

Central Bedfordshire Council Local Plan (2015-2035)

Regulation 22 (1) (c) Statement
(April 2018)

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1. Introduction

1.1. Overview

- 1.1.1. This Consultation Statement has been prepared for submission of the Central Bedfordshire Local Plan under Regulation 22 (1)(c) (i-iv) of the Town and Country Planning (Local Planning) (England) Regulations 2012. It provides details of the bodies and persons invited to make representations under Regulation 18, how these bodies and persons were invited to make representations, a summary of the main issues raised in the representations made at Regulation 18, and how these issues were taken into account. It then details the number of representations made pursuant to Regulation 20 and a summary of the main issues raised in these representations.
- 1.1.2. For completeness, this consultation statement covers the methods used for consultation and community engagement from the launch of the Local Plan in February 2016, up until the submission of the Local Plan in April 2018.
- 1.1.3. At each stage of the consultation, Central Bedfordshire Council (CBC) has complied with its Statement of Community Involvement (October 2012). Consultation responses have been reviewed by officers and informed the next stage of Plan preparation.

1.2. Structure

- 1.2.1. This document is structured to reflect the various stages of consultation, as set out below:
 - Chapter 2: details the consultation and engagement undertaken prior to Regulation 18 consultation
 - Chapter 3: presents the consultation and engagement undertaken for Regulation 18
 - Chapter 4: discusses the Regulation 19 consultation and engagement on the pre-submission Local Plan
- 1.2.2. This document is also supplemented with several appendices, including detailed breakdowns of the key themes raised during Regulation 18 and Regulation 19 consultation.

2. Consultation prior to Regulation 18

2.1. Members Briefings

- 2.1.1. A number of briefing sessions for Members have been held since February 2016 on the Local Plan. These meetings served as an introduction to the Local Plan and covered discussions on Housing, Employment, Infrastructure, Environment, Climate Change and other topics. Information gained from consultation exercises and proposed changes to the Plan were reported and discussed at these meetings. Where possible, Members were supplied with information and leaflets which they were encouraged to share with their Town and Parish Councils (T&PCs).

2.2. Site Assessment Criteria

- 2.2.1. The Council produced separate Site Assessment Criteria for Housing, Employment and Gypsy and Traveller (G&T) sites.
- 2.2.2. The Council consulted on its draft Housing Site Assessment Criteria between February and April 2016. Following a mail out to over 7,000 residents and all stakeholders including statutory consultees (statutory consultees list provided in Appendix A), a notification of the consultation was placed on the Council's website.
- 2.2.3. The Housing Site Assessment Criteria were updated in response to comments received during this initial consultation alongside comments from internal officers. The updated criteria were put out to a second consultation between 30th June and 29th July 2016, this time alongside the Employment and G&T Site Assessment Criteria. Further changes were made following this consultation and the final criteria were agreed and published with the Draft Local Plan as part of the Site Assessment Technical document during Regulation 18 consultation.

2.3. Call for Sites submissions published

- 2.3.1. In May 2016, the Council published parish maps and schedules showing all of the sites submitted to it for consideration under the Call for Sites process. This allowed the public to see what sites the Council would be considered in its assessment process, but importantly it was not a consultation as the Council was still yet to consider the sites and assess them in detail.
- 2.3.2. When this information was published on the Council's website, the Council sent email alerts to all of those on its database and emailed Elected Members, T&PCs and Developers and Agents separately. This was also supplemented with a press release and social media alerts.

2.4. Development Management Workshops

- 2.4.1. A number of Development Management workshops for CBC staff were held between June and August 2016. The workshops were attended by a range of Officers from service areas across the Council in addition to Development Management colleagues, including environmental, heritage and transport specialists.

- 2.4.2. These workshops were held to assess the existing Development Management policies and to consider which policies it would be appropriate to include within the Local Plan. The groups considered which policies were used, which were no longer consistent with national policy and where new policies may be needed to avoid any policy gaps. The results of the workshop were then collated by officers and used by the Local Plan Team to formulate new policy.

2.5. Town and Parish Council Conference

- 2.5.1. A T&PC Conference was held on 5th April 2016. The opportunity was taken to provide attendees with an introduction to the Local Plan and the process that would be followed to produce the Plan. Delegates were invited to attend a workshop which aimed to demonstrate the complexities in identifying sites for housing, employment and infrastructure. A further T&PC Planning Conference was held on 13th July 2016.
- 2.5.2. All 79 T&PCs (see Appendix B) within Central Bedfordshire were invited to attend the conference held at the Council's head office in Chicksands. The agenda for this meeting is provided in Appendix C. In total, over 116 delegates, representing 55 parishes attended the event.
- 2.5.3. The event began with a presentation from the Chairman of the Council's Infrastructure and Development Board and independent advisor for the Local Plan, who provided a strategic overview and explained the requirement for the new Local Plan. The Head of Place Delivery provided an update on key aspects of the Local Plan, including the recent call for sites, the Duty to Cooperate and refreshing of the evidence base.
- 2.5.4. The event then turned to consider community and stakeholder engagement in the Local Plan process, and introduced the concept of Community Plans and their role in the Local Plan. Delegates then joined workshops to identify growth options and infrastructure needs in 15 Community Planning areas.
- 2.5.5. The Community Planning workshops introduced the 15 community group areas and explained how they had been defined based on location and other common factors. The objective for the conference workshops was to unify the group and help to draw out the common factors and issues arising in each community group area, so that when area workshops were held, there would be some common understanding between the T&PCs. The presentations used at the Conference were made available to view on the CBC website.
- 2.5.6. Following feedback from the workshops, there was a review of the 15 Community Planning areas with some modifications made (see Appendix D).

2.6. Local Plan Stakeholders Workshop

- 2.6.1. A Stakeholders Workshop was held on 14th July 2016. From the 200 stakeholders who were invited to the event, 66 attended. A copy of the agenda for this Stakeholders Workshop is provided in Appendix E.
- 2.6.2. Presentations were given outlining the Local Plan's strategic context and the progress made to date. An overview of how the Council planned to consult with local communities and stakeholders was provided alongside an introduction to Community Planning.

- 2.6.3. Attendees were then asked to participate in a workshop which asked for feedback to four questions:
1. What significant changes in demand do you envisage in the future housing and development market in Central Bedfordshire?
 2. What major changes do you foresee affecting viability of development?
 3. Do you have suggestions on how the process of funding necessary infrastructure can be improved?
 4. Are there any other aspects of today's presentations or discussion that you would like to comment on?
- 2.6.4. The event proved to be a useful session which highlighted the many interdependencies between the various technical work streams supporting the Draft Local Plan. This information was fed back and changes were made to the tender briefs for technical studies which comprise the Local Plan evidence base.

2.7. Sustainability Appraisal Scoping Report

- 2.7.1. In July 2016, the draft Sustainability Appraisal Scoping Report was put out to consultation for a six-week period. Emails were sent to over 7,000 residents and stakeholders and the consultation was advertised on the Council's website.
- 2.7.2. Consultants responded to the comments received and re-issued the Sustainability Appraisal Scoping Report in October 2016. This was made available on the Council's website.

2.8. 'Shaping Central Bedfordshire' Consultation

- 2.8.1. This public consultation was launched in October 2016 and aimed to give an indication of the approach the new Local Plan would take. The purpose of the consultation was to help residents and stakeholders shape '*big picture*' options for growth which could then be taken forward in the Plan. The consultation gave background information on the need for a Local Plan and outlined what it needed to address, for example; housing, transport, business, greenspace etc.
- 2.8.2. Four areas of Central Bedfordshire were identified. These reflected the character of the towns and villages, countryside, existing and planned transport corridors and areas of Green Belt. A summary of each of the areas was provided and the '*growth potential*' outlined. A short questionnaire was used to gather consultees' views on these proposed areas and their growth potential (see Appendix F).
- 2.8.3. The consultation was well advertised through a variety of media, including Facebook and Twitter, whilst email bulletins were sent to over 10,000 people who had signed up for updates. Officers attended several events, including local markets and the Council's 'Older People' festival, and used exhibition boards and leaflets to make residents aware of the consultation and provide information. Information through a series of three leaflets (including one which outlined the engagement strategy), was made available at 13 libraries and six leisure centres as well as the Council offices.
- 2.8.4. By the time the consultation closed on 1st November 2016 over 7,000 people had visited the web page hosting the information on the consultation, and 785 responses were received. The Council published a report summarising the findings of the consultation on its website.

2.9. Community Planning

- 2.9.1. Community Plans are developed in partnership with Town and Parish Councils, residents and local interest groups to understand and identify what services or infrastructure issues exist in local areas and equally, what unique characteristics or spaces need to be protected or could be enhanced. Whilst the Local Plan provides the overall approach to sustainable growth and the development of homes, roads, jobs and community facilities, the Community Plans focus on a more localised level. Community Plans are different to Neighbourhood Plans as they cover a much wider area, and do not hold any weight in planning policy terms. However, Community Plans have been used to inform decisions about development, including the Local Plan.
- 2.9.2. The Council held workshop events for each of the 15 Community Planning areas starting in October 2016. These events used interactive techniques to draw out the relevant issues and information on each of the Local Plan's growth themes. In preparation, T&PCs were provided with Community Information Packs which contained posters, leaflets and questionnaires to ensure that they understood the process and enable them to advertise upcoming workshops.
- 2.9.3. The Council's website was used to promote the workshops, along with posts on Facebook and Twitter. Posters were put up in the areas before each event by both local Councillors and officers and emails were sent to over 10,000 people who had signed up for Local Plan updates, alongside emails to elected members and a press-release.
- 2.9.4. The drop-in events consisted on several exhibition boards which introduced the six growth themes: Local Character; Environment; Transport; Jobs and Business; Growth and Infrastructure; and Homes. For each of the themes, attendees were asked to select one category that they felt strongly about, then using a sticker, locate this on a map and expand on why they had chosen this location on the feedback form.
- 2.9.5. The events were well received and the feedback used to produce 15 draft Community Plans. These draft Plans were sent to each of the T&PCs in addition to those that requested to be kept informed. Following feedback on the draft Plans, changes were made and a final Overview Statement produced alongside the 15 plans. Evidence of the Community Planning events is provided in Appendix G.

2.10. Settlement Hierarchy and Settlement Envelope Review

- 2.10.1. Within the Community Information Packs sent out in September and October 2016 for the Community Planning events, each T&PC was provided with a copy of a map showing the settlement envelope and a list of services and facilities which had been identified within the parish. Information explaining the importance of the settlement boundary being correct was also included. The T&PCs were asked to review the information and check for accuracy.
- 2.10.2. A similar exercise was undertaken during Summer 2017 as part of the work on the Settlement Hierarchy, to refine and check the audit information on which the Hierarchy was based.

2.11. Update on Local Plan Timescales (December 2016)

- 2.11.1. In December 2016, the Council made the decision to 'hold back' on publishing the Draft Local Plan for consultation whilst it awaited the Government's Housing White Paper, which it expected to have implications for the Local Plan. An email was sent to all stakeholders and residents who had signed up for updates and press releases were put out to update the public on this decision.
- 2.11.2. Following the publication of the Housing White Paper in February, the Council updated their timescales. Following this decision, further communication was sent out in March 2017 informing elected members, residents and stakeholders of the decision to adjust the Local Plan timetable and the website was updated accordingly. These updated timescales proposed that the Draft Local Plan be considered by the Executive Committee on the 6th June 2017, with the aim to publish it for consultation from the end of June for an eight-week period.

3. Regulation 18 Consultation

3.1. Notice of Consultation to Neighbouring Authorities

- 3.1.1. On the 16th June 2017, an email was sent to all the Council's neighbouring authorities informing them that the Draft Local Plan was available on the Council's website and inviting them to view the plan prior to the official launch of the Regulation 18 consultation.

3.2. Draft Local Plan Consultation

- 3.2.1. Following agreement from the Executive Committee, consultation on the draft Local Plan began on 4th July 2017 and ran until 29th August 2017. All documents and technical reports were made available on the Council's website, and hard copies were held at all Council libraries and Council offices.
- 3.2.2. The consultation was advertised widely through a variety of media including:
- Email alerts (to all those on the database, plus MPs and T&PCs)
 - Websites (both the Council's own website, and T&PC websites)
 - Television
 - Radio
 - Press releases (including specific area press releases for drop-in events)
 - Posters and leaflets in libraries and other locations (additional posters and leaflets were sent to T&PCs to display in their parishes/towns)
 - Social media – Facebook and Twitter including a purpose-made video for social media and specific posts for drop-in events.
(see Appendix H)
- 3.2.3. Residents and stakeholders, including those bodies prescribed under paragraphs (2) of Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, were invited to view and make representations on the draft Plan and accompanying technical evidence base.

3.3. Regulation 18 Elected Members briefings

- 3.3.1. Prior to Regulation 18 consultation officially launching, on the 14th June a briefing session was held for elected members, in total 36 members attended this event. Following this, two separate drop-in sessions were held for members to ask specific questions which in total were attended by 22 members.

3.4. Regulation 18 drop-in sessions

- 3.4.1. Five drop-in sessions were held across the authority, focusing on areas where growth was proposed. Using exhibition boards and leaflets, the events provided information on what was included in the draft Plan. Hard copies of the Plan and supporting documents were made available to view. Several planning officers attended the events and were available to answer questions and support residents in responding to the consultation. In total 658 people attended these drop-in sessions.
- 3.4.2. In addition to the four public drop-in sessions, an additional drop-in session was held for T&PCs. In total 97 people attended this drop-in session.

3.5. Telephone survey

- 3.5.1. During the consultation period a telephone survey was undertaken. The survey was conducted to compliment the Regulation 18 consultation and was developed to closely match the formal consultation. The telephone survey was carried out with a representative sample of 1,222 residents across Central Bedfordshire. The results of this telephone survey were published on the Council's website in November 2017.

3.6. Representations

- 3.6.1. Over 6,800 comments were made on the Draft Local Plan during the Regulation 18 consultation. As shown in Table 3.1, of these comments: 4,459 were made through the website; 1,780 were sent by email; and 589 were made through letters (see Appendix I). Once the consultation had closed, all comments were published online in November 2017.

Table 3.1 Representations received during Regulation 18 consultation, by format.

Representation format	Total	Percentage of total
Web Representations	4,459	65%
E-mail Representations	1,780	26%
Paper Representations	589	9%
Total	6,828	100%

- 3.6.2. The Council has considered all comments received during Regulation 18 consultation and these have informed the preparation of the Regulation 19 Pre-Submission Local Plan. A summary of the Key Issues raised during Regulation 18, and corresponding actions are set out in Appendix J.

4. Regulation 19 consultation

4.1. Town and Parish Council Conference

- 4.1.1. Prior to Regulation 19 consultation, an update on the Local Plan was given at the Town and Parish Council Conference on the 22nd November 2017. T&PCs were given an update on the progress of the Local Plan and made aware of the planned drop-in sessions for Regulation 19 consultation which would provide an opportunity for T&PCs to attend for an hour prior to the event opening to the public.

4.2. Pre-Submission Local Plan consultation notice

- 4.2.1. The Pre-Submission Local Plan was taken to the Executive Committee on 9th January 2018. As part of this process the plan was available on the Council's website from 3rd January 2018. The Local Plan website was updated and emails were sent to all members, T&PCs and local MP's. In addition to this the media were briefed, and the timetable was set out in the local press as shown at Appendix K. Local Plan posters and leaflets were also sent to T&PCs and libraries prior to the consultation launch.

4.3. Members drop-in session

- 4.3.1. On the 4th January 2018, a drop-in session was held for members to allow them to understand the Plan and ask any questions. In total 21 members attended this session.

4.4. Pre-Submission Local Plan Consultation

- 4.4.1. Following agreement from Council's Executive Committee, the Pre-Submission Local Plan was put out to consultation from 11th January to 22nd February 2018. As with the previous consultation, all documents and technical reports were made available on the Council's website, and hard copies were held at all Council libraries and Council offices.
- 4.4.2. The consultation was publicised through local media and on the Council's website. Emails were sent to all members and T&PCs. In addition to this, emails were also sent to those registered for alerts on the Local Plan or specific areas of Central Bedfordshire, and those who were on the consultation system as they had responded during Regulation 18 consultation. Email alerts were also used to remind people of drop-in events.
- 4.4.3. The consultation was also publicised on social media, with Twitter alerts timed to go out throughout the consultation and posts made on Facebook including videos for the each of the four major developments proposed and an infographic for development proposed on the small and medium sites. Additional Facebook posts were also used throughout the event to promote drop-in events, and Facebook posts were made on 18 different community pages to provide information on the Local Plan.

4.5. Regulation 19 Drop-in sessions

- 4.5.1. Four drop-in sessions were held across the area, focusing on areas that had been identified for growth within the Plan. The events used the same structure as used in the events held at Regulation 18, with displays and leaflets providing information, and Planning Officers and Executive Council members in attendance to answer questions and support residents in making representations. Across the four events over 823 people attended.
- 4.5.2. As it was not considered necessary to hold a specific T&PC drop-in session for Regulation 19 consultation, each of the four events were structured to allow a drop-in session exclusively for T&PCs and elected members prior to the event opening to the public. This opportunity was well-used and many T&PCs did take the opportunity to attend an event that was close to them.

4.6. Representations

- 4.6.1. The statement of representations is included in Appendix L. During the six-week consultation period over 6,200 representations were received in various formats. There was a higher proportion of paper representations received than at Regulation 18 consultation, this was due in part a community group organising standardised forms for residents to use to respond. Appendices M and N includes a summary of the key themes raised Regulation 19 consultation.

Table 4.1 Representations received during Regulation 18 consultation, by format.

Representation format	Total	Percentage of total
Web Representations	2,576	41%
E-mail Representations	1,529	24%
Paper Representations (including forms)	2,198	35%
Total	6,303	100%

Table 4.2 Representations received during Regulation 18 consultation, by type.

Representation format	Total	Percentage of total
Comment	1,281	20%
Object	4,577	73%
Support	445	7%
Total	6,303	100%

5. Engagement post-consultation

5.1. Members briefing session

- 5.1.1. A briefing session was held for members on 24th April 2018. This briefing was held prior to the Plan being taken to Full Council on the 26th April 2018 to ask for approval to submit the Plan to the Secretary of State. In total 30 members attended the briefing session.

5.2. Submission communications

- 5.2.1. Following the endorsement of the Local Plan at Full Council, the Council propose to submit the Plan to the Secretary of State. Once this has been done, the website will be updated and communications sent to all those registered to receive alerts, in addition T&PCs.

6. Appendices

APPENDIX A: List of Statutory Consultees

APPENDIX B: List of all Town and Parish Councils

APPENDIX C: Town and Parish Council Workshop Agenda

APPENDIX D: Town and Parish Councils by Community Planning Area

APPENDIX E: Agenda Local Plan Stakeholders Workshop

APPENDIX F: 'Shaping Central Bedfordshire' Consultation

APPENDIX G: Community Planning

APPENDIX H: Draft Local Plan Consultation event (Regulation 18)

APPENDIX I: Draft Local Plan Consultation Statistics

APPENDIX J: Regulation 18 responses, main issues raised and how these issues have been addressed in the Local Plan

APPENDIX K: Pre-submission Local Plan Consultation (Regulation 19)

APPENDIX L: Statement of Representations Procedure

APPENDIX M: Key themes raised during Regulation 19 consultation

APPENDIX N: Key themes raised during Regulation 19 consultation

APPENDIX A: List of Statutory Consultees

List of Statutory Consultees		
Affinity	Greater London Authority	Network Rail
Anglian Water	Greensand Trust	NHS England
Aylesbury Vale District Council	Gypsy Council	NHSE
Bedford Borough Council	Health and Safety Executive	North Hertfordshire District Council
Bedford's Council of Faiths	Health Inequalities	Older People
Bedfordshire Humanists	Hertfordshire County Council	OpenReach BT
Buckinghamshire County Council	Hertfordshire Police Authority	Plant Protection
Cambridge Water	Highways Agency	Police and Crime Commissioner
Cambridgeshire County Council	Historic England	RSPB
Cambridgeshire Police Authority	Housing	Secretary of State for Transport
CBC	Huntingdonshire District Council	SEMLEP
CCG	Learning disabilities and mental health	Sensory Impairment
Citizens advice	Local Nature Partnership	South Cambridgeshire District Council
Citizen's Advice	Local Nature Partnership	St Albans City and District Council
Citizen's Advice	Luton Borough Council	Stevenage Borough Council
Dacorum	Marine Management Organisation	Thames Water
Disability Resource Centre	Mental Health	The Chilterns Conservation Board
East of England Development Agency	Milton Keynes Council	The Homes & Communities Agency
EE	National Grid	Three
Environment Agency	National Grid	Vodafone and O2
Faith and Poverty Issues	Natural England	Wildlife Trust
Gender equality issues		

APPENDIX B: List of all Town and Parish Councils

List of all Town and Parish Councils		
Ampthill Town Council	Flitton & Greenfield Parish Council	Potton Town Council
Arlesey Town Council	Flitwick Town Council	Pulloxhill Parish Council
Aspley Guise Parish Council	Gravenhurst Parish Council	Ridgmont Parish Council
Aspley Heath Parish Council	Harlington Parish Council	Sandy Town Council
Astwick Parish Meeting	Haynes Parish Council	Shefford Town Council
Barton-Le-Clay Parish Council	Heath and Reach Parish Council	Shillington Parish Council
Battlesden Parish Meeting	Henlow Parish Council	Silsoe Parish Council
Biggleswade Town Council	Hockliffe Parish Council	Slip End Parish Council
Billington Parish Council	Houghton Conquest Parish Council	Southill Parish Council
Blunham Parish Council	Houghton Regis Town Council	Stanbridge Parish Council
Brogborough Parish Council	Hulcote and Salford Parish Council	Steppingley Parish Council
Caddington Parish Council	Husborne Crawley Parish Council	Stondon Parish Council
Campton and Chicksands Parish Council	Hyde Parish Council	Stotfold Town Council
Chalgrave Parish Council	Kensworth Parish Council	Streatley Parish Council
Chalton Parish Council	Langford Parish Council	Studham Parish Council
Clifton Parish Council	Leighton Linlade Town Council	Sundon Parish Council
Clophill Parish Council	Lidlington Parish Council	Sutton Parish Council
Cranfield Parish Council	Marston Moretaine Parish Council	Tempsford Parish Council
Dunstable Town Council	Maulden Parish Council	Tilsworth Parish Council
Dunton Parish Council	Meppershall Parish Council	Tingrith Parish Meeting
Eaton Bray Parish Council	Millbrook Parish Meeting	Toddington Parish Council
Edworth Parish Meeting	Milton Bryan Parish Meeting	Totternhoe Parish Council
Eggington Parish Council	Moggerhanger Parish Council	Westoning Parish Council
Eversholt Parish Council	Northill Parish Council	Whipsnade Parish Council
Everton Parish Council	Old Warden Parish Council	Woburn Parish Council
Eyeworth Parish Meeting	Potsgrove Parish Meeting	Wrestlingworth & Cockayne Hatley Parish Council
Fairfield Parish Council		

APPENDIX C: Town and Parish Council Workshop Agenda

Town & Parish Council Planning Conference – 13 July 2016

Priory House, Monks Walk, Chicksands,
Shefford, Bedfordshire, SG17 5TQ

The logo for Central Bedfordshire Council, featuring the words "Central Bedfordshire" in white text inside a green circle.

