

Chapter 7

SA Findings for the Local Plan as Proposed to be Modified

Introduction

7.1 This chapter presents the SA findings for the Local Plan, taking into account the changes proposed in the schedule of Main Modifications (March 2021).

7.2 The SA findings for the submitted Local Plan were presented in the Regulation 19 SA Report, supplemented by the SA Screening Report (April 2018) which considered whether the minor modifications made to the Regulation 19 Local Plan when it was submitted to Government influenced the SA findings that had been previously reported in the Regulation 19 SA Report. That screening report found that the minor modifications provided clarity and helped to reduce some uncertainties, confirming the effectiveness of mitigation measures provided through Local Plan policies, and it was concluded that the minor modifications made to the submitted Local Plan did not significantly affect the findings of the SA as presented in the Regulation 19 SA Report. The Supplementary SA Report (May 2020) revisited the strategic options for the Local Plan and presented new and updated SA findings for those options but did not review the SA findings for the policies and site allocations in the submitted Local Plan.

7.3 This chapter therefore takes the SA findings from the Regulation 19 stage and updates them to take into account the proposed Main Modifications to the Local Plan.

7.4 The SA findings are presented in the following sections:

- Vision and Strategic Objectives
- Strategic site allocation policies
- Small and medium site allocations
- Strategic policies (excluding site allocations)
- Development management policies

This chapter contains new SA work, where the policies and site allocations in the Local Plan are proposed to be modified.

Vision and Strategic Objectives

Vision

7.5 The SA findings for the Vision are set out below. The appraisal work was originally carried out at the Regulation 18 stage as only minor wording changes were made to the Vision after that stage, and the findings were repeated in the Regulation 19 SA Report.

No modifications to the Vision are proposed to be made; therefore the SA findings set out below remain valid at the current stage of plan making.

7.6 At the Regulation 18 stage it was found that the Vision would promote positive effects on **SA Objective 1: Housing**, **SA Objective 2: Communities** and especially **SA Objective 4: Employment** since it recognises the exceptional position of the area as part of a major growth opportunity with the potential for significant positive effects that will be cumulative in the longer term. The Vision acknowledges the need to preserve the special quality of small towns and villages and the high-quality environment, with likely positive effects on **SA Objective 2: Communities** and **SA Objective 5: Health and Equality**, 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 relating to out-commuting. The focus of the Vision 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.

Strategic Objectives

7.7 Thirteen Strategic Objectives are set out in the Local Plan. At the Regulation 19 stage a compatibility analysis was carried out between the SA Objectives and the Strategic Objectives (see Appendix III in the Regulation 19 SA Report). As only minimal changes to the Strategic Objectives are now proposed to be made (as described in the box at the end of this section) the findings of the compatibility analysis, summarised below, remain valid.

7.8 All the Strategic Objectives were found to be compatible with and to support the achievement of at least one of the SA Objectives. As would be expected, there was found to be incompatibility between the Strategic Objectives relating to delivering new housing and employment growth and the SA Objectives aiming to conserve water resources and protect soil quality. Increased water demand and the loss of greenfield land are inevitable consequences of growth in the Local Plan area that cannot be avoided. Other Strategic Objectives, however, do seek to minimise the effects and protect these resources as far as possible. Without precise locational and lower level details, the compatibility of the Strategic Objectives relating to growth with the SA Objectives relating to environmental protection are also largely uncertain.

Two of the Strategic Objectives are now proposed to be modified:

- The additional text proposed to be added to SO3 relating to the historic environment removes the uncertainty that was previously associated with the positive compatibility of that Strategic Objective with **SA Objective 14: Historic Environment**.
- The additional text proposed to be added to SO12 relating to the objectives of the Central Bedfordshire Nature Conservation Strategy, the NIA, AONB and Green Infrastructure Plans, strengthens the existing compatibility of that Strategic Objective with **SA Objective 12: Biodiversity and Geodiversity** and **SA Objective 13: Landscape**.

Strategic Site Allocations Policies

7.9 The strategic site allocation policies in the submitted Local Plan were subject to SA at the Regulation 19 stage. However, those SA findings were superseded by the SA work that was undertaken on the updated set of alternative strategic site options as part of the Supplementary SA (May 2020), as detailed in **Chapter 5**.

7.10 Therefore, the most recent SA findings for the relevant strategic site options have been brought forward from **Chapter 5** and updated to reflect the content of the detailed site allocations policies as set out in the schedule of proposed Main Modifications. When appraised as options (as detailed in **Chapter 5**), the strategic sites were appraised on the basis of their boundaries only, in order to ensure consistency. The appraisal findings set out below now take into account the detailed proposals (including mitigation measures) for each site as set out in the allocations policies as proposed to be modified. At the end of each policy section, a green text box summarises the effects that the proposed Main Modifications have had on the SA findings reported previously.

Policy SA1 North of Luton (approximately 3,600 homes and approximately 7ha employment land)

7.11 The boundary of this strategic site allocation is proposed to be modified from that in the submitted Local Plan. The boundary of the allocation as proposed to be modified is the same as the alternative option appraised in the Supplementary SA as 'Luton North Option 3'¹ (see **Chapter 5**). Option 3 excluded the north eastern parcel of the site, to the north of the M1-A6 Link Road, from the allocation. The eastern part of the site, known as the Eastern Bowl, is also to be defined on the Policies Maps.

7.12 The SA of the strategic option (Luton North Option 3, see **Chapter 5**) identified significant positive effects for **SA Objective 1: Housing**, **SA Objective 3: Services and Facilities**, **SA Objective 4: Employment** and **SA Objective 5: Health and Equality**. Minor positive effects were identified in relation to **SA Objective 7: Sustainable Transport**, **SA Objective 8: Energy and Climate Change** and **SA Objective 12: Biodiversity and Geodiversity** (as part of a mixed effects overall). Neutral effects were identified for **SA Objective 9: Water Resources and Quality** and **SA Objective 10: Flood Risk**. Significant negative

¹ For reference, the area that was allocated in the submitted Local Plan was appraised as Luton North Option One.

effects were identified for **SA Objective 2: Communities** (in relation to coalescence and loss of settlement identity for Lower Sundon), **SA Objective 11: Soil** and **SA Objective 13: Landscape** (as the site is adjacent to the Chilterns AONB). Minor negative effects were identified for **SA Objective 6: Highways and Air Quality** and **SA Objective 14: Historic Environment**.

7.13 The allocation policy (SA1) as proposed to be modified sets out the principles for development, with six aspects required to achieve a sustainable and vibrant community: housing, employment land, health care facility, new facilities for community, education and leisure. The policy then sets out comprehensive development requirements and these remove some uncertainty from the SA of the strategic option by confirming implementation and ensuring that mitigation measures for negative effects will be progressed.

7.14 The requirement for dedicated and safe pedestrian and cycle links both within and the wider Luton conurbation confirms the minor positive effect on **SA Objective 7: Sustainable Transport**; this is further strengthened by the requirement for integration with existing public rights of way. The requirement for the development to contribute to the Link Road and to be phased in accordance with the timing of supporting infrastructure should ensure that the capacity of the transport network is sufficient for existing and new communities, removing the potential for a minor negative effect and confirming a neutral effect for **SA Objective 6: Highways and Air Quality**.

7.15 The requirement to maximise creation and linkages for green infrastructure confirms the significant positive effect identified for **SA Objective 5: Health and Equality** and reinforces the minor positive part of the mixed effect identified for **SA Objective 12: Biodiversity and Geodiversity**. This is further supported by the requirement for the development to deliver mitigation and enhancement of key biodiversity features to achieve net gain. The opportunity for the green infrastructure to help mitigate visual impacts on the setting of the AONB and heritage assets is noted in the policy, providing some mitigation for the significant negative effect that had been identified for **SA Objective 13: Landscape**, and for the minor negative effect that had been identified for **SA Objective 14: Historic Environment**. Further mitigation is provided for impacts on the historic environment through the policy requirement for development to take into account a Heritage Impact Assessment to be agreed in consultation with Historic England. Measures are also included in the policy to preserve archaeology within the site. Overall, the effects on **SA Objective 14: Historic Environment** are considered to be neutral, taking into account the mitigation in the policy.

7.16 Further mitigation for landscape impacts is also provided by the requirement for the development to respect the AONB and to include appropriate landscaping, and by the identification of the Eastern Bowl area on the Policies Map, within which development proposals must avoid or mitigate impacts on the AONB. Overall, the effects of the policy on **SA Objective 13: Landscape** are reduced to minor negative, due to the mitigation in the policy.

7.17 The requirement for flood risk assessment and management confirms the neutral effect previously identified in relation to **SA Objective 10: Flood Risk**. The requirement for development proposals to demonstrate adequate sewerage capacity also reinforces the neutral effect previously identified in relation to **SA Objective 9: Water Resources and Quality**.

7.18 The requirement to incorporate measures to adapt to climate change, minimise energy use, and include renewable energy will support the achievement of **SA Objective 8: Energy and Climate Change**, confirming the previously uncertain minor positive effect.

Implications of the Main Modifications

The proposed Main Modifications to policy SA1 do not significantly alter the SA findings for the policy that were reported previously in the Regulation 19 SA Report. The additional text restricting development within the Eastern Bowl part of the site has reinforced the mitigation that was already included in the policy to reduce the likely significant negative effect on **SA Objective 13: Landscape** to minor negative. The more detailed policy wording requiring mitigation for impacts on cultural heritage also reinforce the mitigation that had already removed uncertainty about the effects on **SA Objective 14: Historic Environment**, to now result in a likely neutral effect.

