of the site indicated potential effects on coalescence and identity with the nearby villages of Sutton and Dunton. For the second element of the SA Objective No 3 relating to services & facilities, whilst the size of these major development sites has the potential for major positive effects through provision of services and facilities associated with development, some uncertainty was recorded for Biggleswade East until further studies including masterplanning are available. There is an established Framework Plan<sup>105</sup> with a well-defined plan of land uses for Luton North, confirming major positive effects.
- 8.40 For Luton North and the first element of the SA Objective on health/equality that relates to opportunity for regeneration/renewal in an area of higher deprivation, the red line boundary confirms the proximity to deprived areas in Luton and changes to likely major positive effects. This will help to resolve an existing sustainability problem with the potential for longer-term synergistic and cumulative effects.
- 8.41 For the SA Objective No 6 on highways and associated air quality, neutral effects were confirmed for Luton North, East of Arlesey, and Biggleswade East with some uncertainty until further transport modelling studies are completed. Initial evidence indicates that the proposed relief roads associated with Luton North & East of Arlesey should mitigate negative effects. Initial transport studies by the land promoter indicate that there is highway capacity at Biggleswade East, such that the SA findings have changed from minor negative to neutral – some uncertainty until further studies are completed.
- 8.42 All major development with the strategic allocations should have positive effects for sustainable transport as they can positively plan and design for access to public transport, and provide effective cycleways and walkways. The red line boundary confirms Marston Vale in close proximity to railway stations with major positive effects in both the short and longer-term for SA Objective No 7.
- 8.43 Four of the five strategic allocations for housing are not located within areas of flood risk and neutral effects are confirmed. The red line boundary for Biggleswade now indicates that parts of the site to the west and centre are located in Flood Zones 2 & 3 with the potential for minor negative effects. It is not clear at this stage whether these areas can be avoided or mitigated through Sustainable Drainage Systems so uncertainty until further studies and masterplanning progressed.
- 8.44 The identification of the red line boundaries now enables appraisal against SA Objective No 11 in two parts – first element relates to loss of greenfield or agricultural land; second element refers to opportunity for reuse of previously

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<sup>105</sup> <http://www.centralbedfordshire.gov.uk/planning/policy/development-briefs/north-luton.aspx>

developed land. All the strategic allocations will result in loss of greenfield and the best/most versatile agricultural land (Grade 1-3a) with major negative effects that are permanent. None of these allocations include previously developed land thus indicating neutral effects.

- 8.45 The red line boundaries and availability of initial ecological studies from land promoters provides more certainty for likely positive effects - especially for East of Arlesey and Marston Vale where masterplanning studies indicate the possibilities for major positive effects. The two sites at Marston are close, separated by the A421, with the potential for synergistic and cumulative positive effects on biodiversity in the longer-term – some uncertainty until further studies completed. Uncertainty of the extent of positive effects remains for Luton North and Biggleswade East until masterplanning progresses.
- 8.46 The red line boundaries confirm that three of the five allocations do not include any designated historic assets with confirmation of neutral effects. Biggleswade East includes a scheduled monument and listed building with the potential for a minor negative effect; Marston Vale is adjacent to a Scheduled Monument with likely negative effects. It is likely that such effects on these assets and their settings could be mitigated but some uncertainty until possibilities are investigated and masterplanning is progressed.
- 8.47 It is recognised that major development sites have a long lead in time and three of the allocations have masterplanning proposals that detail development and layout, including indications for infrastructure (highways, community and green/blue). The Council proposes a phased delivery of these sites with most commencing delivery 2022-2024, although Marston Vale commences in 2019-2020; three of the allocations extend beyond the Plan period post 2035. Thus, mitigation measures have been provided through the phasing proposals to ensure that there is the capacity in essential infrastructure for both existing and new communities.
- 8.48 Details of the SA findings for employment sites are provided in Appendix VIIa, including any recommendations made, and summary findings are set out in Table 8.5b, as follows:

**Table 8.5b: Summary SA of Strategic Allocations - Employment**

SA Objectives	Summary SA of Employment Allocations							
	Sundon Rail Freight Interchange		Biggleswade, West of A1		Ridgmont, M1 Junction 13		RAF Henlow – employment	
1 Housing	0		0		0		0	
2 Communities <sup>106</sup>	--	0	0	-?	0	0	0	-?
3 Accessibility - Services & Facilities	0		0		0		+	?
4 Economy & Employment <sup>107</sup>	+	+	+	+	+	?	+	+
5 Health & Equality <sup>108</sup>	+	+	0	+	0	+	0	+
6 Highways Air Quality <sup>109</sup> ; GHGs	0?		0?		0?		0?	
7 Sustainable Transport	++		++?		++		+	
8 Energy & Climate Change	+	?	+	?	+	?	+	?
9 Water Resources & Quality	0?		0?		0?		0?	
10 Reduce Flood Risk	0		0		0		0	
11 Soils <sup>110</sup>	--	0	--	0	--	0	--	+
12 Biodiversity & Geodiversity	+		+		+		0?	
13 Landscape & Townscape	-?		+	?	+	?	+	?
14 Historic Environment	0		0?		0?		+/-?	

8.49 The availability of proposed red line boundaries and some additional information enabled an updated SA of three of the strategic employment options that are proposed for allocation at Regulation 19. The RAF Henlow site was tested initially through SA as an option for safeguarding as a Broad Location and details are presented in Appendix VIIb – comparative SA of the Henlow site as housing or employment uses. The Council decided to progress

<sup>106</sup> Please note that first symbol relates to location in/out of Green Belt designation; second symbol relates to effects on integration & identity for existing settlements

<sup>107</sup> Please note that first symbol refers to employment land; second symbol refers to vitality & viability of town centres

<sup>108</sup> Please note that first symbol refers to deprived areas; second symbol refers to Green Infrastructure

<sup>109</sup> Please note Air Quality & Green House Gas emissions are essentially associated with emissions from road vehicles for the purposes of this SA and as explained in the SA Scoping Report

<sup>110</sup> Please note that first symbol refers to loss of greenfield/agricultural land; second symbol refers to previously developed land

the site as mixed use employment and it is included here as a strategic employment allocation.

- 8.50 Generally, positive effects for objectives on economy/employment, sustainable transport, energy and climate change were confirmed. Neutral effects were confirmed for housing (not applicable), communities, services/facilities, highways, water, flood risk, and heritage (for three of the sites – both positive and negative effects indicated for RAF Henlow, uncertainty until further project level studies progressed).
- 8.51 Major negative effects remain for Sundon RFI as it is located in the Green Belt. The Biggleswade site is located to the south and west of the A1 at Holme Farm, essentially surrounding this small hamlet indicating potential negative effects for community identity. The proximity of Sundon RFI to deprived areas in the north of Luton can provide local employment indicating a change from the Regulation 18 to 19 in the SA from neutral to minor positive for associated objectives on health/equality.
- 8.52 All employment allocations include the loss of greenfield with permanent negative effects; small areas of the best and most versatile agricultural land may be mitigated through careful masterplanning but some uncertainty remains at this stage of assessment. The Sundon RFI site has potential to provide enhancements to local biodiversity and the wider network such that the SA was revised from neutral to minor positive with some uncertainty remaining. Some uncertainty of potential positive effects for landscape was added to the sites at Biggleswade and Ridgmont – until masterplanning is completed.
- 8.53 Each of the **broad locational** options identified as reasonable alternatives for future growth including the post Plan period after 2035 and early review of the Plan, was tested through SA, building upon the previous SA work of the potential growth locations. These areas remain broad locational areas and there was little more information available, for example, from development promoters. The site at RAF Henlow was tested through SA for either housing or employment use. An earlier potential growth location North & North East Sandy that had not been progressed at the Regulation 18 stage was resubmitted by the promoters and therefore reconsidered in plan-making and subject to SA again in the same way as the other options. Details of the SA findings are provided in Appendix VIIb and summary findings are set out in Table 8.6, as follows:

**Table 8.6: Summary SA of Broad Locational Options**

SA Objectives	Summary SA of Broad Locational Options													
	Aspley Guise Triangle		Luton West		Marston Thrift		RAF Henlow – housing		RAF Henlow – employment		North & North East Sandy		Tempsford	
1 Housing	++		++		++		++		0		++		++	
2 Communities <sup>111</sup>	0	+	--	-?	0	-	0	-?	0	-?	0	-?	0	-?
3 Accessibility - Services & Facilities	+++?		+++?		++		+++?		+?		+++?		+++?	
4 Economy & Employment <sup>112</sup>	+	+	0	+	0	+	0	+	+	+	+	+	0	+
5 Health & Equality <sup>113</sup>	0	+	+	+	0	+	0	+	0	+	+	+	+	+
6 Highways Air Quality <sup>114</sup> ; GHGs	0?		-?		-		0?		0?		0?		0?	
7 Sustainable Transport	++		+		+		+		+		++		+	
8 Energy & Climate Change	+?		+?		+?		+?		+?		+?		+?	
9 Water Resources & Quality	0?		0?		0?		0?		0?		0?		0?	
10 Reduce Flood Risk	0		0		0		0		0		0?		0?	
11 Soils <sup>115</sup>	--	0	--	0	--	0	--	+	--	+	--	0	--	+
12 Biodiversity & Geodiversity	0?		0?		+		0?		0?		0?		0?	
13 Landscape & Townscape	+?		--?		+		+?		+?		-?		-?	
14 Historic Environment	0?		0?		0		+/-?		+/-?		0?		-?	

<sup>111</sup> Please note that first symbol relates to location in/out of Green Belt designation; second symbol relates to effects on integration & identity for existing settlements

<sup>112</sup> Please note that first symbol refers to employment land; second symbol refers to vitality & viability of town centres

<sup>113</sup> Please note that first symbol refers to deprived areas; second symbol refers to Green Infrastructure

<sup>114</sup> Please note Air Quality & Green House Gas emissions are essentially associated with emissions from road vehicles for the purposes of this SA and as explained in the SA Scoping Report

<sup>115</sup> Please note that first symbol refers to loss of greenfield/agricultural land; second symbol refers to previously developed land



- 8.54 Generally, the refreshed SA confirmed previous SA findings with positive effects for SA Objectives on housing, employment (where relevant), town centres, sustainable transport, and energy & climate change. For the second element of the SA Objective No 2 relating to settlement identity, the SA changed from minor negative to minor positive for Aspley Guise Triangle as masterplanning for the site proposes separation and no coalescence. For Tempsford and a potential new settlement of up to 10,000 homes, the red line boundary indicates some separation for the new development around the small settlement of Tempsford but the new settlement will be so much larger that negative effects are indicated until further studies are progressed to show how the identity of Tempsford can be retained. For the other options, minor negative effects remain as it is uncertain at this stage of plan-making how coalescence and loss of identity will be avoided.
- 8.56 All the housing options remain with the potential for major positive effects on SA Objectives for services/facilities due to the size of development but uncertainty as they are proposed beyond the Plan period and for an early Plan review. Positive effects remain indicated for SA Objective on health/equality.
- 8.57 The broad location for Luton West remains minor negative for the SA Objective on the highway network and associated air quality due to increased traffic along the M1 and in Dunstable; the other options remain neutral with some uncertainty at this stage of plan-making and as they are proposed for beyond the Plan period after 2035. All developments of this size can have positive effects on sustainable transport; this was confirmed and the North & NE Sandy options were changed from minor to major positive to reflect the nearby railway stations. Tempsford changed from negative to minor positive as it may benefit from the East-West Rail Link.
- 8.58 Neutral effects were confirmed for SA Objectives on water resources, quality and flood risk. The SA Objective No 11 has been split in two parts – first element relates to loss of greenfield or agricultural land; second element refers to opportunity for reuse of previously developed land. All the broad location options will result in loss of greenfield and the best/most versatile agricultural land (Grade 1-3a) with major negative effects that are permanent. One option at RAF Henlow includes previously developed land (PDL) thus indicating positive effects compared to neutral effects for the other options for the second element of this SA Objective relating to PDL.
- 8.59 The size of such future major developments indicate that positive effects are possible for biodiversity through provision of green infrastructure but some uncertainty remains at this stage until further studies and masterplanning progresses. Neutral or uncertain effects confirmed for effects on the SA Objective for the historic environment – until further studies and masterplanning progressed but no major significant negative effects indicated. The Henlow Broad Location includes a small number of Archaeological Notification Areas, Listed Buildings and heritage assets associated with the RAF use. There is the potential for both positive and negative effects on the heritage assets and their settings with uncertainty at this stage of assessment.

