

Central Bedfordshire Council Local Plan (2015-2035)

Sustainability Appraisal

Non-Technical Summary

(January 2018)

Central Bedfordshire Council Local Plan: Pre-Submission Regulation 19

SUSTAINABILITY APPRAISAL (SA): Sustainability Appraisal (SA); Strategic Environmental Assessment (SEA); Health Impact Assessment (HIA); Equalities Impact Assessment (EqIA)

Sustainability Appraisal Report NON-TECHNICAL SUMMARY

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environmental planning and management for sustainability



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Non-Technical Summary (NTS)

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This is the NTS of the Sustainability Report

1. This is the Non-Technical Summary of the Sustainability Appraisal Report documenting the processes of Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) within an Integrated Appraisal for the Central Bedfordshire Local Plan (CBLP). This summary is an integral part of the Sustainability Appraisal Report that accompanies the Regulation 19 Draft Central Bedfordshire Local Plan (CBLP) for public consultation commencing in January 2018. It provides an outline of the SA process and findings, including how the SA has influenced the development of the draft Plan, and in accordance with the requirements of the National Planning Policy Framework (NPPF), the European SEA Directive, and UK guidance on SA/SEA.

The Central Bedfordshire Local Plan (CBLP)

2. The Local Plan sets out the long-term Vision and Objectives for how the Central Bedfordshire area could develop in the period up to 2035, identifying the needs for housing, employment, supporting infrastructure and community facilities. It has been prepared in accordance with national planning requirements and informed by various technical studies, including the Sustainability Appraisal and consultation with the public, stakeholders and regulators.
3. The Council has also considered if the Central Bedfordshire area can help meet the housing needs arising from outside the Plan area since there are major urban areas with intensifying growth pressures nearby. Luton is severely constrained by its boundary and has major housing pressures in the south-

east, and development in Milton Keynes is now approaching the M1 with potential issues in the north-east of the area. Another key characteristic of the CBLP is that accommodating such growth pressures in the form of unmet need from neighbouring authorities could be achieved through considering those areas that do not contribute strongly to the objectives of the Green Belt designation in the south of the local authority area.

4. The first draft CBLP did not at this stage (Regulation 18) include allocation policies for specific development sites and these were proposed in the next draft of the CBLP (the Pre-Submission Local Plan Regulation 19) later in 2017. The first draft of the CBLP comprised the following elements:
 - Vision & Objectives
 - The Spatial Growth Strategy to deliver a minimum of 20,000 new homes across Central Bedfordshire with directions of growth proposed across all Areas A-D and a proposed approach to strategic Growth Locations that could accommodate more homes than will be required at this stage
 - Strategic Policies for guiding and shaping development
 - Core Policies & Development Management Policies to guide development proposals
5. This first draft CBLP was submitted for formal and public consultation at the beginning of July 2017 for 8 weeks. Comments made were considered and informed the next stage of plan-making. This included assessment of potential site allocations to help identify the most suitable and deliverable sites. The next draft of the CBLP includes proposed site allocations, together with refinements of the Strategic & Development Management Policies, taking into account the comments received from consultation and updated information.
6. The revised Pre-Submission Local Plan for Regulation 19 consultation comprises the following:
 - 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 Further Growth that will be investigated as part of an early Partial Review of the Plan that considers an updated evidence base, in particular the progress on funding and delivering major infrastructure. The work will consider three scenarios -Base, Medium, High Growth; and these scenarios will be subject to SA/SEA in due course.
 - Strategic Policies: SP1 Growth Strategy with Town Extensions North of Luton & East of Arlesey; new Villages at Marston Vale & East of Biggleswade; Strategic Employment Areas at M1 J11a, M1 J13, A1 Biggleswade South, & RAF Henlow Mixed Use Specialist Employment;