Policy SE1 Sundon Rail Freight Interchange (RFI) Strategic Employment Area (40ha employment land)

7.19 The boundary of this site allocation is not proposed to be changed from that previously assessed as an option and identified as an allocation in the Regulation 19 Local Plan.

7.20 The SA of the strategic option (see **Chapter 5**) found that this site would have significant positive effects on **SA Objective 4: Employment**, **SA Objective 5: Health and Equality** (in relation to Green Infrastructure provision) and **SA Objective 7:**

Sustainable Transport. A potential minor positive effect was identified in relation to **SA Objective 8: Energy and Climate Change**. Neutral effects were identified for **SA Objective 1: Housing, SA Objective 3: Services and Facilities, SA Objective 9: Water Resources and Quality, SA Objective 10: Flood Risk** and **SA Objective 14: Historic Environment**. Significant negative effects were identified in relation to **SA Objective 2: Communities** (as the site is located within the Green Belt), **SA Objective 11: Soil** and **SA Objective 13: Landscape** (due to potential effects on the nearby AONB). A mixed (minor positive and minor negative) effect was identified for **SA Objective 6: Highways and Air Quality**. There was uncertainty recorded in relation to several of the effects identified at the options stage.

7.21 The allocation policy (SE1) as proposed to be modified confirms that the site will be used for an intermodal rail facility and new employment land for warehousing/distribution uses, with significant positive effects on **SA Objective 4: Employment** and **SA Objective 7: Sustainable Transport**. The requirement to provide sustainable transport links through a transport assessment confirms the likely significant positive effect on **SA Objective 7: Sustainable Transport**. The requirement for development to be connected to M1 Junction 11a ensures that the highway network will have capacity for new development, confirming at least neutral and potentially minor positive effects on **SA Objective 6: Highways and Air Quality**.

7.22 The requirement to enhance and manage Sundon Chalk Pits County Wildlife Site (CWS) and Sundon Chalk Quarry Site of Special Scientific Interest (SSSI) to improve their ecology and contribute to the green infrastructure network, and to deliver strategic tree planting to contribute to a net gain in biodiversity, provides some mitigation for the minor negative effect on **SA Objective 12: Biodiversity and Geodiversity** that was previously identified and this is reduced to a neutral effect.

7.23 The requirement to preserve and enhance heritage assets and their settings within and around the site, as well as to avoid or mitigate impacts on archaeology, confirms at least neutral effects on **SA Objective 14: Historic Environment**.

7.24 The site is close to the AONB with potential for negative effects on its setting and therefore on **SA Objective 13: Landscape**; however the policy requires tree planting to aid screening and the site is adjacent to the existing railway and motorway that already affect the AONB setting. The SA previously recommended that masterplanning should protect the AONB setting and this was taken forward into the policy requirements. The significant negative effect previously identified for **SA Objective 13: Landscape** is therefore reduced to minor negative.

7.25 The requirement for a site-specific flood risk assessment to be carried out and for a sequential approach to be taken to development confirms the negligible effect previously identified in relation to **SA Objective 10: Flood Risk**.

Implications of the Main Modifications

The proposed Main Modifications to policy SE1 do not significantly alter the SA findings for the policy that were reported previously in the Regulation 19 SA Report. The additional text relating to the mitigation of impacts on heritage features reinforces the mitigation that was already included in the policy and confirms the neutral effect on **SA Objective 14: Historic Environment** that was already identified.

Policy SA2 Marston Vale New Villages (approximately 5,000 homes and approximately 30ha employment land)

7.26 The boundary of this site is proposed to be slightly modified from the allocation in the submitted Local Plan and that which was previously appraised as a strategic option. The boundary of the allocation as proposed to be modified is almost the same as the option appraised previously (see **Chapter 5**)² although a small parcel of land adjacent to Brogborough Village has been removed. The SA work carried out previously for that option has been reviewed and it is concluded that the minor boundary change proposed in the Main Modifications does not affect the SA findings reported previously for the strategic option.

7.27 The SA of the strategic option identified significant positive effects for **SA Objective 1: Housing, SA Objective 3: Services and Facilities, SA Objective 4: Employment, SA Objective 5: Health and Equality** and **SA Objective 7: Sustainable Transport**. Minor positive effects were identified in relation to **SA Objective 8: Energy and Climate Change** and **SA Objective 13: Landscape**. Neutral effects were identified for **SA Objective 9: Water Resources and Quality** and **SA Objective 10: Flood Risk**. Significant negative effects were identified for **SA Objective 2: Communities** (in relation to

² At the strategic options stage (Chapter 5) the site was referred to as 'Marston Moretaine South (Marston Vale)'.

coalescence/loss of settlements' identity), and **SA Objective 11: Soil**. A mixed (minor positive and minor negative) effect was likely in relation to **SA Objective 12: Biodiversity and Geodiversity**.

7.28 The allocation policy (SA2) as proposed to be modified sets out the principles for development with a series of new villages to be appropriately separated and screened from neighbouring settlements. The policy sets out six aspects required to achieve sustainable and vibrant communities – housing, employment land, healthcare facility, new facilities for community, education and leisure. The policy then sets out comprehensive specific development requirements and these remove some uncertainty from the SA of the strategic option by confirming implementation and ensuring that mitigation measures for negative effects will be progressed.

7.29 The requirement for dedicated and safe pedestrian and cycle links between the new and existing villages confirms the significant positive effect already identified for **SA Objective 7: Sustainable Transport**. This is further strengthened by the requirement for development to integrate and connect to, and improvement alignments of, existing public rights of way. Development is also required to enable cycle and pedestrian connections to be made between Stewartby Lake and Ridgmont Railway Station and the development will be required to contribute towards public transport interchange facilities relating to the enhancement of the nominated stopping station for East West Rail.

7.30 The requirement for supporting transport infrastructure, including a deliverable scheme of improvements at M1 J13 and improvements to the local highways network as necessary, should ensure that the capacity of the transport network is sufficient for existing and new communities, removing uncertainty and indicating likely neutral effects for **SA Objective 6: Highways and Air Quality** rather than the minor negative effect indicated through the SA of the strategic option.

7.31 The requirement to maximise creation and linkages for both green and blue infrastructure confirms the significant positive effect already identified for **SA Objective 5: Health and Equality** and supports the minor positive effect part of the mixed effect identified previously for **SA Objective 12: Biodiversity and Geodiversity**. The delivery of a multifunctional green corridor through the site will deliver further benefits, as will the requirement for mitigation and enhancement of key biodiversity features. The requirement for additional habitat creation and linkages, together with the need to avoid detrimental impacts on wet habitats and careful zoning of uses, provides specific strong mitigation for the potential negative part of the mixed effect on **SA Objective 12: Biodiversity and Geodiversity** and results in at least neutral and potentially minor positive effects overall.

7.32 The requirement for development to take into account a Heritage Impact Assessment, to be agreed in consultation with Historic England, provides mitigation for potential effects on heritage assets. The policy also requires the preservation of archaeological interests. Overall, the potential minor negative effect on **SA Objective 14: Historic Environment** that was previously identified for the strategic option is reduced to a neutral effect.

7.33 The requirement for flood risk assessment and the use of SUDS confirms the neutral effects previously identified in relation to **SA Objective 10: Flood Risk**. The requirement for development proposals to demonstrate adequate sewage treatment works capacity confirms the neutral effect previously identified for **SA Objective 9: Water Resources and Quality**. The requirement to incorporate measures to adapt to climate change, minimise energy use, and include renewable energy will support the achievement of **SA Objective 8: Energy and Climate Change**, removing uncertainty and confirming a minor positive effect.

Implications of the Main Modifications

The proposed Main Modifications to policy SA2 do not significantly alter the SA findings for the policy that were reported previously in the Regulation 19 SA Report. The additional text relating to the mitigation of impacts on biodiversity supports the positive effect on **SA Objective 12: Biodiversity and Geodiversity** that was already identified at the Regulation 19 stage. Similarly, the additional detail added to the policy in relation to the protection of heritage assets confirms the neutral effects on **SA Objective 14: Historic Environment** that were already identified.

Policy SE2 Marston Gate Expansion Strategic Employment Area (up to 30ha)

7.34 The boundary of this site is proposed to be modified from that previously appraised as a strategic option (see **Chapter 5**)³ and allocated in the submitted Local Plan. The boundary has been reduced and amended to restrict development in an area of

³ The Marston Gate Expansion site was referred to as 'Land at Ridgmont (M1 Junction 13)' in the strategic options appraisal work.

rising ground in the east of the site. The SA work undertaken previously for the strategic option has been reviewed and the findings are not affected by the boundary change.

7.35 The SA of the strategic option (see **Chapter 5**) identified significant positive effects for **SA Objective 4: Employment**, **SA Objective 5: Health and Equality** and **SA Objective 7: Sustainable Transport**. Minor positive effects were identified for **SA Objective 8: Energy and Climate Change**, **SA Objective 12: Biodiversity and Geodiversity** and **SA Objective 13: Landscape**. Neutral effects were identified for **SA Objective 1: Housing**, **SA Objective 2: Communities**, **SA Objective 3: Services and Facilities**, **SA Objective 9: Water Resources and Quality**, **SA Objective 10: Flood Risk** and **SA Objective 14: Historic Environment**. A significant negative effect was identified for **SA Objective 11: Soil** and a minor negative effect was identified for **SA Objective 6: Highways and Air Quality**.