Agenda

5.30 pm	Arrival and registration	Networking, light refreshments
6.00pm	Welcome and introduction	Cllr Tracey Stock Deputy Executive Member, Corporate Resources.
6.15	Strategic Context (An introduction to the high level requirement for the Local Plan)	Henry Cleary Chairman of CBC Infrastructure and Development Board
6.40	Local Plan – Overview and Process (update on key aspects of the Local Plan, call for sites, evidence base and duty to cooperate)	Andrew Davie Development Infrastructure Group Manager Sue Frost Head of Place Delivery
7.05	Questions	
7.20	Community and Stakeholder Engagement (points of engagement and timeline)	LDA Design (details tbc)
7.35	Questions	
7.50	Introduction to community planning	
8.00pm	Comfort Break	
8.15pm	Community Planning workshops	
9.00pm	Wrap Up and Close	In workshops

Central Bedfordshire Council

Priory House, Monks Walk
Chicksands, Shefford
Bedfordshire SG17 5TQ

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www.centralbedfordshire.gov.uk

APPENDIX D: Town and Parish Councils by Community
Planning Area

Community Area	Town and Parish Councils
1	Billington, Caddington, Eaton Bray, Hyde, Kensworth, Slip End, Stanbridge, Studham, Tilsworth, Totternhoe, Whipsnade
2	Dunstable, Houghton Regis
3	Battlesden, Eggington, Heath & Reach, Hockliffe, Leighton Buzzard
4	Biggleswade, Edworth, Langford
5	Aspley Guise, Aspley Heath, Bryan, Eversholt, Husborne Crawley, Milton Bryan, Potsgrove, Woburn
6	Northill, Old Warden, Southill
7	Amphill, Flitwick, Steppingley
8	Blunham, Moggerhanger, Tempsford, Sandy
9	Dunton, Everton, Eyeworth, Potton, Sutton, Wrestlingworth & Cockayne Hatley
10	Arlesey, Astwick, Fairfield, Stotfold
11	Cranfield, Ridgmont, Brogborough, Lidlington, Marston Moretaine, Millbrook, Hulcote & Salford
12	Clophill, Haynes, Houghton Conquest, Maulden
13	Barton-Le-Clay, Flitton & Greenfield, Gravenhurst, Pulloxhill, Shillington, Silsoe, Streatley
14	Chalgrave, Chalton, Harlington, Sundon, Tingrith, Toddington, Westoning
15	Clifton, Campton & Chicksands, Henlow, Meppershall, Shefford, Stondon

APPENDIX E: Agenda Local Plan Stakeholders Workshop

CBC Local Plan Stakeholder Event

14 July 2016

Priory House, Monks Walk, Chicksands,
Shefford, Bedfordshire, SG17 5TQ



Central
Bedfordshire

Agenda

2.15 pm	Arrival and registration	
2.30 pm	Welcome and introduction	Cllr Nigel Young Executive Member, Regeneration
	Strategic Context (An introduction to the high level requirement for the Local Plan)	Henry Cleary Chairman of CBC Infrastructure and Development Board
	Local Plan – Overview and Process (update on key aspects of the Local Plan, call for sites, evidence base and duty to cooperate)	Sue Frost Head of Place Delivery
	Questions	
	Community and Stakeholder Engagement (points of engagement and timeline)	LDA Design Nicola Longland Associate
	Introduction to Workshop	Henry Cleary
4pm	Local Plan Workshop	Facilitated workshop
4.45pm	Wrap Up and Close	

Central Bedfordshire Council

Priory House, Monks Walk
Chicksands, Shefford
Bedfordshire SG17 5TQ

Telephone 0300 300 8000
Email customer.services@centralbedfordshire.gov.uk
www.centralbedfordshire.gov.uk

APPENDIX F: ‘Shaping Central Bedfordshire’ Consultation

Shaping where you live 2035

www.centralbedfordshire.gov.uk/localplan

Shaping Central Bedfordshire

Have your say, on this consultation.
Fill in the questionnaire online or on paper

Central Bedfordshire

A great place to live and work.

AREA A - South and West/ M1 Corridor

Overall: Potential for all levels of growth including strategic scale growth adjoining urban areas where Green Belt release can be justified.

This area is constrained by the Green Belt and Chilterns Area of Outstanding Natural Beauty (AONB). However, major sites to the north of Houghton Regis are already under development or have planning permission while significant growth is underway at Leighton Buzzard.

Growth potential: Small villages in the Green Belt generally have limited capacity to grow but there is some potential for medium scale growth along the major transport corridor following the M1, A5 and the railway (Midland Main Line), or large scale growth for sites immediately adjacent to Luton that could be linked to the Luton-Dunstable Busway. The lack of new sites within the urban areas of Luton and Dunstable mean that significant further growth in Central Bedfordshire is likely to be required. However any further development in the Green Belt will need to be thoroughly justified to meet national planning policy.



AREA A - South and West/ M1 Corridor continued...

Environment: The Chilterns AONB and Greensand Ridge Nature Improvement Area (NIA), with their valued habitats and landscapes are existing environmental assets. Opportunities for new environmental projects include creating a long distance cycleway along the Greensand Ridge, and new Country Parks for Ampthill and Flitwick, and the Barton-le-Clay area.

AREA B - East/A1 Corridor

Overall: Potential for all levels of growth, including new settlements, if appropriate supporting infrastructure is provided.

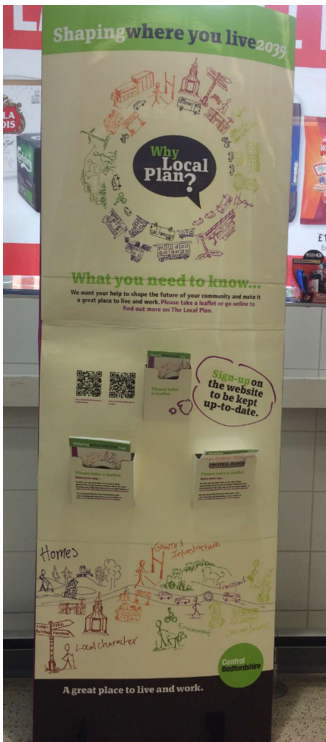
The broad corridor running south-north from Arlesey to the north of Sandy is well served in transport terms with the A1 and East Coast railway, both of which have potential for significant upgrades.

Growth potential: New development will need to provide for jobs growth in order to try and reduce out commuting and to generate investment to benefit town centres and improve local services. At Sandy in particular, there is potential to benefit from the East West Rail proposals and to attract business and housing growth along the Oxford to Cambridge corridor. This area has the potential to accommodate major growth providing it can be planned sustainably and generates clear benefits for existing communities.

Environment: The Greensand Ridge Nature Improvement Area (NIA) and Ivel Valley and their valued habitats are existing environmental assets. There are also opportunities for new environmental projects, including a new Country Park for Arlesey and Stotfold, a long distance 'Great North Cycleway', and access and open space networks around Biggleswade, Sandy, and the Arlesey, Stotfold and Fairfield areas.



Advertisement Display



Central Bedfordshire Council Website
Central Bedfordshire Council website – home page 20/09/16



APPENDIX G: Community Planning

Community Planning Poster

Shapingwhere you live2035

TODAY

2:30 - 7:30pm



Community Planning Event



COME IN AND HELP US SHAPE YOUR COMMUNITY

Sign up for email updates - have your say...
www.centralbedfordshire.gov.uk/local-plan

**Central
Bedfordshire**

A great place to live and work.

Community Planning Feedback Form

<h3 style="color: #e74c3c;">Local character</h3> <p>What we have we love. Our history, countryside and communities. We need to build, with care to enhance what we have.</p> <p><input type="checkbox"/> NO ISSUES</p> <p>Please select one type of Local Character from the list below that you would most like to see protected or improvements made within your local area:</p> <p>A. <input type="checkbox"/> Built Heritage (e.g. ancient monuments, old buildings, memorials) B. <input type="checkbox"/> Landscape Heritage (e.g. historic parks, protected landscapes) C. <input type="checkbox"/> Open space natural (e.g. countryside, nature reserves, viewpoints) D. <input type="checkbox"/> Open space man-made (e.g. parks, common land, village green) E. <input type="checkbox"/> No improvements</p> <div style="border: 1px solid #ccc; padding: 5px; margin-top: 10px;"> <p>With your chosen type of Local Character, please pin-point one specific place on the map table using your red sticker where you think there is an opportunity. Please expand below on what you would like to see at this location:</p> </div>	<h3 style="color: #2ecc71;">Environment</h3> <p>Our environment is important. It influences how & what we create. We need quality development.</p> <p><input type="checkbox"/> NO ISSUES</p> <p>Please select one of the Environment types from the list below that you consider the most valuable attribute to look after for the future within your local area:</p> <p>A. <input type="checkbox"/> Renewable energy B. <input type="checkbox"/> Pollution (Air) C. <input type="checkbox"/> Pollution (Noise) D. <input type="checkbox"/> Open Space - wildlife habitats E. <input type="checkbox"/> Flood risk</p> <div style="border: 1px solid #ccc; padding: 5px; margin-top: 10px;"> <p>With your chosen type of environmental issue from above, please pin-point one specific place on the map table using your green sticker where you think there is an opportunity. Please expand below on what you would like to see at this location:</p> </div>
<h3 style="color: #e91e63;">Transport</h3> <p>How do we get around? With more of us on our cycleways, roads, rail. How do we improve & maintain our transport links?</p> <p><input type="checkbox"/> NO ISSUES</p> <p>Please select one mode of travel from the list below that you would most like to see improvements made within your local area:</p> <p>A. <input type="checkbox"/> Vehicular B. <input type="checkbox"/> Bus C. <input type="checkbox"/> Train D. <input type="checkbox"/> Cycle E. <input type="checkbox"/> On foot</p> <div style="border: 1px solid #ccc; padding: 5px; margin-top: 10px;"> <p>With your chosen type of Transport from above, please pin-point one specific place on the map table using your pink sticker where you think there is an opportunity. Please expand below on what you would like to see at this location:</p> </div>	<h3 style="color: #9b59b6;">Homes</h3> <p>Homes for every stage of life. A house is not a home until it's lived in. We all need a home we're proud of.</p> <p><input type="checkbox"/> NO ISSUES</p> <p>Please select one of the types of Homes from the list below that you consider are needed within your local area:</p> <p>A. <input type="checkbox"/> Older generation (downsizing/sheltered) B. <input type="checkbox"/> Single living (lifestyle/separation) C. <input type="checkbox"/> New starter homes D. <input type="checkbox"/> Family homes E. <input type="checkbox"/> Affordable homes</p> <div style="border: 1px solid #ccc; padding: 5px; margin-top: 10px;"> <p>With your chosen type of Home from above, please pin-point one specific place on the map table using your purple sticker where you think there is an opportunity. Please expand below on what you would like to see at this location:</p> </div>
<h3 style="color: #f1c40f;">Jobs and Business</h3> <p>Where will everyone work? Supporting local businesses to grow & attracting new business. We need to create jobs for all.</p> <p><input type="checkbox"/> NO ISSUES</p> <p>Please select one type of Business from the list below that you would most like to see investment in to improve business or jobs in your local area:</p> <p>A. <input type="checkbox"/> Industrial parks B. <input type="checkbox"/> Business parks C. <input type="checkbox"/> High street development D. <input type="checkbox"/> Local retail units E. <input type="checkbox"/> Small start-up office centres (innovation hubs)</p> <div style="border: 1px solid #ccc; padding: 5px; margin-top: 10px;"> <p>With your chosen type of Business from above, please pin-point one specific place on the map table using your lime sticker where you think there is an opportunity. Please expand below on what you would like to see at this location:</p> </div>	<h3 style="color: #f39c12;">Growth & Infrastructure</h3> <p>Where to place homes & services. Supporting market towns, villages & new settlements. We need to plan places to grow communities.</p> <p><input type="checkbox"/> NO ISSUES</p> <p>Please select one Infrastructure facility from the list below that you consider is most needed in your local area:</p> <p>A. <input type="checkbox"/> Healthcare B. <input type="checkbox"/> Schools C. <input type="checkbox"/> Retail D. <input type="checkbox"/> Community Centres E. <input type="checkbox"/> Leisure facility (leisure centre, play areas etc.) F. <input type="checkbox"/> Utilities improvements (telecoms/electricity/gas/foul treatment)</p> <div style="border: 1px solid #ccc; padding: 5px; margin-top: 10px;"> <p>With your chosen type of Infrastructure from above, please pin-point one specific place on the map table using your orange sticker where you think there is an opportunity. Please expand below on what you would like to see at this location:</p> </div>

APPENDIX H: Draft Local Plan Consultation event
(Regulation 18)

COMMUNITY NEWS

Planning

Local plan is now open for comments

BY LYNN HUGHES
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The public consultation for Central Bedfordshire Council's Draft Local Plan is now open.

The Draft Local Plan sets out the options for growth in the area over the next 20 years, such as the number of homes and jobs that the council proposes to deliver.

To create the Draft Local Plan, the council pulled together 15 new technical studies to guide their overall strategy for growth. This included the Call for Sites exercise last year. This was an opportunity for agents, landowners and developers to submit land that they be-

lieved could be used to meet future demand for homes and jobs. As a result, 851 sites (including 46 employment ones) were submitted. These sites were whittled down by the council to around 150 after assessment. Draft site allocations won't be publicly consulted on until next spring though – at this stage the council is consulting on the broader growth location options.

The council is planning for a range of between 20,000-30,000 new homes (a more exact number will be featured within the next version of the Plan in 2018). The options for delivering the housing growth include creating new attractive villages east of Biggleswade; a new market town near Temps-

ford; and east of Arlesey; as well as some small growth in existing villages, but only where services can support it.

The Plan also anticipates 24-30,000 new jobs coming to the area, through both existing and new strategic employment sites. It also includes proposals to increase public access to the countryside by creating more country parks, as well as play parks and open spaces.

Cllr Nigel Young, Executive Member for Regeneration, said: "We've already undertaken lots of public engagement through consultations and 15 drop-in Community Planning events that we held across the area. This prior community engagement wasn't statutory, but

we wanted to go above and beyond in order to get the plan right."

The public consultation runs from 4 July to 29 August 2017. The public can read the full plan, watch the video, and submit feedback at www.centralbedfordshire.gov.uk/localplan. Copies are available to view at local libraries or the council offices (Chicksands and Dunstable).

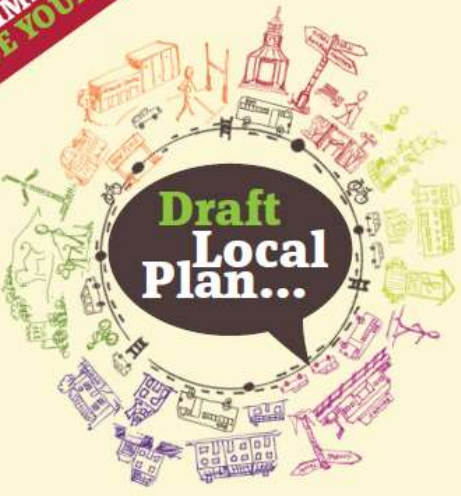
During the consultation, the council will hold a number of public drop-in sessions from 2pm – 8pm on:

- 20 July, Biggleswade Town Council Office
- 26 July, Arlesey Village Hall
- 7 August, Sandy Village Hall

The next version of the Local Plan for comment will be published in spring 2018.

Shaping where you live 2035

**IT'S NOW
TIME TO
HAVE YOUR SAY**



Draft Local Plan...

**Consultation
July 2017**

www.centralbedfordshire.gov.uk/localplan

Central Bedfordshire

A great place to live and work.

Have your say on our Draft Local Plan

The Local Plan sets out how Central Bedfordshire will develop over the next 20 years.

We need more homes because we're in a prime location with excellent connectivity and it's a great place to live. For these reasons, growth is happening in Central Bedfordshire and we need to plan for it. Without a plan, the development will still happen but we'll have no control over where it happens or how it happens.

The Local Plan ensures that this growth:

- happens in the right place
- fits in with the character of Central Bedfordshire
- is developed alongside the right supporting roads, schools, services, retail, leisure and community facilities.

We are consulting the public on the first draft of our Local Plan, which sets out the options for growth.

How we've been developing our Plan

The Local Plan has been informed by around 15 new evidence studies. These look at issues such as population, housing, employment, retail and flooding.

We've also considered existing, potential and new transport infrastructure, such as roads and railways, so that growth and transport arrangements go hand-in-hand.

We've developed this draft Plan with input from residents - through Community Planning events and our Shaping Central Bedfordshire Consultation. We will continue to engage with you because we want to make sure we get this right.

Listening to you

From the consultations and community engagement events, we know that you want us to:

- keep the character of Central Bedfordshire
- limit the impact on the countryside
- plan for homes for the older generation and affordable homes
- plan for local jobs and services
- make sure our roads can cope
- build near to existing roads and infrastructure
- use brownfield sites

What the draft Local Plan proposes

Homes 20,000-30,000

The number of homes we need to plan for is calculated using a standard national approach. However, we need to be flexible and therefore we're planning for a range of between 20,000-30,000 new homes. Further work will be undertaken to establish an exact amount when we produce the next version of the Plan in 2018. This is in addition to the 23,000 homes that are already planned for or built.

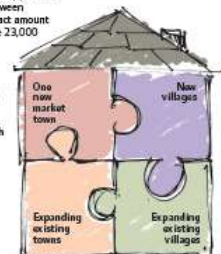
Some of this development will be dependent on improvements to our transport networks, plus the development of critical new infrastructure, like East-West Rail.

The Draft Plan includes a range of different homes to rent and buy with a mixture of sizes including family homes, two bedroom homes, apartments and bungalows. To help people get on the housing ladder, this will include 30% affordable housing, which will be provided as lower cost options including shared ownership.

The options for growth are shown on the map (inside) and more detail on each growth location is provided at:

www.centralbedfordshire.gov.uk/localplan.