## Small & Medium Site Allocations

- 8.60 The Council considered the responses to the Regulation 18 consultation, the call for sites, and investigated the options available for small and medium sites through the Sites Assessment process. At Regulation 18., this comprised a 3-staged process, as follows:
- Stage 1 Suitability & Availability (Exclusionary Stage): provisional capacity, flood risk, relationship to settlement, critical infrastructure, availability, and Green Belt. Options must pass this stage to be considered for further stages.
  - Stage 2 Suitability (Detailed Assessment): assessment considering factors – previously developed land, community, physical constraints, relationship to settlement, agricultural land quality, transport & access to services, school capacity, water utilities, drainage & flooding, environmental health, environmental constraints, minerals & waste, planning history.
  - Stage 3 Achievability: viability and achievability
- 8.61 This sites assessment method had been developed at the same time as the Sites SA Framework – factors and thresholds of significance correlate such that whilst the two processes are presented separately, they have been informed by each other and an integrated appraisal has been undertaken. Identification of significant effects is integral to the sites assessment process that considers opportunities for positive effects, constraints/negative effects and possibilities for mitigation. It may be noted that both sites assessment method and the SA method have been subject to public consultation. Thus, those site options that pass Stage 3 have already been tested through an assessment process that correlates with SA/SEA. It was considered that only those site options that pass Stage 3 are reasonable alternatives (realistic and deliverable) and therefore, should be tested through SA.
- 8.62 Following Regulation 18 consultation and the re-assessment of previously discounted sites and the amended timetabling for the Local Plan, a revised site assessment was developed taking account of the previous site assessment methodology. The revised methodology takes into account the suitability, availability and achievability of the site and provides a qualitative assessment of each. All sites that have been considered suitable, available and achievable have been assessed using the Sites SA Framework.
- 8.63 Each site option that was found to be suitable, available and achievable was assessed using the Sites SA Framework and as previously described in Section 2 of this report, including Table 2.3 that details the significance thresholds applied for each SA Objective. The summary SA findings for each site option are recorded by symbol & colour; any significant effects found are

described in the commentary. The site options are clustered by settlement such that the implications for synergistic, indirect and cumulative effects can be further investigated where relevant. The SA details are provided in this SA Report in Appendix VIIc, and summary findings in the Table 8.7, as follows:

**Table 8.7: Summary SA Findings of Small & Medium Site Options**

Site Option	SA Objectives														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	
	Housing	Communities	Services & Facilities	Employment	Health & Equality	Highways & Air Quality	Sustainable Transport	Energy & Climate Change	Water Resources & Quality	Flood Risk	Soil	Biodiversity & Geodiversity	Landscape	Historic Environment	
ARLESEY															
ALP279 Land at 44 London Row	+	0	0	+	0	+	-?	+	0	0?	+	-	0	-	0
ALP441 Land South East of Arlesey	++	0	-	+	0	+	-?	-	0	0?	+	--	+	-	0
NLP223 Land adjoining Lewis Lane	+	0	0	+	0	+	-?	+	0	0?	+	--?	0	0	0
NLP251 Land South East of Arlesey	++	0	-	+	0	+	-?	-	0	0?	+	--	+	-	0
NLP318 Land at 214-216 High Street	+	0	0	+	0	+	-?	+	0	0?	+	--	0	0	0
NLP403 Land adjoining Lewis Lane	+	0	0	+	0	+	-?	+	0	0?	+	--?	0	0	0
ASPLEY GUISE															
NLP168- Land off Meadow View	+	-	0	-	0	+	-?	+	0	0?	+	-	+	+	0
BARTON le CLAY															
ALP252- Land at Manor Road	+	-	0	+	0	+	-?	+	0	0?	+	--?	+	0	0
NLP123- Land at Luton Road	+	-	0	+	0	-	-?	+	0	0?	+	--?	+	-	-?
NLP158- Land East of Barton le Clay	+	-	-	+	0	+	-?	-	0	0?	+	--?	+	-	-?
NLP382/ALP418- Higham/Bedford Rd	++	-	-	+	0	+	-?	+	0	0?	+	--?	+	0	-?
BIGGLESWADE															
NLP258/ALP194-North Biggleswade	+	0	0	+	0	+	-?	-	0	0?	+	--	+	-?	0
NLP271/ALP474/ALP244- Dunton Lane	+	0	+	+	0	+	-?	+	0	0?	+	-	+	+	-
NLP407/ALP204- East of Saxon Drive	+	0	0	+	0	+	-?	+	0	0?	+	--	-?	-?	-
NLP494- Albone Way Industrial Estate	+	0	+	+	-?	+	-?	++	0	0?	+	+	+	+	0

<b>BLUNHAM</b>																
ALP216- Land north of The Barns	+	0	0	-	0	+	-?	-	0	0?	+	--	+	-?	0	
ALP376- Land West of Station Rd	+	0	0	-	0	+	-?	-	0	0?	+	--	+	-?	0	
<b>CADDINGTON</b>																
NLP439- Caddington Park	+	-	0	-	0	-	-?	+	0	0?	+	--?	+	-	0	
<b>CAMPTON &amp; CHICKSANDS</b>																
ALP287- Land north of Greenway	+	0	0	-	0	+	-?	-	0	0?	+	--	+	+	-	
NLP082- Land South East of Greenway	+	0	0	-	0	+	-?	-	0	0?	+	--	+	+	0	
<b>CHALTON</b>																
NLP435- Chapel Farm	+	--	0	-	0	-	-?	-	0	0?	+	--?	+	+	0	
<b>CLIFTON</b>																
NLP297/ALP149/ALP213	+	0	0	+	0	+	-?	+	0	0?	+	--	+	+	-	
NLP361- Land North of Shefford Rd	+	0	0	-	0	+	-?	+	0	0?	+	--?	+	-?	0	
<b>CLOPHILL</b>																
ALP405- Land west of Jacques Lane	+	0	0	-	0	+	-?	-	0	0?	0	--	+	+	0?	
NLP149- 66a High Street Clophill	+	0	0	+	0	+	-?	-	0	0?	0	--	+	+	-?	
<b>CRANFIELD</b>																
NLP139- Land West of Lodge Road	+	0	0	-?	0	+	-?	-	0	0?	+	--?	0	0	0	
NLP315/ALP109- East End Farm	+	0	0	+	0	+	-?	-	0	0?	+	--?	+	-	0	
<b>DUNSTABLE</b>																
NLP192- Pedrables Land	+	+	+	++	0	+	-?	+	0	0?	+	++	+	+	0	
NLP193- Land at West Street	+	+	+	++	0	-	-?	+	0	0?	+	-	+	+	0	
<b>DUNTON</b>																
ALP323- Land south of Biggleswade Rd	+	0	0	-	0	+	-?	-	0	0?	+	--	+	0	0	
NLP324- Land south of Biggleswade Rd	+	0	0	-	0	+	-?	-	0	0?	+	-	+	0	0	
<b>EATON BRAY</b>																
ALP192- Adjacent to 25-57 Bower Lane	+	-	0	-	0	+	-?	+	0	0?	+	--?	+	+	0	
NLP483- Land off Eaton Park	+	-	0	-	0	+	-?	+	0	0?	+	--?	+	+	0	
<b>EVERTON</b>																
ALP094- Green Lane	+	0	0	-	0	+	-?	-	0	0?	+	--?	+	+	0	
NLP165- Land at Manor Farm	+	0	0	-	0	+	-?	-	0	0?	+	--?	+	+	0?	

<b>FLITTON &amp; GREENFIELD</b>															
NLP127- Land rear of High Street, Flitton	+	0	0	-	0	+	-?	-	0	0?	+	--	+	-?	-
NLP172- Land off Sand Road	+	0	0	-	0	+	-?	-	0	0?	+	--	+	-?	-
NLP203/ ALP240- Land at Flitton Hill	+	0	0	-	0	+	-?	-	0	0?	+	--	+	-?	-
NLP272- Land rear of Moat Farm Close	+	0	0	-	0	+	-?	-	0	0?	+	--	+	+	0
NLP449- 96 Greenfield Road	+	0	0	-	0	+	-?	-	0	0?	+	--	+	-?	0
<b>FLITWICK</b>															
NLP039- Steppingley Road	+	--	0	+	0	+	-?	+	0	0?	+	--	+	+	-?
NLP492- Site next to Flitwick Allotments	+	0	0	+	0	-?	-?	+	0	0?	+	--	+	+	+
<b>GRAVENHURST</b>															
ALP243- Land at Barton Road	+	0	0	-	0	+	-?	-	0	0?	+	--	+	+	0
NLP101/ALP467- The Pyghtle	+	0	0	-	0	+	-?	-	0	0?	+	--	+	+	0
<b>HARLINGTON</b>															
ALP117- Midland Mainline Railway	+	--	0	+	0	+	-?	+	0	0?	+	--	+	0	0
ALP123/NLP303- Goswell End Rd	+	--	+	+	0	+	-?	-?	0	0?	+	--	+	0	0
NLP107/ALP181- West of Sundon Rd	+	-	+	+	+	+	-?	+	0	0?	+	--	+	-	0
NLP381- Land West of Harington	++	--	+	+	0	+	-?	-?	0	0?	+	--	+	-	-?
ALP355/NLP379 – North Goswell End Rd	+	--	+	+	0	+	-?	-?	0	0?	+	--	+	-?	0
NLP470 –Goswell End Road (Parcel 1)	+	--	+	+	0	+	-?	-?	0	0?	+	--	+	0	0
NLP471 –Goswell End Road (parcel 2)	+	--	+	+	0	+	-?	-?	0	0?	+	--	+	0	0
<b>HAYNES</b>															
NLP299- Hill Farm	+	0	0	-	0	+	-?	+	0	0?	+	--?	+	+	0
NLP502- South of Northwood End Road	+	0	0	-	0	+	-?	+	0	0?	+	--?	+	+	0
<b>HENLOW</b>															
ALP001- Adjacent to 1 Clifton Road	+	0	0	+	0	+	-?	+	0	0?	+	--	+	0	0
NLP126- Land at Oldfield Farm	+	0	0	+	0	+	-?	+	0	0?	+	-	+	-	0
NLP220/ALP178/NLP183- Arlesey Road	+	0	0	+	0	+	-?	+	0	0?	0	--	+	0	0
NLP234- Land South of Clifton Road	+	0	0	+	0	+	-?	+	0	0?	+	--	+	0	0
NLP268- Adjacent to Derwent School	+	0	0	+	0	+	-?	+	0	0?	+	--	+	0	0
<b>HOCKCLIFFE</b>															

<b>NLP327-</b> Land South West of A5	+	--	-?	-	0	+	-?	-	0	0?	+	--	+	-?	-
<b>ALP125/NLP413</b> – Land off Leighton Rd	+	--	0	-	0	+	-?	-	0	0?	+	--	+	0	0
<b>ALP184/NLP259</b> – R/O Manor Avenue	+	--	0	-	0	+	-?	-	0	0?	+	--	+	0	0
<b>NLP298</b> – Land South of Leighton Road	+	--	-?	-	0	+	-?	-	0	0?	+	--	+	-?	0
<b>HOUGHTON CONQUEST</b>															
<b>ALP313-</b> South of Houghton Conquest	+	0	0	+	0	+	-?	+	0	0?	+	--?	+	0	0
<b>ALP314-</b> North and south of The Grove	+	0	0	+	0	+	-?	+	0	0?	+	--?	+	0	0
<b>ALP197-</b> Chapel End Rd & London Lane	+	0	0	+	0	+	-?	+	0	0?	+	--?	+	-	0
<b>HOUGHTON REGIS</b>															
<b>ALP260-</b> Parcels Covering Bidwell Vision	+	0	0	+	0	+	-?	+	0	0?	0	--?	+	+	0
<b>ALP307-</b> Bidwell Gospel Hall	+	0	0	+	0	+	-?	+	0	0?	+	-?	+	+	0
<b>NLP546-</b> Land East of Houghton Regis	+	0	0	+	0	+	-?	+	0	0?	+	--?	+	+	0
<b>LANGFORD</b>															
<b>ALP003-</b> Site adjoining Langford School	+	0	0	-	0	+	-?	+	0	0?	+	--	+	0	0
<b>ALP451-</b> Loft Farm, Church Street	+	0	0	-	0	+	-?	+	0	0?	+	--	+	0	0
<b>NLP066/ALP071/ALP132-</b> Thistle Hill Farm	+	0	0	-	0	+	-?	+	0	0?	+	--	+	0	0
<b>NLP111-</b> Land off Jubilee Lane	+	0	0	-	0	-	-?	+	0	0?	+	--	+	0	0
<b>NLP143-</b> Land off Church Street	+	0	0	-	0	+	-?	+	0	0?	+	--	+	-?	0
<b>NLP144-</b> Land off St Andrews Way	+	0	0	-	0	+	-?	+	0	0?	+	--	+	0	0
<b>NLP230-</b> Land Bridge Field	+	0	0	-	0	+	-?	+	0	0?	+	--	+	-?	0
<b>NLP302-</b> Prospect Rd and Curneys Lane	+	0	0	-	0	+	-?	+	0	0?	+	--	+	0	0
<b>NLP309-</b> Land at Church Street	+	0	0	-	0	+	-?	+	0	0?	+	--	+	0	0
<b>LEIGHTON LINSLADE</b>															
<b>NLP124-</b> Spinny Park	+	0	+	+	-?	+	-?	-	0	0?	+	+	+	0	0
<b>NLP310-</b> Pledge Office Chairs	+	0	+	+	-?	+	-?	-	0	0?	+	+	+	0	0
<b>NLP456-</b> Spinny Park	+	0	+	+	-?	+	-?	-	0	0?	+	+	+	0	0
<b>NLP464-</b> Chiltern-Hunt Land	+	0	0	+	-?	+	-?	-	0	0?	+	-	+	0	0
<b>NLP495-</b> Chiltern Industrial Estate	+	0	+	+	-?	+	-?	+	0	0?	+	+	+	0	0
<b>ALP064</b> – North Chamberlains Farm	+	0	0	+	0	+	-?	-?	0	0?	+	-	+	0	0
<b>NLP049</b> – Land North of Soulbury Road	+	--	0	-?	0	+	-?	-?	0	0?	+	-	+	0	0