7.36 The allocation policy (SE2) as proposed to be modified sets out the requirement for new employment land confirming the significant positive effect on **SA Objective 4: Employment**. While the amount of employment land has been reduced through the Main modifications, the effect on the SA Objective is still considered to be significant positive. The requirement for improvements to the A507 and M1 J13 will ensure that the highway network will have capacity for new development, removing uncertainty and confirming likely neutral effects on **SA Objective 6: Highways and Air Quality**. The requirement to provide sustainable transport links through a transport assessment and accompanying travel plan confirms the likely significant positive effect on **SA Objective 7: Sustainable Transport**, which is further enhanced through the requirement for development to take full account of potential arising from improvements to Ridgmont railway station and to provide contributions towards enhancing infrastructure at the station.

7.37 The requirement to deliver strategic measures to reduce flood risk including using SUDS confirms the neutral effect identified previously on **SA Objective 10: Flood Risk**.

7.38 The requirement to provide appropriate screening and landscaping to ensure effective integration into the open countryside supports the minor positive effect identified for **SA Objective 13: Landscape**, particularly as the policy also requires development at the site to have a maximum height of 18.5m and to incorporate specific design features such as colour banding. Targeted off-site planting will also aid with mitigating key views and enhance the appearance of the site.

7.39 The requirements in the policy to take account of the identified heritage features and to accord with other Local Plan policies relating to the historic environment confirms the neutral effect identified previously for **SA Objective 14: Historic Environment**.

Implications of the Main Modifications

The proposed Main Modifications to policy SE2 do not significantly alter the SA findings for the policy that were reported previously in the Regulation 19 SA Report. The revised boundary removes an area of rising ground which reinforces the potential positive effect on **SA Objective 13: Landscape** (the potential for the development to achieve enhancements has already been recognised). The reduced employment land provision does not change the significant positive effect previously identified for **SA Objective 4: Employment**.

Policy SA3 East of Arlesey (approximately 2,000 homes)

7.40 The boundary of this site allocation is not proposed to be changed from that previously assessed as an option and identified as an allocation in the Regulation 19 Local Plan. Additional detail is proposed to be added to the Policies Map to show which areas of the site must be retained as open agricultural land and which areas shall be used for leisure and/or sports provision.

7.41 The SA of the strategic option (see **Chapter 5**)⁴ identified significant positive effects for **SA Objective 1: Housing**, **SA Objective 3: Services and Facilities** and **SA Objective 5: Health and Equality**. A significant positive effect on **SA Objective 12: Biodiversity and Geodiversity** was also identified as part of a mixed effect overall. Minor positive effects were identified in relation to **SA Objective 4: Employment**, **SA Objective 7: Sustainable Transport** and **SA Objective 8: Energy and Climate Change**. A potential significant negative effect was identified in relation to **SA Objective 11: Soil**, as well as minor negative

⁴ The strategic option that relates to the allocated area is the first of the three alternative boundary options considered at Arlesey (referred to as Arlesey Option 1 in Chapter 5 of this report).

effects in relation to **SA Objective 2: Communities** and **SA Objective 14: Historic Environment**. Neutral effects were identified for **SA Objective 6: Highways and Air Quality** and **SA Objective 10: Flood Risk**.

7.42 The allocation policy (SA3) as proposed to be modified sets out the principles for development of the site with five aspects required to achieve a sustainable and vibrant community – housing, healthcare provision, new facilities for the community, education facilities and leisure provision. The policy then sets out comprehensive development requirements and these remove some of the negative effects and uncertainty from the SA of the strategic option by confirming implementation and ensuring that mitigation measures for negative effects will be progressed.

7.43 The requirement for dedicated and safe pedestrian and cycle links both within and the wider areas confirms the positive effect on **SA Objective 7: 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 Arlesey, meaning that a significant positive effect is likely for SA Objective 7.

7.44 The requirement for the relief road to connect the area from the south of Hitchin Road to the A507/High Street Link Road is clear. The guidance/direction for integration, phasing and other supporting transport infrastructure 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 Objective 6: Highways and Air Quality**. This is reinforced by the policy requirement to consider through a transport assessment the cumulative impacts of planned development in north Hertfordshire and to identify any required mitigation measures. Some minor positive effects are indicated as the relief and link roads will allow direct access onto the A507, relieving congestion along the High Street in Arlesey and thus helping to resolve an existing sustainability problem.

7.45 The requirement to maximise creation and linkages for green infrastructure confirms the significant positive effects already identified in relation to **SA Objective 5: Health and Equality** and **SA Objective 12: Biodiversity and Geodiversity**, with specified links between the proposed country park with existing green infrastructure assets in Arlesey and Fairfield Park. The requirement for mitigation and enhancement of key biodiversity further confirms significant positive effects for **SA Objective 12: Biodiversity and Geodiversity**. The country park will provide separation between the new development and Fairfield, helping to mitigate against coalescence and loss of identity thus reducing the minor negative effect on **SA Objective 2: Communities** that was identified in the appraisal of the strategic option.

7.46 The detailed policy requirements to avoid and mitigate effects on the identified designated heritage assets and their settings confirms the implementation of mitigation, supported by the relevant development management policies that are referred to in this policy, and this removes uncertainty from the SA findings to confirm neutral effects on **SA Objective 14: Historic Environment**.

7.47 The requirement for flood risk assessment and management will confirm the neutral effect previously identified in relation to **SA Objective 10: Flood Risk**.

7.48 The requirement for any mains sewerage infrastructure, including any necessary phasing, provides strong mitigation measures thus helping to remove uncertainty from the previous SA findings with regard to **SA Objective 9: Water Resources and Quality** to at least neutral effects overall. The requirement to incorporate measures to adapt to climate change, minimise energy use and include renewable energy will help to achieve **SA Objective 8: Energy and Climate Change**, removing uncertainty and confirming a minor positive effect.

7.49 The requirement to provide appropriate landscaping measures for a predominately agricultural landscape, with a net gain for biodiversity, provides mitigation and confirms the minor positive effect indicated by the SA of the strategic option in relation to **SA Objective 13: Landscape**. The proposed modification to the Policies Map to show which areas of the site will be retained as agricultural land, provide further mitigation.

Implications of the Main Modifications

The proposed Main Modifications to policy SA3 do not significantly alter the SA findings for the policy that were reported previously in the Regulation 19 SA Report. The addition of text requiring no built development in the eastern edge of the site confirms the reduction of the minor negative effect on **SA Objective 2: Communities** to a neutral effect, as already defined at the Regulation 19 stage. Neutral effects on **SA Objective 14: Historic Environment** were also already identified at the Regulation 19 stage, which is further confirmed by the addition of further mitigation text within the policy. The additional text relating to the Country Park provides more certainty over its delivery and reinforces the positive effects already identified for **SA Objective 5: Health and Equality** and **SA Objective 12: Biodiversity and Geodiversity**.

Policy SA4 East of Biggleswade Garden Community (approximately 1,500 homes)

7.50 The boundary of this site is proposed to be modified from that previously appraised as a strategic option (see **Chapter 5**)⁵ and allocated in the submitted Local Plan. The boundary has been amended to change the access points to the site. The SA work undertaken previously for the strategic option has been reviewed and the findings remain valid despite the proposed boundary change.

7.51 The SA of the strategic option identified significant positive effects for **SA Objective 1: Housing, SA Objective 3: Services and Facilities** and **SA Objective 5: Health and Equality**. Minor positive effects were also identified in relation to **SA Objective 2: Communities, SA Objective 4: Employment, SA Objective 7: Sustainable Transport, SA Objective 8: Energy and Climate Change** and **SA Objective 13: Landscape**. Neutral effects were identified for **SA Objective 6: Highways and Air Quality, SA Objective 9: Water,** and **SA Objective 14: Historic Environment**. A potential significant negative effect was identified for **SA Objective 11: Soil**, as well as minor negative effects for **SA Objective 10: Flood Risk** and **SA Objective 12: Biodiversity and Geodiversity**.

7.52 The allocation policy (SA4) as proposed to be modified sets out the principles for development for a well-designed and sustainable garden village, with six aspects required to achieve a sustainable and vibrant stand-alone community – housing, health/social care facilities, new facilities for community, education and leisure. The policy then sets out comprehensive development requirements and these remove some uncertainty from the SA of the option by confirming implementation and ensuring that mitigation measures for negative effects will be progressed.

7.53 The requirement for dedicated and safe pedestrian and cycle links both within and the wider areas confirms the significant positive effect on **SA Objective 7: 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. The requirement for development to provide appropriate vehicular access to the existing highway network should ensure that the capacity of the transport network is sufficient for existing and new communities, removing uncertainty and confirming a neutral effect on **SA Objective 6: Highways and Air Quality**. This is reinforced by the policy requirement for a transport assessment to consider the cumulative impacts of development proposed in northern Hertfordshire and to identify any required mitigation measures.

7.54 The requirement to maximise creation and linkages with multi-functional green infrastructure, including a green corridor that will provide visible separation between the new village and Biggleswade, mitigates against coalescence and potential loss of identity thus confirming the potential minor positive effect on **SA Objective 2: Communities** identified in the SA of the strategic option. The requirement for mitigation and enhancement of key biodiversity features provides mitigation for the potential minor negative effect identified for **SA Objective 12; Biodiversity and Geodiversity**. The requirement includes additional habitat creation and linkages and specifies improvement for Biggleswade Common and Green Wheel.