The options put forward in the draft Plan to deliver this housing growth are through:

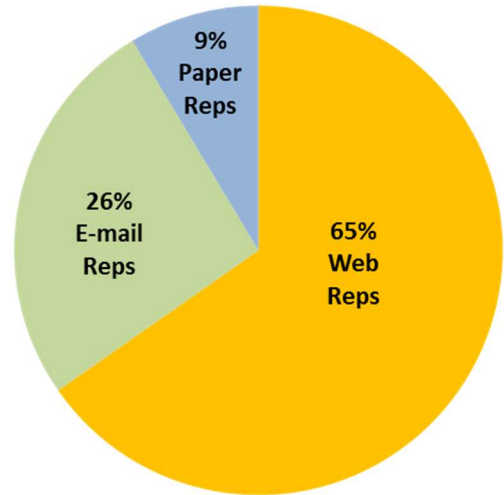


APPENDIX I: Draft Local Plan Consultation Statistics

Draft Local Plan consultation statistics

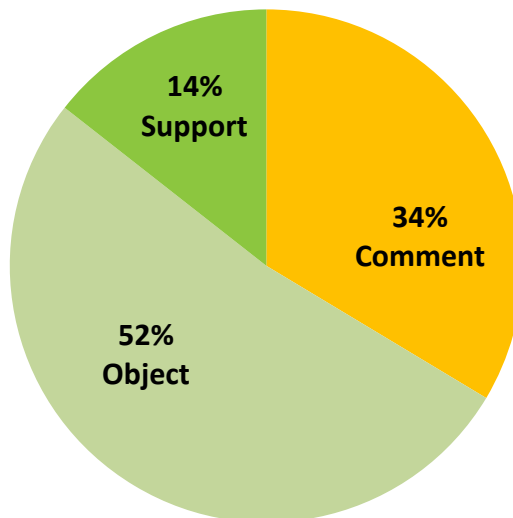
Total Representations: 6,828

Reg 18 Type of Representations	Reps	%
Web Representations (Reps)	4,459	65%
E-mail Representations (Reps)	1,780	26%
Paper Representations (Reps)	589	9%
	6,828	100%



Type of Representations

Comment	34%
Object	52%
Support	14%



APPENDIX J: Regulation 18 responses, main issues raised and how these issues have been addressed in the Local Plan

Section	Summary of the main issues raised	How the main issue has been addressed in the Local Plan
1) Introduction	No main issues raised	Not applicable
2) Key Themes for the Local Plan	No main issues raised	Not applicable
3) Consultation	No main issues raised	Not applicable
4) Community Planning	No main issues raised	Not applicable
5) Developing the Strategy	No main issues raised	Not applicable
6) Vision and Objectives	No main issues raised	Not applicable
7) The Spatial Strategy	Concerns regarding the capacity of the area to accommodate new housing development whilst maintaining its quality, character and identity should be a key consideration.	Noted. Conserving and enhancing the area's Local Character is one of six key themes identified in the Local Plan, with two corresponding Strategic Objectives; SO3, and SO4. The Plan has been subject to a rigorous Sustainability Appraisal (SA) which has considered amongst other things the level of growth which can be accommodated sustainably, having regard to factors such as character and identity. In addition, we have identified 19 important countryside gaps where our evidence shows there is a risk of coalescence as a result of development pressures. These have been delineated to provide clear separation between existing towns and villages and the new developments, so they keep their own identities and rural character. See Policy SP5: Preventing Coalescence and Important Countryside Gaps.
	Concerns regarding the over-reliance on strategic sites which are complex and slow to deliver. The Council must make specific provision to plan for medium / small scale sites.	Noted. Growth will be delivered through a combination of four strategic allocations (12,500 homes), and a portfolio of small to medium sites in a range of sizes ranging from 11 up to 650 homes (c. 5,505 homes). Reasonable assumptions have been made to determine the likely delivery of particular development sites taking into consideration competing sites, likely commencement, and any enabling works that need to be undertaken in advance of development, and these have factored into the identification of the specific allocations identified in this Plan to ensure that we can deliver a continuous supply of housing throughout the Plan period.
	Concerns that growth is dependent on critical infrastructure, such as East - West Rail and the Expressway. Unclear how significantly the areas for development are dependent on the Rail and Expressway schemes coming forward or on any particular alignment. Should either scheme be delayed, not go ahead or a significantly different route be chosen, it is unclear whether the development locations set out in the DLP may have to be reconsidered.	Agree. Sites dependent on future strategic infrastructure delivery have not allocated for development at the present time. We agree that it is important that new allocations identified by this Local Plan contribute to delivering a continuous supply of housing throughout the plan period. The Strategic Allocations identified in the Regulation 19 Draft constitute an appropriate strategy for development. Additional Strategic Allocations were considered as part of the Regulation 18 draft Local Plan - additional new villages in Biggleswade, new villages at Aspley Guise, a new market town in Tempsford and expanding Luton to the west - but these are not allocated for development at the present time. Whilst we believe these locations do have potential for growth they are dependent on future strategic infrastructure delivery; namely the realignment of the A1 or significant improvements through Central Bedfordshire, East West Rail, the Expressway and the expansion of Luton Airport. In each case these are either expected to enable development or in other cases they may mean that development is not feasible in a location due to sterilisation of the land by the route of the infrastructure. These sites are formally identified in the Local Plan as Identified Locations for Future Growth, and will be reconsidered as part of the Partial Plan Review.
	Range of between 20,000 - 30,000 new homes. A lot of concern about delivering the higher end of this range, and a more specific number requested in the next iteration of the Local Plan.	Agree. We have considered a range of options and sites, and believe we can deliver around 20,000 new homes over the next 20 years and this level of growth is sustainable. This is in addition to the 23,000 homes that are already allocated or have planning permission. Plan text revised to reflect this.
	Housing numbers excessive and unjustified.	Section 6.9 has been revised to clearly show the derivation of the Plan housing target, and sets this against commitments over this same period, and proposed housing supply made through the Plan.
	Phasing of development of Strategic Allocations should ensure that is aligned with infrastructure provision.	Agree. Policy HQ1 (Planning Obligations and the Community Infrastructure Levy) added which requires all new development must be supported by the required infrastructure at the appropriate stage. In addition to this all development proposals brought forward at the identified strategic allocations will be subject to new Policy SP3 (Generic Requirements for Strategic Sites) and site specific allocation policies - Policy SA1 (North of Luton); Policy SE1 (M1 Junction 11a - Sundon Rail Freight Interchange); Policy SA2 (Marston Vale New Villages); Policy SE2 (M1 Junction 13 - Marston Gate Expansion); Policy SA3 (East of Arlesey); Policy SA4 (East of Biggleswade); Policy SE3 (A1 Corridor - Holme Farm, Biggleswade); and Policy SE4 (Former RAF Base, Henlow) - which amongst other things require the timely provision of infrastructure.
8) Implementation	Strategic Allocations proposed through Plan will result in the coalescence of settlements.	Disagree. Coalescence will be mitigated through the Masterplanning process, and development will have to accord with Policy SP5 (Preventing coalescence and important countryside gaps). Coalescence Policy wording amended so that all future development, including that proposed through the Plan will have to comply with Policy.
	Concerns regarding the over-reliance on strategic sites which are complex and slow to deliver. The Council must make specific provision to plan for medium / small scale sites.	Noted. Growth will be delivered through a combination of four strategic allocations (12,500 homes), and a portfolio of small to medium sites in a range of sizes ranging from 11 up to 650 homes (c. 5,505 homes). Reasonable assumptions have been made to determine the likely delivery of particular development sites taking into consideration competing sites, likely commencement, and any enabling works that need to be undertaken in advance of development, and these have factored into the identification of the specific allocations identified in this Plan to ensure that we can deliver a continuous supply of housing throughout the Plan period.

Section	Summary of the main issues raised	How the main issue has been addressed in the Local Plan
	Site specific concerns raised regarding suitability of strategic sites, and potential impacts road network, historic environment, flood risk, lost of agricultural land, biodiversity, and landscape.	We have carefully considered all comments received, and adjusted our site assessments which has informed the allocation of sites and detailed policies in the Plan.
9) Green Belt, Coalescence and Settlements	Policy SP3 (Development in the Green Belt) not in accordance with NPPF - Policy requires special circumstances to justify infill development within the Green Belt. Furthermore definition of infill introduces a restriction on the availability of the exception within Paragraph 89 of the NPPF by defining infilling more prescriptively than the NPPF.	Agree. Reference to infill removed from Policy and supporting text.
	Green Belt performance should be considered on a site specific basis rather via parcellisation.	Agree. Additional evidence commissioned assessing Green Belt harm on a site specific basis (Central Bedfordshire Stage 3 Green Belt Study, December 2017). Information used to inform the site allocation process.
	Essential to define new Green Belt around Aspley Guise, north of the railway line to prevent coalescence with Milton Keynes.	Noted but new Green Belt cannot be justified. Paragraph 82 of the NPPF states that the general extent of Green Belt across the country is already established and that new Green Belts should only be established in exceptional circumstances, when planning for larger scale development such as new settlements or major urban extensions. In particular Local Planning Authorities should demonstrate why normal planning and development management policies would not be adequate. Having reviewed the existing evidence and commissioned additional Green Belt study considering the potential to designate new Green Belt, it is considered that the exceptional circumstances required by National Policy to justify the creation of new Green Belt do not exist. Instead Important Countryside Gaps will be designated in those areas originally earmarked for new Green Belt, including around Aspley Guise. These will protect against incremental built development which would cause the separate identity of settlements to be eroded or lost entirely without the need to designate new Green Belt.
	Exceptional circumstances have not been demonstrated / clearly articulated.	Disagree - no action required. The case for the exceptional circumstance in relation to Green Belt release is set out in section 8.2 of the Plan, but this will be supported by a topic paper which will be prepared for Submission.
	Policy SP4 (Coalescence) should apply to all future development, including that proposed through the Local Plan. Development proposed through the Local Plan will in direct contradiction to Policy SP4.	Agree. Policy wording amended so that all future development, including that proposed through the Plan will have to comply with Policy. The potential of coalescence resulting from the Strategic Allocations will be mitigated through the Masterplanning process.
	Repetition with Policy SP5 - Important Countryside Gaps	Agree. Policies SP4 (Coalescence) and SP5 (Important Countryside Gaps) merged to produce revised Policy SP5: Preventing coalescence and Important Countryside Gaps.
	Strategic development proposed through Plan will result in the coalescence of settlements.	Disagree. Coalescence will be mitigated through the Masterplanning process, and development will have to accord with Policy SP5 (Preventing coalescence and important countryside gaps).
	Essential to define an Important Countryside Gap around Cranfield to prevent coalescence with Milton Keynes.	Agree. Important Countryside Gap designated around Cranfield.
	Clarity re identification of Important Countryside Gaps	Agree. Criteria for Important Countryside Gaps have been added to Plan and are set out at 8.9.2 and 8.9.3, and this is supported by Technical Paper setting out the criteria and methodology.
10) Settlement Envelopes and Settlement Hierarchy	No main issues raised	Not applicable
11) Planning for Gypsies and Travellers	Reliance on windfall sites has placed an excess of G&T numbers in some villages with impact on settled community, and loss of Green Belt.	Noted but no action required. Domination dealt with via the first bullet of Policy H8 (Assessing planning applications for Gypsy and Traveller Sites) which states "the scale of the site and the number of pitches would not dominate the nearest settled community and would not place undue pressure on local infrastructure".
	There should be an equitable distribution of G&T sites throughout the Plan area. Avoiding domination	Noted, but not applicable at this stage because no G&T allocations made in this Plan. Domination dealt with via the first bullet of Policy H8 (Assessing planning applications for Gypsy and Traveller Sites) which states "the scale of the site and the number of pitches would not dominate the nearest settled community and would not place undue pressure on local infrastructure".

Section	Summary of the main issues raised	How the main issue has been addressed in the Local Plan
	Plan prejudice to Gypsies and Travellers and Travelling Showpeople that don't accord with Planning Policy for Traveller Sites (PPTS)(August 2015) definition.	Agree. Policy H8 (Assessing planning applications for Gypsy and Traveller sites) and H9 (Assessing planning applications for Travelling Showpeople) amended. Reference to PPTS definition deleted. Policies now apply to all Gypsies and Travellers regardless of whether they accord with the PPTS planning definition.
12) Housing	Policies "woolly", unclear what targets are, and what evidence there is to justify these.	Agree. Policies tightened, and additional evidence commissioned as part of the Luton & Central Bedfordshire Strategic Housing Market Assessment (December 2017) to provide specific targets for policy. In particular Policy H2: Housing Standards, now requires all new build housing to deliver at least 35% Category 2 Requirement MA (2) adaptable homes (or any new or revised regulations that revoke or modify the Building Regulations); and all new build housing to deliver at least 5% Category 3, Requirement M4 (3) wheelchair accessible homes (or any new or revised regulations that revoke or modify the Building Regulations).
	Concerns regarding the viability of housing standards, both in isolation, and in combination with other planning obligations. Flexibility in policy required.	Noted but no action required. The Council has produced a viability report which considers the cost of policies, both individually and in combination. Cost and requirements applied to a range of site typologies (8 dwellings up to 500 dwellings) across all value areas within the Plan area. This report concludes that all allocated sites are viable with full policy compliance, with a reasonable return to developers and landowners.
13) Employment and Economy	Excessive employment land allocated / concerns that there is an imbalance between the number of jobs and homes proposed in the Plan, and that this will yield a surplus in workers, and lead to increases in net out-commuting.	Noted. Total planned jobs reduced from 30,000 jobs (Table 7.3, Reg 18 Draft Plan, July 2017) to a minimum of 24,000, with the Strategic Employment Allocations now contributing to the delivery of 24,000 jobs, rather than being on top of this figure. The Strategic Housing Market Assessment (December 2017) concludes that housing and jobs numbers are balanced prior to the market signals adjustment. Since market uplift is applied to respond to factors such as overcrowding, concealed households, affordability etc., then increasing housing numbers won't increase the population, or number of workers, but rather increase the number of households forming, leading to a reduction in household size. The Council is therefore confident that homes and jobs are balanced.
14) Retail and Town Centres	No main issues raised	Not applicable
15) Transport	Transport infrastructure can't cope.	Noted, but no action required. Detailed transport modelling undertaken as part of preparation of the Plan which has included consideration of impacts on transport infrastructure which has informed the assessment and allocation of site in the Regulation 19 Draft Local Plan.
	Shouldn't plan growth without knowing where and when infrastructure is being delivered.	Agree. It is important that new allocations identified by the Local Plan contribute to delivering a continuous supply of housing throughout the plan period. The draft Local Plan proposed additional strategic allocations - additional new villages in Biggleswade, new villages at Aspley Guise, a new market town in Tempsford and expanding Luton to the west - but these are not included in this Local Plan. We believe these locations do have potential for growth but they are dependent on critical infrastructure (e.g. East-West Rail) to support them, and therefore delivery over the Plan period is less certain. The Local Plan has therefore safeguarded these sites for future development, to be assessed further as part of the Partial Plan Review.
16) Environmental Enhancement	No main issues raised	Not applicable
17) Climate Change and Sustainability	No main issues raised	Not applicable
18) High Quality Places	Concerns over Infrastructure delivery	No action required. Legal obligations and policy requirements will be used to secure infrastructure. However it is not possible to provide this all upfront, rather this will be phased with the development.
	Impact of large-scale development on local communities.	No action required. The council must consider all reasonable options for meeting its development needs, including larger sites. Design of large sites will take into account surrounding communities through careful masterplanning.
19) Historic Environment	No main issues raised	Not applicable
20) Development in the Countryside	No main issues raised	Not applicable

APPENDIX K: Pre-submission Local Plan Consultation
(Regulation 19)

COMMUNITY NEWS

Planning

Local plan will be published on Tuesday

BY NEWS REPORTER
editor@biggleswadechronicle.co.uk
@biggleswadechronicle

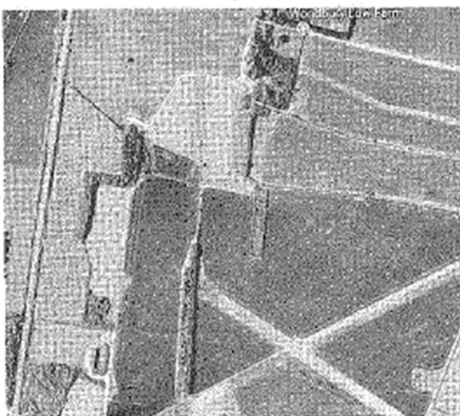
Central Bedfordshire Council (CBC) has backed down over plans to force through its housing development plan without ALL councillors having a say.

In August, CBC carried out a public consultation on its draft Local Plan for housing.

This plan will decide how many houses are built in the next 20 years and where they are built although the draft plan showed four villages around Biggleswade and a 7,000 new town near Tempsford.

Last month it became clear public comments on the final consultation would NOT affect the plan to go to the inspector. Independent Councillor Adam Zerny also complained the meeting where the Plan would be approved for consultation would be CBC's Executive where only members of the Council's Executive committee would be allowed to vote and the meeting would take place during the working day.

CBC has now agreed to a special meeting of the full



Tempsford airfield could become a new town under the plans

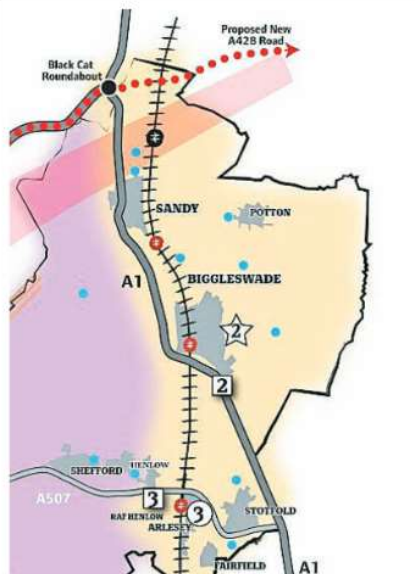
Council on Wednesday 10 January at Priory House, Chick-sands at 6.30pm and is open to the general public who can ask questions and see how their councillors vote.

CBC had conducted a further investigation and found Government regulations "clearly requires that the approval of the local plan are drafts thereof for consultation, must be approved by Full Council and cannot be delegat-

ed to the Executive".

The meeting agenda will appear here in the coming weeks: <http://centralbeds.moderngov.co.uk> and anyone who would like to speak at the meeting should contact helen.bell@centralbedfordshire.gov.uk.

The final plan document should be available for view on January 3. The public consultation will begin on January 11 if approved.



A map showing some of the development sites in Central Bedfordshire Council's Local Plan.

Central Beds Local Plan voted through by council

Central Bedfordshire Council has approved the final draft of a plan which will shape housing and employment across the area for the next 20 years.

At a meeting last week, the full council agreed the current draft of the Local Plan which will include 20,000 homes and 24,000 new jobs over the next 20 years. The plan will now go out for public consultation.

Proposals to build a settlement of 7,000 new homes at Tempsford have been dropped but a new 2,000-home village east of Arlesey, settlements east of Biggleswade, at Holme Farm Biggleswade and RAF Henlow are still being considered, as well as a series of smaller housing developments.

The Arlesey settlement would contain a country park, a health and social care hub, community centres, new shops, a nursery, lower school and middle school provision and enlargement of upper school and sixth form provision.

There is an allocation for 1,500 homes east of Biggleswade's Baden Powell Way. This will be a

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separate settlement from Biggleswade with a similar set of community facilities to the new Arlesey development.

There will be a parkland area to the west of it to help preserve the Biggleswade Green Wheel.

The site at Holme Farm will contain 60 hectares of employment space.

The base at RAF Henlow has been earmarked for 85 hectares of high tech employment use, and 45 hectares allocated for homes and a visitor attraction.

Councillor Nigel Young, executive member for regeneration, said: "This is now the Local Plan that we will take forward, which will guide the development of fewer homes than originally proposed, though we do recognise that up to 20,000 homes over the next 20 years is still significant."

"However, by consulting residents now and submitting our plan before the end of March, we

will retain control over where development will be located and how it is delivered rather than succumbing to the pitfalls of speculative development.

"Not all the homes will be built in one go, so the growth will be gradual. And it will be delivered with the supporting roads, transport networks, schools, shops, more parks and open spaces, community leisure and health facilities that, during our previous consultations and engagement events, thousands of people told us were needed."

"We have listened to that feedback and now have a Local Plan that will deliver the homes and jobs our residents need, where they are needed, while creating communities where people want to live."

The plan is now open for a further consultation until February 22. Details of how to do this are available at www.centralbeds.gov.uk.

Drop-in sessions will be held on January 30 at Arlesey Village Hall and February 8 at Biggleswade Orchard Centre from 3pm to 7.30pm.



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Local Plan consultation

You are being notified because you have indicated that you wish to be kept updated on the progress of the Local Plan. Consultation began at **10am on Thursday 11th January 2018** for a period of six weeks until **5pm on Thursday 22nd February**.

In accordance with Regulation 19 of The Town and Country Planning (Local Planning) (England) Act 2012, the Council is publishing its Pre-submission Local Plan, and we are inviting you to express your views by taking part in the consultation.

View the Local Plan and supporting documents

Central Bedfordshire Council
Published by Communications Team [?] · January 18 at 3:02pm ·

If you'd like to speak to our officers and ask questions about our Local Plan, come down to Barton Rovers Football Club from 3pm-7:30pm today.

Can't make it to this one? There are 3 more across Central Bedfordshire in January and February. Find out where, plus more about the Plan, here: <http://www.centralbedfordshire.gov.uk/.../loca.../overview.aspx...>

Have your say on new homes in...

Arlesey	Aspley Guise	Biggleswade	Chalton
Barton-le-Clay	Caddington	Dunton	Clifton
Campton & Chicksands	Cranfield	Everton	
Flitwick	Haynes	Henlow	Harlington
Langford	Gravenhurst	Houghton Conquest	Hockliffe
Leighton Linlade	Maulden	Meppershall	Houghton Regis
Marston Moretaine	Potton	Shefford	Moggerhanger
Shillington	Stondon	Toddington	Sutton
			Westoning

Homes **Shaping where you live 2035**

1,554 people reached
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Central Bedfordshire Council

...