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

Sustainability (Integrated) Appraisal: SA, SEA, EqIA and HRA

7. The purpose of Sustainability Appraisal (SA) is to promote sustainable development through the integration of environmental, social and economic considerations in the preparation of Local Plans. This requirement for SA is in accordance with planning legislation and paragraph 165 of the National Planning Policy Framework. Local Plans must also be subject to Regulations for Strategic Environmental Assessment (SEA) and Government advises that an integrated approach is taken so that the SA process incorporates the requirements for SEA – and to the same level of detail.
8. Central Bedfordshire Council commissioned independent specialist consultants, Enfusion, to progress the sustainability appraisal work in early 2016. 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 to assess the impact of their policies on different population groups to ensure that discrimination does not take place and, where possible, to promote equality of opportunity.
9. The Council is also required to undertake a Habitats Regulations Assessment (HRA) of the 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. At the Regulation 19 stage of plan-making, and as the locational specificity for strategic and other small-medium sites is progressed, the HRA Screening was updated. The findings of the health, equality and habitats assessments have been integrated into the SA as relevant and at each stage of plan-making and assessment.
10. SA is an iterative and ongoing process that informs plan-making by assessing developing elements of the plan, evaluating and describing the likely significant effects, and suggesting possibilities for mitigating significant adverse effects and enhancing positive effects. UK Guidance suggests a staged approach to SEA. Initially the scope of the SA is determined by establishing the baseline conditions and context of the area, by considering

other relevant plans and objectives, and by identifying issues, problems and opportunities. From this scope, SA Frameworks of objectives for sustainable development in the Central Bedfordshire area were developed and form the basis against which the emerging elements of the CBLP are assessed.

Sustainability Characteristics of the Central Bedfordshire Council area and likely evolution without the Local Plan

11. **Communities & Housing:** The area has mostly rural communities and, like other Local Authorities, an increase in population is expected in the number of people aged over 65 and over. Compared to several of the surrounding areas, and England, Central Bedfordshire is considered to be less culturally diverse. In line with national trends there is an under delivery of housing in the Plan area; the predominant tenure is home ownership and the affordability of housing has become a critical issue in the area. There are many 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, aiming to avoid coalescence of settlements.
12. **Employment & Economy:** The employment rate in Central Bedfordshire is higher than national and regional areas, and residents earn more than the England average weekly gross pay. 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 specialisms, which reflect Central Bedfordshire's strengths in the engineering/manufacturing sector. The rural economy also plays an important role through leisure and tourism. Dunstable has a significantly higher number of retail vacancies when compared to other towns in Central Bedfordshire.
13. **Health and Equalities:** 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. The areas with higher levels of deprivation are generally in the south of Central Bedfordshire near to the boundary with Luton Borough Council. Life expectancy for both men and women is higher than the England average. Estimated levels of adult excess weight are ranked significantly worse than the England average. Residents undertake various activities within the countryside, using footpaths, bridleways, cycle paths or other tracks, and visiting country parks. Many 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.
14. **Transport and Movement:** Central Bedfordshire has numerous key road connections running through the Plan area including the strategic road connections of the M1, A1, A5 and A421. There are good existing north-south links and strategic gaps east-west are likely to be improved with the opening of the A5-M1 Link in May 2017. There are also three strategically important rail lines; the East Coast Mainline, the Midland Mainline and the West Coast Mainline. 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.

15. **Air Quality:** 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. There are three Air Quality Management Areas (AQMAs) designated for exceedances of Nitrogen Dioxide (NO₂) within Central Bedfordshire: Ampthill, Sandy, and South Bedfordshire/Dunstable.
16. **Energy and Climate Change:** The total energy demand in Central Bedfordshire could rise over coming years, largely due to an increased electricity consumption. Road transport is the biggest contributor to greenhouse gas emissions within Central Bedfordshire at approximately 42% of the total emissions. The impacts of climate change that are likely to affect Central Bedfordshire most are flooding, water resources, overheating, subsidence, and risks to the natural environment.
17. **Water: Resources, Quality and Flooding:** 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 Water Resource Zone will be in deficit by 2026/27. The overall water quality classification status for most water bodies in the Plan area are largely moderate to good. Records of historic flooding are spread throughout Central Bedfordshire, but there is a greater intensity of reported events to the centre and north-east of the area.
18. **Soil & Land:** The geology of Central Bedfordshire is largely comprised of clay and chalk, with lime-rich loamy and clayey soils. 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 in the east of Central Bedfordshire. 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.
19. **Biodiversity and Geodiversity:** There are no European designated sites within Central Bedfordshire. There are nationally designated sites, including 33 Sites of Special Scientific Interest (SSSIs) and 3 National Nature Reserves (NNR). There are also sites that are designated locally for their biodiversity and geodiversity importance, including 12 Local Nature Reserves and over 250 County Wildlife Sites. Around 107 species and 18 habitats of 'principal importance' have been recorded in Central Bedfordshire. The Greensand Ridge running north-east/south-west covers a significant part of Central Bedfordshire and is an identified Nature Improvement Area.
20. **Landscape and Townscape:** The area is predominantly rural, containing countryside, villages and small to medium sized towns including Leighton Buzzard and Dunstable, with a varied and distinct landscape, informed by the underlying geology of clay, chalk and greensand. 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.