7.55 The requirement to mitigate effects on the nearby designated heritage assets and their settings, and to preserve archaeology, confirms the implementation of mitigation and thus a neutral effect on **SA Objective 14: Historic Environment**.

7.56 The SA of the strategic option had identified a potential minor negative effect on **SA Objective 10: Flood Risk** as parts of the site are in flood zones 2 and 3. 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 and 3, thus providing mitigation and reducing the minor negative effect previously identified to neutral.

⁵ The site was referred to as 'Biggleswade East Phase 1' in the strategic options appraisal work.

7.57 The requirement for development proposals to demonstrate that there is adequate sewage treatment works capacity, and that it will not have negative effects on water quality or quantity, confirms the neutral effect identified for **SA Objective 9: Water Resources and Quality**. The requirement to incorporate measures to adapt to climate change, minimise energy use, and include renewable energy will support the achievement of **SA Objective 8: Energy and Climate Change**, removing uncertainty and confirming a minor positive effect.

7.58 The requirement to provide appropriate landscaping, with a net gain for biodiversity, provides mitigation and confirms the minor positive effect on **SA Objective 13: Landscape** that was indicated by the SA of the strategic option.

Implications of the Main Modifications

The proposed Main Modifications to policy SA4 do not significantly alter the SA findings for the policy that were reported previously in the Regulation 19 SA Report. The additional text relating to access points to the site confirms the neutral effect on **SA Objective 6: Highways and Air Quality** that was already identified at the Regulation 19 stage. The additional mitigation included in the policy in relation to the protection of heritage assets reinforces the neutral effect on **SA Objective 14: Historic Environment** that was already identified at the Regulation 19 stage.

Policy SE3 Holme Farm Biggleswade Strategic Employment Area (up to 63 ha employment land)

7.59 The boundary of this site is proposed to be modified from that previously appraised as a strategic option (see **Chapter 5**)⁶ and allocated in the submitted Local Plan. The boundary has been amended to provide a more cohesive development area. The SA work undertaken previously for the strategic option has been reviewed and it has been concluded that, despite the relatively significant changes proposed to the site boundary, the likely effects on the SA Objectives remain the same. The expanded boundary does not incorporate sensitive features or constraints such as designated heritage assets or areas of flood risk that were not previously included within the site, and so if a new SA matrix was prepared to reflect the boundary as proposed to be modified, it would identify the same likely effects on the SA Objectives as the existing matrix. The SA findings for the original strategic option, described below, therefore remain valid for this alternative boundary option.

7.60 The SA of the strategic option identified significant positive effects for **SA Objective 4: Employment, SA Objective 5: Health and Equality** and **SA Objective 7: Sustainable Transport**. Minor positive effects were also identified for **SA Objective 8: Energy and Climate Change, SA Objective 12: Biodiversity and Geodiversity** and **SA Objective 13: Landscape**. Neutral effects were identified for **SA Objectives 1: Housing, SA Objective 3: Services and Facilities, SA Objective 9: Water Resources and Quality, SA Objective 10: Flood Risk** and **SA Objective 14: Historic Environment**. A significant negative effect was identified for **SA Objective 11: Soil** and minor negative effects were identified for **SA Objective 2: Communities** (in relation to effects on the identity of the small hamlet of Holme) and **SA Objective 6: Highways and Air Quality**.

7.61 The allocation policy (SE3) as proposed to be modified sets out the requirement for new employment land, confirming the significant positive effect on **SA Objective 4: Employment**. The requirement to protect the nearby wind farm confirms the minor positive effect on **SA Objective 8: Energy and Climate Change**.

7.62 The requirement for improvements to the A1 ensures that the highway network will have capacity for new development, removing uncertainty and confirming a likely neutral effect on **SA Objective 6: Highways and Air Quality**. The requirement to provide a new footbridge and cycle way over the A1 as well as improvements to existing footpaths in the area and shuttle bus services to and from the railway station confirms the significant positive effect on **SA Objective 7: Sustainable Transport**. The neutral effect on **SA Objective 3: Services and Facilities** may also be increased to a minor positive effect as the footbridge and cycleway over the A1 will provide access for employees to the services and facilities in the nearby Stratton Park employment and retail area.

7.63 The requirements to provide appropriate and sensitive landscaping, to protect the mature woodland within the site and to contribute to the green infrastructure network, specifically the Biggleswade Green Wheel, confirm the likely minor positive effect on **SA Objective 13: Landscape**. This is further reinforced by the detailed measures set out in the policy to reduce visual impact and achieve landscape enhancements, including retaining certain trees and hedgerows and providing a landscape amenity area and ecological park with water feature.

⁶ The site was referred to as 'Land West of the A1' in the strategic options appraisal work.

7.64 Some of these measures will also benefit biodiversity, thereby confirming the minor positive effect identified for **SA Objective 12: Biodiversity and Geodiversity**. The requirement to avoid and mitigate impacts on heritage assets and to develop a field evaluation and mitigation strategy for multi-period archaeological remains removes uncertainty and confirms likely at least a neutral effect on **SA Objective 14: Historic Environment**, and there may be possibilities for positive effects through contributions to information on the archaeological resource.

7.65 The requirement for a ground water risk assessment to demonstrate no adverse impacts in relation to groundwater pollution confirms the neutral effect identified for **SA Objective 9: Water Resources and Quality**. The requirement for development to deliver strategic measures to reduce flood risk including the use of SUDS also confirms the neutral effect identified for **SA Objective 10: Flood Risk**.

Implications of the Main Modifications

The proposed Main Modifications to policy SE3 do not significantly alter the SA findings for the policy that were reported previously in the Regulation 19 SA Report. The additional text relating to sustainable transport links to be provided to and from the site reinforces the significant positive effect on **SA Objective 7: Sustainable Transport** that was already identified. The inclusion of additional text relating to the mitigation of impacts on biodiversity and the landscape confirm the likely minor positive effects on **SA Objective 12: Biodiversity and Geodiversity** and **SA Objective 13: Landscape** that were already identified at the Regulation 19 stage.

Policy SE4 Former RAF Base Henlow Strategic Mixed-Use Redevelopment Area

7.66 *The submitted Local Plan included this strategic allocation; however this is proposed to be deleted from the Local Plan through the Main Modifications. Therefore, there are no likely significant sustainability effects associated with this site that will occur as a result of the Local Plan as proposed to be modified.*

Implications of the Main Modifications

The proposed Main Modifications to policy SE4, i.e. the deletion of the policy, mean that the likely effects identified previously will no longer occur.

Policy SC1 Houghton Regis North Sites 1 and 2 Strategic Commitment

7.67 The boundary of this strategic commitment is not proposed to be changed from that previously assessed as a strategic site option and identified as an allocation in the Regulation 19 Local Plan. The site has planning permission and is included in the Local Plan as a strategic commitment, rather than an allocation.

7.68 The SA of the strategic option (see **Chapter 5**) identified significant positive effects for SA Objectives 1: Housing, 3: Services and Facilities and 5: Health. Minor positive effects were identified for **SA Objectives 4: Employment, SA Objective 7: Sustainable Transport, SA Objective 8: Energy and Climate Change** and **SA Objective 13: Landscape**. Neutral effects were identified for **SA Objective 9: Water Resources and Quality** and **SA Objective 10: Flood Risk**. Significant negative effects were identified in relation to **SA Objective 2: Communities, SA Objective 6: Highways and Air Quality** and **SA Objective 11: Soil**. A minor negative effect was identified in relation to **SA Objective 14: Historic Environment**. A mixed (minor positive and minor negative) effect was identified in relation to **SA Objective 12: Biodiversity and Geodiversity**.

7.69 Site-specific requirements in the Local Plan policy as proposed to be amended (SC1) reiterate requirements in the Framework Plan and provide further information and guidance. The requirement for a mix of uses to achieve a sustainable community supports the positive effects already identified for **SA Objective 1: Housing, SA Objective 4: Employment** and **SA Objective 5: Health and Equality**. The requirements for efficient public transport links with dedicated and safe pedestrian and cycle links from the new and existing neighbourhoods will reinforce the minor positive effect already identified for **SA Objective 7: Sustainable Transport**.

7.70 The requirement to provide a green infrastructure network within the existing urban area, the new allocation, and the wider countryside will support the achievement of **SA Objective 12: Biodiversity and Geodiversity**, particularly as the policy also requires development contributions to mitigate the impact of development on Houghton Regis Marl Lakes SSSI and Chalk Pit

CWS and ensure its long term protection. The overall effect of the policy on this SA Objective is therefore expected to be at least neutral with the potential for minor positive effects.

7.71 The policy requirements in relation to green infrastructure provision will also support the achievement of **SA Objective 13: Landscape**, confirming the potential minor positive effect already identified – particularly as the policy specifies that the green infrastructure network will help to preserve and enhance the landscape within the existing urban area, the development area and the wider countryside.

7.72 Mitigation measures are required to ensure the preservation of all designated heritage assets, indicating at least neutral effects for **SA Objective 14: Historic Environment**. A reduction in flood risk is sought, by engaging with the Environment Agency to explore suitable opportunities – confirming the neutral effect on **SA Objective 10: Flood Risk**.