<b>LIDLINGTON</b>															
NLP103/NLP482- Land at Lidlington	+	0	0	-	0	+	-?	+	0	0?	+	--?	+	-?	0
<b>MARSTON MORETAINE</b>															
ALP011- Land at Lower Shelton Road	+	0	0	+	0	+	-?	+	0	0?	+	--	+	0	-?
ALP315- Land off Lower Shelton Road	+	0	0	+	0	+	-?	+	0	0?	+	--	+	0	0
NLP026- Land at Upper Shelton Road 2	+	0	0	+	0	+	-?	+	0	0?	+	--	+	-	0
NLP029- Land at Upper Shelton Road	+	0	0	+	0	+	-?	+	0	0?	+	--	+	-	0
NLP031- Land at Upper Shelton Road North	+	0	0	+	0	+	-?	+	0	0?	+	--	+	-	0
NLP199- Wood End Land	+	0	0	+	0	+	-?	-	0	0?	+	--	+	+	0
NLP312/ALP114- Upper Shelton Road	+	0	0	+	0	+	-?	-	0	0?	+	--	+	0	0
<b>MAULDEN</b>															
ALP051- Between 129 & 131 Clophill Rd	+	0	0	-	0	+	-?	+	0	0?	+	-	-?	+	0
ALP116- Between 129 & 131 Clophill Rd	+	0	0	-	0	+	-?	+	0	0?	+	-	-?	+	0
NLP053 /NLP233- Cobbitts Road	+	0	0	-	0	+	-?	+	0	0?	+	--?	+	+	0
NLP129/ALP409- Gardeners Close	+	0	0	-	0	+	-?	+	0	0?	+	--?	+	-	-?
NLP131- Land off Moor Lane	+	0	0	-	0	+	-?	+	0	0?	+	--?	+	-	0
NLP253- Land fronting Silsoe Road	+	0	0	-	0	+	-?	+	0	0?	+	--	+	+	0
NLP416- Land at Duck End Farm	+	0	0	-	0	+	-?	+	0	0?	+	--?	+	-	0
<b>MEPPERSHALL</b>															
ALP210/ALP211/NLP095- Stocken House	+	0	0	-	0	+	-?	-	0	0?	+	--	+	+	0
NLP096- Wren Park	+	0	0	-	0	+	-?	-	0	0?	+	+	+	+	0
NLP237- Part of Bandland Nursery	+	0	0	-	0	+	-?	-	0	0?	+	--	+	+	0
NLP282- Land off Stondon Road	+	0	0	-	0	+	-?	-	0	0?	+	--	+	+	0
NLP283- Shefford Road Meppershall	+	0	0	-	0	+	-?	-	0	0?	+	--	+	+	0
NLP313- Land at Bury Farm	+	0	0	-	0	+	-?	-	0	0?	+	--	+	+	0
<b>MOGGERHANGER</b>															
NLP286/ALP180- Park Rd/Bedford Rd	+	0	0	-	0	+	-?	+	0	0?	+	--	+	+	0?
NLP305 / NLP159- North of Park Road	+	0	0	-	0	+	-?	+	0	0?	+	--	+	+	0?
<b>NORTHILL</b>															



<b>ALP396-</b> Land at Water Lane	+	0	0	-	0	+	-?	+	0	0?	+	--	+	+	0
<b>NLP065-</b> Biggleswade Rd & Pound Close	+	0	0	-	0	+	-?	+	0	0?	+	--	+	-?	0
<b>NLP207-</b> Land at Thorncote Road	+	0	0	-	0	+	-?	+	0	0?	+	--?	+	+	-
<b>NLP263-</b> Land south of Biggleswade Rd	+	0	0	-	0	+	-?	+	0	0?	+	--	+	+	0
<b>NLP478/ALP398-</b> Land at The Pound	+	0	0	-	0	+	-?	+	0	0?	+	--	+	-?	0
<b>POTTON</b>															
<b>ALP217-</b> Land to North of Sandy Road	+	0	0	+	0	+	-?	+	0	0?	+	--	+	0	0
<b>ALP465-</b> 6b Sutton Roads	+	0	+	+	0	+	-?	+	0	0?	+	+	+	0	0
<b>NLP170-</b> Land off Everton Road	+	0	0	+	0	+	-?	+	0	0?	+	--	+	0	0
<b>NLP347-</b> Land at rear of Everton Road	+	0	0	+	0	+	-?	+	0	0?	+	--	+	0	0
<b>NLP542-</b> One Acre Field	+	0	0	+	0	+	-?	+	0	0?	+	--?	+	0	0
<b>PULLOXHILL</b>															
<b>ALP060-</b> Land west of Tyburn Lane	+	0	0	-	0	+	-?	-	0	0?	+	--?	+	-	0
<b>ALP061-</b> Land at Blackhill Lane	+	0	-	-	0	+	-?	-	0	0?	+	--	+	-	0
<b>ALP292-</b> Land West of Tyburn Lane	+	0	0	-	0	+	-?	-	0	0?	+	--	+	-	0
<b>NLP335-</b> Land off Greenfield Road	+	0	0	-	0	+	-?	-	0	0?	+	--	+	-	0
<b>NLP353-</b> Hand Post Field	+	0	-	-	0	+	-?	-	0	0?	+	--	+	-	0
<b>SANDY</b>															
<b>ALP320/ALP319/NLP084/NLP414-</b> Sandy	+	0	-?	-	0	+	-?	-	0	0?	+	--	+	0	0
<b>NLP249/NLP461-</b> North of Beamish Close	+	0	-?	-	+	+	-?	-	0	0?	+	--	+	0	0
<b>SHEFFORD</b>															
<b>ALP407-</b> Old Laundry Site	+	0	+	+	-	+	-?	+	0	0?	+	++	+	+	+
<b>NLP355-</b> Land at Bedford Road	+	0	0	+	0	+	-?	+	0	0?	+	--	+	-?	0
<b>NLP373-</b> Line Field	+	0	0	+	0	+	-?	-	0	0?	+	--	+	+	0
<b>SHILLINGTON</b>															
<b>ALP062-</b> Land at Apsley End Road	+	0	0	--	0	-	-?	-	0	0?	+	--?	+	-	-
<b>ALP167/NLP188-</b> South & east of High Rd	+	0	0	-	0	+	-?	-	0	0?	+	--?	+	-	0
<b>ALP402/ALP166/ALP275/NLP243-</b> Gables	+	0	0	-	0	+	-?	-	0	0?	+	--?	+	-	0
<b>SLIP END</b>															
<b>NLP167-</b> Land South of Markyate Road	+	-	0	-	0	+	-?	+	0	0?	+	--?	+	+	0

NLP239- Land at Church Road	+	-	0	-	0	+	-?	+	0	0?	+	--?	+	+	0
<b>SOUTHILL</b>															
NLP359- Land at Broom Farm	+	0	0	-	0	-	-?	-	0	0?	+	--	+	+	0
NLP516/ALP422-North of Bancroft	+	0	0	-	0	-	-?	-	0	0?	+	--	+	+	-?
NLP521- Land rear of 17-33 Southill Rd	+	0	0	-	0	-	-?	-	0	0?	+	--	+	+	0
<b>STEPPINGLEY</b>															
NLP085- Land south of Rectory Road	+	-	0	-	0	+	-?	-	0	0?	+	--?	+	+	0
<b>STONDON</b>															
ALP271- Rear of Doctor's Surgery	+	0	0	+	0	-	-?	+	0	0?	+	--	+	+	0
ALP304- Land West of Bedford Road	+	0	0	+	0	-	-?	-	0	0?	+	--?	+	-?	0
NLP162/ALP378- Trinity College Farm	+	0	0	-	0	+	-?	-	0	0?	+	--	+	-?	0
NLP281/ALP298-Land off Pastures	+	0	0	-	0	+	-?	-	0	0?	+	--?	+	+	0
NLP428/ALP272- South of Greyhound Trk	+	0	0	+	0	-	-?	+	0	0?	+	--	+	+	0
NLP429/ALP268/ALP469-Greyhound	+	0	+	+	-	-	-?	+	0	0?	+	++	+	+	0
NLP448- Land adj to 85 Station Rd	+	0	0	+	0	+	-?	-	0	0?	+	--	+	+	0
<b>STOTFOLD</b>															
NLP115- Land off Taylors Road	+	0	+	-	-	+	-?	-	0	0?	+	+	+	+	0
NLP160- Land at Arlesey Road	+	0	0	+	0	+	-?	+	0	0?	+	--	+	-	0
NLP391- Land off Aspen Gardens	+	0	0	-	0	+	-?	+	0	0?	-?	--	+	-	0
<b>SUTTON</b>															
NLP325- Land South of High Street	+	0	0	-	0	+	-?	-	0	0?	+	--	0	0	0
<b>TODDINGTON</b>															
NLP152- Land SE of Leighton Rd	+	-	0	+	0	+	-?	-?	0	0?	+	--?	-?	0	0
NLP153- Land SE of Leighton Rd	+	-	0	+	0	+	-?	-?	0	0?	+	--?	-?	0	0
NLP184/ALP086- Middle Lakes	+	-	0	+	0	+	-?	-	0	0?	+	--?	-?	0	0
NLP405/NLP378- East of Leighton Rd	+	-	0	+	0	+	-?	-	0	0?	+	--?	-?	0	-?
NLP411- Alma Farm	+	-	0	+	0	+	-?	-	0	0?	+	--?	+	-?	0
NLP138 – Land off Luton Road	+	--	0	+	0	+	-?	-	0	0?	+	--?	+	0	0
NLP528-Land at Dropshot Farm	+	--	0	+	0	+	-?	-	0	0?	+	--?	+	-	0
<b>WESTONING</b>															

<b>NLP136-</b> Land off Flitwick Road	+	--	0	+	0	+	-?	-	0	0?	+	--	+	+	0
<b>NLP317-</b> West View Farm	+	-	0	+	0	+	-?	-	0	0?	+	-	+	+	0

- 8.64 Significant negative effects have been avoided by integrating the SA with the sites assessment method that investigated options for opportunities and constraints (potential negative effects) with any possibilities for mitigation through Stage 2 of the process. Each site option that was found to be suitable, available and achievable was subject to SA, including by settlement.
- 8.65 In the Regulation 18 consultation, the Council explained the proposals to include small growth in and around villages across Central Bedfordshire, but only where services can support growth and there is good accessibility<sup>116</sup>. The Regulation 18 Draft Plan included a policy on the proposed Settlement Hierarchy that categorises the settlements in Central Bedfordshire into four, recognising the relative level of services and community functions, as follows:
- Major Service Centres
  - Minor Service Centres
  - Large Villages
  - Small Villages
- 8.66 The refinement to the Settlement Hierarchy provides additional information for clarification and further guidance, two settlements were recategorised from Minor Service Centres to Large Villages.
- 8.67 The Council selected those non-strategic site options that best promoted sustainable development, progressed the Vision & Objectives of the Plan, and aligned with the Plan Policy Growth Strategy SP1 and Plan Policy SP5 Preventing Coalescence & Important Countryside Gaps, the Settlement Hierarchy, and Policy SP7 Development in Settlement Envelopes. Selection of small and medium site allocations took into account the findings of the sites assessment process, the SA findings, consideration of cumulative effects for each settlement, proximity of the major development allocations and other developments that have planning applications/permissions, and the outcome from discussions with the Parishes and comments received during the Regulation 18 consultation. The site options considered with outline reasons for selection or non-progression into the Regulation 19 Draft Plan are set out in this SA Report in Appendix VIId.

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<sup>116</sup> <http://www.centralbedfordshire.gov.uk/planning/policy/local-plan/village-expansions.aspx>

- 8.68 Many of the site options will result in the loss of the best and most versatile agricultural land (Grades 1-3a) with major negative effects that are permanent and cumulative. However, other options are able to progress previously developed land with major positive effects for the SA Objective No 11 on soils and land. Those site options located in the Green Belt (GB) recorded major negative effects if they were in areas that contribute strongly to GB objectives and minor negative if they are in areas that only contribute weakly. The Council has carefully selected those options in the GB for those settlements that have not been able to benefit from development previously and to ensure that cumulative effects are not significant.<sup>117</sup>
- 8.69 Some of the site options were found to have minor negative effects with regard to access to services and facilities; accordingly, limited development was proposed for these settlements to mitigate for cumulative effects. Minor negative effects were indicated for all the site options with regard to objectives for transport and air quality – but with uncertainty as the likely effects depend upon the options selected for each settlement.
- 8.70 Some options were found to have likely minor negative effects for landscape and visual amenity; mitigation measures will be required through screening/design for those sites allocated. Similarly, some options are in Conservation Areas with the potential for negative effects on historic assets and their settings. Most options were minor positive with regard to biodiversity objectives; further studies and mitigation measures may be needed for those options with uncertain negative effects that are progressed as allocations. However, the strong Development Management Policies will ensure that these potential negative effects will be mitigated.
- 8.71 Generally, the options indicated positive effects for housing and communities, flood risk management, and biodiversity. Neutral effects were indicated for energy, climate change, water - and usually for the historic environment since important assets were avoided through the Sites Assessment Method.