Published by Communications Team [?] · January 11 at 7:30pm · 🌐

We want your views on new homes in Marston.
But it's much more than just homes. Watch our video to find out what is being proposed in our Local Plan and read more detail on our website, where you can have your say
<http://www.centralbedfordshire.gov.uk/.../loca.../overview.aspx...>



We are planning for:

- **up to 5,000 new homes and four new villages in Marston Vale**
- **and 63 new homes in Marston Moretaine**



📍 Your video is popular in [England](#)

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2.4K Views

APPENDIX L: Statement of Representations Procedure



Statement of Representations Procedure

(Regulation 19) Town and Country Planning (Local Planning) (England) Regulations 2012

Central Bedfordshire Council Local Plan (2015 – 2035)

Central Bedfordshire Council Local Plan Regulation 19 Publication

Central Bedfordshire Council has produced a Local Plan which sets out a vision, strategy, objectives and planning policy for planning and delivery across Central Bedfordshire up to 2035.

The Council is inviting comments, also known as representations, on the 'soundness' and legal compliance of the Central Bedfordshire Council Local Plan (Regulation 19) Publication Version. The information below sets out how and by when to make such representations, how to express interest in appearing at the Examination, as well as where to find the proposed submission documents (the Central Bedfordshire Council Local Plan (Regulation 19) Publication Version and its supporting evidence).

Consultation Document

Central Bedfordshire Council Local Plan (Regulation 19) Publication Version (also known as pre-submission)

Subject matter and area covered

The Central Bedfordshire Council Local Plan sets out the broad spatial strategy and policy framework for Central Bedfordshire Council up to 2035. The Local Plan has been informed by a number of new evidence studies looking at issues such as population, housing, employment, retail and flooding. These have helped develop an overall strategy that directs development and identifies suitable sites together with the policies that will be used to determine on planning applications.

What is this Consultation About?

This is the Local Plan that the Council considers is ready for examination and this is your opportunity to comment on the Plan's "soundness", legal compliance and compliance with the Duty to Cooperate before it is submitted to an independent Inspector to be examined.

Legal Compliance

The Inspector will first check that the Plan meets all the necessary legal requirements and compliance with the Duty to Cooperate before considering the tests of soundness. There are five areas to consider when looking at whether or not the Plan is legally compliant. These are:

- Is the Plan consistent with the Council's production timetable known as the Local Development Scheme (LDS)?
- How has the community been involved in the process and has the Council met its Statement of Community Involvement (SCI)?



- Does the Plan comply with the relevant regulations? (Town and County Planning (Local Planning) (England) Regulations 2012 and the Planning and Compulsory Purchase Act 2004)
- Was a Sustainability Appraisal (SA) Report produced and how it has been carried out?
- Has the Council complied with the Duty to Cooperate?

Soundness

There are four areas to consider when looking at whether or not the Plan is sound. To be sound the Plan should be:

- Positively Prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy - the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

Period of publication for representations

The Council will receive representations from **10am on Thursday 11th January 2018 to 22nd February 2018**. Representations should arrive no later than 5.00pm on 22nd February 2018. Anonymous comments or comments received outside these dates will not be accepted.

How to make representations

Representations can be made through the following means:

- Online:

By using the Council’s online response form at www.centralbedfordshire.gov.uk/localplan

- By mail:

By writing to Local Plan, Central Bedfordshire Council, Priory House, Monks Walk, Chicksands, Shefford, SG17 5TQ

How to appear at the Examination

The Examination is open to the public. Anyone can attend to listen to the discussions but there are strict rules which apply to those who wish to participate. A request to participate must be made as part of the representation on the Central Bedfordshire Council Local Plan (Regulation 19) Publication. The appointed Inspector will then decide who can attend the Examination.

Using the online system at <http://www.centralbedfordshire.gov.uk/> or response form you can request to be notified via email to be kept up to date on the Local Plan process.

All valid comments will be submitted to the Secretary of State (the Planning Inspectorate) and considered as part of a Public Examination by an independent Planning Inspector.

Any comments that you submit maybe accompanied by request to be notified of the following:

- The Central Bedfordshire Council Local Plan (Regulation 19) Publication version and supporting evidence (the proposed submission documents) are available for inspection from **Thursday 11th January 2018 to 22nd February 2018 (5pm)** at:

- The Councils website: www.centralbedfordshire.gov.uk/localplan
- Central Bedfordshire Council Office, Priory House, Monks Walk, Chicksands, Shefford, Beds, SG17 5TQ
Office opening hours (excluding Bank Holidays)
Monday to Thursday 8:30am – 5pm
Friday 8:30am – 4pm
- Reference copies of the Central Bedfordshire Council Local Plan (Regulation 19) Publication version have been placed in all Central Bedfordshire libraries. Locations and opening times for the libraries can be found at:
<http://www.centralbedfordshire.gov.uk/leisure/libraries/overview.aspx>

Contact us...

by telephone: 0300 300 8000

by [email: customers@centralbedfordshire.gov.uk](mailto:customers@centralbedfordshire.gov.uk)

on the web: www.centralbedfordshire.gov.uk

Write to Central Bedfordshire Council, Priory House, Monks
Walk, Chicksands, Shefford, Bedfordshire SG17 5TQ

APPENDIX M: Key themes raised during Regulation 19
consultation

MAIN ISSUES TABLE for Regulation 22c Statement

Chapter / Policy	Main Issues raised
Chapter 1	
Introduction	<p>Specific</p> <ul style="list-style-type: none"> Public participation - community have not been adequately engaged with / views have not informed Plan; Complex consultation system. Infrastructure uncertainty - overreliance on EW rail and the A1 alignment; Inequitable distribution of growth; Housing target should be higher / lower; fails to have regard to impact of the Oxford Cambridge Arc and standardized methodology; Need for further small and medium housing allocations; Pressure on existing infrastructure – proposed growth out of scale with existing infrastructure; Reasonable alternatives have not been adequately considered; Brownfield sites underutilized. Concerns about the partial plan review; Inappropriate to include potential Identified Locations for Future Growth; Lack of cooperation on housing numbers with adjoining LPAs; No evidence that CBC has complied with DTC. <p>Key Issues</p> <ul style="list-style-type: none"> None raised
Chapter 2	
Key Themes	<p>No main issues raised</p> <ul style="list-style-type: none"> None raised <p>Key Issues</p> <ul style="list-style-type: none"> None raised
Chapter 3	
Consultation	<p>Specific</p> <ul style="list-style-type: none"> Timing of consultation; Not enough detailed information provided; Web based response system difficult to use; Neighbourhood Plans not being taken into consideration <p>Key Issues</p> <ul style="list-style-type: none"> None raised
Chapter 4	
Vision and Objectives	<p>Specific</p> <ul style="list-style-type: none"> Vision and Objectives weak re natural environment/climate change etc - reference to BOAs, Greensand Ridge NIA, AONB, and GI Plans; Amend SO11, SO12 and SO13 to include protection of the natural environment and the enhancement of biodiversity <p>Key Issues</p> <ul style="list-style-type: none"> Vision and Objectives weak re natural environment/climate change etc
Chapter 5	
Spatial Strategy	<p>Specific</p> <ul style="list-style-type: none"> Para 5.4 – word “moderate” should be replaced by “proportionate” this would be relevant to both size and existing level of services; <p>General</p>

Chapter / Policy	Main Issues raised
	<ul style="list-style-type: none"> • Strategy unbalanced - inequitable distribution of development; scale of proposed development inappropriate; • Delivery and timing assumptions, unjustified and optimistic, increase small-medium allocations; • Scope of Partial Plan Review should not be limited to identified areas for future growth • should review OAN based on standard methodology; • Partial Plan Review – Review within 6 months premature • Future growth locations – status unclear, clarity requested; • OAN – too high, too low • Impact on natural environment, amenity, rural character/identity, agricultural land • Loss of Green Belt • Infrastructure cannot cope <p>Key Issues</p> <ul style="list-style-type: none"> • Strategy unbalanced; • Delivery and timing assumptions, unjustified and optimistic; • Future growth locations – status unclear, clarity requested;
Chapter 6	
Proposed locations for growth	<p>South Area</p> <ul style="list-style-type: none"> • Opposition for Toddington allocations; • Opposition/support for West of Luton; • Impact on AONB – lack of reasonable alternatives/detailed mitigation measures; • Impact on natural environment; • Impact on heritage; • Impact on rural character/identity; • Concern over scale of proposals; • Green Belt – further Green Belt should be released; • Green Belt – lack of exceptional circumstances; oppose Green Belt release; • Unmet need – Plan does not meet unmet need where it arises; • Infrastructure – insufficient to support new development; • Transport – increase in traffic <p>A1 Corridor</p> <ul style="list-style-type: none"> • Coalescence - filling area between Biggleswade, Dunton, Sunton, and Tempsford; • Loss of agricultural land; • Inequitable distribution of growth; • Scale of proposals and cumulative impacts; • Impact on rural character/identity/loss of rural way of life; • Impact on natural environment; • Impact on heritage; • Infrastructure – insufficient to support new development; • Transport – increase in traffic; inadequate transport infrastructure; • Delivery – impact of providing infrastructure on viability/affordability of development; <p>East-West Area</p> <ul style="list-style-type: none"> • Coalescence - merging of settlements; • Scale of proposals and cumulative impacts; • Inequitable distribution of growth; • Impact on rural character/identity/loss of rural way of life; • Impact on natural environment;

Chapter / Policy	Main Issues raised
	<ul style="list-style-type: none"> • Impact on heritage; • Infrastructure – insufficient to support new development; • Transport – increase in traffic; inadequate transport infrastructure; • Delivery – impact of providing infrastructure on viability/affordability of development; • Strategy fails to fully make use of opportunities for sustainable growth in Cranfield/Cranfield University/Technology Park • Loss of agricultural land <p>Central Area</p> <ul style="list-style-type: none"> • Inequitable distribution of growth; • Cumulative impact with unprecedented levels of recent growth; • Concern over scale of proposals; • Impact on rural character/identity/loss of rural way of life; • Impact on natural environment; • Infrastructure – insufficient to support new development; • Transport – increase in traffic; inadequate transport infrastructure, A507 at capacity; • Coalescence - concerns over merging of settlements <p>Key Issues</p> <ul style="list-style-type: none"> • Strategy unbalanced, inequitable distribution of development; • Unmet need – Plan does not meet unmet need where it arises; • Delivery and timing assumptions – unjustified and optimistic - further small-medium allocations required; • Scale of proposed development inappropriate; • Impact on natural environment; • Impact on rural character/identity; • Green Belt exceptional circumstances have not been demonstrated • Loss of Green Belt; • Infrastructure cannot cope
6.6 Growth Strategy	<p>General</p> <ul style="list-style-type: none"> • Sites have been incorrectly assessed; • Allocations in the Green Belt are contrary to Policy SP4 (Development in the Green Belt); • Small and medium allocations will alter rural character/identity; • Pressure on education, health and transport that cannot be met; • Need zero carbon energy targets for SME sites; • Cumulative impacts; • Employment – strategy reliant on large employment sites; should allocate small and medium employment allocations <p>Key issue</p> <ul style="list-style-type: none"> • None raised
6.7 Small and Medium Sites	<p>Specific</p> <ul style="list-style-type: none"> • Should allocate small & medium employment sites • Overreliance on strategic sites • Sites incorrectly assessed • Allocations in green belt are contrary to SP4 (Development in the Green Belt) <p>General</p> <ul style="list-style-type: none"> • 650 homes not a small-medium scale allocation; • Impact on character of settlements and identity of communities; • growth should only meet local needs; • Pressure on local infrastructure;

Chapter / Policy	Main Issues raised
	<ul style="list-style-type: none"> Cumulative impacts <p>Key Issues</p> <ul style="list-style-type: none"> Impact on character of settlements and identity of communities; Pressure on local infrastructure; Cumulative impacts
6.8 Neighbourhood Planning	<p>Specific</p> <ul style="list-style-type: none"> Reliance on Neighbourhood Plans to allocate sites will result in inconsistent growth across CBC; Suggest setting target for NHPs <p>Key Issues</p> <ul style="list-style-type: none"> None identified
6.9 Housing target	<p>Specific</p> <ul style="list-style-type: none"> Housing figure is too high/has been over estimated/plan over allocates/contingencies too high; Housing figure is too low/below figure indicated by new methodology; OAN is incorrect/calculations incorrect; OAN should be calculated in the context of the 4 HMAs; OAN should have regard to Growth Corridor; OAN should have regard to new standard methodology; Imbalance between homes and jobs - more homes have been provided than jobs/housing target is unjustified; Inconsistency with figure of 20,000 in the foreword; Bring empty homes back into use; Clarity sought over housing delivery in CB within Luton and Stevenage HMAs over 2011-2031 <p>Key Issue</p> <ul style="list-style-type: none"> OAN is disputed
6.10 Summary of Growth in CB	<p>Specific</p> <ul style="list-style-type: none"> Dispute calculations; Not sustainable to limit development in villages; More small/medium housing sites needed; Why no small/medium employment allocations; Windfall allowance is too high/unsound; Over reliance on strategic allocations; Dispute delivery of strategic sites; Contingency is too small; Should apply a non-delivery rate of 10%; <p>Key Issues</p> <ul style="list-style-type: none"> Overreliance on strategic sites/delivery of strategic sites is disputed; Contingency is too small
Policy SP1: Growth Strategy	<p>Specific</p> <ul style="list-style-type: none"> Housing figure is too high/has been over estimated/plan over allocates/contingencies too high; Housing figure is too low/below figure indicated by new methodology; Housing target should be increased to reflect Oxford-Cambridge arc and new standard methodology; Strategy reliant on small number of strategic sites which could stall; lack of contingency; allocate further small-medium sites; Object to loss of Green Belt; exceptional circumstances not demonstrated, suitable alternatives exist outside Green Belt; Further small-medium sites should be allocated in Minor Service Centres; Imbalance of homes and jobs/balance achieved with OAN of 32,000 - Plan target of 39,350 more than required to balance labour supply/demand, increase in out-commuting; Plan should specify where in HMA unmet need will be accommodated;

Chapter / Policy	Main Issues raised
	<ul style="list-style-type: none"> • Inequitable distribution of growth; • Cumulative impact with unprecedented levels of recent growth; • Concern over scale of proposals; • Impact on natural environment; • Impact on heritage; • Impact on character/identify/rural way of life; • West of Luton – can be brought forwards earlier within this Plan period <p>Key Issues</p> <ul style="list-style-type: none"> • Housing figure is too high; • Housing figure is too low/below figure indicated by new methodology and Oxford-Milton Keynes-Cambridge Arc; • Inequitable distribution of growth; • Impact on character/identify/rural way of life; • Coalescence; • Scale of allocations • Overreliance on strategic sites – delivery concerns; • Imbalance of homes and jobs; • Unclear where unmet need will be delivered
Policy SP2: National Planning Policy Framework - Presumption in Favour of Sustainable Development	<p>Specific</p> <ul style="list-style-type: none"> • No indication in policy of what constitutes an ‘out of date’ policy; <p>General</p> <ul style="list-style-type: none"> • Inadequate infrastructure to accommodate large scale growth; • Does not give sufficient weight to brownfield land; <p>Key Issues</p> <ul style="list-style-type: none"> • None raised
Chapter 7	
Implementation	<p>Specific</p> <ul style="list-style-type: none"> • Existing commitments should be delivered first; • Scale of development is disproportionate/exceeds local requirements; • Contest build out rates; • More small/medium sites should be allocated; • Contingency is modest; • OAN should be higher; • More sites at large villages in the Green Belt needed; • Insufficient measures to ensure infrastructure is in place in advance of homes; • Monitoring must include impacts of development; • Does not take into account areas where significant development has occurred or is committed; • Plan does not include sufficient measures to ensure required infrastructure is in place in advance or in parallel to development; • Implementation and monitoring must take account timing and provision of infrastructure; • Inadequate consideration and mitigation to reduce the cumulative impact of development; • Phasing of development must be reviewed to take account of wider strategic infrastructure developments. <p>Key Issues</p> <ul style="list-style-type: none"> • Delivery rates for the strategic sites are ambitious • Delay to strategic sites will heavily impact on plan delivery
7.1 Delivery Rates	<p>Specific</p>

Chapter / Policy	Main Issues raised
	<ul style="list-style-type: none"> • There will be deliverability issues linked to viability; • Housing land supply is less than assumed; • More small and medium sites should be allocated; • Delivery rates do not address employment provision which could impact on phasing; • Delivery rates do not account for cumulative effects of other sites; • Rates are not realistic; • Phasing must take account of timing and provision of infrastructure; • Inadequate consideration of cumulative impact in the phasing; <p>Key Issues</p> <ul style="list-style-type: none"> • Delivery rates for the strategic allocations are unrealistic/optimistic; • Over reliance on strategic allocations
7.2 Housing Supply	<p>Specific</p> <ul style="list-style-type: none"> • Lack of detail relating to employment land supply • Dispute housing figures • Unrealistic windfall assumptions • Lapse rate should be applied • Clarity sought over contents of SHLAA table • Lack of confidence in 5-year supply calculations • Too many homes planned for the Biggleswade area • Biggleswade is already gridlocked • Loss of agricultural land <p>Key Issues</p> <ul style="list-style-type: none"> • Housing figures disputed • 5-year supply calculations disputed
7.3 Monitoring	<p>Specific</p> <ul style="list-style-type: none"> • Need to monitor employment land also • Monitoring must include the impact of development • Monitoring should take into account timing and provision of infrastructure <p>Key Issues</p> <ul style="list-style-type: none"> • None identified
7.4 Key Diagram	<p>Specific</p> <ul style="list-style-type: none"> • Forest of Marston Vale should be shown on the policies map; • Key diagram should show the area of the Oxford-Milton Keynes-Cambridge Arc; • Key diagram is misleading with regards to EW Rail <p>Key Issues</p> <ul style="list-style-type: none"> • None identified
Policy SP3: Generic Requirements for Strategic Sites	<p>Specific</p> <ul style="list-style-type: none"> • Policy duplicates the requirements of the relevant strategic policies; • Should require preparation of high level heritage impact assessment to inform/guide masterplans/dev briefs; • Should refer to a net environmental gain. • Should require full transport assessment to ensure a complete package of mitigation measures are secured; • Should be required to provide indoor and outdoor sports facilities; • Should include requirement for fully integrated SUDS to mitigate against any potential flood risk, apply a flood risk sequential approach to development across the site; • Fails to describe need for the provision of Social & Community Infrastructure, too much focus on 'integrated health & care hubs' at expense of other needs;

Chapter / Policy	Main Issues raised
	<ul style="list-style-type: none"> • Should include milestones for delivery with a trigger for alternative sites; • Policy fails to fulfil the strategic objectives (SO1 - SO13); • Terminology inconsistent, with the interchangeable use of 'masterplan' and 'development brief'. <p>Key Issues</p> <ul style="list-style-type: none"> • Should require preparation of high level heritage impact assessment to inform/guide masterplans/dev briefs; • Should require full transport assessment to ensure a complete package of mitigation measures are secured; • Should include requirement for fully integrated SUDS to mitigate against any potential flood risk, apply a flood risk sequential approach to development across the site
7.7	<p>Specific</p> <ul style="list-style-type: none"> • Alternative residential development sites; • Concern relating to the distribution of strategic allocations; • Information only refers to fluvial flood risk, suggest including an indication of the surface water, groundwater flood risk as well as any risk from reservoir breaching/flooding; <p>Key Issues</p> <ul style="list-style-type: none"> • None raised
Policy SA1: North of Luton	<p>Specific</p> <ul style="list-style-type: none"> • Impact on the setting, tranquility and privacy Keech Hospice; • Loss of Green Belt; • Loss of Wildlife, impact on biodiversity and habitats, CWS, and Ancient Woodland; • Harm to the AONB and it's setting; • Water supply stress; • Increased flood risk from development; • Increased pollution; • Impact on designated and non-designated heritage assets; • Impacts from development and M1-A6 link road on local road networks; • Increase in traffic, pressure on A6 and A5; • Need to deliver more than 10% affordable housing • Size of allocation too large; • The cost of delivering the M1 - A6 link road • Existing capacity issues at local schools and GPs • No alternatives for location of link road • Coalescence with surrounding villages; • Delivery rates are overly optimistic and unjustified; • DtC - no evidence of engagement <p>Key Issues</p> <ul style="list-style-type: none"> • Impact on the setting, tranquility and privacy Keech Hospice; • Harm to the AONB and it's setting - Require preparation of Landscape Visual Impact Assessment for AONB and it's setting to inform/guide development brief; • Harm to historic environment - Require preparation of Heritage Impact Assessment to inform/guide development brief; • Cost of delivering M1 - A6 link road and impact on viability/deliverability; • Scale; • Coalescence; • Character/Identity; • Delivery rates
Policy SE1: M1 Junction 11a – Sundon Rail Freight Interchange (RFI)	<p>Specific</p> <ul style="list-style-type: none"> • Harm to the AONB and it's setting - Require preparation of Heritage Impact Assessment to inform/guide development brief; • Harm to historic environment - Require preparation of Landscape Visual Impact Assessment for AONB to inform/guide development brief; • Extent of GB Release & no evidence of exceptional circumstances;