21. **The Historic Environment:** Central Bedfordshire has a wide range and number of heritage assets, including potential and existing archaeological sites, and these are widespread across the whole plan area. There are some 84 Scheduled Monuments, 14 Registered Parks & Gardens, over 1900 Listed Buildings, 60 Conservation Areas, and many non-designated locally important assets and their settings. It is also recognised that there is the potential for unknown and unidentified heritage assets.
22. **Minerals & Waste:** Minerals and waste are both strategically planned across the three Local Authority areas of Central Bedfordshire Council, Luton Borough Council, and Bedford Borough Council, and their 2014 Joint Minerals and Waste Local Plan sets a planning framework. Forecasts predict that the tonnage of waste requiring management in the Plan area is likely to increase from 2,100,000 tonnes in 2013/14 to 2,300,000 tonnes in 2028/29. The Councils have designated Minerals Safeguarding Areas (MSAs).

Key Sustainability Issues, Problems and Opportunities

23. The key sustainability issues and opportunities are summarised in the table below:

Key Sustainability Issues and Opportunities
There is the potential that Central Bedfordshire will be needed to accommodate housing growth from outside the Plan area
New transport infrastructure is being proposed within the Plan area, which includes the East West Rail Link
In line with national trends there is an increasing and ageing population
Maintaining the identity of settlements and communities in both rural and urban areas
Meeting the needs of communities with different sustainability issues and ensuring that any opportunities to address these issues are maximised.
Minimising the loss of important Green Belt land that provides protection for settlement identity, soil quality and open land
There is poor access to services and facilities in some areas of Central Bedfordshire, particularly in rural settlements
Approximately 50% of residents commute to the surrounding areas including Hertfordshire, Luton, London, Milton Keynes and Bedford
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
Dunstable has a significantly higher retail vacancy rate compared to the national rate
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
There are relatively high outflows of retail and convenience spending
Evidence suggests that there is a significant oversupply of industrial employment land