Implications of the Main Modifications

The proposed Main Modifications to policy SC1 do not significantly alter the SA findings for the policy that were reported previously in the Regulation 19 SA Report.

Small and Medium Site Allocations

7.73 Small and medium site allocations are made through Local Plan policy HA1: Small and Medium Allocations. The SA findings for the reasonable alternative small and medium site options were presented in **Chapter 6**. Forty eight of the options are included as allocations in policy HA1, as proposed to be modified. **Appendix D** sets out CBC's reasons for selecting or rejecting each option. This is based on the information previously set out in Appendix VIId in the Regulation 19 SA Report but has been updated to reflect the changes to the small and medium site allocations that are proposed to be made through the Main Modifications. One of the sites included as an allocation in policy HA1, NLP538 - A5 Watling Street, Hockliffe (allocated as site HAS26) was omitted from the SA work undertaken for the options previously and presented in **Chapter 6**; therefore it has now been subject to SA.

7.74 Of the small and medium sites previously allocated in the submitted Local Plan, four are now proposed to be deleted: HAS03, HAS04, HAS09 and HAS24. The likely effects of those sites on the SA Objectives (detailed in **Chapter 6**) will therefore no longer occur as a result of Policy HA1. No new allocations are proposed to be included in policy HA1 through the Main Modifications.

7.75 Four of the sites allocated in policy HA1 are proposed to have boundary changes through the Main Modifications: HAS08, HAS11, HAS45 and HAS48. Based on the assessment criteria explained in **Chapter 2** of this report, none of the proposed boundary changes result in changes to the SA findings for those sites as set out previously in **Chapter 6**.

7.76 The capacity of four sites are also changed in the Main Modifications: HAS25, HAS36, HAS45 and HAS48; however this does not result in any changes in their effects on **SA Objective 1: Housing** and all would still have minor positive effects on that objective.

7.77 In addition, extra text has been added to the policy in relation to specific requirements for some of the site allocations. **Table 7.1** below summarises the likely effects of the sites now allocated in Policy HA1 as proposed to be modified and the likely effects of the policy, taking into account the mitigation included within the policy as proposed to be modified, are summarised beneath the table.

Table 7.1: Summary of SA findings for the small and medium site allocations included in Policy HA1 as proposed to be modified

Site Option	SA Objectives														
	1: Housing	2: Communities	3: Services & Facilities	4: Employment	5: Health & Equality	6: Highways & Air Quality	7: Sustainable Transport	8: Energy & Climate Change	9: Water Resources & Quality	10: Flood Risk	11: Soil	12: Biodiversity & Geodiversity	13: Landscape	14: Historic Environment	
ARLESEY															
NLP223 Land adjoining Lewis Lane (HAS01)	+	0	0	+	0	+	-?	+	0	0?	+	--?	0	0	0
NLP318 Land at 214-216 High Street (HAS02)	+	0	0	+	0	+	-?	+	0	0?	+	--	0	0	0
NLP403 Land adjoining Lewis Lane (HAS01)	+	0	0	+	0	+	-?	+	0	0?	+	--?	0	0	0
BARTON le CLAY															
NLP158 Land East of Barton le Clay (HAS05)	+	-	-	+	0	+	-?	-	0	0?	+	--?	+	-	-?
BIGGLESWADE															
NLP258/ALP194 North Biggleswade (HAS06)	+	0	0	+	0	+	-?	-	0	0?	+	--	+	-?	0
CADDINGTON															
NLP439 Caddington Park (HAS07)	+	-	0	-	0	-	-?	+	0	0?	+	--?	+	-	0
CAMPTON & CHICKSANDS															
NLP082 Land South East of Greenway (HAS08)	+	0	0	-	0	+	-?	-	0	0?	+	--	+	+	0
CLIFTON															
NLP297/ALP149/ALP213 New Home (HAS10)	+	0	0	+	0	+	-?	+	0	0?	+	--	+	+	-
CRANFIELD															
NLP139 Land West of Lodge Road (HAS12)	+	0	0	-?	0	+	-?	-	0	0?	+	--?	0	0	0
NLP315/ALP109 East End Farm (HAS11)	+	0	0	+	0	+	-?	-	0	0?	+	--?	+	-	0
DUNTON															
NLP324 Land south of Biggleswade Rd (HAS13)	+	0	0	-	0	+	-?	-	0	0?	+	-	+	0	0
EATON BRAY															
NLP483 Land off Eaton Park (HAS14)	+	-	0	-	0	+	-?	+	0	0?	+	--?	+	+	0

Site Option	SA Objectives														
	1: Housing	2: Communities	3: Services & Facilities	4: Employment	5: Health & Equality	6: Highways & Air Quality	7: Sustainable Transport	8: Energy & Climate Change	9: Water Resources & Quality	10: Flood Risk	11: Soil	12: Biodiversity & Geodiversity	13: Landscape	14: Historic Environment	
EVERTON															
ALP094 Green Lane (HAS15)	+	0	0	-	0	+	-?	-	0	0?	+	-?	+	+	0
NLP165 Land at Manor Farm (HAS16)	+	0	0	-	0	+	-?	-	0	0?	+	-?	+	+	0?
FLITWICK															
NLP039 Steppingley Road (HAS17)	+	--	0	+	0	+	-?	+	0	0?	+	--	+	+	-?
NLP492 Site next to Flitwick Allotments (HAS18)	+	0	0	+	0	-?	-?	+	0	0?	+	--	+	+	+
GRAVENHURST															
NLP101/ALP467 The Pyghtle (HAS19)	+	0	0	-	0	+	-?	-	0	0?	+	--	+	+	0
HARLINGTON															
ALP117 Midland Mainline Railway (HAS20)	+	--	0	+	0	+	-?	+	0	0?	+	--	+	0	0
NLP107/ALP181 West of Sundon Rd (HAS21)	+	-	+	+	+	+	-?	+	0	0?	+	--	+	-	0
NLP381 Land West of Harlington (HAS20)	++	--	+	+	0	+	-?	-?	0	0?	+	--	+	-	-?
HAYNES															
NLP502 South of Northwood End Road (HAS22)	+	0	0	-	0	+	-?	+	0	0?	+	-?	+	+	0
HENLOW															
NLP268 Adjacent to Derwent School (HAS23)	+	0	0	+	0	+	-?	+	0	0?	+	--	+	0	0
HOCKCLIFFE															
ALP125/NLP413 Land off Leighton Rd (HAS25)	+	--	0	-	0	+	-?	-	0	0?	+	--	+	0	0
NLP538 - A5 Watling Street, Hockliffe (HAS26)	+	--	-?	-	0	+	-?	-	0	0?	+	--	+	-?	-
HOUGHTON REGIS															
ALP307 Bidwell Gospel Hall (HAS28)	+	0	0	+	0	+	-?	+	0	0?	+	-?	+	+	0
NLP546 Land East of Houghton Regis (HAS29)	+	0	0	+	0	+	-?	+	0	0?	+	-?	+	+	0
LANGFORD															

Site Option	SA Objectives														
	1: Housing	2: Communities		3: Services & Facilities	4: Employment	5: Health & Equality	6: Highways & Air Quality	7: Sustainable Transport	8: Energy & Climate Change	9: Water Resources & Quality	10: Flood Risk	11: Soil	12: Biodiversity & Geodiversity	13: Landscape	14: Historic Environment
NLP066/ALP071/ALP132 Thistle Hill Farm (HAS30)	+	0	0	-	0	+	-?	+?	0	0?	+	--	+	0	0
NLP230 Land Bridge Field (HAS31)	+	0	0	-	0	+	-?	+?	0	0?	+	-	+	-?	0
LEIGHTON LINSLADE															
NLP464 Chiltem-Hunt Land (HAS34)	+	0	0	+	-?	+	-?	-	0	0?	+	-	+	0	0
ALP064 North Chamberlains Farm (HAS32)	+	0	0	+	0	+	-?	-?	0	0?	+	-	+	0	0
NLP049 Land North of Soulbury Road (HAS33)	+	--	0	-?	0	+	-?	-?	0	0?	+	-	+	0	0
MARSTON MORETAINE															
NLP199 Wood End Land (HAS35)	+	0	0	+	0	+	-?	-	0	0?	+	--	+	+	0
MAULDEN															
ALP051 Between 129 & 131 Clophill Rd (HAS36)	+	0	0	-	0	+	-?	+	0	0?	+	-	-?	+	0
ALP116 Between 129 & 131 Clophill Rd (HAS37)	+	0	0	-	0	+	-?	+	0	0?	+	-	-?	+	0
NLP253 Land fronting Silsoe Road (HAS38)	+	0	0	-	0	+	-?	+	0	0?	+	--	+	+	0
MEPPERSHALL															
NLP237 Part of Blandland Nursery (HAS39)	+	0	0	-	0	+	-?	-	0	0?	+	--	+	+	0
MOGGERHANGER															
NLP286/ALP180 Park Rd/Bedford Rd (HAS40)	+	0	0	-	0	+	-?	+	0	0?	+	--	+	+	0?
NORTHILL															
NLP207 Land at Thorncote Road (HAS41)	+	0	0	-	0	+	-?	+	0	0?	+	--?	+	+	-
NLP478/ALP398 Land at The Pound (HAS42)	+	0	0	-	0	+	-?	+	0	0?	+	--	+	-?	0
POTTON															
NLP542 One Acre Field (HAS43)	+	0	0	+	0	+	-?	+	0	0?	+	--?	+	0	0
SHEFFORD															
NLP373 Line Field (HAS44)	+	0	0	+	0	+	-?	-	0	0?	+	--	+	+	0