Chapter / Policy	Main Issues raised
	<ul style="list-style-type: none"> RFI permitted in Hertfordshire. Only 26km south of Sundon and adjacent to the Midland Mainline. <p>Key Issues</p> <ul style="list-style-type: none"> Harm to the AONB and it's setting - Require preparation of Heritage Impact Assessment to inform/guide development brief; Harm to historic environment - Require preparation of Landscape Visual Impact Assessment for AONB to inform/guide development brief; RFI permitted in Hertfordshire. Only 26km south of Sundon and adjacent to the Midland Mainline.
Policy SA2: Marston Vale New Villages	<p>Specific</p> <ul style="list-style-type: none"> Impact on quality of life; Impact on ROW; Loss of wildlife, impact on natural environment; Impact on Greensand Ridge; Impact of Covanta Incinerator on public health, pollution issues; Loss of agricultural land; Harm to historic environment - require preparation of Heritage Impact Assessment to inform/guide development brief; traffic issues, pressure on roads; impact on public transport, level crossings; Concern over access; Impact on services and facilities; Loss of character/identity; Coalescence with surrounding settlements; Pressures from existing development; Delivery rates overly optimistic and unjustified; Scale too large; Too much warehousing; <p>Key Issues</p> <ul style="list-style-type: none"> Harm to historic environment - require preparation of Heritage Impact Assessment to inform/guide development brief; Impact on public transport, level crossings; Scale Coalescence Character/Identity Delivery rates
Policy SE2: M1 Junction 13 – Marston Gate Expansion	<p>Specific</p> <ul style="list-style-type: none"> Impact on the Greensand Ridge; Impact on designated and non-designated heritage assets, require Heritage Impact Assessment to inform capacity, and guide development brief; Impact of proposals on historic setting of Ridgmont; Impact on Junction 13 of M1; Cumulative impact with Marston Vale site; <p>Key Issues</p> <ul style="list-style-type: none"> Impact on Junction 13 of M1; Cumulative impact with Marston Vale site; Impact on designated and non-designated heritage assets, require Heritage Impact Assessment to inform capacity, and guide development brief
Policy SA3: East of Arlesey	<p>Specific</p> <ul style="list-style-type: none"> Impact on character/identity Concerns over access Protect West Drive Concern over location of relief road Pollution issues, water capacity issues, flooding issues

Chapter / Policy	Main Issues raised
	<ul style="list-style-type: none"> • Impact on countryside, Impact on wildlife, biodiversity • Impact on countryside, lagoon area • Impact on designated and non-designated heritage assets • Traffic issues, impact from relief road • Impact on public services • Coalescence with existing settlements, and other developments, e.g. Arlesey Cross and North Herts; • Delivery overly optimistic and unjustified; • DtC need more consultation with local communities, plans are vague; • Infrastructure needs to come first; • Impact on services and facilities; • Impact on green infrastructure; • Request additional Important Countryside Gap to ensure separation; • Unfair distribution of housing • Scale of proposals • S106 issues in the past <p>Key Issues</p> <ul style="list-style-type: none"> • Harm to historic environment - require preparation of Heritage Impact Assessment to inform/guide development brief; • Impact on public transport, level crossings; • Scale • Coalescence • Character/Identity • Delivery rates • Timely provision of infrastructure, poor track record for recent developments
Policy SA4: East of Biggleswade	<p>Specific</p> <ul style="list-style-type: none"> • Recent poor-quality housing; • Impact character/identity of the area – loss of rural character; • Loss of wildlife, biodiversity and habitats, Biggleswade Common should be protected; • Concern over drainage and sewerage • High flood risk • Loss of Best and Most Versatile Agricultural Land • Impact on designated and non-designated heritage assets – site capacity not informed by Heritage Impact Assessment; • Roads in poor condition, increase in traffic, parking issues, impact on A1 • Impact on public transport • Coalescence • Delivery rates overly optimistic and unjustified; • Insufficient new jobs • Provision of AH in new development • Cumulative impacts with recent development around Biggleswade; • Lack of facilities/services <p>Key Issues</p> <ul style="list-style-type: none"> • Impact character/identity of the area – loss of rural character; • Scale of development; • Coalescence; • Character/Identity; • Delivery rates; • Impact on A1

Chapter / Policy	Main Issues raised
Policy SE3: A1 Corridor – Holme Farm, Biggleswade	<p>Specific</p> <ul style="list-style-type: none"> • Access to the A1 is poor; • Impact on designated and non-designated heritage assets – site capacity not informed by Heritage Impact Assessment; • Premature to allocate ahead of A1 improvements/realignment decision. • Not well related to Biggleswade • Additional traffic will have a negative impact on the residents of Biggleswade. <p>Key Issues</p> <ul style="list-style-type: none"> • None raised
Policy SE4: Former RAF Base, Henlow	<p>Specific</p> <ul style="list-style-type: none"> • Impact on designated and non-designated heritage assets • Impact on the A659/A600 towards Hitchin • Should require improvements to Arlesey Train Station • Allocation for employment is unjustified • RAF Henlow remote from major university specialising in science/technology/major R&D intensive industry nearby. Unlike what would anchor a R&D requirement at this location. • Should be allocated for Residential – brownfield before greenfield. • Site is not available for employment allocation. • Retaining the airfield also retains green space and existing jobs • Retain airfield as is currently well used and is of historical importance. <p>Key Issues</p> <ul style="list-style-type: none"> • Impact on the A659/A600 towards Hitchin • Historic Airfield • RAF Henlow remote from major university specialising in science/technology/major R&D intensive industry nearby. Unlike what would anchor a R&D requirement at this location. • Allocation for employment is unjustified
Policy HA1 (general)	<p>Specific</p> <ul style="list-style-type: none"> • Promotions for alternative sites • Inconsistencies with single evidence documents, e.g. site which performs least well in the Green Belt study might not be allocated • No evidence of changes as a result of information submitted at Reg 18, e.g. flood reports to dispute a site failing due to it being in Flood Zone 2/3. • Dispute assessment and outcomes for particular sites. Consistency with site assessments • Should build on Brownfield land instead/ first • Complex plan/ consultation system, not enough time • Overall housing target is 2,490 higher than OAN • Could set precedent for further development • Impact on quality of life/ amenity • Dispute strategy, should instead use windfall/rural exceptions, or housing distribution should be different • Uncertainty regarding implications and delivery of proposed key infrastructure • Setting of precedent for unrestricted development • Poor quality of recent development • Cumulative impact with recent permissions / other allocations • Lack of evidence of cooperation • Dispute site assessment (particularly assessment of cumulative impact). • Development of specific sites contrary to Local Plan policies (including settlement envelopes) • Concerns over settlement hierarchy • Impact on limited infrastructure (GPs, schools, dentists, sewage, water) • Need for affordable housing

Chapter / Policy	Main Issues raised
	<p>Key Issue</p> <ul style="list-style-type: none"> Wording of Policy HA1 too imprecise/vague. Conflict with Para. 157 of the NPPF as no reference to form, scale, access, quantum
Policy HA1: Arlesey sites	<p>Specific</p> <ul style="list-style-type: none"> Increase in traffic, parking issues Impact on settlement character Cumulative impact of recent permissions/ over-development on eastern side of High Street <p>Key Issue</p> <ul style="list-style-type: none"> Need for the sites to be developed together due to access issues
Policy HA1: Aspley Guise sites	<p>Specific</p> <ul style="list-style-type: none"> Landscape impact Loss of Green Belt Increase in traffic/pollution Access issues Impact on limited infrastructure Growth out of scale with settlement <p>Key Issues</p> <ul style="list-style-type: none"> None raised
Policy HA1: Barton-le-Clay sites	<p>Specific</p> <ul style="list-style-type: none"> Loss of Green Belt Loss of wildlife, biodiversity Impact on AONB, landscape, countryside, loss of agricultural land Growth out of scale with settlement Cumulative impacts with other allocations Increase in traffic, parking issues <p>Key Issue</p> <ul style="list-style-type: none"> Loss of recreational facilities
Policy HA1: Biggleswade sites	<p>Specific</p> <ul style="list-style-type: none"> Access issues Loss of agricultural land Impact on wildlife, Green Wheel, Biggleswade Common, recreational areas Concern over flood risk Increase in traffic/pollution, parking issues. Increase in commuting Limited Public Transport. Pressure on public transport. Increase in commuting Impact on limited infrastructure <p>Key Issue</p> <ul style="list-style-type: none"> Impact on level crossing
Policy HA1: Caddington sites	<p>Specific</p> <ul style="list-style-type: none"> Access issues Loss of open space. Impact on AONB, landscape Impact on CWS Increase in traffic/pollution Impact on limited infrastructure. Need for upgrades to STW Poor relationship to existing settlement Will not make significant contribution <p>Key Issue</p>

Chapter / Policy	Main Issues raised
	<ul style="list-style-type: none"> Conflict with emerging Neighbourhood Plan
Policy HA1: Campton & Chicksands sites	<p>Specific</p> <ul style="list-style-type: none"> Back-land development. Presence of underpass reduces frontage onto road Access issues Impact on landscape, loss of agricultural land. Loss of green space Impact on wildlife Impact on settlement character /pattern. Growth out of scale with settlement. No local need for housing Concern over flood risk Increase in traffic, parking issues Impact on adjacent properties Coalescence between Campton and Shefford Impact on limited infrastructure
Policy HA1: Chalton sites	<p>Specific</p> <ul style="list-style-type: none"> Loss of Green Belt Landscape impact (site elevated) Impact on limited infrastructure Cumulative impact of recent permissions (Houghton Regis North) Impact on settlement character / Growth out of scale with settlement <p>Key Issues</p> <ul style="list-style-type: none"> None raised
Policy HA1: Clifton sites	<p>Specific</p> <ul style="list-style-type: none"> Surface water drainage issues Increase in traffic. Lack of footpaths Cumulative impact of permissions Impact on limited infrastructure Impact on settlement character Loss of open space/ green space <p>Key Issues</p> <ul style="list-style-type: none"> Confusion over site area
Policy HA1: Cranfield sites	<p>Specific</p> <ul style="list-style-type: none"> Issues with access. Impact on designated 'quite lane' (HAS12) Major gas pipe in field Back-land development (particularly HAS11) Topography of site (HAS11) Impact on wildlife/ ecology/ biodiversity/ SSSI. Impact on wider forest of Marston Vale (including recently planted trees) Limited Public Transport Increase in traffic/pollution, poor quality roads, road safety Landscape impact. Loss of countryside/ impact on rural character or outdoor pursuits Historic flooding events/ potential to flood/ impact of topography on flood risk/ concern over recent 'levelling' work on site / impact of surface water on Thrift (particularly HAS11) Planning history – site or similar sites previously refused Impact on limited infrastructure (GPs, schools, dentists, sewage, water), particular concern over recent failed attempts to address severe capacity constraints at GPs. Impact on settlement character Existing drainage issues (HAS11) <p>Key Issues</p> <ul style="list-style-type: none"> Site capacity limited by TPOs (HAS12) Cumulative impact of high number of recent permissions (including appeals)

Chapter / Policy	Main Issues raised
	<ul style="list-style-type: none"> Heritage impact from loss of garden to Cranfield Court Estate (HAS12)
Policy HA1: Dunton sites	<p>Specific</p> <ul style="list-style-type: none"> Loss of agricultural land (Grade 2) Impact on wildlife/ ecology/ biodiversity Limited Public Transport Increase in traffic, parking issues Impact on settlement character / Growth out of scale with settlement Cumulative impact of recent permissions Impact on limited infrastructure Development within/impacting the respective Drainage Districts. The site is not well related to the settlement. <p>Key Issues</p> <ul style="list-style-type: none"> Other sites in Dunton are a reasonable alternative.
Policy HA1: Eaton Bray sites	<p>Specific</p> <ul style="list-style-type: none"> Impact on nearby Chiltern AONB Impact on biodiversity and wildlife Flooding issues Impact on listed buildings and Conservation Area Poorly served by roads and rail. Traffic issues, Parking issues Loss/harm of green belt Impact on limited infrastructure Site not included at Reg 18 Impact on settlement character / Growth out of scale with settlement Site poorly related to settlement <p>Key Issues</p> <ul style="list-style-type: none"> No consideration of neighbourhood plan
Policy HA1: Everton sites	<p>Specific</p> <ul style="list-style-type: none"> Impact on countryside, loss of agricultural land. Increase in traffic, parking issues Concern over access arrangements (HAS15) Impact on settlement character / Growth out of scale with settlement Density too high for settlement. Cumulative impact of recent permissions Impact on adjacent Manor Farm (heritage asset). Impact on limited infrastructure <p>Key issue</p> <ul style="list-style-type: none"> The loss of the village farm shop and impact on local businesses / employment (HAS16).
Policy HA1: Flitwick sites	<p>Specific</p> <ul style="list-style-type: none"> Impact on wildlife/ ecology/ biodiversity/ SSSI/ Semi-Ancient Woodland/ CWS (particularly HAS17) (visitor pressure concern on LNR from Greensand Trust) Landscape impact. Loss of countryside/ impact on rural character or outdoor pursuits/ loss of agricultural land (Grade 2) Loss of Green Belt Suggested public transport improvements Increase in traffic/pollution/ noise, road safety, existing congestion Impact on limited infrastructure (GPs, schools, dentists, sewage, water) Coalescence between Flitwick / Steppingley and Flitwick/ Ampthill (HAS17) Commuting/ need for higher paid employment locally

Chapter / Policy	Main Issues raised
	<ul style="list-style-type: none"> Cumulative impact with recent development Impact on character (of Steppingley) <p>Key Issues</p> <ul style="list-style-type: none"> None raised
Policy HA1: Gravenhurst sites	<p>Specific</p> <ul style="list-style-type: none"> Lower density suggested Loss of Agricultural Land Increase in traffic, parking issues. Reliance on the car Impact on settlement character / Growth out of scale with settlement Impact on limited infrastructure <p>Key Issues</p> <ul style="list-style-type: none"> None raised
Policy HA1: Harlington sites	<p>Specific</p> <ul style="list-style-type: none"> Impact on wildlife/ ecology/ biodiversity Landscape/ AONB impact. Loss of Agricultural Land (Grade 2)/ countryside Loss of Green Belt / no exceptional circumstances Increase in traffic/pollution/ noise, road safety, existing congestion, poor quality road network, lack of parking Reductions in public transport, including reduced high-speed train services. Need to improve station facilities. Access concerns over safety (particularly HAS20) HAS20 cut-off from settlement by railway line. Impact on limited infrastructure (GPs, schools, sewage, water). Existing issues with water/ sewerage infrastructure Coalescence with Westoning / sprawl from Luton Commuting/ need for higher paid employment locally/ more affordable housing to reflect local wages Cumulative impact of recent permissions / other allocations Historic flooding events/ potential to flood/ flood risk for existing residents (no surface water drainage) (particularly HAS21) Growth out of scale of settlement/ impact on settlement character <p>Key Issues</p> <ul style="list-style-type: none"> None raised
Policy HA1: Haynes site	<p>Specific</p> <ul style="list-style-type: none"> Impact on wildlife/ ecology/ biodiversity/ NIA Loss of Agricultural Land / countryside Impact on Greensand Ridge walk Safety of access. Increase in traffic, road safety Heritage impact on historical sites Impact on limited infrastructure (GPs, schools, sewage, water, electricity) Need for affordable housing Suggest alternative site as identified in parish plan. Impact on character of village/ growth out of scale of settlement. Poorly located to main settlement, will set precedent for growth away from centre Parts of site previously refused planning permission for garden extensions. <p>Key Issues</p> <ul style="list-style-type: none"> None raised
Policy HA1: Henlow (camp) site	<p>Specific</p> <ul style="list-style-type: none"> Increase in traffic/ pollution, parking pressure, existing congestion Cumulative impact with recent development /allocations including RAF Henlow (lack of clarity of RAF Henlow proposals) Impact on limited infrastructure (GPs, schools, sewage, water) Growth out of scale of settlement/ impact on settlement character

Chapter / Policy	Main Issues raised
	<ul style="list-style-type: none"> Proximity to school will prevent future expansion <p>Key Issues</p> <ul style="list-style-type: none"> None raised
Policy HA1: Hockliffe sites	<p>Specific</p> <ul style="list-style-type: none"> Concern over access Loss of wildlife Impact on heritage assets Increase in traffic/pollution, poor quality roads, Lack of public transport Cumulative impact from multiple developments Impact on limited infrastructure Impact on settlement character / Growth out of scale with settlement Loss of green belt <p>Key Issues</p> <ul style="list-style-type: none"> No consideration of neighbourhood plan
Policy HA1: Houghton Conquest sites	<p>Specific</p> <ul style="list-style-type: none"> Need for commitment to rights of way and public transport. Needs for landscape buffers to Houghton Conquest. Impact on mature countryside sites and additional visitors e.g. Maulden Wood SSSI. Site should be a strategic allocation <p>Key Issues</p> <ul style="list-style-type: none"> None raised
Policy HA1: Houghton Regis sites	<p>Specific</p> <ul style="list-style-type: none"> Potential cross boundaries with HRN Strategic site on maps STW will need upgrading to accommodate growth Map out of date Cumulative impact from this development and HRN on parts of the parish <p>Key Issues</p> <ul style="list-style-type: none"> None raised
Policy HA1: Langford sites	<p>Specific</p> <ul style="list-style-type: none"> Loss of agricultural land, impact on ROW Impact on wildlife Impact on conservation area Impact of site on footbridge Increase in traffic/pollution, parking issues, lack of footpaths Cumulative impact of recent permissions Impact on limited infrastructure Access issues Impact on settlement character / Growth out of scale with settlement <p>Key Issues</p> <ul style="list-style-type: none"> None raised
Policy HA1: Leighton Linlade sites	<p>Specific</p> <ul style="list-style-type: none"> Access issues Drainage issues. Rainwater and surface water problems. Increase in traffic/pollution, road safety,

Chapter / Policy	Main Issues raised
	<ul style="list-style-type: none"> • Loss of tranquility • Cumulative impact of recent permissions • Impact on limited infrastructure • Previous applications refused • Set precedent for further development • Loss of Green Belt <p>Key Issue</p> <ul style="list-style-type: none"> • Perception that it undermines AVDC's plans for new Green Belt and sets a precedent for further Green Belt incursions • Harm to adjacent woodland. Impact on wildlife
Policy HA1: Marston Moretaine allocation	<p>Specific</p> <ul style="list-style-type: none"> • Increase in traffic, poor quality road network • Cumulative impact with recent development /allocations including Marston Valley proposals • Impact on limited infrastructure (GPs, schools, sewage, water) particular concern over recent failed attempts to address severe capacity constraints at GPs. • Total growth out of scale of settlement (including strategic allocation) • Potential for future coalescence with surrounding villages <p>Key Issues</p> <ul style="list-style-type: none"> • None raised
Policy HA1: Maulden allocations	<p>Specific</p> <ul style="list-style-type: none"> • Safety of access • Impact on wildlife/ ecology/ biodiversity/ Maulden Woods / Greensand Ridge /SSSI/ CWS (particularly HAS36/37 – Greensand Trust note need for buffering) • Loss of Agricultural Land/ countryside. Impact on rural character or outdoor pursuits • Increase in traffic/pollution, existing parking issues, road safety, poor quality existing roads • Historic flooding events/ potential to flood (particularly HAS38) • Impact on limited infrastructure (GPs, schools) • Existing issues with sewerage/ water infrastructure • Cumulative impact from recent permissions and other allocations • Growth out of scale of settlement/ impact on settlement character / poorly related to village center/ loss of 'gaps' • Incorrect capacity stated for HAS36 <p>Key Issues</p> <ul style="list-style-type: none"> • None raised
Policy HA1: Meppershall sites	<p>Specific</p> <ul style="list-style-type: none"> • Increase in traffic. • Loss of agricultural land. • Impact on settlement character / Growth out of scale with settlement • Need for self-build plots on part of the site • Density of the site too high and scale of the site should be reduced. <p>Key Issue</p> <ul style="list-style-type: none"> • Proposed site jeopardises the emerging Neighbourhood Plan.
Policy HA1: Moggerhanger site	<p>Specific</p> <ul style="list-style-type: none"> • Issues with access • Density too high • Loss of countryside, landscape impact. • Increase in traffic, road safety, pedestrian safety. Will not encourage sustainable travel. Uncertainty over A1 realignment • Cumulative impact from recent permissions • Growth out of scale of settlement/ impact on settlement character, heritage impact, poorly related to village • Planning history – site or similar sites previously refused

Chapter / Policy	Main Issues raised
	<ul style="list-style-type: none"> Impact on limited infrastructure. Existing issues with sewerage/ water/ broadband infrastructure Flooding concern, particularly in relation to surface water drainage <p>Key Issues</p> <ul style="list-style-type: none"> None raised
Policy HA1: Northill sites	<p>Specific</p> <ul style="list-style-type: none"> Impact on the landscape. Loss of open space. Impact on settlement character / Growth out of scale with settlement <p>Key Issue</p> <ul style="list-style-type: none"> No consideration of Neighbourhood Plan.
Policy HA1: Potton sites	<p>Specific</p> <ul style="list-style-type: none"> Impact on countryside Impact on wildlife Impact on settlement character / Growth out of scale with settlement Cumulative impact of recent permissions <p>Key Issues</p> <ul style="list-style-type: none"> None raised
Policy HA1: Shefford sites	<p>Specific</p> <ul style="list-style-type: none"> Concern over access arrangements <p>Key Issues</p> <ul style="list-style-type: none"> None raised
Policy HA1: Shillington sites	<p>Specific</p> <ul style="list-style-type: none"> Concerns over access arrangements. Impact on ecology and biodiversity. Impact on limited infrastructure Concern over coalescence of 'ends'. Impact on character of Shillington. <p>Key Issues</p> <ul style="list-style-type: none"> None raised
Policy HA1: Stondon sites	<p>Specific</p> <ul style="list-style-type: none"> Concern over additional pressure on A600. Lack of public transport. Increase in traffic. Need for comprehensive development of the site. Impact on settlement character / Growth out of scale with settlement Cumulative impact of recent permissions / allocations Impact on limited infrastructure <p>Key Issues</p> <ul style="list-style-type: none"> None raised
Policy HA1: Sutton sites	<p>Specific</p> <ul style="list-style-type: none"> Loss of agricultural land and Millennium Trees Concern over impact on wildlife. Development compromises the green corridor south of Sutton. Coalescence between Sutton, Dunton and Biggleswade. Increase in traffic, parking issues