### **Strategic & Core/Development Management (DM) Policies**

- 8.72 The changes made to the Strategic and the Core/DM Policies, as a result of further technical studies and comments made at the Regulation 18 consultation, were screened for their significance with regard to the SA process. Appendix X to this SA Report provides a summary of the changes, deletions and additions to each Plan Policy. The screening considers whether these changes significantly affect the findings of the Initial SA Report (June 2017) and/or give rise to significant environmental/sustainability effects – in line with the requirements of the SEA Regulations.
- 8.73 Many changes are minor to provide clarification and correction of any errors; others provide updating as technical studies progress and provide further

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<sup>117</sup> Although Green Belt performance has been considered as part of the sustainability appraisal of small & medium site options, it has had limited weight in the Council's assessment of overall suitability of sites. Rather, sites have been shortlisted based on their overall suitability, and then performance against Green Belt purposes, and harm that may result, was considered separately alongside other technical evidence, as part of the allocation of sites by the Council.

information and guidance for new development. **The Spatial Strategy 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 Strategic Policies SP1-SP8, including the site allocation Policies SA1-5, SE1-4, and HA1.

- 8.74 **SP1 Growth Strategy:** New text in the Policy confirms that the Plan will deliver 39,350 homes (around 24,000 already planned/built) with 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. The Plan target is 39,350 new homes – objectively assessed need for CBC of 32,000 and unmet needs from Luton of 7,350, resulting in approximately 40,000 new homes. This is significant with regard to the SA. The refined options for strategic site allocations were subject to further SA and reported here in Appendix VIIa & b. The options for small and medium site allocations were subject to SA and reported here in Appendix VIIc.
- 8.75 For each Strategic Allocation Policy, it is asserted that planning permission will only be granted for each of the strategic allocations following the Council's adoption of a Development Brief (prepared through consultation with key stakeholders and communities) and Phasing Strategy as Supplementary Planning Documents (SPDs) for the area. Design Codes will be required for each phase, prepared by the developer and approved by the Council. These policy requirements will ensure that positive effects and mitigation for negative effects will be implemented. Each Strategic Site Allocation was considered through the SA framework of SA Objectives & Themes and the findings are as follows:
- 8.76 **Policy SA1 North of Luton (Town Extension 4000 homes & up to 20ha employment land:** The SA of the strategic option identified key positive effects for objectives on housing, services/facilities, employment, health, sustainable transport, energy/climate change, and biodiversity. Neutral effects were possible for objectives on highways, water, and the historic environment. Key negative effects were indicated for coalescence & loss of settlement identity for Lower Sundon and in the Green Belt, loss of BVL, and for landscape as the site is adjacent to the Chilterns AONB. There was uncertainty recorded and the SA made recommendations for ensuring that positive effects were implemented and negative effects mitigated through suggestions for the Site Specific Policy.
- 8.77 The Allocation Policy sets out the principles for development with six aspects required to achieve a sustainable and vibrant community – housing, employment land, health/social care hub, new facilities for community, education and leisure. The Policy then sets out comprehensive specific development requirements and these remove uncertainty from the SA of the option by confirming implementation and ensuring that mitigation measures for negative effects are progressed.

- 8.78 The requirement for dedicated and safe pedestrian and cycle links both within and the wider Luton conurbation confirms the positive effects for sustainable transport; further strengthened by the requirement for integration with existing public rights of way and provision of new crossings over the A6 and the Link Road. The requirement for the Link Road is clear and the guidance/direction for phasing and other supporting transport infrastructure, supported by Policies T1-6, should ensure that the capacity of the transport network is sufficient for existing and new communities, removing uncertainty and confirming neutral effects for SA objectives in both the short and longer-term.
- 8.79 The requirement to maximise creation and linkages for GI confirms the major positive effects, including for human health and wildlife; the opportunity for the GI to help mitigate visual impacts on the setting of the AONB and heritage assets is included providing some mitigation for the major negative effects that had been found for landscape, and helping to remove the uncertainty for the historic environment. The requirement for mitigation and enhancement of key biodiversity, together with the requirement for net gain provided through Policy EE2, removes uncertainty and confirms positive effects for SA objectives on biodiversity.
- 8.80 The requirement that the whole development including the A6 to M1J11a Link Road, should have no undue impacts on the AONB, heritage and biodiversity provides mitigation but is qualified by "where feasible". However, other Policies such as EE2 Enhancing Biodiversity should ensure that overall there is net gain in biodiversity from the major development. The requirement to preserve designated heritage assets and their settings confirms the implementation of mitigation, supported by DM Policies HE1-3, and this removes uncertainty from the SA findings to confirm neutral effects.
- 8.81 The requirement for flood risk assessment and management will confirm the neutral effects previously found by the SA. The requirement includes consideration of offsite solutions and draws attention to the inter-relationships between flood risk management/SUDs, maintenance/safety, and biodiversity enhancement, mitigation of visual impacts – all with potential for strong mitigation and some possible positive effects.
- 8.82 The requirement for any mains sewerage infrastructure, including any necessary phasing, supported by the new Policy CC6 Water Supply & Sewerage Infrastructure, 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. The requirement to incorporate measures to adapt to climate change, minimise energy use, and include renewable energy will progress SA objectives for energy and climate change, supported by Policies CC1-7, removing uncertainty and confirming minor positive effects that will be cumulative in the longer-term with other major developments in the area.
- 8.83 The requirement to provide appropriate landscaping measures, including to mitigate the impact on the wider landscape including the AONB, indicates some mitigation for the major negative effects that had been indicated by

the SA of the strategic option. It has been recognised that there will be impacts on the AONB and its setting adjacent to the north of the site, such that the policy requires significant landscape enhancements on and beyond the northern allocation boundary and to create a long term defensible Green Belt boundary as informed by detailed assessments. This suggests that the major negative effects will be mitigated to at least minor negative with the potential for neutral effects in the longer-term as enhancements become established.

- 8.84 **Policy SA3 East of Arlesey (Town Extension 2000 homes):** The SA of the strategic option identified key positive effects for objectives on housing, services/facilities, health, sustainable transport, energy/climate change, biodiversity and landscape. Neutral effects were possible for objectives on Green Belt, highways, water, and the historic environment. Key negative effects were indicated for coalescence, loss of settlements' identity, and loss of BVL. There was uncertainty recorded and the SA made recommendations for ensuring that positive effects were implemented and negative effects mitigated through suggestions for the Site Specific Policy.
- 8.85 The Allocation Policy sets out the principles for development with six aspects required to achieve a sustainable and vibrant community – housing, a country park on the eastern edge to provide separation between Arlesey and Fairfield Park, health/social care hub, new facilities for community, education and leisure. The Policy then sets out comprehensive specific development requirements and these remove uncertainty from the SA of the option by confirming implementation and ensuring that mitigation measures for negative effects are progressed.
- 8.86 The requirement for dedicated and safe pedestrian and cycle links both within and the wider areas confirms the positive effects for sustainable transport; further strengthened by the requirement for integration with existing public rights of way and provision of new routes, including connections to the railway station at Arlesey, confirming major positive effects for sustainable transport. The requirement for the Relief Road to connect the area from the south of Hitchin Road to the A507/High Street Link Road (being proposed as part of the emerging Arlesey Cross development) is clear. The guidance/direction for integration, phasing and other supporting transport infrastructure, supported by Policies T1-8, should ensure that the capacity of the transport network is sufficient for existing and new communities, removing uncertainty and confirming at least neutral effects for SA objectives in both the short and longer-term. Some minor positive effects are indicated as the Relief & Link Roads will allow direct access onto the A507 relieving congestion along the High Street in Arlesey, thus helping to resolve an existing sustainability problem.
- 8.87 The requirement to maximise creation and linkages for GI confirms the major positive effects, including for human health and wildlife, with specified links between the proposed country park with existing GI assets in Arlesey and Fairfield Park. The country park will provide separation between the two settlements, helping to mitigate against coalescence and loss of identity thus reducing the minor negative effects identified in the SA of the strategic



option. The requirement for mitigation and enhancement of key biodiversity, together with the requirement for net gain provided through Policy EE2, removes uncertainty and confirms positive effects for SA objectives on biodiversity.

- 8.88 The requirement to preserve designated heritage assets and their settings confirms the implementation of mitigation, supported by DM Policies HE1-3, and this removes uncertainty from the SA findings to confirm neutral effects.
- 8.89 The requirement for flood risk assessment and management will confirm the neutral effects previously found by the SA. The requirement includes consideration of offsite solutions and draws attention to the inter-relationships between flood risk management/SUDs, maintenance/safety, and biodiversity enhancement, mitigation of visual impacts – all with potential for strong mitigation and some possible positive effects.
- 8.90 The requirement for any mains sewerage infrastructure, including any necessary phasing, supported by the new Policy CC6 Water Supply & Sewerage Infrastructure, 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. The requirement to incorporate measures to adapt to climate change, minimise energy use, and include renewable energy will progress SA objectives for energy and climate change, supported by Policies CC1-7, removing uncertainty and confirming minor positive effects that will be cumulative in the longer-term with other major developments in the area.
- 8.91 The requirement to provide appropriate landscaping measures for a predominately agricultural landscape, with a net gain for biodiversity, provides mitigation and, supported by Policies EE1-5, confirms the minor positive effects indicated by the SA of the strategic option.
- 8.92 **Policy SA2 Marston Vale New Villages (5000 homes):** The SA of the strategic option identified key positive effects for objectives on housing, services/facilities, employment, health, sustainable transport, energy/climate change, biodiversity and landscape. Neutral effects were possible for objectives on Green Belt, water, and the historic environment. Key negative effects were indicated for coalescence, loss of settlements' identity, highways & air quality, and loss of BVL. There was uncertainty recorded and the SA made recommendations for ensuring that positive effects were implemented and negative effects mitigated through suggestions for the Site Specific Policy.
- 8.93 The Allocation Policy sets out the principles for development with two distinct villages separated from existing settlements of Marston Moretaine & Lidlington by green/blue infrastructure, and six aspects required to achieve sustainable and vibrant communities – housing, employment, health/social care facility, new facilities for community, education and leisure. The Policy then sets out comprehensive specific development requirements and these remove uncertainty from the SA of the option by confirming implementation and ensuring that mitigation measures for negative effects are progressed.

- 8.94 The requirement for dedicated and safe pedestrian and cycle links both within and the wider areas confirms the positive effects for sustainable transport. This is further strengthened by the requirement for integration with existing public rights of way and provision of new routes, including connections to the railway station at Ridgmont for East West Rail and a multi-functional Green Corridor providing the future setting for the navigable Bedford & Milton Keynes Waterway (and Policies EE10-11 River & Waterway Network), confirming strong major positive effects for sustainable transport in the longer-term. The requirement for supporting transport infrastructure with contributions to improvements at M1 J13 and the Marsh Leys roundabout, supported by Policies T1-6, should ensure that the capacity of the transport network is sufficient for existing and new communities, removing uncertainty and indicating neutral effects for SA objectives from the minor negative indicated through the SA of the strategic option.
- 8.95 The requirement to maximise creation and linkages for both green and blue infrastructure confirms the major positive effects, including for human health and wildlife, that will be synergistic and cumulative in the wider area in the longer-term; links between Brogborough and Stewartby Lakes are specified - and onto the railway station for sustainable transport. The Green Corridor will provide separation between the two new villages and the existing settlements, helping to mitigate against coalescence and loss of identity thus reducing the minor negative effects identified in the SA of the strategic option. The requirement for mitigation and enhancement of key biodiversity, together with the requirement for net gain provided through Policy EE2, confirms positive effects for SA objectives on biodiversity. The requirement includes additional habitat creation and linkages, together with the need to avoid detrimental impacts on wet habitats (derelict brick pits with potential for protected species) and careful zoning of uses – confirming specific strong mitigation for potential negative effects.
- 8.96 The requirement to preserve designated heritage assets and their settings confirms the implementation of mitigation, supported by DM Policies HE1-3, and this removes uncertainty from the SA findings to confirm neutral effects.
- 8.97 The requirement for flood risk assessment and management will confirm the neutral effects previously found by the SA. The requirement includes consideration of offsite solutions and draws attention to the inter-relationships between flood risk management/SUDs, maintenance/safety, and biodiversity enhancement, mitigation of visual impacts – all with potential for strong mitigation and some possible positive effects.
- 8.98 The requirement for any mains sewerage infrastructure, including any necessary phasing, supported by the new Policy CC6 Water Supply & Sewerage Infrastructure, 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. The requirement to incorporate measures to adapt to climate change, minimise energy use, and include renewable energy will progress SA objectives for energy and climate change, supported by Policies

CC1-7, removing uncertainty and confirming minor positive effects that will be cumulative in the longer-term with other major developments in the area.