Both the urban and rural economies are important for the Central Bedfordshire economy as a whole
There are areas of higher deprivation in the south of the Plan area, particularly around the boundary with Luton Town
Trends show that deprivation is increasing in the north of the Plan area, north Sandy, although this remains below areas in the most deprived 30% in England
The potential loss of Green Infrastructure from new development, as well as the need for additional provision of areas of open space or recreation for people
A need to reduce excess weight in adults, which is ranked significantly worse than the England average
In some areas, there is insufficient highway capacity to meet current and future demands, for example, strategic movement east to west and around Luton.
Public transport is less accessible and frequent in rural areas compared to some of the larger settlements
Approximately 50% of residents commute for work to the surrounding areas - predominantly using the private vehicle
Supporting a modal shift, and a built environment that supports a modal hierarchy in which the pedestrian and cyclist have appropriate priority
3 AQMAs designated for exceedances of Nitrogen Dioxide in Sandy, Ampthill and Dunstable – principally associated with road traffic
Adapting to the predicted effects of climate change
Demand for energy is rising; there is significant capacity for new renewable energy development
Increased pressure on water resources particularly in the Anglian region as a result of high population density and relatively low rainfall
Water quality is declining in some areas and improving in others
High flood risk areas situated around existing water courses, and areas at risk of surface water flooding
The need to retain and protect the best and most versatile agricultural land - this is a National issue
The appropriate remediation of contaminated land
Nationally and locally designated sites for nature conservation and geodiversity as well as a range of important habitats and species
Important ecological corridors that run throughout Central Bedfordshire as well as into the surrounding Local Authority areas
Improving ecological connectivity within the plan area and particularly within the Greensand Ridge Nature Improvement Area
Balancing the need for new development with the retention of a predominantly rural landscape character with far-reaching views and high levels of tranquillity.
Maintaining traditional field boundaries, habitats and building materials that contribute to landscape character
The loss of agricultural land is changing the landscape character of the Plan area
Areas vulnerable or sensitive to changes in the landscape/ townscape, including the setting of the AONB
Conserving and enhancing the many designated and non-designated heritage assets and the contribution made by their settings
Heritage assets at risk from neglect, decay, or development pressures
Ensuring that the direction of new development does not conflict with the strategic allocations and plans outlined within the Minerals & Waste Local Plan, minimises the associated effects of minerals and waste development/ operations on human health, and encourages recycling

How has the Central Bedfordshire Local Plan been assessed?

24. An SA Framework was compiled, including SA Objectives and decision-aiding questions that aim to resolve the issues and problems identified for development planning in the CBLP area. This SA Framework, together with the baseline information, comprises the basis for assessment. The Framework was refined into a Strategic SA Framework that was appropriate for assessing strategic options and a more detailed Sites SA Framework that included detailed thresholds of significance that were appropriate for assessing site options in the future. The SA Objectives are as follows:

SA No	SA Objective
1	To ensure that the housing needs of all residents and communities are met
2	To maintain and enhance community and settlement identities
3	To improve accessibility to services and facilities
4	To support the economy and ensure that there are suitable opportunities for employment
5	To improve the health and wellbeing of communities and reduce inequalities
6	To maintain and improve the existing highway network and reduce associated indirect impacts on air quality and greenhouse gas emissions
7	To encourage a demonstrable modal shift to more sustainable forms of transport and reduce the need to travel
8	To maximise the potential for energy efficiency, reduce greenhouse gas emission and ensure that the built, natural environment and its communities can withstand the effects of climate change
9	To minimise the demand for water and maintain or improve water quality
10	To reduce the risk of flooding from all sources
11	To protect and conserve soil
12	To protect, enhance and manage biodiversity & geodiversity
13	To protect and enhance the landscape and townscape
14	To ensure the protection and enhancement of heritage assets, the historic environment and its setting

25. Each developing element of the Draft CBLP, including strategic scenarios for the amount and distribution of growth, as well as Strategic and Development Management Policies to guide and control proposed development, was subject to sustainability appraisal. Using the SA Framework, the baseline information available, and professional opinion, the likely effects of the emerging Draft CBLP were assessed. The SA considered the nature of the likely sustainability effects (including positive/negative, duration (short, medium or long term), permanent/ temporary, secondary, cumulative and synergistic) and according to categories of significance as set out in the following table:

Categories of Significance		
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 & improbable because of known sustainability issues; mitigation likely to be difficult &/or expensive

26. The SA made suggestions to the plan-making team for mitigating significant negative effects, where possible, and possibilities for enhancement, where relevant. Sustainability Appraisal 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 plan level. For example, specific significance of effects on biodiversity, heritage assets, or changes to local level traffic flows may depend on more detailed studies and assessments that are more appropriately undertaken at the next stage of planning - at the project or site level. Climate change impacts are difficult to predict as the effects are most likely to be the result of changes at a cumulative and regional or national level, and therefore a precautionary approach that seeks to deliver best practice mitigation and adaptation is the most appropriate approach.

What reasonable alternatives have been considered and addressed?