Site Option	SA Objectives														
	1: Housing	2: Communities	3: Services & Facilities	4: Employment	5: Health & Equality	6: Highways & Air Quality	7: Sustainable Transport	8: Energy & Climate Change	9: Water Resources & Quality	10: Flood Risk	11: Soil	12: Biodiversity & Geodiversity	13: Landscape	14: Historic Environment	
SHILLINGTON															
ALP167/NLP188 South & east of High Rd (HAS45)	+	0	0	-	0	+	-?	-	0	0?	+	--?	+	-	0
STONDON															
ALP271 Rear of Doctor's Surgery (HAS46)	+	0	0	+	0	-	-?	+	0	0?	+	--	+	+	0
NLP281/ALP298 Land off Pastures (HAS47)	+	0	0	-	0	+	-?	-	0	0?	+	--?	+	+	0
NLP428/ALP272 South of Greyhound Track (HAS46)	+	0	0	+	0	-	-?	+	0	0?	+	--	+	+	0
NLP429/ALP268/ALP469 Greyhound Stadium (HAS46)	+	0	+	+	-	-	-?	+	0	0?	+	++	+	+	0
NLP448 Land adj to 85 Station Rd (HAS46)	+	0	0	+	0	+	-?	-	0	0?	+	--	+	+	0
SUTTON															
NLP325 Land South of High Street (HAS48)	+	0	0	-	0	+	-?	-	0	0?	+	--	0	0	0
TODDINGTON															
NLP152 Land SE of Leighton Rd (HAS49)	+	-	0	+	0	+	-?	-?	0	0?	+	--?	-?	0	0
NLP153 Land SE of Leighton Rd (HAS49)	+	-	0	+	0	+	-?	-?	0	0?	+	--?	-?	0	0
NLP184/ALP086 Middle Lakes (HAS49)	+	-	0	+	0	+	-?	-	0	0?	+	--?	-?	0	0
NLP405/NLP378 East of Leighton Rd (HAS49)	+	-	0	+	0	+	-?	-	0	0?	+	--?	-?	0	-?
NLP411 Alma Farm (HAS50)	+	-	0	+	0	+	-?	-	0	0?	+	--?	+	-?	0
WESTONING															
NLP136 Land off Flitwick Road (HAS51)	+	--	0	+	0	+	-?	-	0	0?	+	--	+	+	0
NLP317 West View Farm (HAS52)	+	-	0	+	0	+	-?	-	0	0?	+	-	+	+	0

7.78 The sites that are allocated in policy HA1 as proposed to be modified will all have minor positive effects on **SA Objective 1: Housing** as they will all individually contribute a relatively small number of homes. However, the cumulative effects of the allocations and therefore the effects of the policy overall will be significant positive.

7.79 The effects of the site allocations on **SA Objective 2: Communities** are more mixed – where sites are allocated at settlements in or near to the Green Belt, a number of negative effects are identified. The effects of the site allocations on **SA Objective 3: Services and Facilities** are also quite mixed – approximately half of the sites allocated would have minor negative effects as they are not well-located in relation to existing services and facilities. This is particularly the case for sites allocated at Caddington, Campton and Chicksands, Dunton, Eaton Bray, Everton, Gravenhurst, Haynes, Langford, Maulden, Meppershall, Moggerhanger, Northill, Shillington and Sutton. However, it is noted that the new development allocated may stimulate the provision of new services. Sites allocated at some of the larger villages tend to be better located in relation to existing services so will have minor positive effects. As well as access to existing services, the cumulative effects of allocations may be positive in terms of supporting those services and ensuring their ongoing viability as well as stimulating new provision.

7.80 Most of the allocated sites will have negligible effects on **SA Objective 4: Employment**, therefore the effects of the policy as a whole can be said to be negligible. However, two of the allocated sites will have minor negative effects as they may result in the loss of existing employment uses.

7.81 Most of the site allocations will have minor positive effects on **SA Objective 5: Health and Equality** as they are well-related to existing open spaces and sports and leisure facilities. While some of the allocated sites are less well-located, the overall effects of the policy are considered to be minor positive, particularly because the new development allocated could stimulate the provision of new facilities.

7.82 All of the allocated sites will have potential minor negative effects on **SA Objective 6: Highways and Air Quality** as all could increase traffic on the surrounding roads. The overall effects of the policy are therefore also considered to be potentially minor negative although some of the site allocations have specific mitigation requirements included in the policy – for example, at HAS20 development proposals must make specific improvements to the transport network locally. While around half of the sites allocated are within reasonable walking distance of sustainable transport links, a number are not and so the effects of the policy on **SA Objective 7: Sustainable Transport** are fairly mixed. This is unsurprising given the location of many of the small-medium site allocations in more rural parts of Central Bedfordshire.

7.83 All of the allocations and therefore policy HA1 overall will have negligible effects on **SA Objective 8: Energy and Climate Change** as the achievement of this objective will not be influenced by the spatial distribution of small-medium site allocations. Similarly, all of the allocations and therefore the policy overall will have negligible effects on **SA Objective 9: Water Resources and Quality** and **SA Objective 10: Flood Risk**. There is no evidence of site allocations leading to negative effects on water quality that cannot be mitigated and none of the allocated sites are in areas of flood risk that cannot be mitigated. Where necessary, policy HA1 specifies that particular sites should be subject to a Flood Risk Assessment.

7.84 Most of the allocations will have significant negative effects on **SA Objective 11: Soil**; therefore, so will the policy overall. Most of the sites allocated are located on greenfield land within areas of best and most versatile agricultural land'; however, this reflects the nature of much of Central Bedfordshire.

7.85 Most of the allocated sites and therefore policy HA1 overall will have minor positive effects on **SA Objective 12: Biodiversity and Geodiversity** as they will not lead to the loss of important biodiversity features and may offer opportunities for enhancement. A number of sites listed in policy HA1 include specific mitigation measures relating to biodiversity; for example, HAS05 is required to provide appropriate mitigation/compensation to avoid or mitigate impacts such as increased visitor pressure on the Barton Hills NNR/SSSI.

7.86 The effects of policy HA1 on **SA Objective 13: Landscape** are much more mixed. Many of the allocated sites are in sensitive landscape areas, i.e. close to the AONB, and so could have minor negative effects. However, policy HA1 includes specific mitigation requirements for certain sites; for example site HAS06 is required to include appropriate landscape mitigation to protect the setting of Biggleswade Common and Greensand Ridge Escarpment.

7.87 Most of the allocated sites will have negligible effects on **SA Objective 14: Historic Environment** although a small number of the allocations could have minor negative effects as they could impact upon designated heritage features. Policy HA1 includes site specific mitigation for certain sites; for example at HAS14 development proposals must demonstrate the impact of development on the setting of the Grade II listed Moor End Farmhouse has been considered and assessed.

The SA findings for the small-medium site allocations described above take into account the proposed Main Modifications. The changes proposed to policy HA1 through the Main Modifications do not significantly affect the SA findings for the policy. The additional mitigation included in the policy through site-specific requirements builds on the mitigation included previously to mitigate the potential impacts of development sites on the environmental SA Objectives in particular. The proposed removal of four of the site allocations does not significantly affect the likely effects of the policy.

Strategic Policies (Excluding Strategic Site Allocations)

7.88 This section summarises the SA findings for the strategic policies in the Local Plan as proposed to be modified, excluding those relating to strategic site allocations which were addressed in the previous section.

7.89 The strategic policies were originally subject to SA at Regulation 18 stage and the findings were repeated in Appendix VI in the Regulation 19 SA Report. A screening exercise was also undertaken at that stage (see Appendix X in the Regulation 19 SA Report) to assess whether the changes made to the strategic policies at the Regulation 19 stage were significant with regards to the SA findings reported previously.

7.90 Table 7.2 overleaf summarises the SA findings for the strategic policies as reported previously. The text below the table summarises the effects of each policy reported previously and a green text box then addresses the SA implications of the modifications that are now proposed to be made to each of the Strategic Policies, as detailed in **Appendix E**.

Table 7.2: Summary of SA findings for the strategic policies

Strategic Policies	SA Objectives																		
	1. Housing	2. Communities		3. Services and facilities	4. Employment		5. Health & Equality		6. Highways & Air quality	7. Sustainable Transport	8. Energy & Climate Change	9. Water Resources & Quality	10. Flood Risk	11. Soil & Land		12. Biodiversity & Geodiversity	13. Landscape	14. Historic Environment	
Growth Strategy (SP1)	++	-?	?	++?	++	++	++	++	-?	+	0	0?	0	--	-?	++	-	0?	
NPPF – Presumption in Favour of Sustainable Development (SP2)	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	
Approach to Master Planning for Strategic Growth Locations (now SP3, Generic Requirements for Strategic Sites)	++	-?	+	++	+	+	0	+	+	+	+	+	0	0	0	+	+	0	
Gypsy & Traveller, and Travelling Showpeople Pitch Requirement (SP8)	++	+	?	0?	0	?	++	?	0	?	?	0	?	-	0	0?	0?	0?	
Development in the Green Belt (SP4)	-	++	+	0	-	+	-	+	++	+	+	0	+	+	++	++	++	++	+
Coalescence (now part of SP5)	-?	+	++	0	0	+	+	+	0?	0?	0	0	+	+	+	+	+	+	
Important Countryside Gaps (now part of SP5)	-	+	+	0	0	+	+	+	0	0	0	0?	+	+	+	+	+	+	
Development within Settlement Envelopes (now SP7 Windfall Development)	+	++	++	++	++	++	+	+	+	+	0	+	+	+	+	+	+	+	
Settlement Hierarchy	++	++	++	++	++	++	+	+	+	+	+	+	+	+	+	+	+	+	

SP1 Growth Strategy

7.91 The SA findings for policy SP1 at Regulation 18 stage are summarised in **Table 7.2** above. The screening exercise that was undertaken at the Regulation 19 stage concluded that the changes made to SP1 then were significant with regard to the SA. However, the changes made to the policy were largely reflected in changes to the more detailed site allocations policy (addressed in the previous section) and no changes to the likely significant effects on the SA Objectives as a result of policy SP1 were identified.