- 8.99 The requirement to provide appropriate landscaping, with a net gain for biodiversity, provides mitigation and, supported by Policies EE1-5, confirms the minor positive effects indicated by the SA of the strategic option. The sites are within the Forest of Marston Vale and therefore, the policy requirement includes that any development must provide a total of 30% tree cover – and in line with Policy EE9.
- 8.100 **Policy SA4 East of Biggleswade (New Village 1500 homes):** The SA of the strategic option identified key positive effects for objectives on housing, services/facilities, health, sustainable transport, energy/climate change, biodiversity and landscape. Neutral effects were possible for objectives on Green Belt, employment, highways & air quality, and water. Key negative effects were indicated for integration/identity of settlements, loss of BVL, and the historic environment. There was uncertainty recorded and the SA made recommendations for ensuring that positive effects were implemented and negative effects mitigated through suggestions for the Site Specific Policy.
- 8.101 The Allocation Policy sets out the principles for development for a distinct village that will be visibly and physically separate from Biggleswade, and with six aspects required to achieve sustainable and vibrant communities – housing, health/social care facilities, new facilities for community, education and leisure. The Policy then sets out comprehensive specific development requirements and these remove uncertainty from the SA of the option by confirming implementation and ensuring that mitigation measures for negative effects are progressed.
- 8.102 The requirement for dedicated and safe pedestrian and cycle links both within and the wider areas confirms the positive effects for sustainable transport. This is further strengthened by the requirement for integration with existing public rights of way and provision of new routes, including connections to Biggleswade Town Centre, confirming positive effects for sustainable transport in the longer-term. The requirement for improving the transport highway, supported by Policies T1-6, should ensure that the capacity of the transport network is sufficient for existing and new communities, removing uncertainty and indicating neutral effects for SA objectives from the minor negative indicated through the SA of the strategic option.
- 8.103 The requirement to maximise creation and linkages with multi-functional GI, including a Green Corridor that will provide visible separation between the new village and Biggleswade, mitigating against coalescence and potential loss of identity thus reducing the negative effects identified in the SA of the strategic option. The requirement for mitigation and enhancement of key biodiversity, together with the requirement for net gain provided through Policy EE2, confirms positive effects for SA objectives on biodiversity. The requirement includes additional habitat creation and linkages, and specifies improvement for Biggleswade Common and Green Wheel.

- 8.104 The requirement to preserve designated heritage assets and their settings confirms the implementation of mitigation, supported by DM Policies HE1-3, and this removes uncertainty from the SA findings to confirm neutral effects.
- 8.105 The SA of the strategic option had found potential minor negative effects as parts of the site are in Flood Risk Zones 2 & 3 -with some uncertainty for the effectiveness of mitigation measures. The Policy requires that the development should be designed to ensure that uses and developments within the site that are vulnerable to flood risk are located beyond areas of Flood Zone 2&3 – thus providing mitigation and reducing the previous negative effects to neutral. The requirement includes consideration of offsite solutions and draws attention to the inter-relationships between flood risk management/SUDs, maintenance/safety, and biodiversity enhancement, mitigation of visual impacts – all with potential for strong mitigation and some possible positive effects.
- 8.106 The requirement for any mains sewerage infrastructure, including any necessary phasing, supported by the new Policy CC6 Water Supply & Sewerage Infrastructure, 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. The requirement to incorporate measures to adapt to climate change, minimise energy use, and include renewable energy will progress SA objectives for energy and climate change, supported by Policies CC1-7, removing uncertainty and confirming minor positive effects that will be cumulative in the longer-term with other major developments in the area.
- 8.107 The requirement to provide appropriate landscaping, with a net gain for biodiversity, provides mitigation and, supported by Policies EE1-5, confirms the minor positive effects indicated by the SA of the strategic option.
- 8.108 **Policy SA5 Houghton Regis North Strategic Allocation:** This area is a major urban extension on the northern side of Houghton Regis between the A5 and the M1 Junction 11a. The adopted Framework Plan<sup>118</sup> (October 2012) sets out a Vision, Aims, Proposals, Design Principles, and Infrastructure and Development Mitigation that were prepared during initial preparation of a new Development Strategy at that time. The Luton and Southern Central Bedfordshire Joint Core Strategy was drafted in July 2011 and considered to be an important material consideration. This was subsequently withdrawn from independent examination as Luton and Central Bedfordshire Councils progressed developing separate Local Plans. Nonetheless, considerable planning work had been completed and including being subject to SA at the time.
- 8.109 Around 7,000 new homes could be accommodated: approximately 4,600-5,600 on Site 1 (eastern side from M1 to A5120) and approximately 1,500-1,850 new homes on Site 2 (east of the A5 to the A5120). Around 40 hectares of employment is planned – 32 ha on Site 1 and 8 ha on Site 2. Outline planning permission for Site 1 was granted in June 2014, and a hybrid planning permission for Site 2 granted in November 2015). These developments are

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<sup>118</sup> [http://www.centralbedfordshire.gov.uk/Images/north-houghton-regis-framework-plan\\_tcm3-6807.pdf](http://www.centralbedfordshire.gov.uk/Images/north-houghton-regis-framework-plan_tcm3-6807.pdf)

supported by the recently completed new A5-M1 strategic link road and the Woodside link road. Sufficient land has been identified for removal from the Green Belt in order to accommodate the full potential of the strategic allocation; the new Green Belt boundary is aligned with the new A5-M1 link road.

- 8.110 By proposing a strategic allocation in the new Local Plan, delivery over the two sites will allow a more detailed approach to phasing. The two sites will be more fully integrated with each other, as well as with the urban area of Houghton Regis. The timely delivery of supporting infrastructure within the integrated allocation will complement and enhance existing services and facilities as well as assisting in the regeneration of the existing urban area.
- 8.111 Site-specific requirements in the new Policy reiterate requirements in the Framework Plan and provide further information and guidance. The requirement for a mix of uses to achieve sustainable communities indicate positive effects for SA Objectives on housing, community identities, economy, and health & equality. The requirements for efficient public transport links with dedicated and safe pedestrian and cycle links from the new and existing neighbourhoods will support SA objectives for sustainable transport that will be cumulative in the longer-term.
- 8.112 Requirements to provide a green infrastructure network within the existing urban area, the new allocation, and the wider countryside will support SA objectives for biodiversity, landscape, access, and health with positive effects that will be synergistic and cumulative in the longer term; specific protection is required for designated and protected areas. Mitigation measures are required to ensure preservation of all designated heritage assets, indicating at least neutral effects for SA objectives on the historic environment. A reduction in flood risk is sought for both sites, by engaging with the Environment Agency for suitable opportunities – with potential positive effects for SA objectives on sustainable water management.
- 8.113 **Strategic Employment Area Allocations:** The detailed SAs of strategic options are provided in Appendix VIIa (RAF Henlow options are reported in VIIb). For each of the four allocations, there is a requirement to comply with other Policies in the Plan and to prepare a Masterplan. These requirements will confirm implementation of mitigation measures for any negative effects and remove uncertainties found in the earlier SA. All allocations take some of the best and most versatile agricultural land with likely negative effects that are permanent.
- 8.114 **Policy SE1 Sundon Rail Freight Interchange (RFI) Strategic Employment Area (40ha):** The SA of the strategic option found key positive effects for objectives on employment/economy, health, GI/biodiversity, sustainable transport, energy/climate change, and helping to resolve an existing sustainability problem of deprivation within areas of Luton. Neutral effects were indicated for housing, services/facilities, highways & air quality, water, and the historic environment. Key negative effects were found as the site is located within the Green Belt and potential effects for the nearby AONB. There was uncertainty recorded and the SA made recommendations for ensuring that positive

effects were implemented and negative effects mitigated through suggestions for the Site Specific Policy.

- 8.115 The Allocation Policy confirms the requirement for an intermodal rail facility, new employment land for warehousing/distribution uses with major positive effects. The requirement for a new strategic road link between Sundon Park Road and the M1 J11a ensures that the highway network will have capacity for new development, supported by DM Policies T1-6, will remove uncertainty and confirm likely neutral effects. The requirement to provide sustainable transport links through a Transport Assessment confirms the likely major positive effects.
- 8.116 The requirement to enhance and manage Sundon Pits CWS and Sundon Quarry SSSI to improve their ecology and contribute to the GI network, supported by DM Policies EE1-5, confirms positive effects on GI and biodiversity for people and wildlife. The requirement to preserve and enhance heritage assets within and around the site, supported by DM Policies HE1-3, confirms at least neutral effects on the historic environment. The Green Belt boundary has been adjusted to follow the extent of the RFI and employment land; the CWS and SSSI will remain in the Green Belt, thus providing some mitigation measures for the negative effects identified. The site is close to the AONB with potential for negative effects on its setting but DM Policies EE5-7 provide mitigation and the site is adjacent to the existing railway and motorway that already affect the AONB setting. The SA recommended that masterplanning should protect the AONB setting and this was taken forward into the Policy requirements.
- 8.117 **Policy SE3 Holme Farm Biggleswade Strategic Employment Area (up to 60 ha):** The SA of the strategic option had found key positive effects for objectives on employment, health & GI, sustainable transport, energy/climate change, biodiversity and landscape. Neutral effects were indicated for housing, services/facilities, highways & air quality, water, and the historic environment. Minor negative effects were found for identity and visual amenity effects on the small hamlet of Holme. There was uncertainty recorded and the SA made recommendations for ensuring that positive effects were implemented and negative effects mitigated through suggestions for the Site Specific Policy.
- 8.118 The Policy sets out the requirement for new employment land, including protecting the nearby wind farm, confirming the major positive effects. The requirement for improvements to the A1 ensures that the highway network will have capacity for new development, supported by DM Policies T1-6, will remove uncertainty and confirm likely neutral effects. The requirement to provide sustainable transport links through a Transport Assessment confirms the likely major positive effects.
- 8.119 The requirements to provide appropriate landscaping, protect the mature woodland within the site, and contribute to the GI network, specifically the Biggleswade Green Wheel, will confirm the likely positive effects. The requirement for field evaluation and a mitigation strategy for multi-period archaeological remains removes uncertainty and confirms likely neutral effects for the historic environment, although there may be possibilities for

positive effects through contribution to information on the archaeological resource.

- 8.120 **Policy Marston Gate Expansion Strategic Employment Area (up to 35 ha):** The SA of the strategic option had found key positive effects for objectives on employment, health & GI, sustainable transport, energy/climate change, biodiversity and landscape. Neutral effects were indicated for housing, services/facilities, highways & air quality, water, and the historic environment. There was some uncertainty recorded, and the SA made recommendations for ensuring that positive effects were implemented and negative effects mitigated through suggestions for the Site Specific Policy.
- 8.121 The Policy sets out the requirement for new employment land confirming the major positive effects. The requirement for improvements to the A507 and M1 J13 ensures that the highway network will have capacity for new development, and supported by DM Policies T1-6, will remove uncertainty and confirm likely neutral effects. The requirement to provide sustainable transport links through a Transport Assessment confirms the likely major positive effects, further enhanced through the requirement to take full account of potential from improvements to Ridgmont railway station.
- 8.122 **Policy SE4 Former RAF Base Henlow Strategic Mixed-Use Redevelopment Area (up to 130 ha, housing to be determined):** The SA of the strategic options had found key positive effects for objectives on housing, employment, services/facilities, health & GI, sustainable transport, energy/climate change, redevelopment of previously developed land, biodiversity and landscape. Neutral effects were indicated for highways & air quality, water, and the historic environment. Minor negative effects were indicated for the scale of the development compared to the small existing communities in the area. There was some uncertainty recorded, particularly with regard to extent of archaeological and other historic assets; the SA noted that there was the potential for both positive and negative effects on such assets and their settings.
- 8.123 The Policy sets out the requirement for new employment land and a mixed-use visitor-economy and residential scheme with numbers of homes to be determined through masterplanning and to include the redevelopment of existing properties as windfall housing (approximately 500 homes) confirming the major positive effects. The requirement for improvements ensures that the highway network will have capacity for new development, and supported by DM Policies T1-6, will remove uncertainty and confirm likely neutral effects. Transport restrictions associated with neighbouring uses are acknowledged. The requirement to provide sustainable transport links through a Transport Assessment confirms the likely minor positive effects. The requirement to protect listed buildings and their settings, supported by DM Policies HE1-3, should provide mitigation, removing uncertainty from the SA and indicating at least neutral effects for the historic environment.

## Development Management Policies

- 8.124 The screening of the changes to Chapters 12-20 of the Draft Plan for their significance with regard to the initial SA findings (June 2017) is provided in Appendix X of this SA Report. Most of the changes, additions or deletions are for correction, updating of information, and to provide more clarity and further guidance for new development – as such, they are not significant to the SA and the initial SA findings are still relevant and valid. Some additional/changed wording in the supporting text or Policy strengthens the previous SA findings for positive effects and/or certainty of mitigation measures for negative effects, but overall is not significant.
- 8.125 For Policy EE9 Forest of Marston Vale, additional text with a 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.
- 8.126 The new Policy EE11 River & Waterway Network 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; No 14 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. 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. Overall, this new Policy will have major positive effects on many objectives for Sustainable Development that are likely to be synergistic and cumulative in the longer-term.
- 8.127 Policy CC1 Climate Change & Sustainability includes additional and changed wording provide clarification regarding requirements from developments for energy and climate change – overall confirms the 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. Policy CC3 Flood Risk Management includes changes that provide clarification and 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.
- 8.128 New Policy CC6 Water Supply & Sewerage Infrastructure 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. Policy CC7 Water Quality



includes a change to an expectation of enhancement to rivers and lakes not achieving Good Ecological Status (GES) or potential – thus, provides more certainty of implementation and resolving an existing sustainability problem with likely positive effects confirmed.

- 8.129 The new Policy HQ1 Planning Obligations & Community Infrastructure Levy (CIL) 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 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 adjoining LPAs should mitigate potential indirect or cumulative negative effects that might arise.
- 8.130 Policies HE1-2 include additional text that proposals resulting in a reduction in the number of heritage assets at risk will be encouraged. This will help encourage resolution of existing environmental problem with potential for positive effects, but overall, not significant with regard to the previous SA findings.