Chapter / Policy	Main Issues raised
	<ul style="list-style-type: none"> Poor access Lack of public transport Impact on conservation area and listed buildings. Impact on settlement character / Growth out of scale with settlement <p>Key Issues</p> <ul style="list-style-type: none"> None raised
Policy HA1: Toddington sites	<p>Specific</p> <ul style="list-style-type: none"> Loss of Green Belt. Need to incorporate Green Infrastructure. Loss of rural wildlife and environmental heritage. Concerns over access. Increase in traffic. Impact on settlement character / Growth out of scale with settlement. Does not reflect village needs. Development must provide additional facilities. Impact on limited infrastructure <p>Key Issue</p> <ul style="list-style-type: none"> No consideration of Neighbourhood Plan.
Policy HA1: Westoning sites	<p>Specific</p> <ul style="list-style-type: none"> Loss of countryside/ Agricultural land. Landscape impact Wildlife/ Ecological impact (particularly HAS52)/ No EIA (Greensand Trust object to HAS52) Loss of Green Belt/ no exceptional circumstances Increase in traffic/pollution, road safety, existing congestion, parking issues Lack of safe and good quality pedestrian/ cycle infrastructure Limited public transport infrastructure Coalescence with Flitwick Cumulative impact from recent permissions and other allocations Historic flooding events/ potential to flood (HAS52) Growth out of scale of settlement/ impact on settlement character Request for contributions towards football pitches and village hall Strain on limited local facilities. Particular concern over school capacity and reliance of school on public open space (land-locked site), need for new school site. Planning history – site or similar sites previously refused Existing issues with sewerage/ water infrastructure <p>Key Issues</p> <ul style="list-style-type: none"> None raised
7.9 Identified locations for future growth	<p>Specific</p> <ul style="list-style-type: none"> Site specific issues raised to be appropriately considered as Partial Plan review <p>Key Issues</p> <ul style="list-style-type: none"> Plan language misleading and disingenuous in relation to the identified areas for future growth; Premature to identify future growth locations; Ambiguity/lack of status re future sites – whether they are fully justified sites which can be debated at examination or not; Scope of Partial Plan Review – should not be limited, other sites should be considered as part of review, and should take account of standard OAN methodology and increased housing need; Site specific issues raised to be appropriately considered as Partial Plan review
Policy SA5: Houghton Regis	<p>Specific</p> <ul style="list-style-type: none"> Noise and air pollution issues

Chapter / Policy	Main Issues raised
North Strategic Allocation	<ul style="list-style-type: none"> • Wastewater capacity issues • flood risk provision must be similar to the other policy areas • Affects a number of designated heritage assets, not identified in policy or on map • Biodiversity - amend policy at Site 2 Bullet 8 to mention Marl Lakes SSSI and Chalk Pit CWS. • Increased traffic on the A5 through the village of Hockliffe • This policy is historical growth as it has been planned for several years. Other historical growth across CBC has not be recognised. • Clarify the number of homes expected from HRN site 2. • Delivery rates are optimistic and unjustified • Include drainage strategy. • Impact on vitality of Houghton Regis town centre • Clarity is needed on how the IDP will be funded and delivered. <p>Key Issues</p> <ul style="list-style-type: none"> • This policy is committed growth. Other committed growth across CBC has not be recognised. • Include drainage strategy. • Impact on vitality of Houghton Regis town centre • Clarity is needed on how the IDP will be funded and delivered. • Flood risk provision must be similar to the other policy areas • Affects a number of designated heritage assets, not identified in policy or on map • Biodiversity - amend policy at Site 2 Bullet 8 to mention Marl Lakes SSSI and Chalk Pit CWS.
Chapter 8	
Green Belt, Coalescence and Settlements	<p>Specific</p> <ul style="list-style-type: none"> • Findings of GB Study ignored/sites allocated not ones contributing least to GB, or cause least harm; • Fails to recognise good practice re-establishing long term defensible boundaries; further Green Belt should be released to ensure boundaries capable of enduring beyond Plan period; • Partial Plan Review may necessitate further adjustments to Green Belt boundary – this should be referenced in Policy; • Scale of Green Belt release; • Afford greater protection for Green Belt which remains; • Exceptional circumstances do not exist/have not be demonstrated; • Reasonable alternatives not thoroughly explored; • Insufficient notice taken of Neighbourhood Plans, policy should allow for Green Belt release through Neighbourhood Plans • Deprived PC the opportunity to use emerging NPs to undertake detailed site assessment and community engagement work • Small-medium site allocations contested <p>Key Issues</p> <ul style="list-style-type: none"> • Findings of GB Study ignored/taken out of context; • Exceptional circumstances do not exist/have not be demonstrated; • Reasonable alternatives not thoroughly explored; • Partial Plan Review may necessitate further adjustments to Green Belt boundary – this should be referenced in Policy;
Policy SP4: Development in the Green Belt	<p>Specific</p> <ul style="list-style-type: none"> • Infill – too restrictive/rigid as drafted; • “Very special circumstances” (VSC) should be detailed in Policy; • Unclear how Council will work proactively with developers to enhance Green Belt • 5yr supply should be factored into VSC; if supply can be demonstrated permission should be refused; • Wording should be strengthened to prevent incremental development <p>Key Issues</p> <ul style="list-style-type: none"> • Infill – too restrictive/rigid as drafted;

Chapter / Policy	Main Issues raised
Policy SP5: Preventing Coalescence and Important Countryside Gaps	<p>Specific</p> <ul style="list-style-type: none"> • Para 2 should be reworded “permission will be refused for development...” • Para 3 should be recast “within the areas identified as Important Countryside Gaps, permission will be refused for any development that would....” • Request inclusion of mechanism for identifying Gaps of similar merits through Neighbourhood Plans; • Should remain suitably permissive in relation to development proposals that can be sensitively integrated into their wider setting; • Policy should only relate to identified Gaps. Areas not covered by Gaps are by definition less sensitive, and may be capable of accommodating development without resulting in undue coalescence; • Rationale for identification of specific gaps unclear and not sufficiently justified; • Gaps have wider GI network function/potential, Policy could be strengthened to support proposals that enhance the beneficial uses of Gaps; • Gaps not large enough; gaps too large • Various requests for additional gaps; • Allocation of Important Countryside Gap north of Sandy unjustified and will blight development and cause Sandy to stagnate; forces development east of Sandy where there is greater landscape/wildlife (NIA)/amenity value; • Overlap of Gaps with areas identified for future growth – CG2, CG6, and CG18 • Plan strategy contradicts Policy, allocations within Plan promote coalescence <p>Key Issues</p> <ul style="list-style-type: none"> • Rationale for identification of specific gaps unclear and not sufficiently justified; • Overlap of Gaps with areas identified for future growth – CG2, CG6, and CG18
Chapter 9	
Settlement Envelopes and Hierarchy	<p>Specific</p> <ul style="list-style-type: none"> • Settlement hierarchy unjustified. No evidence base published; • Reclassification of various named settlements based on “flawed information”, and not based on local intelligence; • Dispute application of methodology which has skewed classification of settlements; • Envelopes should be redrawn to make space for future development; • Envelopes should be redrawn around allocations <p>Key Issues</p> <ul style="list-style-type: none"> • Settlement hierarchy unjustified. No evidence base published
Settlement Hierarchy	<p>Specific</p> <ul style="list-style-type: none"> • Distinction between Large and Small Villages arbitrary, will result in stagnation of Small Villages • Dispute settlement by settlement classification; • Flitton, Greenfield and Wardhedges should be reclassified as three separate settlements <p>Key Issue</p> <ul style="list-style-type: none"> • Settlement hierarchy unjustified. No evidence base published
Policy SP7: Development within Settlement Envelopes	<p>Specific</p> <ul style="list-style-type: none"> • Settlement by settlement envelopes contested; • Policy should allow specialist housing types outside SEs; • Wording should be clearer that there is support for employment, tourism, leisure and community uses on sites outside settlement envelopes; • Definition of infill too restrictive; • SEs too restrictive. Should allow for consideration of intrinsic character of specific countryside locations and/or merits of sustainable development; • Request designation of further infill boundaries in Small Villages in Green Belt. <p>Key Issues</p> <ul style="list-style-type: none"> • None identified
Chapter 10	

Chapter / Policy	Main Issues raised
Planning for Gypsies and Travellers	<p>Specific</p> <ul style="list-style-type: none"> • Reliance on ad-hoc windfall sites - will result in increased unauthorised developments, dominance; • Approach to transit sites unclear; • Need not sufficiently justified <p>Key Issues</p> <ul style="list-style-type: none"> • Reliance on ad-hoc windfall sites - will result in increased unauthorised developments, dominance;
Policy SP8: Gypsy and Traveller, and Travelling Showpeople Pitch Requirement	<p>Specific</p> <ul style="list-style-type: none"> • Reliance on ad-hoc windfall sites - will result in increased unauthorised developments, dominance; Plan should allocate sites; • Policy should reference natural environment and require mitigation to address adverse impacts; • Challenge supply assumptions underpinning GTAA <p>Key Issues</p> <ul style="list-style-type: none"> • Need contested – target should be higher/lower • Challenge supply assumptions underpinning GTAA
Chapter 11	
Housing (general)	<p>General</p> <ul style="list-style-type: none"> • Too many homes planned for • Houses only for local people • Lack of clarity in policies • Unsound policies • Numbers too high <p>Key Issues</p> <ul style="list-style-type: none"> • None raised
Policy H1: Housing Mix	<p>Specific</p> <ul style="list-style-type: none"> • Unsound having regard to the requirements of paragraph 182 of the NPPF • Housing mix should be subject to the individual viability of sites in order to ensure that delivery of housing is achieved • Housing mix should be prescribed by the Council and based upon the locally assessed need • Provide no guidance to what the mix should be • Implies that the mix should be uniform without regard for size or types of site a 'one size fits all' approach would be inappropriate and will not work • The Housing Mix policy must explicitly state that the housing mix on individual sites should be based on site specific viability assessments <p>Key Issues</p> <ul style="list-style-type: none"> • No key issues raised
Policy H2: Housing Standards	<p>Specific</p> <ul style="list-style-type: none"> • Insufficient evidence to justify 35% of all new homes being built to the optional standard M4(2). • The Council should not apply the higher-level Part M4(3) to market homes the appropriate relevant paragraph of H2 should be deleted • appropriate to ensure the specific requirement for a site, as opposed to using a prescriptive percentage for all sites <p>Key Issues</p> <ul style="list-style-type: none"> • The Council should not apply the higher-level Part M4(3) to market homes the appropriate relevant paragraph of H2 should be deleted
Policy H3: Housing for Older People	<p>Specific</p> <ul style="list-style-type: none"> • No indication as to the relative split between tenures; • 6th bullet point requires the provision of bungalows and level access development but gives no indication as to the proportion of the development; • Dispute council also requiring level access properties and bungalows; • The final bullet point is likely that the majority of cases will not be suitable for extra care facilities; • Explain whether the viability of delivering the requirements set out within Policy H3 has been fully considered; • Needs to provide greater clarity to both applicants and decision makers with regard to the Council's expectations regarding housing for older people;

Chapter / Policy	Main Issues raised
	<ul style="list-style-type: none"> The delivery of bungalows and extra care facilities must therefore be clearly explained; Bullets 5 and 7 of draft Policy H3 are deleted as they are Council objectives/ambitions rather than being suitable as specific policy requirements; Do not appear to take into account viability; Gives no indication as to the proportion of the development that should be bungalows <p>Key Issues</p> <ul style="list-style-type: none"> No indication as to the relative split between tenures
Policy H4: Affordable Housing	<p>Specific</p> <ul style="list-style-type: none"> Incorrect justification for 30% AH requirement. Goes against SHMA recommendations of 25% AH requirement Proportion of affordable housing may change in accordance with the most up to date SHMA, unacceptable without proper scrutiny of through the LP process Not consistent with national policy Should set out the overall affordable housing need that the Local Plan will be making provision for in the Luton HMA and ensure that the affordable housing needs are clearly identified Additional text required on Statements of Common Ground Does not explain that the 30% affordable housing requirement will be subject to viability Question if Policy H4 provides sufficient scope and flexibility to allow for potential future initiatives which may enable the direct delivery of housing by the Council. Viability testing around commuted sums needs to be included in policy, the amplification includes some important detail about viability testing and commuted sums - this should be included in the policy. Lack of evidence requiring all affordable dwellings to meet NDSS Further DTC required on Statements of Common Ground Does not comply with DTC <p>Key Issue</p> <ul style="list-style-type: none"> Subject to NPPG future revision and future relevant case law – not consistent with national policy Lack of evidence requiring all affordable dwellings to meet NDSS
Policy H5: Rural Exception Sites	<p>Specific</p> <ul style="list-style-type: none"> 20% market housing restriction based on justified viability, percentage should be allowed to be increased; Includes the need for such sites to be 'well related' to a settlement, not complying with the NPPF; Should not limit the number of market units to 20%. This is contrary to the NPPF definition; <p>Key Issues</p> <ul style="list-style-type: none"> No key issues raised
Policy H6: Starter Homes	<p>Specific</p> <ul style="list-style-type: none"> Additional text / bullet point required on referencing viability Not possible to deliver 10% starter homes as proposed through intermediate tenure requirement of 27%. 27% of 30% equates to just 8% of the total amount of housing to be provided Requirement to provide Starter Homes should be subject to viability, and that this should be explicitly stated within the policy text Unclear – predicated on Governments White Paper Starter Homes are discount market sale and currently not classed as 'affordable housing' in the NPPF, so it is incorrect to count these under intermediate housing. Important for this policy to be modified to provide clearer guidance to applicants on what is expected of them <p>Key issues</p> <ul style="list-style-type: none"> Does not comply with NPPF in the absence of a viability clause
Policy H7: Self and Custom Build Housing	<p>Specific</p> <ul style="list-style-type: none"> Threshold / target not justified, target should be higher, should be flexible Not compliant with national policy, doesn't explore all ways suggested by PPG to support self/custom build Mechanisms not clear – (unsold plots reverting to developer, links to affordable) Unclear how evidence will be translated to percentage requirement Proposed amendments to allow for consideration of viability No certainty, burden to negotiate Should delete policy and rely on windfall

Chapter / Policy	Main Issues raised
	<ul style="list-style-type: none"> • Should provide more support for small site self-build • Should be an exception policy • SUDS attenuation/ drainage provision to be included • Does not consider practicalities of self/custom build delivery, needs further guidance • Lack of clarity on mechanism for offering plots to those on register • Lack of supporting evidence on demand and viability, not considered appropriately in SHMA/ Viability studies • Need for self/custom build • Impact of self/custom build on affordable housing and infrastructure delivery • Longer delivery times – impact on delivery and trajectory <p>Key Issue</p> <ul style="list-style-type: none"> • Not compliant with national policy, doesn't explore all ways suggested by PPG to support self/custom build
Policy H8: Assessing planning applications for Gypsy and Traveller sites	<p>General</p> <ul style="list-style-type: none"> • No mention of flood risk, avoiding areas that would have a detrimental impact on the health/well-being on any Gypsies or Travellers; • Should have regard to wider landscape and historic environment; • Dominance - definition of dominance and clarity re how this will be measured <p>Key Issues</p> <ul style="list-style-type: none"> • No mention of flood risk, avoiding areas that would have a detrimental impact on the health/well-being on any Gypsies or Travellers
Policy H9: Assessing planning applications for Travelling Showpeople sites	<p>General</p> <ul style="list-style-type: none"> • No mention of flood risk, avoiding areas that would have a detrimental impact on the health/well-being on any Gypsies or Travellers; • Should have regard to wider landscape and historic environment; • Dominance - definition of dominance and clarity re how this will be measured requested <p>Key Issues</p> <ul style="list-style-type: none"> • No mention of flood risk, avoiding areas that would have a detrimental impact on the health/well-being on any Gypsies or Travellers
Chapter 12	
Employment & Economy	<p>Specific</p> <ul style="list-style-type: none"> • Too much priority being given to warehousing, logistics and distribution uses. Land hungry uses that do not provide high quality jobs. • 330ha is unsubstantiated. Consider this is a 110ha over-allocation based on the ELR. • Too much land being released for B8. • Number of B use jobs identified and the amount of land being allocated • Recommendations of ELR not apparent in the LP. • Potential increase in freight movement on roads • Employment Policies lack the detail of the housing policies. <p>Key Issues</p> <ul style="list-style-type: none"> • None raised
Policy EMP1: Employment Sites and Uses	<p>Specific</p> <ul style="list-style-type: none"> • Strategic Employment Sites (Policy SP1) are not supported through the available evidence base. • Alternative sites promoted • Additional sites should be identified in Appendix 4 <p>Key Issues</p> <ul style="list-style-type: none"> • None raised
Policy EMP2: Change of Use to Non-Employment Generating Uses	<p>Specific</p> <ul style="list-style-type: none"> • Alternative Sites proposed • Need to demonstrate no adverse impact on designated sites and landscapes • Against national and local policy <p>Key Issues</p> <ul style="list-style-type: none"> • None raised

Chapter / Policy	Main Issues raised
Policy EMP3: Employment proposals within or adjacent to Settlement Envelopes	<p>Specific</p> <ul style="list-style-type: none"> • Wording would limit the ability for smaller sites to come forward in situations where there are major sites nearby. • Smaller employment sites have not been adequately identified and allocated within the plan. <p>Key Issues</p> <ul style="list-style-type: none"> • None raised
Policy EMP4: Rural and Visitor Economy	<p>Specific</p> <ul style="list-style-type: none"> • Incorrectly references the NPPF • Potential issues with carrying capacity • Need to demonstrate no adverse impact on designated sites and landscapes <p>Key Issues</p> <ul style="list-style-type: none"> • None raised
Policy EMP5: Significant facilities in the Countryside and Green Belt	<p>Specific</p> <ul style="list-style-type: none"> • Difficult to discern what is appropriate in sensitive locations • Concern over management plans and how these will be safeguarded and measured <p>Key Issues</p> <ul style="list-style-type: none"> • None raised
Chapter 13	
Retail & Town Centres	<p>Specific</p> <ul style="list-style-type: none"> • Lack of and capacity of public transport • Lack of car parking • Leighton Buzzard – need to remove vehicles from town centre and improve pedestrian environment • Flitwick – bypass needed to relieve traffic • Loss of expenditure to Milton Keynes and other larger centres • Lack of investment in town centres • Definition of primary retail frontage required • Impact of out of town retail on town centres • Evidence not up to date <p>Key Issues</p> <ul style="list-style-type: none"> • None raised
Policy R1: Ensuring Town Centre Vitality	<p>Specific</p> <ul style="list-style-type: none"> • Need to be strengthened to support town centre retail. • Requirements of sequential test need to be waived for strategic land allocations. • New masterplan required for Houghton Regis town centre. <p>Key Issues</p> <ul style="list-style-type: none"> • None raised
Policy R2: Retail for minor service centres, villages and the rural economy	<p>Specific</p> <ul style="list-style-type: none"> • Insufficient infrastructure in the A1 corridor. • Transport system at capacity. <p>Key Issues</p> <ul style="list-style-type: none"> • None raised
Policy R3: Town Centre Development	<p>Specific</p> <ul style="list-style-type: none"> • Town centre improvements required in Houghton Regis. • Use of S106 resources for town centre improvements. • Need for improved public transport.