7.92 Significant positive effects were identified in relation to **SA Objective 1: Housing, SA Objective 3: Services and Facilities, SA Objective 4: Employment, SA Objective 5: Health and Equality** and **SA Objective 12: Biodiversity and Geodiversity**. A significant negative effect was identified for **SA Objective 11: Soil**.

The proposed Main Modifications to policy SP1 do not significantly affect the SA findings reported previously. The changes made to the policy provide further detail about the development that is proposed specifically to meet the needs of Luton Borough, which reinforces the significant positive effect already identified in relation to **SA Objective 1: Housing**. Changes to the strategic site allocations (capacity changes and the removal of reference to RAF Henlow) are addressed through the proposed modifications to the more detailed site allocation policies.

SP2: National Planning Policy Framework – Presumption in Favour of Sustainable Development

7.93 The SA findings for policy SP2 at Regulation 18 stage are summarised in **Table 7.2** above. No changes were made to the policy at the Regulation 19 stage so there were no changes to the SA findings.

7.94 Minor positive effects were identified in relation to all of the SA Objectives – no significant effects (positive or negative) were identified.

No changes are proposed to policy SP2 through the Main Modifications; therefore, the SA findings reported previously remain valid.

SP3: Generic Requirements for Strategic Sites

7.95 The SA findings for policy SP3 at Regulation 18 stage⁷ are summarised in **Table 7.2** above. The screening exercise that was undertaken at the Regulation 19 stage concluded that the changes made to SP3 then were significant with regard to the SA as they provided mitigation measures to remove previous uncertainties for some negative effects and confirmed the implementation of positive effects.

7.96 Significant positive effects were identified in relation to **SA Objective 1: Housing** and **SA Objective 3: Services and Facilities**. No likely significant negative effects were identified.

The proposed Main Modifications to policy SP3 do not significantly affect the SA findings reported previously. The changes made to the policy are mainly minor amendments to policy wording, although the addition of additional text requiring a strategy for the conservation, protection and enhancement of the historic environment to be developed and implemented means that the neutral effect previously identified in relation to **SA Objective 14: Historic Environment** is reinforced and there may be opportunities to achieve minor positive effects.

SP4: Development in the Green Belt

7.97 The SA findings for policy SP4 at Regulation 18 stage are summarised in **Table 7.2** above. The screening exercise that was undertaken at the Regulation 19 stage concluded that the changes made to SP4 were not significant with regard to the

⁷ At that stage the policy was known as 'Approach to Master Planning for Strategic Growth Locations'.

previous SA findings as there had been mitigation measures required through the earlier draft of the policy for any likely negative effects.

7.98 Significant positive effects were identified in relation to **SA Objective 2: Communities, SA Objective 5: Health and Equality, SA Objective 11: Soil, SA Objective 12: Biodiversity and Geodiversity** and **SA Objective 13: Landscape**. No likely significant negative effects were identified.

The proposed Main Modifications to policy SP4 do not significantly affect the SA findings reported previously. The proposed deletion of the policy text relating to replacement buildings does not affect the significant positive effects that were identified previously in relation to SA objectives 2: Communities and 11: Soil. SP5: Preventing Coalescence and Important Countryside Gaps

7.99 At Regulation 18 stage, the policy now referred to as SP5 was split into two policies known as 'Coalescence' and 'Important Countryside Gaps'. The SA findings for these policies at Regulation 18 stage are summarised in **Table 7.2** above. The screening exercise that was undertaken at the Regulation 19 stage concluded that the changes made at that stage were not significant with regard to the previous SA findings, despite the two policies being amalgamated into one at that point.

7.100 Only one significant positive effects was identified in relation to **SA Objective 2: Communities** and no significant negative effects were identified.

Policy SP5 is proposed to be significantly redrafted through the Main Modifications; however the changes are made to improve the clarity of the policy and its overall meaning is unchanged. Therefore, the SA findings reported previously remain valid.

Settlement Hierarchy

7.101 The SA findings for the settlement hierarchy at Regulation 18 stage are summarised in **Table 7.2** above. The screening exercise that was undertaken at the Regulation 19 stage concluded that the changes made to the settlement hierarchy then involved additional information providing clarification and further guidance and overall were not significant with regard to the previous SA findings.

7.102 Significant positive effects were identified in relation to **SA Objective 1: Housing, SA Objective 2: Communities, SA Objective 3: Services and Facilities** and **SA Objective 4: Employment**. No significant negative effects were identified.

The proposed Main Modifications to the settlement hierarchy do not significantly affect the SA findings reported previously. The changes made provide clarity and reclassify one village; however the effects on the SA Objectives are unchanged.

SP7: Windfall Development

7.103 The SA findings for policy SP7 at Regulation 18 stage are summarised in **Table 7.2** above. The screening exercise that was undertaken at the Regulation 19 stage concluded that the changes made to the policy at that time were not significant with regard to the previous SA findings.

7.104 Significant positive effects were identified in relation to **SA Objective 2: Communities, SA Objective 3: Services and Facilities** and **SA Objective 4: Employment**. No significant negative effects were identified.

The proposed Main Modifications to policy SP7 do not significantly affect the SA findings reported previously. The policy is renamed as 'Windfall Development', although this does not alter its effects. The additional wording relating to the types of development that CBC will support within settlement envelopes reinforces the significant positive effect already identified in relation to **SA Objective 3: Services and Facilities**. The additional policy wording relating to criteria applying to proposals for the redevelopment of previously developed land reinforce the minor positive effects already identified in relation to **SA Objectives 6: Highways and Air Quality, SA Objective 7: Sustainable Transport, SA Objective 11: Soil** and **SA Objective 13: Landscape**.

SP8: Gypsy and Traveller and Travelling Showpeople Pitch Requirement

7.105 The SA findings for policy SP8 at Regulation 18 stage are summarised in **Table 7.2** above. No changes were made to the policy at Regulation 19 stage; therefore the SA findings were also unchanged.

7.106 Significant positive effects were identified in relation to **SA Objective 1: Housing** and **SA Objective 5: Health and Equality**. No likely significant negative effects were identified.

The proposed Main Modifications to policy SP8 do not significantly affect the SA findings reported previously. The changes made provide clarity and update the policy in relation to the latest situation and evidence; however the effects on the SA Objectives are unchanged.

Development Management Policies

7.107 The SA findings for the Development Management policies were originally set out in the Regulation 18 SA Report. At the Regulation 19 stage, the previous SA findings were repeated and a screening exercise was carried out in order to identify the implications in SA terms of the changes made to the Development Management policies since the Regulation 18 Local Plan. The screening findings were set out in Appendix X of the Regulation 19 SA Report. Most of the changes, additions or deletions were for correction, updating of information, and to provide more clarity and further guidance for new development – as such, they were not found to be significant to the SA and the initial SA findings (Regulation 18 stage) were still relevant and valid. Some additional/changed wording in the supporting text or policy was found to strengthen the previous SA findings for positive effects and/or certainty of mitigation measures for negative effects, but overall was not considered to be significant.

7.108 The SA findings for the Development Management policies are described below. Where the SA findings originally reported at the Regulation 18 stage were affected by changes made to the policies at Regulation 19 stage, this is reflected in the summaries. A green box at the end of each section summarises the implications of the proposed Main Modifications to the Development Management policies, which are set out in detail in **Appendix E**.

7.109 The SA findings for the Development Management policies are 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 **Chapter 2** of this report). **Table 7.1** below shows which of the Local Plan policies/policy chapters have been considered under each topic heading.

Table 7.3: SA topics and DM Policies/Draft Local Plan Chapter

SA Topic	Relevant Policies / Policy Chapters Considered in Sustainability Appraisal
Communities	Housing Social Infrastructure, Communication & Transport Green Belt Development in the Countryside
Economy and Employment	Employment & Economy Town Centres & Retail
Health and Inequality	Housing High Quality Places Green Belt Environment
Transport and Movement	Social Infrastructure, Communication & Transport High Quality Places

SA Topic	Relevant Policies / Policy Chapters Considered in Sustainability Appraisal
	Town Centres & Retail
Energy and Climate Change	Environment High Quality Places Housing
Water – Resources, Quality and Flooding	High Quality Places Environment
Soil and Land	Development in the Countryside Green Belt Environment
Biodiversity and Geodiversity	Environment Housing Employment & Economy
Landscape and Townscape	Environment Town Centres & Retail Historic Environment High Quality Places
Historic Environment	Historic Environment

Communities

SEA Regulations 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

7.110 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 and 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.