### **SA of Implementing the Regulation 19 Central Bedfordshire Local Plan**

- 8.131 The Council has considered the objectively assessed need for housing and employment development, and the constraints and opportunities identified through technical studies and consultation, in order to prepare the Pre-Submission Draft Plan. This has included consideration of the inter-relationships between factors, for example, biodiversity and green/blue infrastructure for both human health and wildlife for a net gain in biodiversity. This has considered the character and capacity of the settlements in Central Bedfordshire to accommodate development growth, and with a particular concern to direct development close to key transport corridors, together with strong proposals for promoting sustainable transport. The Council has also progressed its duty to cooperate obligation and proposes to deliver some of the unmet need from Luton close to where it arises and where there is capacity to do so. The overall effects of the Draft Plan on sustainability themes/topics, including inter-relationships, synergistic and cumulative effects, may be summarised as follows:
- 8.132 **Communities: Housing, Services & Facilities, Identities:** The Draft Plan is likely to have major positive effects on housing by meeting the identified needs of all in Central Bedfordshire and helping to deliver some of the unmet need for Luton. Most of the development is proposed in major strategic developments of Town Extensions and New Villages that have the scale and scope for a wide range of sustainable homes for all needs. Smaller scale allocations are proposed throughout the area and aligned with a Settlement Hierarchy that recognises the capacity of services and facilities; some smaller growth is

proposed in the Green Belt for settlements that have not previously benefitted from development.

- 8.133 Site-Specific requirements in Strategic Allocation Policies, supported by Core/DM Policies H1-9 and HQ1-11 will ensure that the development and its supporting infrastructure is delivered in a phased and timely manner. Where relevant, new development is required to ensure that it will not compromise existing services and facilities. The Identified Locations for Future Growth recognise the potential cumulative effects of new development on transport capacities, including the sustainable transport network, and the associated lead-in time for provision of supporting infrastructure – thus providing mitigation for potential negative effects. The commitment to an early Partial Plan Review including further assessment and investigation of three scenarios for future growth will provide further evidence to inform decision-making; these scenarios will also be subject to SA/SEA.
- 8.134 A particular concern for the Council has been to retain the special character and identity of the settlements in the area. By focusing on Town Extensions and New Villages, the potential for cumulative negative effects on the identities of existing settlements has been mitigated by avoidance. The selection of the small-medium sites has aimed to ensure that new development can be integrated well and minimise any negative effects. Where necessary, site-specific requirements are made in policy to ensure a visual and physical separation between existing and new development. The Council has carefully considered the scope for development within the Green Belt that covers much of the south-west area of Central Bedfordshire. By proposing allocation adjacent to the urban area of Luton and carefully realigning Green Belt boundaries to protect local biodiversity and landscape character, and supported by Policy SP4, the Plan minimises potential negative effects on the Green Belt and helps to ensure that the objectives for Green Belt are maintained.
- 8.136 **Economy & Employment:** Proposals for Strategic Employment Areas have been identified with careful consideration of the characteristics and needs of the Central Bedfordshire area, including strategic warehousing, location on key transport corridors, helping to discourage out-commuting, and optimising opportunities on previously developed land – all with major positive effects.
- 8.137 **Health & Equalities:** Proposals for new development adjacent to Luton and nearby Dunstable help to resolve an existing sustainability issue with some deprivation in these areas; new development can be a catalyst and with positive effects on health and equalities that can be synergistic. The provision of good quality homes, supporting services and facilities, and local employment will all have inter-related major positive effects on health; Policies H1-9 ensure that this is inclusive and for all needs. The EqIA concluded that the Draft Plan is unlikely to have any negative effects on protected characteristics or persons identified under the Equality Act 2010.
- 8.138 The provision of, and access to, open/green space and sports/leisure facilities are important for health and well-being. The Strategic Allocations all include requirements for green/blue infrastructure (GI) and sports facilities with

positive effects for health. Policy requirements typically include new, enhance, and linked to existing GI – with synergistic and cumulative positive effects, particularly in the longer-term as GI becomes established.

- 8.139 **Transport & Air Quality:** The Strategic Allocations include specific policy requirements to ensure that the necessary improvements to the highway network are made in a timely manner and such that there is capacity for both the new development and existing communities. The Council has focused development in Town Extensions and New Villages that are of a scope and size that they can establish sustainable transport networks of cycling and walking routes, linking with improved public transport and optimising opportunities such as the East West Rail Link. The potential cumulative negative effects should be mitigated through the site-specific transport requirements, including masterplanning and transport assessments, and strong DM Policies T1-6. Requirements will be identified and confirmed through ongoing transport studies.
- 8.140 Ensuring capacity on the highway network should minimise congestion and associated emissions with poor air quality. In the longer-term, it is likely that emissions from vehicles will reduce as stronger regulations are implemented and the number of electric vehicles increases. The major developments can help improve the sustainable transport network that should facilitate use of public transport, cycling & walking routes, with positive effects that extent beyond the new developments with cumulative effects in the longer-term.
- 8.141 **Energy & Climate Change:** The focus on major developments means that they are of a size and scope that can accommodate exemplar sustainable design including requirements for energy and water management. This, supported by strong Core/DM policies CC1-3, will mitigate the potential cumulative negative effects of new development to at least neutral and with the possibility for some positive effects overall in the longer-term
- 8.142 **Water Resources, Quality, & Flood Risk:** The focus on major developments means that they are of a size and scope that can accommodate exemplar sustainable design, including policy requirement that seeks to aim for water neutrality. The location of the major developments has avoided risk to water quality and flood management with likely neutral effects overall. The new Policy EE11 recognises the particular character and opportunities available to protection, conservation and enhancement of the waterways' heritage, built environment, landscape character & biodiversity, together with promotion of the waterway and riverside paths as part of the green infrastructure network.
- 8.143 **Soils & Land:** Most new development will involve loss of the best and most versatile agricultural land – this is an area that is characterised by its rural nature and agricultural use – and with major negative effects that are cumulative and permanent. However, the Council has sought to mitigate the effects by allocating Town Extensions that are adjacent to the existing urban form, and the smaller non-strategic sites are distributed throughout the area in settlements and proportionate to the existing services and facilities. The strategic employment allocations include redevelopment of previously developed land with major positive effects.

8.144 **Biodiversity & Geodiversity:** The Council has recognised the inter-relationships and multi-functionality of GI networks for people and wildlife; where necessary policy requirements draw attention to any need to separate uses to avoid conflicts. Policies EE1-4 ensure that biodiversity is protected and enhanced for net gain; site-specific requirements ensure that biodiversity at all levels of importance from national to local is protected and enhanced. There are no internationally designated European Sites within the Central Bedfordshire area but some in the areas around. The HRA concluded that the Draft Plan will not have likely significant effects, individually or in-combination, on the identified European Sites (HRA Report November 2017).

8.145 **Landscape & Townscape:** The potential for cumulative negative effects on visual amenity and landscape character was recognised at an early stage of plan-making and assessment. The Town Extensions and New Villages are of a scale and scope that can ensure high quality design and landscaping through creative masterplanning at an early stage to minimise and potential negative effects. All the major development sites are required to have masterplanning, phasing and design codes that will have to be approved by the Council. The smaller non-strategic sites have been selected to minimise negative effects and integrate with existing settlements throughout the Central Bedfordshire area such that negative cumulative effects should be minimised. The SA had indicated uncertain major negative effects for the area north of Luton and adjacent to the AONB. By proposing allocation adjacent to the urban area of Luton and carefully realigning Green Belt boundaries to protect local biodiversity and landscape character, and supported by Policy SP4, the Plan reduces potential negative effects. This suggests that the major negative effects will be mitigated to at least minor negative with the potential for neutral effects in the longer-term as enhancements become established.

8.146 **The Historic Environment:** The proposed allocations have generally avoided potential effects on the historic environment. Where there are particular issues for Listed Buildings or archaeological potential, site-specific policy requirements ensure that there is protection of the heritage asset. This, supported by DM Policies HE1-3, will ensure that there are neutral effects on the historic environment, including cumulative effects.

### **Inter-relationships and Cumulative Effects**

8.147 The key diagram for the Central Bedfordshire Local Plan showing the location of proposed new development is presented in Figure 8.1; a further diagram Figure 8.2 shows the development growth in neighbouring authority areas, together with relevant major projects that are planned or in development, as follows:

Figure 8.1: Key Diagram for the Central Bedfordshire Local Plan

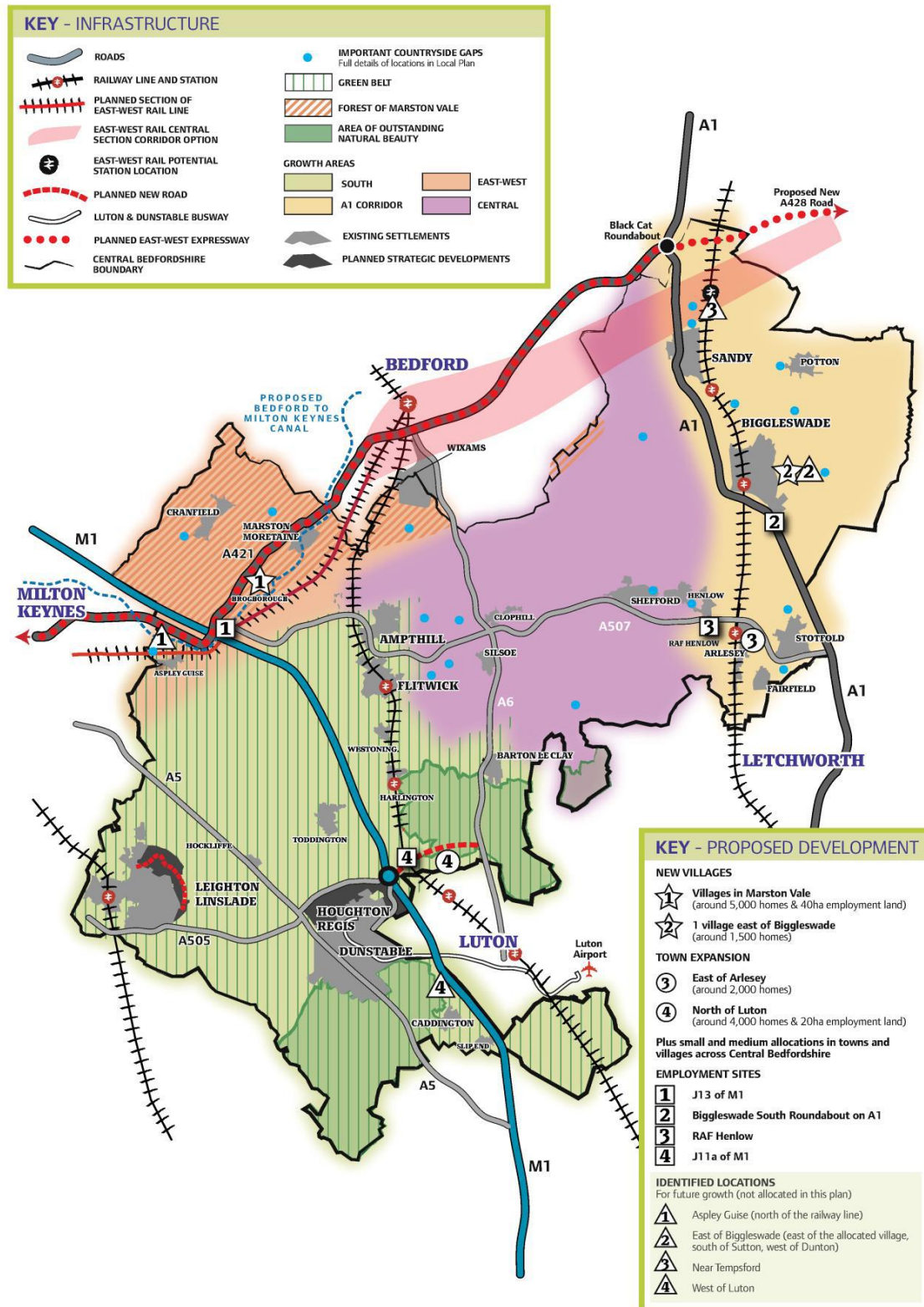
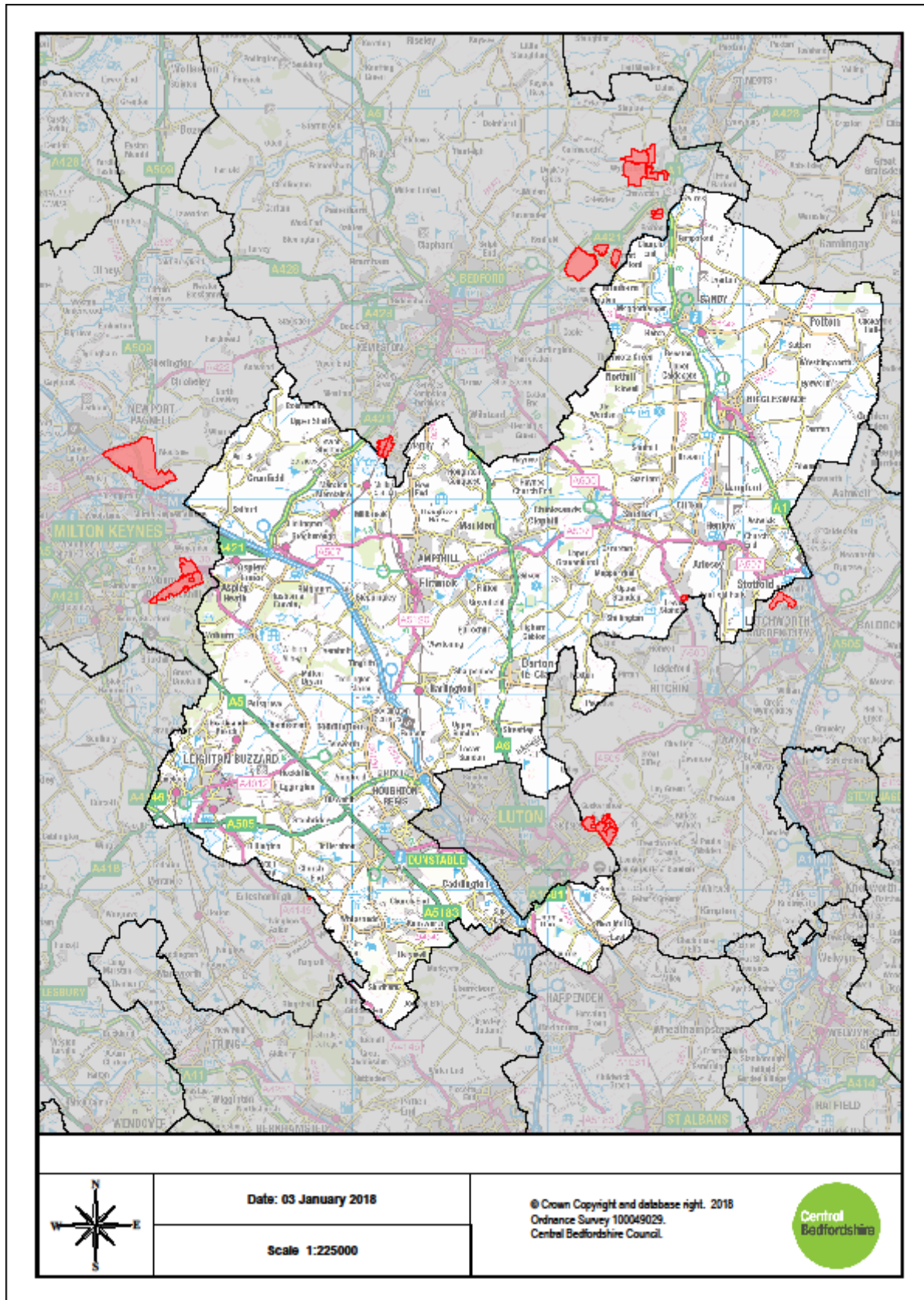