27. Reasonable alternatives have been considered and appraised through the SA process in an iterative and ongoing way such that the findings of the SA have informed each stage of plan-making and the development of the CBLP. For the Regulation 18 draft plan, the SA considered strategic options as follows:
- Areas A-D for potential growth:
 - Area A – South of Central Bedfordshire (predominantly Green Belt)
 - Area B – A1 Corridor Area to the East
 - Area C – East West Corridor to North
 - Area D – Central Section (villages)
 - Seven Approaches to Distributing Growth with each option placing greater emphasis on each approach to distributing 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 around 1,500 to 2,000 new homes 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
- Growth Scenarios were identified for accommodating and distributing the identified need for development growth. Five Scenarios for Housing and two Scenarios for Employment were developed with potential Growth Locations and applying the opportunities from each of the approaches to distributing growth. The numbers of housing in each scenario related to the likely capacities indicated from evidence including the Growth Locations study, and thus reflecting reasonable levels of housing to investigate. The Scenarios tested through SA were as follows:

Housing

- Scenario 1: Higher levels of growth across all Central Bedfordshire (reflecting options set out in the Draft Local Plan)
- 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

Employment

- Scenario 1: New jobs in Areas A (Sundon Rail Freight Interchange RFI), B (Biggleswade west of A1), and C (M1 junction 13)
- Scenario 2: As scenario 1 but without the Sundon RFI

28. Comparative assessments of strategic alternatives were made, where possible, to highlight key likely significant effects, including inter-relationships between sustainability topics and cumulative effects. At this strategic level of assessment there can be uncertainty until further technical studies have been undertaken. The SA recorded such uncertainties and data gaps. There is a hierarchy of alternatives that are relevant and proportionate to the level and stage of plan-making. It is important that the assessments should be proportionate to the level and scope of decision-making. It is only necessary at this stage that the main differences between alternatives need to be documented.
29. At the Regulation 19 stage of plan-making, further work was undertaken to identify and investigate potential site options for proposed allocation. Each option for the strategic major development sites was subject to detailed SA using the Strategic SA Framework. Each reasonable (identified as suitable and

deliverable) option for the small-medium sites was assessed using the SA Sites Framework with consideration of options clustered by settlement. The detailed findings are presented in a technical appendix and the summary findings included in the main SA Report.

30. It may be noted that the Do-Nothing scenario is not a reasonable option for the CBLP as the Council is obliged to provide development according to the identified needs for housing, employment and supporting infrastructure. Without the Plan, there will be a less coordinated approach to development that could exacerbate inequalities, adversely affect the viability of towns, and reduce opportunities to address existing issues such as out-commuting for employment and shopping. Without the Plan, sustainable transport is less likely to be promoted, issues for sustainable water management may be exacerbated, and the cumulative effects of development on biodiversity are unlikely to be addressed with missed opportunities for habitat and green infrastructure improvements for wildlife and people.

What are the likely significant effects of the Regulation 18 Draft CBLP?

Areas A-D

31. These approaches to development growth were tested through SA at an early stage of plan-making during Autumn 2016. 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. Nonetheless, some clear differences did emerge following assessment. The emerging Development Management Policies at that time also provided guidance to avoid or minimise potential negative effects such that neutral effects were indicated for all options with regard to energy, water, biodiversity and the historic environment.
32. **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:

Key Positive Effects:

- . Growth in this area will offer opportunities associated with new development which Green Belt designation restricts.
- 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.

33. **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.

34. **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.

35. **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.

Approaches for Distributing Development Growth:

36. **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.

37. **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.

38. **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.

39. **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.

40. **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.

41. **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.

Growth Scenarios:

42. **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.

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

Summary of SA & Plan-Making Findings 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

43. **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.

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

Summary of SA & Plan-Making Findings 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

44. **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. This scenario, in combination with Scenario 5, matches most closely the growth location options set out in the Draft Local Plan

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

Summary of SA & Plan-Making Findings 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.

45. **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.

Area	Strategic Growth Location	Housing Number
A	North of Luton	0
	Green Belt Villages	0
	West of Luton	0
B	Tempsford	7,000
	East of Biggleswade	3,000
	East of Arlesey	2,000
	Villages	0
C	Marston Vale	5,000
	Apsley Guise	3,000
	Wixams South	1,000

	Villages	0
D	RAF Henlow	1,000
	Villages	500
Total		22,500

Summary of SA & Plan-Making Findings 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 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.