Chapter / Policy	Main Issues raised
	Key Issues <ul style="list-style-type: none"> None raised
Chapter 14	
Transport (general)	<p>Specific</p> <ul style="list-style-type: none"> Greater understanding of strategic sites to be obtained from Transport Assessments for each site. Modelling assumptions should be refined as soon as possible, including on site access/infrastructure when information becomes available. HE to be consulted at all stages Strategy encourages use of the car / lack of proposals for achieving mode shift. Strategy led by strategic road network/ not consistent with infrastructure proposals. Need for emphasis on compliance with Travel Plan / transport Assessment proposals Differences in amount/location of employment compared to housing in LP, leading to commuting. Reliance on funding/ decisions outside of CBC's control. Reliance on East-West Rail. Lack of detail /clarity specific schemes (rail and A1) No reference to level crossings Focus on walking/cycling with limited reference to other users (those with disabilities, off-roaders, horse-riders) Focus on reducing car use not realistic for rural areas Existing congestion/ Specific highways safety concerns including rat-running and HGV routing / requests for mitigation to existing issues Impact on public transport capacity (specifically rail stations) Impact of allocations/ commitments on transport network/ requests for further mitigation as part of allocations Mitigations schemes highways-focused and show limited impact. Need for more localised assessment, and inclusion of rail capacity Comparisons between policies/ supporting text and sites that were/ weren't allocated <p>Key Issues</p> <ul style="list-style-type: none"> DtC - Need to cooperate with adjoining authorities, and ensure modelling has regard to specific growth in adjoining authorities
Policy T1: Mitigation of Transport Impacts on the Network	<p>Specific</p> <ul style="list-style-type: none"> Many allocation sites do not accord with bus/rail distance. Not clear whether bus/rail distances are policy requirement or guidance Dispute/ suggest flexibility on distances to bus/rail Policy should consider quality of pedestrian/ cycle/ public transport routes Does not recognize the purposes of journeys and cycle distances to locations such as employment. Unclear what the consequences are of failing to meet agreed targets/ measures in Travel Plan Developments should provide new/enhanced cycle provision Lack of confidence in TA's. Impact of allocations/ commitments on transport network/ requests for further mitigation as part of allocations /Strategy will encourage commuting Existing congestion/ Specific highways safety concerns / requests for mitigation to existing issues Half-hourly bus services not viable rurally Impact on AQMAs Improvements to date have been ineffective <p>Key Issues</p> <ul style="list-style-type: none"> Allocations do not accord with bus/rail distance. Not clear whether bus/rail distances are policy requirement or guidance
Policy T2: Highway Safety & Design	<p>Specific</p> <ul style="list-style-type: none"> Wording should be amended from 'detrimental' to relate to severe impact only (as per NPPF). Should include reference to the need for development to have regard to the historic environment Opportunities could be recognised (alternatives to car use can result in the removal of redundant highway furniture) Suggest links to GI strengthened and potential for proposals to protect/enhance or adversely impact natural environment/ air quality recognised suggest wording relating to safety improvements at level crossings Cycle/ pedestrian proposals should go further. Need for safer/ better quality cycle/pedestrian routes Existing congestion/ Specific highways safety concerns / requests for mitigation to existing issues. Concerns over rat-running <p>Key Issues</p> <ul style="list-style-type: none"> None raised

Chapter / Policy	Main Issues raised
Policy T3: Parking	<p>Specific</p> <ul style="list-style-type: none"> • Suggest highlighting need for consideration of flood risk on transport links - clarify position on whether parking is appropriate in areas at flood risk (Environment Agency). • Design Guide Standards. Standards out of date, as no ref to EV charging. • Retail impact on parking charges in town centres • Lack of parking strategy • Areas of specific parking concern (e.g. schools/nurseries, new estates). Need for freight parking • Comments on design of parking, e.g. against parking courts/ on-road parking <p>Key Issues</p> <ul style="list-style-type: none"> • None raised
Policy T4: Public Transport Interchanges	<p>Specific</p> <ul style="list-style-type: none"> • Suggest public transport available from first occupation and masterplanned into developments • Suggest re-wording to relate to safety improvements at level crossings • Recent reduction in local bus services. • Impact of development on existing public transport provision. Lack of public transport provision in recent developments • Need for public transport improvements. Lack of cycle/car parking at stations • Station planned for Wixams not delivered • Timetabling could be improved to better meet demand (e.g. school times/ train times) <p>Key Issues</p> <ul style="list-style-type: none"> • None identified
Policy T5: Ultra Low Emission vehicles	<p>Specific</p> <ul style="list-style-type: none"> • Need for Smart Charging points • Large infrastructure burden for sites • No need for separate policy, could be included in another policy. • Policy wording vague/ no thresholds • Need for update LTP • Schools should be included in 'educational establishments • Use of electric vehicles still produces CO2. Need to supplement with renewable energy • Impact on national grid • Lack of clarity on national policy direction • Impact on street character • Growth in Automated Vehicles may negate need <p>Key Issues</p> <ul style="list-style-type: none"> • None identified
Policy T6: Management of Freight	<p>Specific</p> <ul style="list-style-type: none"> • Impact of restrictions in CBC on roads outside of CBC • Impact of HGVs on environment/ air quality • Impacts of HGV traffic / parking of HGVs on towns/villages • Increases in traffic • Suggested promotion of rail for freight • Construction impact from allocated/permitted sites • Second bullet point implies comparison with other proposals which is not effective or practical. <p>Key Issues</p> <ul style="list-style-type: none"> • None identified
Chapter 15	
Environmental Enhancement	<p>Specific</p> <ul style="list-style-type: none"> • Need to protect and enhance the environment.

Chapter / Policy	Main Issues raised
	<ul style="list-style-type: none"> Need for new green wedges and buffers in development. References required about the role of the historic environment and heritage. <p>Key Issues</p> <ul style="list-style-type: none"> None identified
Policy EE1: Green Infrastructure	<p>Specific</p> <ul style="list-style-type: none"> References to green wheel and green way should be clarified. Addition of "accessible green space" or "informal access land" (or equivalent) to the list of types of green infrastructure. Definition of green infrastructure required. Need to embed concept of 'Net Gain in Natural Capital'. Needs to be clearer about what expected from new development. Evidence outdated. Need to update local GI Plans and a new CBC-wide GI Plan or Natural Capital Investment Plan <p>Key Issues</p> <ul style="list-style-type: none"> None identified
Policy EE2: Enhancing biodiversity	<p>Specific</p> <ul style="list-style-type: none"> Ecological corridors and strategic ecological network areas to be defined. Should have references to the five actions of the NPS and Nature Conservation Strategy. Policy ineffective to get biodiversity gains. Include provision that development will not be permitted where there would be a net loss in biodiversity or damage to wildlife corridors. Amended wording proposed to read 'should provide a net gain in biodiversity where possible'. additional wording suggested to make developers aware of the benefits of the emerging district level great crested newt (GCN) licence. <p>Key Issues</p> <ul style="list-style-type: none"> Amended wording proposed to read 'should provide a net gain in biodiversity where possible'.
Policy EE3: Nature conservation	<p>Specific</p> <ul style="list-style-type: none"> Need a reference to European Sites - SAC, SPAs and HRA. There needs to be a recognition that development can contribute to nature conservation. Recommend that Roadside Nature Reserves are added as they often contain wildlife interest which is equivalent to CWS or Sites of Special Scientific Interest. Need a reference to European Sites. <p>Key Issues</p> <ul style="list-style-type: none"> Need a reference to European Sites. Greater support for importance of habitat networks
Policy EE4: Trees, woodlands and hedgerows	<p>Specific</p> <ul style="list-style-type: none"> Need to insert 'where possible'. Policy is inadequate and needs strengthening. Supporting text needs amending to note the special, additional requirements of development in the Forest of Marston Vale. <p>Key Issues</p> <ul style="list-style-type: none"> None identified
Policy EE5: Landscape Character and Value	<p>Specific</p> <ul style="list-style-type: none"> Need to acknowledge Forest of Marston Vale designation Amendment to expand re role of historic environment to play in understanding the landscape Not NPPF compliant; policy needs to protect and enhance and not respect and retain Not proportionate and not consistent with Environmental Framework Object to inclusion of 'valued landscape' – interpretation and criteria not clear Impact of development on the countryside and village character Additional planting for new developments Loss of history, impact on Conservation Area, impact on listed buildings Need to acknowledge the impact on heritage and historic setting as a result of development <p>Key Issues</p>

Chapter / Policy	Main Issues raised
	<ul style="list-style-type: none"> Not NPPF compliant; policy needs to protect and enhance and not respect and retain.
Policy EE6: Tranquillity	<p>Specific</p> <ul style="list-style-type: none"> No justification in evidence to support this policy; Policy not compliant with and is inconsistent with the NPPF; Policy is vague and needs strengthening; A definition of tranquillity is required; Areas of tranquillity should be protected from the mass of housing proposed on its doorstep; No justification in evidence to support this policy. <p>Key Issues</p> <ul style="list-style-type: none"> None raised
Policy EE7: The Chilterns Area of Outstanding Natural Beauty	<p>Specific</p> <ul style="list-style-type: none"> Unjustified requirements on sites outside of AONB Ament first paragraph to make it NPPF compliant - to refer to development also being in public interest. Paragraph 15.8.4 would be clearer if these points were added to the policy. Concerns over the development north of Luton and its impact on the AONB. References to Chilterns AONB needs to be expanded. <p>Key Issues</p> <ul style="list-style-type: none"> None raised
15.9 Greensand Ridge NIA	<p>Specific</p> <ul style="list-style-type: none"> Enhancing NIA through development is a dichotomy Preservation of wetland is dependent on condition of adjoining land, a more sensitive approach is required east of Biggleswade <p>Key Issues</p> <ul style="list-style-type: none"> None raised
Policy EE8 : Greensand Ridge Nature Improvement Area	<p>Specific</p> <ul style="list-style-type: none"> Policy has no threshold and is unjustified and ineffective/ not appropriate for all development in this location to meet policy requirements Allow area to develop naturally and plant woodlands, trees and hedgerows <p>Key Issues</p> <ul style="list-style-type: none"> None raised
15.10 The Forest of Marston Vale	<p>Specific</p> <ul style="list-style-type: none"> Forest of Marston Vale Trust advises that wording must be consistent with BBC wording to meet DTC requirements. <p>Key Issues</p> <ul style="list-style-type: none"> None raised
Policy EE9: Forest of Marston Vale	<p>Specific</p> <ul style="list-style-type: none"> Wording needs to be consistent with BBC wording. Policy should be widened to allow for off-site compensation Wording requires strengthening wording must be consistent with BBC wording to meet DTC requirements. Requirements of policy will impact on viability Developments should contribute more than 30% tree cover Developers must clearly demonstrate how they will contribute towards the FOMV (FOMVT) Strategic scale development proposals must provide strategic scale contributions. Proposed development will impact on the Forest 30% tree coverage should not apply to water bodies Council should adopt a more flexible approach when seeking to secure the amount of tree planting sought <p>Key Issues</p>

Chapter / Policy	Main Issues raised
	<ul style="list-style-type: none"> None raised
15.11 The Bedford & Milton Keynes Waterway Park	<p>Specific</p> <ul style="list-style-type: none"> Explanation of the Bedford and Milton Keynes Waterway Park needs expanding <p>Key Issues</p> <ul style="list-style-type: none"> None raised
Policy EE10: The Bedford & Milton Keynes Waterway Park	<p>Specific</p> <ul style="list-style-type: none"> Route should be shown on the proposals map <p>Key Issues</p> <ul style="list-style-type: none"> None raised
Policy EE11: The River and Waterway Network	<p>Specific</p> <ul style="list-style-type: none"> Policy should require protection and provision of tow and riverside paths Fails to make reference to and confirm support for the Marston Vale Surface Waters Plan Policy lack guidance/direction on strategic and integrated SUDS Lack of reference to attenuation rather than filtration Fails to promote maintenance requirements Explanation of Bedford and MK Waterways needs expanding suggest additional reference/bullet point to boating to attract the public should mention role of smaller watercourses for flood management <p>Key Issues</p> <ul style="list-style-type: none"> None raised
15.13 Public Rights of Way	<p>Specific</p> <ul style="list-style-type: none"> Concern over officer resource Reassurance required over maintenance Would like acknowledgement of JLAF role Should reference importance of strategic access routes as a leisure resource Needs reference to connectivity work that is underway Clarity sought over delivery of Green Wheel <p>Key Issues</p> <ul style="list-style-type: none"> None raised
Policy EE12 : Public Rights of Way	<p>Specific</p> <ul style="list-style-type: none"> Amendments/flexibility required to reflect that where appropriate, development offers the opportunity to improve/realign/rationalise routes Should be strengthened from ‘may’ to ‘will’ Improvements to restore and re-connect public rights of way to the wider network outside of the extent of the site is a third-party consideration and outside the reasonable remit of a developer. policy is important to the approach to development which affects level crossings that are on the routes of public rights of way Development that threatens/results in loss of rights of way is concerning <p>Key Issues</p> <ul style="list-style-type: none"> None raised
Policy EE13: Outdoor sport, leisure and open space	<p>Specific</p> <ul style="list-style-type: none"> Greater clarity required to identify which stage of development the policy would apply Not clear whether policy intended to apply to all developments or just major developments Concern regarding provision to be made for ‘countryside recreation sites’ – considered to duplicate the planting required in the FOMV Playing pitch strategy takes no account of the needs arising from neighbouring authorities Concern over omission of open space designations around Sewell and Maiden Bower Fails to clarify on what can be classed as equal or better or who will make this assessment

Chapter / Policy	Main Issues raised
	<p>Key Issues</p> <ul style="list-style-type: none"> None raised
15.15 Local Green Space	<p>Specific</p> <ul style="list-style-type: none"> No responsibility is being taken by council to 'green' the area south of Sutton Countryside Gaps should be designated as Local Green Space Para 15.15.2 should be caveated with "where a clear and robust methodology consistent with Government guidance has been followed" <p>Key Issues</p> <ul style="list-style-type: none"> None raised
15.16 Restoration of Minerals and Waste Sites	<p>Specific</p> <ul style="list-style-type: none"> None raised <p>Key Issues</p> <ul style="list-style-type: none"> None raised
Policy EE14: Applications for Minerals and Waste Development	<p>Specific</p> <ul style="list-style-type: none"> Should include reference to how the Council expects high quality aftercare to be secured Policy/supporting text do not make reference to historical environment or potential impacts Clarity on how this relates to Covanta Should the policy state that incinerators are an appropriate reuse No mention of opportunities for additional access as part of restoration Rename policy Applications for Minerals and Waste Restoration <p>Key Issues</p> <ul style="list-style-type: none"> Proposals should be required to be accompanied by and EIA
Chapter 16	
Climate Change and Sustainability	
Policy CC1: Climate Change and Sustainability	<p>Specific</p> <ul style="list-style-type: none"> Not compliant with National Policy/ amendments proposed by the section 43 of the Deregulation Act 2015 to Section 1 of the Planning and Energy Act 2008 Proposed amendment to clarify Adaptation Strategy should form part of SA Adaptation statement not a current validation requirement, level of assessment needs to be proportionate to development size Clarify wording 'all new development' Should look for ways to conserve and collect water No ref to DEFRA climate change allowances for rainfall and flow in CC1 or 16.2.12-15 Support but need for balance between social, economic and environmental aspects of sustainable development Housing should be self-sustaining in terms of energy Comments about increase in traffic/ pollution, impact on air quality (is this from committed/allocated sites?) Impact of Incinerator on allocated sites Existing water supply issues Need for technical feasibility and financial viability evidence <p>Key Issues</p> <ul style="list-style-type: none"> None raised
Policy CC2: Sustainable energy development	<p>Specific</p> <ul style="list-style-type: none"> Does not comply with NPPF No reference to guidance documents Concern over wind farms Housing needs to be self-sustainable <p>Key Issues</p>

Chapter / Policy	Main Issues raised
	<ul style="list-style-type: none"> None raised
Policy CC3: Flood Risk Management	<p>Specific</p> <ul style="list-style-type: none"> Need to specify what is a normal design standard Separate guidance document is needed for more understanding on voids Alternative approaches to SDS needs to be considered Need to state that a sequential test was applied to strategic allocations Define 'all sources of flooding' Include National Flood Management <p>Key Issues</p> <ul style="list-style-type: none"> None raised
Policy CC4: Development close to watercourses	<p>Specific</p> <ul style="list-style-type: none"> Buffering should be assessed on a case by case basis Contrary to SFRA Include requirement to protect protected species Impact on wildlife, landscape
Policy CC5: Sustainable Drainage	<p>Specific</p> <ul style="list-style-type: none"> Should deliver multiple benefits Include guidance for drainage maintenance and provision Amend wording to improve importance of MVSWP <p>Key Issues</p> <ul style="list-style-type: none"> Should be a material consideration in applications
Policy CC6: Water supply and sewerage infrastructure	<p>Specific</p> <ul style="list-style-type: none"> Additional wording on water recycling Small STW may be unable to cope with more housing Water supply concerns <p>Key Issues</p> <ul style="list-style-type: none"> None identified
Policy CC7: Water Quality	<p>Specific</p> <ul style="list-style-type: none"> Conflict with water framework directive <p>Key Issues</p> <ul style="list-style-type: none"> None identified
Policy CC8: Pollution and Land Instability	<p>Specific</p> <ul style="list-style-type: none"> Impact of Covanta on pollution/air quality Comments about increase in traffic/ pollution, impact on air quality (is this from committed/allocated sites?) Concern over pollution <p>Key Issues</p> <ul style="list-style-type: none"> None identified
Chapter 17	
HQ1: High Quality Development	<p>Specific</p> <p>Does not satisfy NPPF in addressing crime</p> <ul style="list-style-type: none"> Fails to promote sustainable communities Requirement for HIA should be deleted (N/A policy deleted after Reg 18) Does not consider streetscapes recommend amendment to 6th bullet point to read '...to the existing natural, built and historic environment...'

Chapter / Policy	Main Issues raised
	<ul style="list-style-type: none"> Design should promote healthy/active lifestyles Should refer to Sport England's and Public Health England's Active Design Guidance Dispute /Suggest updating Design Guide/ Standards Criticism of existing development/ scepticism over the implementation of this policy <p>Key Issues</p> <ul style="list-style-type: none"> None identified
17.2 Planning Obligations and the Community Infrastructure Levy	<p>Specific</p> <ul style="list-style-type: none"> Council should seek CIL funding for management and maintenance of SUDS and watercourses Must have a clear and robust policy to ensure that the maximum Section 106 funding and CIL is obtained <p>Key Issues</p> <ul style="list-style-type: none"> None identified
Policy HQ2: Planning Obligations and the Community Infrastructure Levy	<p>Specific</p> <ul style="list-style-type: none"> First paragraph of the Policy does not make it clear that "compensatory provision" should be proportionate to the development proposed. Not clear what is meant by 'the Council will seek to introduce a Community Infrastructure Levy and retain the use of Section 106 agreements where necessary' Need increased focus of funding to those parishes most affected by development <p>Key Issues</p> <ul style="list-style-type: none"> None identified
Policy HQ3: Provision for Social and Community Infrastructure	<p>Specific</p> <ul style="list-style-type: none"> Request for new community facility for Scout Activity and Community centre. Opportunities for the co-location of facilities. The need to keep social and community facilities affordable. Loss of football community site. Does not comply with NPPF. Needs clarification with regards to the loss of facilities and services. Need to maintain and enhance children service centres. Rewording of policy suggested to include 'contributions towards the management, running costs and maintenance'. Existing health care and schools at capacity. Concern regarding the use S106 agreements More communication required with communities prior to S106 being drawn up. <p>Key Issues</p> <ul style="list-style-type: none"> None identified
Policy HQ4: Indoor Sport and Leisure Facilities	<p>Specific</p> <ul style="list-style-type: none"> Minor amendment to text proposed to ensure consistency with EE13 some ambiguity surrounds elements of this policy making it hard to establish its purpose. Policy fails to reflect the requirements set out in legislation for the use of planning obligations Policy does not reflect the Council's evidence base contained within its 'Leisure Strategy' <p>Key Issues</p> <ul style="list-style-type: none"> None identified
Policy HQ5: Broadband and Telecommunications Infrastructure	<p>Specific</p> <ul style="list-style-type: none"> Policy should provide connections to existing residential homes near to new development. Broadband and telecommunications infrastructure inadequate compared to other countries. Open Reach are rolling out faster speeds. Policy is not future proofed. Section should make reference to the impact that siting of comms equipment can have on the historic environment, see 'The Cabinet Siting and Pole Siting Code of Practice' for advice Wording of policy should be amended. It is not for developers to deliver broadband it is for providers to deliver.