Figure 8.2: Key Major Growth Planned in Neighbouring Authority Areas



- 8.148 The inter-relationships between sustainability topics and the synergistic, indirect and cumulative effects of emerging elements of the Central Bedfordshire Local Plan have been considered as the SA has progressed in line with the development of the Plan. However, Central Bedfordshire already has allocated and committed new development, and further new development is expected from the surrounding areas as the Local Plans for these authorities are progressed – all with the potential for cumulative effects. The Council has taken these considerations into account when developing the proposals for the Regulation 19 Plan.
- 8.149 Biggleswade has allocated/built developments to the east and north. There is the Arlesey Cross development to the south of Arlesey. Houghton Regis has major development around 7,000 new homes. Where there is committed growth, and new allocations are being proposed nearby, future growth will need to take into account the committed development and careful masterplanning will be needed.
- 8.150 The proposal for major development north of Luton locates the town expansion to the north edge of Luton, optimising possibilities for housing, employment, services/facilities, road/public transport improvements. By locating the strategic site at the edge, negative effects on landscape/visual amenity are reduced as the site adjoins an already urban area, the housing contributes to the unmet need for Luton, and employment provision can help to reduce outcommuting.
- 8.151 There is major growth planned along the East-West Rail corridor – to optimise possibilities for using sustainable transport. East-West Rail will link Bedford to the north-east and Cambridge to the west, with the Central Bedfordshire area located in the Western and Central section of the route. Further funding and a promise to accelerate progress was announced by Government in November 2017. Bedford Council has a major development proposed to the north, and Milton Keynes Council has major developments proposed near to the M1 and East-West Rail adjacent to the west of the Central Bedfordshire area. It will be necessary for the local authorities to continue liaising and ensure that major developments are phased such that capacity can be maintained for existing and new communities.
- 8.152 It is uncertain how poor air quality associated with emissions from road vehicles will develop in the medium to longer term. Tighter emission controls and increasing use of electric vehicles, together with increasing use of improved sustainable transport networks, should provide mitigation. The wider extent of new development growth will have effects on water resources and wastewater treatment works/sewerage networks. Whilst water resources are planned on a regional scale and can be provided from beyond, principles of sustainable water management including aspirations for water neutrality can be implemented in major new development – especially in the wider area of water scarcity in East Anglia and increasing issues through climate change. It will be important that the local authorities continue liaising carefully with the water companies and environmental regulators to ensure that water infrastructure can be planned, funded and built in time to align with the phased proposals for new development.

- 8.153 Such major developments proposed through the East-West Rail Link corridor of a scale and scope such that sustainable transport (cycling and walking routes) can be implemented and link, enhancing the existing network. When aligned with aspirations for green/blue infrastructure, such as the Waterway Park linking new villages in the Marston Vale, there can be synergistic and cumulative positive effects for both human health and wildlife. This will need to be planned and implemented in a strategic way, acknowledging ecosystems services. The cumulative increase in recreational activities and likely effects is uncertain at this stage but ongoing careful planning and management can mitigate, including separation of conflicting uses for people and wildlife.
- 8.154 Whilst individual elements of major developments may be able to mitigate for negative effects on landscape and visual amenity, there must be cumulative effects throughout the East-West Rail Link Corridor as essentially rural areas are transformed to urban areas. However, exemplar and innovative design with creative masterplanning should offer mitigation measures and such development change can provide new environments for communities that are sustainably built and occupied. The important natural areas are protected and can be enhanced through the Environmental Framework.
- 8.155 By aligning major new development along the East-West Rail Link corridor, the Council has optimised possibilities for high-tech, educational, and innovative employment development that is likely to be synergistic with similar new technology planned around Cambridge and Milton Keynes. The provision of such high quality jobs in the Central Bedfordshire area and nearby should reduce the current out-commuting that is characteristic of the area. This should have further indirect and cumulative effects on transport and use of local services/facilities – all with positive effects in the longer-term.



## **9.0 EQUALITIES IMPACT ASSESSMENT (EqIA) & HABITATS REGULATIONS ASSESSMENT (HRA)**

### **Health and Equalities Impact Assessment**

- 9.1 Health, well-being and equality is integrated throughout the SA through the SA Objective No 5 to improve the health and wellbeing of communities and reduce inequalities. Consideration of effects on equality and health will continue to be made throughout the SA process. The SA Frameworks (Tables 4.2 and 4.3) and topics (Para 5.9 - 5.10 & Figure 5.1) contain several direct and indirect links to health and equality. However, in order to demonstrate compliance with the Equality Act 2010, a separate detailed screening has been carried out and is presented as a technical Appendix VIII to this Initial SA Report. An EqIA demonstrates how the Council has met with the Public Sector Equality Duty (PSED) as set out under Section 149 of the Equality Act 2010.
- 9.2 The development of the draft Central Bedfordshire Local Plan has been influenced by a number of other plans, programmes and assessments relating to the protected characteristics or persons under the Equality Act 2010. This includes the SA process that has tested all the emerging elements of the draft CBLP against a framework of SA Objectives – No 5 specifically relates to equality & health.
- 9.3 At the Regulation 18 draft stage, the Plan Vision, Strategic Objectives and Policies, and Development Management (DM) Policies were assessed to the same level of detail, taking into account the baseline information gathered to establish any potential impacts on the protected characteristics or persons identified under the Equality Act 2010. The assessment found that nearly all the components of the draft plan will lead to positive effects on the protected characteristics; two DM Policies were found to be not relevant to the protected groups with neutral effects. No negative effects were identified.
- 9.4 At the Regulation 19 draft stage, the changes made to the Plan – refinements to the Strategic and Development Management Policies were considered for their implication for the findings of the EqIA. Most changes to policies are associated with providing further information, updating and clarification; the findings of the screening of changes for SA significance is detailed in this SA Report at Appendix X.
- 9.5 Overall, the changes did not affect the findings of the EqIA reported in June 2017. However, positive effects were strengthened through changes to Policy H2 Housing Standards that now include requirements for specified percentage adaptable and wheelchair accessible homes, providing certainty of delivery for the relevant protected groups. An additional criterion in Policy H8 & H9 (Planning Applications for Gypsy & Traveller Sites; Travelling

Showpeople) provides additional certainty of protection for safety and amenity with positive effects confirmed for the SA and Objective No 5 Health & Equalities. New Policies EE11 River & Waterway Network; CC6 Water Supply & Sewerage Network; and HQ1 Planning Obligations & the Community Infrastructure Levy are all compatible and will lead to positive effects on the protected characteristics. No negative effects were identified.

- 9.6 The proposed Strategic Allocations for major housing development include site-specific requirements for a mix of housing, contributions to health/social care, community/education and leisure facilities, together with enhancement of the Green Infrastructure and sustainable transport networks – all confirming positive effects for equality and health. All site allocations will be subject to the requirements of the Policies considered in the EqlA and therefore, they are considered to all lead to positive effects on the protected characteristics.
- 9.7 A number of reports are already produced on an annual basis which include consideration of equality, health and diversity within the Central Bedfordshire area. The Draft CBLP will also provide a further monitoring framework that addresses equality, health and diversity through assessing the delivery of the CBLP against its' Strategic Objectives and policy targets. Therefore, further monitoring regarding equality and diversity is not considered to be required.
- 9.8 The updated assessment confirmed the initial findings that the Draft Central Bedfordshire Local Plan Regulation 19 is unlikely to have any negative effects on protected characteristics or persons identified under the Equality Act 2010 and as a result a full EqlA will not be required.

### **Habitats Regulations Assessment (HRA)**

- 9.9 In 2014 Central Bedfordshire Council conducted a Habitat Regulations Screening Assessment (HRA) to identify any potential significant effects that their proposed Development Strategy and Gypsy and Traveller Local Plan may have on designated European Conservation sites. Their screening assessment identified that there are no European Conservation sites within their administrative boundary. Nine sites were identified outside of Central Bedfordshire that had the potential to be negatively affected by their Plan, all located within 50km of the Central Bedfordshire area.
- 9.10 The HRA concluded that there were several threats to the European sites that could arise as a result of the Plan. These threats were an increase in recreational pressure, an increase in air pollution, and a decrease in water quality and increased runoff leading to localised flooding. The HRA found that none of the European sites would be significantly affected by either air pollution or water quality/increased runoff due to their distance from any proposed development, and the mitigation provided through local policies. Two of the sites were considered to have the potential to be affected by an increase in recreational pressure, Chilterns Beechwoods SAC and Eversden and Wimpole Woods SAC. However, the HRA at that time (2014) determined

that any increase in recreational pressure would be negligible, and that no significant effects were likely.

- 9.11 The screening process considered other plans and programmes, both locally and in adjacent authorities, which had the potential to act in-combination with the Central Bedfordshire Plan. The HRA found that there were no likely in-combination effects with other plans and programmes that would impact on the European sites. The HRA therefore concluded that the policies which were allocating land for development were not considered to result in any impacts on European designated sites in the surrounding area, either alone or in-combination with other plans and programmes. The HRA findings can be found summarised in a table below<sup>119</sup>.

**Table 8.1: HRA Screening Summary (2014)**

European Sites	Designation	AA required alone? N No Y Yes ? Uncertain	AA required in combination? X No Y Yes ? Uncertain
Chiltern Beechwoods	SAC	N	N
Eversden and Wimpole Woods	SAC	N	N
Chippenham Fen	Ramsar	N	N
Wicken Fen	Ramsar	N	N
Woodwalton Fen	Ramsar	N	N
Ouse Washes	SPA/SAC/Ramsar	N	N
Portholme	SAC	N	N
Fenland SAC	SAC	N	N
Upper Nene Gravel Pits	SPA/Ramsar	N	N

- 9.12 The Initial SA Report (June 2017) accompanying the Draft Plan on Regulation 18 Consultation (July-August 2017) included Section 8 that summarised the previous HRA, explained that the European Sites Characterisation had been updated, together with the Review of Plans, Programmes & Projects. It further explained that as the locational specificity for strategic and other small-medium sites is progressed for the Pre-Submission Draft Plan, the HRA Screening will be updated and published alongside the Plan for public consultation.
- 9.13 The details of comments made on the Initial SA Report are detailed in the SA Report (November 2017) in Appendix IX. Comments were received from the nature conservation regulator, Natural England (NE) who noted that it was

<sup>119</sup> Central Bedfordshire Council (2014) Central Bedfordshire Development Strategy HRA Screening Assessment

difficult for NE to comment on the HRA since the HRA had had only limited progression until the locational specificity of the site allocations was more developed. NE was concerned that the SA cannot rely alone on the emerging development management policies to mitigate the potential adverse effects on the natural environment, including designated sites and landscapes, and that studies will be needed. The SA, HRA and plan-making share an evidence base; ongoing technical studies for the Council and information provided by land promoters were considered in this next iteration of the SA and HRA.