46. **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. This scenario, in combination with Scenario 3, matches most closely the growth location options set out in the Draft Local Plan.

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

Summary of SA & Plan-Making Findings 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.
47. The Council also considered two strategic employment scenarios (with numbers of jobs in brackets) as follows:
- Scenario 1: A Sundon Rail Freight Interchange (RFI) (2,300); B Biggleswade (2,000); C M1 J13 (1,700) D 0 Total = 6,000 jobs
 - Scenario 2: A 0; B Biggleswade (2,000); C M1 J13 (1,700) D 0 Total = 3,700 jobs
48. The SA found that 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 major positive and cumulative in the longer term. Scenario 1 includes the RFI that is located within the Green Belt but will benefit from access to the M1 via the new Junction J11 and complement existing provision in north Luton with positive synergistic effects.
49. The Council proposed an approach to new development in the Spatial Growth Strategy that aligns with a combination of Scenarios 3 and 5 - to meet with the identified need for housing and employment using a range of distribution approaches and housing levels across all four Areas A-D. This mixed approach aims to avoid or minimise significant negative effects and promote likely positive effects. RAF Henlow was considered for housing growth in the scenarios but since the appraisals were undertaken the Council is considering the site as a mixed-use employment site, supporting the wider visitor economy and the research and development sector.
51. The key findings from the SA indicated that Housing 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. 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.

52. Each Housing Scenario 1-5 capitalises on opportunities to sustainably connect with major employment areas with East West Rail. 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. 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.
53. Employment 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. Some uncertainty of significance of effects on community and environmental factors in Scenario 1 and Area A; further studies will be needed.
54. **The Spatial Growth Strategy, Growth Locations & Core Policies:** The provision for new homes and jobs designed within large scale development, supported by the other Strategic and Core/Development Management Policies, is likely to lead to major positive effects for SA objectives on housing, communities, employment, health - and biodiversity since major developments tend to have the scale and scope to secure multi-functional Green Infrastructure and long term biodiversity enhancements. They also offer scope for creative and/or exemplar design for people and sustainability.
55. The amount of development will have cumulative permanent negative effects for loss of soil, greenfield, and landscape. Most Growth Locations avoid the best and most versatile agricultural land, thus reducing the negative effects overall to minor. There will be possibilities for mitigating some landscape/visual negative effects when further detailed studies are completed but cumulative effects are likely to remain.
56. There is the potential for negative effects on the highways network and associated air quality, and water resources and water quality – some uncertainty of significance until further detailed studies are completed for the next phase of plan-making. The Growth Strategy includes a summary of Growth Locations describing key characteristics, potential and requirements; new development will be planned at a selection of these locations and subject to further detailed SA studies.
57. **Development Management Policies:** The emerging Policies were tested through SA at an early stage of plan-making in autumn 2016. Inter-relationships between topics and cumulative effects were considered by assessing the policy chapters against SA themes as follows:

SA Topic	Policies & Policy Chapters considered in Sustainability Appraisal
Communities	Housing Social Infrastructure, Communication & Transport Green Belt

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

58. The effects of these Policies will depend on the location and design of new development, as well as the timing of delivery of supporting infrastructure and services. The SA assumes that the criteria that seek to restrict development and mitigate its potentially negative effects are implemented. At this initial stage of SA and plan-making, the SA found mostly positive effects of Policies on the SA objectives.

What are the likely significant effects of the Pre-Submission Regulation 19 Draft CBLP?

59. The comments received from the Regulation 18 consultation and continuing evidence confirms support for the Council's approach to new development in the Spatial Strategy that aligns with a combination of Scenarios 3 and 5 - to meet with the identified need for housing and employment using a range of distribution approaches and housing levels across all four Areas A-D. Scenarios 3 and 5 provide development opportunities in the Green Belt villages and opportunities for small and medium sites in villages across Central Bedfordshire. These Scenarios also avoid high levels of development in areas reliant on significant infrastructure.