7.111 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.

7.112 Planning Obligations and Community Infrastructure Levy provides explanation and guidance on how the Council will ensure that there is no overall reduction in provision of infrastructure from new development. This 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 will help achieve SA Objective 3.

7.113 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 Development and 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.

7.114 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.

7.115 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, 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.

7.116 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 SA Objective 1.

Synergistic and Cumulative Effects

7.117 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.

Implications of the Main Modifications

The proposed Main Modifications to the Development Management policies do not significantly alter the SA findings described above for the 'Communities' theme. The proposed amendments to policies on Housing Mix, Housing Standards, Housing for Older people, Affordable Housing and Rural Exceptions Sites reinforce the positive effects on **SA Objective 1: Housing**. The proposed deletion of policy H6: Starter Homes is to improve the clarity of the plan and does not significantly alter the effects of the Development Management Policies on **SA Objective 1: Housing**.

The proposed amendments to policy HQ3: Provision for Social and Community Infrastructure are made to improve the clarity of the Local Plan and do not detract from the positive effects of the Development Management policies on **SA Objective 3: Services and Facilities**.

The proposed additional wording to be added to policy HQ8: Back-land Development enhances the positive effects already identified in relation to SA Objective 5: Health and SA Objective 13: Landscape, as it now requires proposals to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.

Economy and Employment

SEA Regulations Topics: Population & Human Health

Relevant SA Objectives:

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

7.118 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, to cater for economic growth associated with expansion of London-Luton Airport. **Strategic Warehousing and 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.

7.119 **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.

Implications of the Main Modifications

The proposed Main Modifications to the Development Management policies do not significantly alter the SA findings described above for the 'Employment' theme. Proposed wording amendments to the policies on Change of Use to Non-Employment Generating Uses, Employment Development on Non-Allocated Sites, Rural and Visitor Economy and Significant Facilities in the Countryside and Green Belt all reinforce the positive effects of the Development Management policies on **SA Objective 4: Employment** already identified.

Similarly, the proposed modifications to policies on town centre developments reinforce the positive effects already identified in relation to **SA Objective 6: Highways and Air Quality** and **SA Objective 7: Sustainable Transport**.

7.120 The proposed Main Modifications to the Development Management policies do not significantly alter the SA findings described above for the 'Communities' theme.

Synergistic and Cumulative Effects

7.121 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.

Health and Equalities

SEA Regulations Topics: Population & Human Health

Relevant SA Objectives:

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

7.122 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.

7.123 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 and Custom Build Housing**) will help improve accessibility to housing particularly for those with particular needs.

7.124 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.

7.125 Climate Change and 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.

7.126 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.

Synergistic and Cumulative Effects

7.127 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.

Implications of the Main Modifications

The proposed Main Modifications to the Development Management policies do not significantly alter the SA findings described above for the 'Health and Equalities' theme. While the wording of the policy on Outdoor Sport, Leisure and Open Space is proposed to be significantly revised, the overall meaning of the policy is unchanged and it will continue to contribute to positive effects on **SA Objective 5: Health and Equality**.

Transport and Movement

SEA Regulations 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

7.128 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.

7.129 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.

Synergistic and Cumulative Effects

7.130 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.

Implications of the Main Modifications

The proposed Main Modifications to the Development Management policies do not significantly alter the SA findings described above for the 'Transport and Movement' theme.

The proposed wording amendments to policies such as those on Mitigation of Transport Impacts on the Network, Highways Safety and Design and Parking will reinforce the positive effects already identified on **SA Objective 6: Highways and Air Quality** and **SA Objective 7: Sustainable Transport**. While the wording of the policy on Public Transport Interchanges is proposed to be significantly redrafted, its overall meaning and effects on the SA Objectives are unchanged.

Energy and Climate Change

SEA Regulations 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

7.131 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.

7.132 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.

7.133 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.

7.134 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.

Synergistic and Cumulative Effects

7.135 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.

Implications of the Main Modifications

The proposed Main Modifications to the Development Management policies do not significantly alter the SA findings described above for the 'Energy and Climate Change' theme. Proposed wording amendments to policies on Climate Change and Sustainability and Sustainable Energy Development will reinforce the positive effects already identified in relation to **SA Objective 8: Energy and Climate Change**.

Water Resources, Quality and Flood Risk

SEA Regulations 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

7.136 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.

7.137 Water Quality requires developers to demonstrate that water quality will be maintained and enhanced. The policy includes an expectation of enhancement to rivers and lakes not achieving Good Ecological Status (GES) or potential.

7.138 Water Supply and Sewerage Infrastructure provides strong mitigation measures that should ensure the implementation of such infrastructure.

7.139 Flood Risk Management is positive in safeguarding land for future flood management needs, although such areas are not identified. It reflects the 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.

Synergistic and Cumulative Effects

7.140 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 and 13.

Implications of the Main Modifications

The proposed Main Modifications to the Development Management policies do not significantly alter the SA findings described above for the 'Water Resources, Quality and Flood Risk' theme.

Proposed changes to the wording of policies on Development Close to Watercourses and Sustainable Drainage will reinforce the positive effects already identified on **SA Objective 8: Energy and Climate Change**, **SA Objective 9: Water Resources and Quality** and **SA Objective 10: Flood Risk**.

Soil and Land

SEA Regulations Topics: Soil

Relevant SA Objectives:

- SA Objective 11: To protect and conserve soil

7.141 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.

7.142 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.

7.143 Development in the Green Belt 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.

Synergistic and Cumulative Effects

7.144 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.

Implications of the Main Modifications

The proposed Main Modifications to the Development Management policies do not significantly alter the SA findings described above for the 'Soil and Land' theme. Proposed changes to the wording of policies on Agricultural Land, Minerals and Waste restoration (previously known as Applications for Minerals and Waste Development) will reinforce the positive effects already identified in relation to **SA Objective 11: Soil**.

Biodiversity and Geodiversity

SEA Regulations Topics: Biodiversity, Flora and Fauna

Relevant SA Objectives:

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

7.145 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.

7.146 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. Policy EE11 River and Waterway Network requires protection, conservation and enhancement of the waterways' heritage, built environment, landscape character and biodiversity, together with promotion of the waterway and riverside paths as part of the green infrastructure network – all with significant positive effects for SA Objective 5: Health and Equality, SA Objective 12: Biodiversity and Geodiversity, SA Objective 13: Landscape and SA Objective 14: Historic Environment. The policy requires promotion of the use of the waterway and paths for sustainable transport and recreational routes for walking and cycling – all with significant positive effects for SA Objective 7. Positive effects are also indicated for SA Objective 4: Employment through the policy requirement for promoting the waterway as a catalyst for urban regeneration and in support of waterway related enterprise. Overall, this policy will have significant positive effects on many objectives for Sustainable Development that are likely to be synergistic and cumulative in the longer-term.

7.147 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.

Synergistic and Cumulative Effects

7.148 There are clear synergies with SA Objective 13: Landscape and potentially with SA Objective 9: Water Resources and Quality and SA Objective 11: Soil 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.

Implications of the Main Modifications

The proposed Main Modifications to the Development Management policies do not significantly alter the SA findings described above for the 'Biodiversity and Geodiversity' theme. Proposed changes to the wording of policies on Green Infrastructure, Enhancing Biodiversity, Nature Conservation, and Trees, Woodlands and Hedgerows will reinforce the positive effects already identified in relation to **SA Objective 12: Biodiversity and Geodiversity**.

Landscape and Townscape

SEA Regulations Topics: Landscape

Relevant SA Objectives:

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

7.149 Town Centre Uses applies a sequential approach to directing retail development to town centres and **Town Centre Development** encourages town centre development, which will improve their vitality and viability and if sensitively developed, will help to achieve SA Objective 13 regarding townscape.

7.150 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 and Livestock Related Development** provides for these developments, as long as negative effects on landscape and transport are acceptable.

7.151 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.

7.152 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.

Synergistic and Cumulative Effects

7.153 There are synergies with SA Objective 11: Soil, SA Objective 12: Biodiversity and Geodiversity and to an extent SA Objective 10: Flood Risk, SA Objective 12: Historic Environment and SA Objective 5: Health and Equality (in relation to health including provision of green infrastructure). There are also synergies between SA Objective 2: Community, SA Objective 3: Services and Facilities and SA Objective 4: 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.

Implications of the Main Modifications

The proposed Main Modifications to the Development Management policies do not significantly alter the SA findings described above for the 'Landscape and Townscape' theme. Proposed changes to the wording of policies on Landscape Character and Value will reinforce the positive effects already identified in relation to **SA Objective 13: Landscape**.

Historic Environment

SEA Regulations Topics: Cultural Heritage

Relevant SA Objectives:

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

7.154 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 SA Objective 14.

7.155 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. If the **Historic Environment** policies of the Plan are implemented then they should provide appropriate protection and mitigation for potential negative effects.

Synergistic and Cumulative Effects

7.156 The protection of archaeological 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.

Implications of the Main Modifications

The proposed Main Modifications to the Development Management policies do not significantly alter the SA findings described above for the 'Historic Environment' theme. Proposed changes to the wording of policies on Archaeology and Scheduled Monuments, Historic Parks and Gardens and Listed Buildings, Conservation Areas and Built Heritage will reinforce the positive effects already identified in relation to **SA Objective 14: Historic Environment**.