- 9.14 Building on the previous screening work and informed by the consultation response received from NE, the screening tasks were revisited for the Regulation 19 Draft Plan. The HRA considered that the allocations and policies that could have likely significant effects were as follows:
- The Growth Strategy Policy SP1 and Strategic Allocations for Town Extensions North of Luton & East of Arlesey, New Villages at Marston and East of Biggleswade, Houghton Regis North
  - Strategic Employment Areas focused on Transport Corridors M1 J11a & J13, and the A1 Biggleswade South
  - Policies T1-2 Transport Network will lead to infrastructure development
  - Policies CC1-8 Climate Change & Sustainability could lead to infrastructure developments
  - Policies HQ1-11 High Quality Places including provision of social and community infrastructure
- 9.15 These Policies and their potential impacts were screened against each of the European sites scoped into the HRA. This included consideration of the environmental pathways and sensitivities of the sites, as well as mitigation provided by other Plan Policies, including the Development Management Policies. For air quality, five of the European Sites are not sensitive to air pollution. The other three Sites (C Beechwood SAC, Eversden & Wimpole SAC, Fenland SAC) were considered to be potentially sensitive to air pollution that might arise from increased traffic on nearby roads. The HRA concluded that with the strong Policies (including site-specific requirements) in the CBC Draft Plan and the locations of the Strategic Allocations relative to these European Sites, there will be no likely significant effects (LSEs) individually or in-combination.
- 9.16 With regard to disturbance impacts, six of the European Sites were found to be not sensitive to disturbance. For the remaining 2 designated Sites (Chiltern Beechwoods SAC and Upper Nene Valley Grave Pits SPA/Ramsar), the screening indicated a risk of increased recreational activities having negative effects. The HRA concluded that mitigation is provided by other Plan Policies (including site-specific allocation requirements) and with the distances of the Sites from the Strategic Allocations, individual and in-combination effects through recreation are unlikely.
- 9.17 Changes in hydraulic conditions, groundwater pollution and flooding were indicated as threats for four European Sites (Chippenham Fen Ramsar, Fenland SAC, Ouse Washes SAC/SPA/Ramsar and Wicken Fen Ramsar). The

mitigation provided through the Draft Local Plan Policies will protect the water environment from pollution, enhance flood risk management and protect water resources, and in consideration of site-specific policy requirements, the HRA concluded that there would be no significant effects alone or in-combination.

- 9.18 Due to the distance of the European sites from the Plan area, there was not considered to be any potential environmental pathways for habitat loss or fragmentation which would have alone or in-combination negative effects on the Natura 2000 sites.
- 9.19 The HRA screening assessment found that the mitigation provided through Draft Local Plan Policies was sufficient such that there were no likely significant effects alone as a result of the Plan. Furthermore, the screening investigated potential in-combination effects, and determined that there was sufficient mitigation and avoidance that in-combination effects with other plans and projects would not result in likely significant effects. Therefore, it was concluded that no further assessment is needed and an Appropriate Assessment is not required for this HRA.

## 10.0 PROPOSED MONITORING

### Introduction

- 10.1 The SEA Directive and Regulations require that the significant effects (positive and negative) of implementing the plan should be monitored in order to identify at an early stage any unforeseen effects and to be able to take appropriate remedial action. Government guidance<sup>120</sup> on SA/SEA advises that existing monitoring arrangements should be used where possible in order to avoid duplication. Government requires local planning authorities to produce Monitoring Reports (MRs), and the Central Bedfordshire Council Monitoring Report<sup>121</sup> (produced annually) is considered sufficient to ensure appropriate monitoring takes place. The SA Scoping Report Frameworks set out how indicators align with issues and objectives for sustainable development for the Central Bedfordshire area. These will be reviewed at each stage of the SA and consultation as the plan-making and the SA processes progress.

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<sup>120</sup> [http://planningguidance.planningportal.gov.uk/?post\\_type=&s=sustainability+appraisal](http://planningguidance.planningportal.gov.uk/?post_type=&s=sustainability+appraisal)

<sup>121</sup> <http://www.centralbedfordshire.gov.uk/planning/policy/monitoring/reports.aspx>

## 11.0 CONCLUSIONS, CONSULTATION & NEXT STEPS

- 11.1 The SA has helped identify and refine reasonable strategic alternatives; assessed these alternatives to predict the likely significant effects – positive and negative, including cumulative where possible; and suggested mitigation measures to avoid or minimise negative effects. The SA findings have informed the progression of the strategic options and the proposed Spatial Strategy and Approach; they have informed the development of Strategic, Core and Development Management Policies. It may be noted that the SA is not the sole source of information and plan-making is informed by other technical studies and comments received through consultation.
- 11.2 The SA tested early versions of strategic options for approaches and scenarios for distributing growth (including levels of housing growth identified as reasonable capacities from studies), and potential Growth Locations. These strategic options had already taken some mitigation measures by avoiding significant environmental assets and by focusing potential new development near to existing communities and sustainable transport. Overall the SA found that all scenarios and levels of housing growth considered have the potential for positive effects for development growth. On this basis, the Council determined that delivery of housing and employment will be supported in the most sustainable way by a combination of approaches.
- 11.3 The SA supported growth in Areas A, B and C as having positive effects on housing delivery and employment. In Area D, the appraisal supported growth of small to medium scale, focused around settlements with existing good services, to minimise negative effects from the need to travel by car, as Area D is characterised by market towns and villages linked by rural roads. The spatial strategy therefore limits growth in Area D to village extensions, and the proposal for higher growth in villages as per Scenario 5 is not preferred.
- 11.4 Green Belt constraints have previously restricted the opportunities that can be associated with development such as new housing and infrastructure in Area A. This area also includes pockets of higher deprivation, so new growth can have the potential for major positive effects, with the delivery of new infrastructure, facilities and affordable housing. In addition, allowing some development in the Green Belt releases the pressure on non-Green Belt settlements and help avoid the coalescence of settlements in non-Green Belt areas.
- 11.5 Across Central Bedfordshire, providing higher levels of growth is likely to place more pressures on the capacity of infrastructure, but these pressures may be mitigated by the provision of new settlements and/or urban extensions, with the scale and scope for exemplar design, offering enhancements to both existing and new communities with major positive effects, especially for sustainable energy and water; landscape and the potential enhancement of Green Infrastructure.

- 11.6 Higher growth can offer opportunities for supporting a modal shift in transport and new settlements of the scale and scope proposed could contribute to highways and sustainable transport improvements that could benefit wider areas of CBC and beyond. Area C is well-connected with the improved A421, the M1 and the planned section upgrade for East West Rail. Growth in Area B would support the East-West connections delivered by East West Rail and the Expressway and improvements to the A1.
- 11.7 The Spatial Strategy contains options for new villages and urban extensions along the A1 corridor in Area B and near to the M1 in Area A and C. The Spatial Strategy includes options for concentrating moderate growth in the rail corridor between Luton & Flitwick, therefore promoting sustainable development in an area constrained by Green Belt. Across Areas A, B and C there is the potential for development to contribute to improvements of the road and public transport networks, to ensure continuing capacity.
- 11.8 The potential negative effects of growth can be mitigated with the support of the core/development management policies, which protect the natural environment and promote sustainable, connected communities through requirements for appropriate provision of supporting infrastructure. The SA (June 2017) at Regulation 18 stage consultation concluded that the possibilities for exemplar design and specific requirements for new large-scale projects can be reflected in the detailed site-specific policies.
- 11.9 The Council has considered the consultation comments made on the Regulation 18 draft CBLP (and the accompanying Initial SA Report), together with the findings of ongoing technical studies, to identify Strategic Allocations for Housing and Employment, and small-medium site allocations. The DM Policies were also refined for clarification and updating. Options for both strategic and the small-medium sites were tested through SA. Recommendations were made for the site-specific requirements being developed for Policy SP1 and Policies for each of the Strategic Allocations for Housing and Employment.
- 11.10 The Draft Plan focuses new housing development in Town Extensions at North of Luton and East of Arlesey, and in New Villages at Marston Vale and East of Biggleswade. Focusing new development in such a manner facilitates promoting positive effects and mitigating negative effects because the major development sites are of a size and scope that can support creative masterplanning. These strategic allocations can provide timely supporting infrastructure to ensure that there is capacity for both new and existing communities, thus mitigating potential negative effects. They can also provide improvements to sustainable transport and the green/blue infrastructure network with further positive effects for both health and wildlife. Whilst the North of Luton allocation necessitates a change to the Green Belt boundary, the site is adjacent to the urban form of Luton such that negative effects are minimised.
- 11.11 Three of the Strategic Employment Areas are allocated at key transport corridors – the M1 J11a & J13, and the A1 Corridor Biggleswade South. The fourth provides opportunities for redevelopment at RAF Henlow with a Mixed-



Use Specialist Employment allocation. This approach helps to support employment/economy in Central Bedfordshire and helps to resolve an existing sustainability problem of out-commuting for work. The location at key transport nodes/corridors optimises opportunities for warehousing and, together with encouragement for specific sustainable transport, minimises negative effects. Redevelopment of previously developed land reduces land take for greenfield and has major positive effects.

- 11.12 All reasonable alternatives for non-strategic site options were identified as those that passed through the Council's Site Assessment Method and tested through SA. There was correlation between the two methods such that constraints or negative effects were avoided or mitigated, and opportunities for positive effects from new development were promoted such that there were minimal residual negative effects. The small-medium allocations are distributed throughout the Central Bedfordshire area to integrate with existing settlements according to the hierarchy that considers services/facilities and accessibility. Thus, potential negative effects are avoided or mitigated. The Council has also taken the opportunity to propose some small-scale development in the Green Belt, for settlements that have not benefitted from new development for a long time and therefore take the pressure for growth off non-Green Belt areas which would have been the focus for growth historically.
- 11.13 Overall, there are major positive effects indicated for housing and employment. By focusing on Town Extensions and New Villages, opportunities for supporting infrastructure are optimised. Site-specific requirements in policy, supported by strong Core/Development Management Policies, ensure that such infrastructure will be provided in a timely manner to provide and ensure capacities for both new and existing communities. This include provision of green/blue infrastructure, with implementation ensured through site-specific requirements that link and extend beyond the sites with potential for synergistic and cumulative effects in the longer term as the GI becomes established – positive effects for both people and wildlife.
- 11.14 Positive effects are indicated for energy and climate change; also, for sustainable transport as strategic allocations are located to optimise opportunities for alignment with railways, and they are of a size/scope that can create GI with cycleways and walking routes that extend beyond to benefit the wider sustainable transport network in the longer term.
- 11.15 Site-specific requirements and strong Core/Development Management Policies should ensure that overall effects on water resources, quality and flood risk, and the historic environment are at least neutral. Site-specific requirements should facilitate positive effects for biodiversity that will be cumulative in the longer-term as GI enhancements become established.
- 11.16 There will be permanent loss of the best and most versatile agricultural land but this has been minimised through the approach for town extensions and by redevelopment of land for the strategic employment sites. Initial concerns for negative effects on transport/air quality and landscape, including cumulative effects, have been addressed. Policy HQ1 ensures that there will

be no overall reduction in provision of infrastructure from new development, including equitable contributions and working with adjoining LPAs to mitigate for potential indirect or cumulative effects. The site-specific requirements for each strategic allocation ensure that delivery of improvements to the highway network is in place to maintain capacity for existing communities and phased to accommodate the new communities. These requirements should mitigate for increased pressures on the highway network and this will be confirmed through further ongoing transport studies.

- 11.17 Maintaining capacities should minimise additional vehicle emissions with effects on air quality. As emissions standards tighten and the use of electric vehicles increases, together with improvements in sustainable transport, effects on air quality should be mitigated. The focus on major development sites should mitigate concerns for landscape and visual amenity; some concern remains with uncertainty of cumulative negative effects near the AONB and north of Luton. However, the development proposals are near the existing urban area and site-specific requirements will help to reduce the effects to minor negative visual effects.
- 11.18 Overall, the Draft Plan will have positive effects for socio-economic factors and the communities in Central Bedfordshire, with benefits also indicated for communities in Luton. Potential negative effects for environmental factors have been migrated to at least neutral effects. Positive effects are likely for biodiversity and green/blue infrastructure that will extend beyond the new developments with wider positive effects in the longer term.
- 11.19 The Plan includes Identified Locations for Future Growth (Section 7.9 and Appendix 7) with areas that may be required to serve development needs in the longer term beyond the plan period or potentially earlier if the wider context changes – especially with regard to delivery of strategic infrastructure. Currently, there is insufficient supporting infrastructure to support allocation but there is significant potential based on their location and Central Bedfordshire's position at the centre of the Oxford-Cambridge Growth Corridor.
- 11.20 Therefore, the Council is committing to an early Partial Review of the Plan, and in particular to assess the capacity for and deliverability of further growth on the strategic sites. It will consider whether there is potential for years 10-15 (2030-35) for the current Plan period or whether this would be in the next Plan period, given the long lead times for such large sites. Three scenarios will be investigated – Base; Medium; High Growth – and these options will be also subject to SA/SEA in due course.
- 11.21 This SA Report accompanies the Draft Regulation 19 Pre-Submission Central Bedfordshire Local Plan on consultation for 8 weeks from 11 January to 22 February 2018. Any further comments received on the SA will be taken into account in the preparation of the Submission Plan that will be submitted in March 2018 to the Secretary of State for independent examination.

- 11.22 For further information and to make any comments, please contact the Council via the Planning website:

[www.centralbedfordshire.gov.uk/localplan](http://www.centralbedfordshire.gov.uk/localplan)