60. Scenarios 1 and 2 are not progressed as they have high levels of development in Areas B and C which are reliant on significant infrastructure delivery. Scenario 4 is not progressed since no growth is proposed in Area A indicating little change to accessibility to services and facilities for these communities.
61. The Spatial Strategy and Policy SP1 Growth Strategy continue to aim to balance wider delivery and sustainability considerations, based on Scenario 1 and now further refined with development of the Strategic Allocations, supported by small and medium scale extensions to villages and towns throughout Central Bedfordshire.
62. The Draft Plan focuses new housing development in Town Extensions at North of Luton and East of Arlesey, and in New Villages at Marston Valley, 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.
63. 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.
64. Each Strategic Allocation Policy (SA1-5 & SE1-4) includes site-specific requirements that recognise the characteristics of the site and local area, helping to progress development benefits and to ensure that mitigation measures for likely negative effects are implemented. Each Town Extension and New Village will have a Masterplan and Phasing Strategy, together with a Design Code for each phase. Each Strategic Allocation Policy includes comprehensive site-specific requirements for housing, employment, social/community and green infrastructure, transport, biodiversity, landscape and the historic environment.
65. 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 and for settlements that have not benefitted from new development for a long time.

66. 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 includes provision of green/blue infrastructure with positive effects for both people and wildlife.
67. 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 and scope that can create Green Infrastructure with cycleways and walking routes that extend beyond to benefit the wider sustainable transport network in the longer term.
68. Site-specific requirements and strong 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 Green Infrastructure enhancements become established.
69. 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. 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.
70. 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.
71. 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.

72. The Council has recognised the likely cumulative effects of major development growth and the gaps in information particularly with regard to the funding and delivery of major infrastructure such as the routeing and timing for the East West Rail new line to Cambridge. Central Bedfordshire has a key role in relation to the Cambridge-Milton Keynes-Oxford Arc and has undertaken studies to help prepare for possible future growth. Therefore, the Plan now includes Identified Areas for Future Growth. The Council has made a commitment for an early Partial Review of the Plan and this will include further investigation of these Areas including assessing three scenarios – Base, Medium, High Growth; these will be subject to SA.

How could negative effects be mitigated?

73. A key function of the Sustainability Appraisal process is to provide advice and recommendations to the development of the plan to help mitigate identified negative effects and enhance positive effects. At each stage, these recommendations are taken forward into the next stage of the plan making process. Potential negative effects have been mitigated through the development of strong policies that protect the natural environment and promote sustainable and connected communities through requirements for appropriate provision of supporting infrastructure. Major significant effects have been avoided by selecting growth locations that avoid negative effects on nationally designated environmental assets.
75. The focus for development in Town Extensions and New Villages in the Plan facilitates mitigation of negative effects since such major developments are of a size and scope that can positively progress masterplanning and sustainable design; implementation of such mitigation measures is ensured through site-specific requirements in allocation policies, supported by strong development management policies. Potential negative effects on the transport network and other infrastructure are mitigated through the requirement for each major development is phased with supporting infrastructure so that capacities are retained for existing and new communities.
76. The potential negative effects of the smaller site allocations are mitigated through avoidance and locations that are distributed throughout the Central Bedfordshire area in settlements categorised according to services/facilities and sustainable transport. It is not possible to mitigate for the loss of agricultural land but the effects have been reduced by redeveloping previously used land for employment sites.
77. Potential cumulative negative effects on major transport and other infrastructure have been minimised by not allocating further growth yet but rather identifying areas for possible future growth that will be investigated early when more information is available, particularly regarding nationally significant infrastructure (road and rail).

HRA & EqIA

78. At this Regulation 19 stage of plan-making and as the locational specificity for strategic and other small-medium site allocations is progressed, the HRA Screening was updated. There are no designated European Sites in the Central Bedfordshire area but there is the potential for likely significant effects for a number of sites outside and within a 50km distance. The HRA considered the sensitivity of these identified European Sites, the potential impacts from proposed development, and the existence of potential environmental pathways through which significant effects might occur.
79. The HRA considered the likely effects on air quality, disturbance, changes in water levels or quality, and habitat loss or fragmentation – from the Plan individually, or in combination with effects from other plans and projects. 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, or in-combination, as a result of the implementation of the Plan.
80. The equalities screening assessment has found that the Draft Central Bedfordshire Local Plan is unlikely to have negative effects on protected characteristics or persons identified under the Equality Act 2010 and thus a full EqIA will not be required. Overall, effects were compatible and positive, or not applicable, with regard to protected persons; no negative effects were identified.

Were there any difficulties encountered?

81. There were no significant technical difficulties encountered during the preparation of this SA. Some technical information is yet to be prepared and the SA recorded such data gaps. There are inherent difficulties in predicting the likely future baseline and assumptions were made using professional judgment.

How has the SA influenced the draft Central Bedfordshire Local Plan?

82. The SA investigated early drafting of Development Management Policies and made some suggestions for improving sustainability, particularly about sustainable water management. The SA tested early versions of strategic options for approaches and scenarios for housing/employment levels and distributing growth, 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 considered have the potential for some positive and negative 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 with Scenario 1 meeting the identified need for housing and employment. The SA made recommendations

including that potential negative effects could be mitigated through site-specific development requirements, and limiting the size and number of sites in the Green Belt area.

83. The SA supports growth in Areas A, B and C as having positive effects on housing delivery and employment. In Area D, the appraisal supports 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.
84. 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.
85. 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.
86. 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.
87. 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.
88. 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 and the possibilities for sustainable construction and management. The SA of the strategic options made recommendations and considerations for the emerging site-specific policies, including suggestions for site-specific development requirements. These have been progressed into the Policies SA1-5 and SE1-4, in particular with regard to implementation of

mitigation/enhancement for green infrastructure/biodiversity, historic assets, sustainable transport, and sustainable water management. These specific development requirements will help ensure that positive effects and mitigation measures for negative effects will be implemented.

89. The SA had found some potential cumulative negative effects, particularly in the longer term and with some uncertainties due to lack of information. The Plan has addressed these concerns by proposing Identified Locations for Future Growth and making a commitment to an early review of the Plan that will include investigating three scenarios for future growth. More information will then be available and these scenarios will also be tested through SA.
90. Thus, the SA has influenced the development of the Regulation 19 Draft Local Plan by helping identify and refine reasonable strategic alternatives; assessing these alternatives to predict the likely significant effects – positive and negative, including cumulative where possible; and suggesting mitigation measures to avoid or minimise negative effects. The SA findings have informed the progression of the strategic options and proposed Spatial Strategy and Approach; they have informed the development of Strategic 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.

Consultation

91. The SA Scoping Report was subject to wide consultation during summer 2016 and comments received have been considered. Comments made on the Initial SA Report (June 2017) were taken into account in the next stages of plan-making and assessment for Regulation 19 consultation to commence in January 2018. Further comments on the SA will be provided to the Inspector together with the Submission Plan, consultation comments on the Plan, and supporting evidence.

Monitoring Proposals

92. The SEA Directive and Regulations require that the significant effects (positive and negative) of implementing the plan should be monitored to identify at an early stage any unforeseen effects and to be able to take appropriate remedial action. Government guidance on SA/SEA advises that existing monitoring arrangements should be used where possible to avoid duplication. Government requires local planning authorities to produce Monitoring Reports (MRs), and the Central Bedfordshire Council Monitoring Report (produced annually) is considered sufficient to ensure appropriate monitoring takes place.

Next Steps

93. The Pre-Submission Local Plan will be published for Regulation 19 consultation commencing 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 in March 2018 for examination later in 2018. The draft Plan will be accompanied by all the supporting documents, including the SA Report and the HRA Report.

94. The SA Report accompanies the Draft Regulation 19 Central Bedfordshire Local Plan on consultation for 8 weeks between 11 January and 22 February 2018. For further information and to make any comments, please contact the Council via the Planning website:

<http://www.centralbedfordshire.gov.uk/planning/>