Chapter / Policy	Main Issues raised
	<ul style="list-style-type: none"> Section should make reference to the impact that siting of comms equipment can have on the historic environment, see 'The Cabinet Siting and Pole Siting Code of Practice' for advice Does not cater for provision to 2035. The policy on broadband communications infrastructure should require that all development of 10 or more to include additional wording Slow broadband and mobile internet speeds and poor mobile signal coverage for existing communities. Support for broadband Concern regarding broadband Wording too weak and inadequate <p>Key Issues</p> <ul style="list-style-type: none"> None identified
Policy HQ7: Public Art	<p>Specific</p> <ul style="list-style-type: none"> Viability Contribution to wider development more appropriate when multiple builders are present No evidence base Fails obligations test Have regard to the historic environment Requirement must be justified Concerns over public art trigger <p>Key Issues</p> <ul style="list-style-type: none"> None identified
Policy HQ8: Back-land Development	<p>Specific</p> <ul style="list-style-type: none"> Back-land generally against pattern of development, but not always harmful Does not recognise that back-land can be sustainable and make a positive contribution to the settlement Negatively worded Restrictive <p>Key Issues</p> <ul style="list-style-type: none"> None identified
Policy HQ9: Larger Sites	<p>Specific</p> <ul style="list-style-type: none"> Dispute requirement / threshold for development brief No requirement for social/community infrastructure in this policy Development briefs should be approved through planning application process, not prior to submission of the application Suggested inclusion of additional requirement for proposals to be accompanied by an Ecological Mitigation and Enhancement Plan, to demonstrate delivery of biodiversity net gain in accordance with paragraph 109 of the NPPF Developers need to be held to account Should not lead to delay on sites <p>Key Issues</p> <ul style="list-style-type: none"> None identified
Policy HQ10: Small Open Spaces	<p>General</p> <ul style="list-style-type: none"> Open spaces need preserving <p>Key Issues</p> <ul style="list-style-type: none"> None identified
Policy HQ11: Modern Methods of Construction	<p>Specific</p> <ul style="list-style-type: none"> Policy unclear. Need to clarify if it refers to all scales of developments or just new-builds Impact of modern construction techniques on listed buildings/ heritage assets contrary to local/national objectives Suggested MMC made an aspiration rather than requirement Lack of evidence behind 20% requirement, target unjustified <p>Key Issues</p>

Chapter / Policy	Main Issues raised
	<ul style="list-style-type: none"> None identified
Chapter 18	
Historic Environment	<p>Specific</p> <ul style="list-style-type: none"> Editorial suggestions including reference to how chapter integrates with Environmental Enhancement chapter and Local List; Heritage assets, including areas with potential for assets should be preserved; Site specific heritage comments – presence of SMs, LBs etc <p>Key Issues</p> <ul style="list-style-type: none"> None identified
Policy HE1: Archaeology and Scheduled Monuments	<p>Specific</p> <ul style="list-style-type: none"> Too restrictive – only where asset of national significance should preservation in-situ be required; Unclear whether Policy also applies to non-designated assets of equivalent significance. Not enough for public benefits to outweigh harm, harm or loss itself needs to be necessary to achieve public benefits <p>Key Issues</p> <ul style="list-style-type: none"> Not enough for public benefits to outweigh harm, harm or loss itself needs to be necessary to achieve public benefits
Policy HE2: Historic Parks and Gardens	<p>Specific</p> <ul style="list-style-type: none"> Amendment needed to ensure that a proportionate statement is provided for both designated / non-designated historic parks/gardens; Supporting text refers to importance of "Historic Landscapes" yet HE2 only provides protection for listed parks and gardens; <p>Key Issues</p> <ul style="list-style-type: none"> Amendment needed to ensure that a proportionate statement is provided for both designated / non-designated historic parks/gardens;
Policy HE3: Built Heritage	<p>Specific</p> <ul style="list-style-type: none"> Term 'Built Heritage' should be renamed to 'Listed Buildings and Conservation Areas' or supporting text should clarify how upstanding scheduled monuments relate to the Built Heritage section; Too restrictive - requirements set out in the second bullet point go beyond the scope of the statutory tests; Clarity needed re whether this applies to non-designated upstanding structures which are non-designated heritage assets include reference to historic shopfronts; make reference to need to consider impact upon the special architectural or historic interest of listed buildings <p>Key Issues</p> <ul style="list-style-type: none"> Term 'Built Heritage' should be renamed to 'Listed Buildings and Conservation Areas' or supporting text should clarify how upstanding scheduled monuments relate to the Built Heritage section; Too restrictive - requirements set out in the second bullet point go beyond the scope of the statutory tests; Clarity needed re whether this applies to non-designated upstanding structures which are non-designated heritage assets include reference to historic shopfronts; make reference to need to consider impact upon the special architectural or historic interest of listed buildings
Chapter 19	
Development in the Countryside	<p>Specific</p> <ul style="list-style-type: none"> Needs cross reference with the requirements of policy EE3 and EE7 to ensure the protection of designated sites and landscapes. Overlap between SP7 and Development in Country. Development control policies restrictive to development outside of settlement envelopes Commitment to reuse PDL and promote rural economy is not reflected in DC1-DC5 <p>Key Issues</p> <ul style="list-style-type: none"> None identified
19.1 Overview	<p>General</p> <ul style="list-style-type: none"> DC policies too restrictive to development outside Settlement Envelopes <p>Key Issues</p> <ul style="list-style-type: none"> None identified

Chapter / Policy	Main Issues raised
19.2 Reuse of Buildings in the Countryside	<p>Specific</p> <ul style="list-style-type: none"> • Redevelop agricultural buildings sensitively • Could increase rural traffic • Risk of flooding and impact on farmland should be assessed <p>Key Issues</p> <ul style="list-style-type: none"> • None identified
Policy DC1: Re-use of Buildings in the Countryside	<p>Specific</p> <ul style="list-style-type: none"> • EMP3 contradicts this policy • Concern regarding design of reused buildings in the countryside • Policy does not comply with case law <p>Key Issues</p> <ul style="list-style-type: none"> • None identified
Policy DC2: Replacement Dwellings in the Countryside	<p>Specific</p> <ul style="list-style-type: none"> • Policy should include the ability to permit development of exceptional quality or innovative nature of design <p>Key Issues</p> <ul style="list-style-type: none"> • None identified
Policy DC3: Rural Workers Dwellings	<p>Specific</p> <ul style="list-style-type: none"> • Policy does not comply with case law • NPPF does not define a rural worker as ‘those employed in agriculture or forestry’ • Recommend amendment to require development to have regard to the historic environment and its setting • Concern regarding design of reused buildings in the countryside • Over restrictive <p>Key Issues</p> <ul style="list-style-type: none"> • None identified
Policy DC4: Equestrian Development	<p>Specific</p> <ul style="list-style-type: none"> • Amendment to require development to have regard to historic environment and setting. • Reference needs to be made regarding opportunities that can be achieved to improve access through development schemes and BHS web site. <p>Key Issues</p> <ul style="list-style-type: none"> • None identified
Policy DC5: Agricultural Land	<p>Specific</p> <ul style="list-style-type: none"> • Policy not compliant with NPPF. • Brownfield land should be built on first. <p>Key Issues</p> <ul style="list-style-type: none"> • Policy not compliant with NPPF.
Appendices	
Appendix 1	<p>General</p> <ul style="list-style-type: none"> • No definition of ‘major development’ • Typo in listed building description ‘cartilage’. • No definition of: Heritage Asset, Non-designated Heritage Asset, Registered Park and Garden, Scheduled Monument. <p>Key Issue</p> <ul style="list-style-type: none"> • None raised
Appendix 2	N/A
Appendix 3	N/A

Chapter / Policy	Main Issues raised
Appendix 4	N/A
Appendix 5	Reps moved to Important Countryside Gaps Study Technical Report
Appendix 6	Reps moved to Policy HA1: Small and Medium Site Allocations
Technical Reports	
Strategic Flood Risk Assessment	<p>Specific</p> <ul style="list-style-type: none"> IDB not consulted on Contains errors Misses key message of Marston Vale Surface Waters Plan Lacking in detail Omission of watercourses <p>Key Issue</p> <ul style="list-style-type: none"> None raised
GTAA	<p>Specific</p> <ul style="list-style-type: none"> Site listed in GTAA as part of calculation of supply but should be listed as a temporary site <p>Key Issue</p> <ul style="list-style-type: none"> None raised
FEMA & ELR	<p>Specific</p> <ul style="list-style-type: none"> Alternative sites are proposed ELR figures for employment needs updating Objects to exclusion of allocating sites that do not provide at least 40,000sqm of employment space Promoting mixed use development over employment led <p>Key Issue</p> <ul style="list-style-type: none"> None raised
Green Belt Study (stages 1,2,3)	<p>Specific</p> <ul style="list-style-type: none"> Contest site specific conclusions in relation to Green Belt; Alternative site by site assessments undertaken; Exceptional circumstances not demonstrated <p>Key Issue</p> <ul style="list-style-type: none"> None raised
Luton HMA Growth Options Study	<p>Specific</p> <ul style="list-style-type: none"> Needs not properly assessed, luton need not properly assessed Will fail DtC obligations Challenge OAN calculations – too high; too low <p>Key Issue</p> <ul style="list-style-type: none"> None raised
Viability Report	<p>Specific</p> <ul style="list-style-type: none"> North of Luton assessment does not outline full infrastructure costs and includes Central Government money. Methodology is not clear on how borrow costs are considered. Methodology does not consider the land value of non-residential areas. <p>Key Issue</p> <ul style="list-style-type: none"> None raised
IDP	Specific

Chapter / Policy	Main Issues raised
	<ul style="list-style-type: none"> IDP has not identified specific schemes to mitigate impacts on strategic road network Lacks details and costings impact of development on the East Coast Mainline and the associated infrastructure at Biggleswade Station/East of Biggleswade allocation little reference to the additional pressure on the rail network with the increase in users need infrastructure in Harlington to support the village growth. <p>Key Issue</p> <ul style="list-style-type: none"> None raised
Important Countryside Gaps	<p>Specific</p> <ul style="list-style-type: none"> CG2 is too small, will not protect settlements' identity CG19 – does not represent a countryside gap CG2 – boundaries should follow existing defensible boundaries Should surround all villages and towns Aspley Guise ICG should be extended to east of Salford Road ICG's in maulden could be extended Assessments are incorrect <p>Key Issue</p> <ul style="list-style-type: none"> None raised
Transport Modelling (1c &1d)	<p>Specific</p> <ul style="list-style-type: none"> Unable to find previous versions of reports Changes in assumptions between stages No mention of duty to cooperate Impact on adjoining authorities <p>Key Issue</p> <ul style="list-style-type: none"> None raised
Sustainability Appraisal	<p>Specific</p> <ul style="list-style-type: none"> Over reliance on development management policies. Does not consider adjoining LPA growth. Negative effects not assessed in any detail. There is lack of consideration of historic assets. SA has failed to identify and assess all reasonable alternatives in a consistent manner. Issues identified in SA not addressed in Local Plan. Plan does not sufficiently address the sustainability objectives identified in the SA. <p>Key Issue</p> <ul style="list-style-type: none"> None raised
HRA	<p>Specific</p> <ul style="list-style-type: none"> None raised <p>Key Issue</p> <ul style="list-style-type: none"> None raised
SHMA	<p>Specific</p> <ul style="list-style-type: none"> General challenges to Council OAN, alternative OANs proposed; OAN should be reassessed using new standard methodology; Justification for recalculating migration flows weak; Market signals adjustment of 10% inadequate (suggest 30%); Conversion of population to dwellings contested; Household formation rates too low <p>Key Issue</p>

Chapter / Policy	Main Issues raised
	<ul style="list-style-type: none"> None raised
SHLAA	<p>Specific</p> <ul style="list-style-type: none"> Not clear why site allocated Dispute delivery assumptions Dispute assessment results/methodology (particularly approach to flood risk) Not clear failed sites have not been re-considered as smaller portions No published assessments for re-assessed sites/ post Reg 18 assessment Inconsistency with SA Dispute re-assessment of sites which had previously failed at Reg 18 on green belt. <p>Key Issue</p> <ul style="list-style-type: none"> Not clear why site allocated Dispute delivery assumptions Dispute assessment results/methodology (particularly approach to flood risk) Not clear failed sites have not been re-considered as smaller portions No published assessments for re-assessed sites/ post Reg 18 assessment Inconsistency with SA Dispute re-assessment of sites which had previously failed at Reg 18 on green belt.
Housing Implementation Strategy	<p>Specific</p> <ul style="list-style-type: none"> Strategic site delivery overly optimistic for both annualised rates and start dates Housing target should be higher, need for additional site allocations Question site capacities Dispute use of windfall Dispute annual delivery rates in trajectory Commencement for strategic sites too early <p>Key Issue</p> <ul style="list-style-type: none"> None raised
Settlement Envelope Review	<p>Specific</p> <ul style="list-style-type: none"> Blunham Cranfield - Wharley End Marston Gate Distribution Centre Everton Potton Should assess all boundaries as part of the review SER should be an appendix to the Local Plan <p>Key Issue</p> <ul style="list-style-type: none"> None raised
Proposed Submission Policies Map	<p>Key Issue</p> <ul style="list-style-type: none"> None raised

APPENDIX N: Key themes raised during Regulation 19
consultation

Local Plan Pre-Submission Regulation 19 Consultation (11 January – 22 February 2018):

SA & HRA Representations & Responses/Action Taken

Section of SA Report (Dec 2017)	Consultee (Ref Number) & Comments	Enfusion Responses & Action Taken
Environment Agency		
	No comments on the SA or HRA at this stage	
Historic England (4509)		
Plan & SA in general	There is a lack of a detailed and proportionate historic environment evidence base underpinning the Plan and the Sustainability Appraisal. This is a particular issue for the identification of appropriate Strategic Site Allocations, therefore more detail has been provided on these policies, and as follows:	Noted, with thanks
SA Appendix VII1 (page 12) Policy SA1 North of Luton	<p>This allocation affects a number of designated and non-designated heritage assets which are not identified in the policy or on the allocation map. There is no supporting text with this policy.</p> <p>Negative impacts on the heritage assets affected by this proposed allocation depend on the proximity, design and mitigation of built development and the location of the M1-A6 link road. Positive impacts could be made through bringing Sundon Park into public use and the protection of the setting of Drays Ditches as part of the wider green infrastructure provision. This leads us to conclude that without an analysis of the capacity of the site and a heritage impact assessment, this allocation is unsound.</p> <p>For the reasons set out above we disagree with the assessment in Appendix VIIa of the Sustainability Appraisal (page 12) that the allocation of this site would have neutral or uncertain effects on the historic environment.</p>	<p>The SA used Defra Magic Map as the main source for the historic environment & the SA text acknowledges the presence of designated heritage assets in close proximity of the site option. The SA considered that the mitigation provided through Local Plan Policy (Built Heritage), will protect designated and non-designated heritage assets.</p> <p>Furthermore, the site-specific allocation Policy (SA1) provides criteria for the protection of non-designated heritage assets of</p>

Section of SA Report (Dec 2017)	Consultee (Ref Number) & Comments	Enfusion Responses & Action Taken
		<p>archaeological interest, the protection of designated heritage assets within the site boundary and the setting of any designated assets outside of the boundary. The Policy requires development to provide mitigation to ensure no negative effects occur.</p> <p>The SA considers this mitigation provided to be comprehensive to reduce any potential negative effects to neutral. Some uncertainty remains until site level heritage assessments are completed – and the SA reported 0? Neutral with some uncertainty.</p>
<p>SA Appendix VIIa (page 58)</p> <p>Policy SE1 M1 Junction 11a-Sundon Rail Freight Interchange (RFI)</p>	<p>This proposed allocation needs to be reviewed to understand its cumulative impacts on the historic environment along with SA1. The site is within the setting of the grade I Church of St Mary's at Lower Sundon which also borders proposed allocation SA1. Therefore, there is significant potential cumulative harm to the setting and significance of the church.</p> <p>The SA assesses this site as having a neutral effect on the historic environment. The cumulative effects of allocating this site and SA1 have not been assessed. As such, and given the points raised above in relation to SE1 and SA1, we disagree with the overall assessment relating to the historic environment.</p>	<p>The SA details the presence of various heritage assets in close proximity to the site. Masterplanning for the proposed employment site shows the site boundary approx. 500m from the Listed Building.</p> <p>The mitigation provided through the Built Heritage Policy, and the mitigation protecting heritage assets in the wording of Policy SE1 for the site option, will protect heritage assets.</p> <p>The SA reported potential cumulative effects with regard to</p>

Section of SA Report (Dec 2017)	Consultee (Ref Number) & Comments	Enfusion Responses & Action Taken
		SA Objectives on employment, landscape/visual impacts, and biodiversity; the SA did not consider likely cumulative effects from proposals in SE1 & SA1 for the historic environment & para 8.80 considered that LP Policies HE1-3 provide adequate mitigation measures.
SA Appendix VIIa (page 37) Policy SA2 Marston Vale New Villages	<p>This allocation affects a number of designated heritage assets which are not identified in the policy or on the allocation map. There is no supporting text with this policy. We find this proposed allocation unsound on principle. The multiple highly designated heritage assets directly affected by this site and their landscape would be irrevocably harmed by the introduction of development of this scale. This site should not be allocated without a heritage impact assessment and capacity study setting out where, if anywhere, a new village/s can be sited without harming the designated heritage assets.</p> <p>Without further evidence whether the effects are major or minor negative cannot be confirmed.</p>	<p>The SA of the allocation concluded that due to the presence of designated heritage assets within the site boundary, and numerous heritage assets in the surrounding area, there is the potential for minor negative effects.</p> <p>However, uncertainty remains until site level assessments are completed. It is not considered that major negative effects are likely as there is Policy mitigation available.</p>
SA Appendix VIIa (page 74) Policy SE2 M1 Junction 13- Marston Gate Expansion	<p>This allocation affects grade II Ridgmont Station and the setting of a number of designated heritage assets which are not identified in the policy or on the allocation map. There is no supporting text with this policy.</p> <p>The assessment of neutral / unknown effect on the historic environment in the SA is based on a distance-based assessment. The topography of the area and the type and location of designated heritage assets indicate that this assessment does not provide a full assessment of impact. It is important to understand the significance of any heritage assets, and their settings, that would be affected by a potential site allocation. This involves more than identifying known heritage assets within a given distance, but rather a more holistic process which seeks to understand their significance and value. Whilst a</p>	The SA identified potential negative effects but noted that there are no designated assets within the site boundary, and that there are a limited number of heritage assets in the local area. The SA considered that the Policy mitigation provided through the Built Heritage Policy, will prevent significant negative

Section of SA Report (Dec 2017)	Consultee (Ref Number) & Comments	Enfusion Responses & Action Taken
	<p>useful starting point, a focus on distance or visibility alone as a gauge is not appropriate. An allocation at a considerable distance away from a heritage asset may cause harm to its significance, reducing the suitability of the site allocation in sustainable development terms.</p> <p>We also would note that any cumulative impacts owing to the proximity of SA2 also have not been considered. As potential negative impacts on the historic environment have not been assessed, we cannot agree with the assessment of neutral/unknown.</p>	<p>effects, resulting in likely neutral residual effects but some uncertainty until further project level studies.</p> <p>SA2 and SE2 are approximately 1km apart & the SA did not consider or explicitly report any likely cumulative effects.</p>
<p>SA Appendix VIIa (page 25)</p> <p>Policy SA3 East of Arlesey</p>	<p>This allocation affects a number of designated heritage assets which are not identified in the policy or on the allocation map. There is no supporting text with this policy.</p> <p>The SA does not identify that the two listed farmhouses in Arlesey will be severed from their settings by the proposed allocation. As such, we disagreed with the assessment that the effect will be neutral/unknown.</p>	<p>The SA identified the presence of Listed Buildings in both Arlesey and Fairfield that are in close proximity to the site; however, the SA did not explicitly mention the two listed farmhouses in Arlesey. It is noted that these are within an existing built environment.</p> <p>There are no designations within the site boundary. The Policy mitigation provided through the Built Heritage Policy, and the wording within the site-specific policy, including the protection of non-designated and designated heritage assets in the vicinity of the site, and their setting. The mitigation provided should ensure neutral effects, with some uncertainty until site level assessments are completed.</p>

Section of SA Report (Dec 2017)	Consultee (Ref Number) & Comments	Enfusion Responses & Action Taken
SA Appendix VIIa (page 48) Policy SA4 East of Biggleswade	<p>This allocation affects a number of designated heritage assets which are not identified in the policy or on the allocation map. There is no supporting text with this policy.</p> <p>Without further evidence whether the effects are major or minor negative, the assessment of minor/unknown cannot be confirmed in the SA.</p>	<p>The SA of the allocation concluded that due to the presence of designated heritage assets within the phase 2 site boundary, and numerous heritage assets in the surrounding area, there is the potential for minor negative effects. It is not considered that major negative effects are likely as there is Policy mitigation available. However, uncertainty remains until site level assessments are completed.</p>
SA Appendix VIIa (page 66) Policy SE3 A1 Corridor Holme Farm Biggleswade	<p>This allocation affects a number of designated heritage assets which are not identified in the policy or on the allocation map. There is no supporting text with this policy.</p> <p>The SA does not identify all the heritage assets potentially affected by the development. Specifically, there are three list entries for multiples of buildings either within or adjacent to the proposed site. As such we cannot support the assessment of neutral/unknown.</p>	<p>The SA reported the presence of one Listed Building; it did not explicitly mention the two Listed Buildings to the south of the site allocation.</p> <p>However, with mitigation available through Local Plan Policy (Built Heritage), and wording in site specific Policy SE3, to ensure an appropriate mitigation strategy for multi-period archaeological remains, significant negative effects are not considered likely.</p>
SA Appendix VIIb	<p>This allocation affects a number of designated heritage assets which are not identified in the policy or on the allocation map. There is no supporting text with this policy.</p> <p>We could not find a detailed assessment in the Sustainability Appraisal Appendix VIIa. In the overview table (page 51) the historic environment assessment is unknown. We would</p>	<p>The site allocation was assessed & reported in Appendix VIIb - as a broad location option, for either employment or housing. Effects remain uncertain as both</p>

Section of SA Report (Dec 2017)	Consultee (Ref Number) & Comments	Enfusion Responses & Action Taken
Policy SE4 Former RAF Base Henlow	expect to see more detailed evidence and assessment for the site to be brought forward as an allocation.	positive and negative effects are possible, and until site level proposals and studies are further progressed.
SA Appendix VIIc Policy HA1 Small and Medium Allocations	<p>We have been unable to check in site in detail, however it is clear that the small and medium sites have similar issues with lack of evidence or consideration for the historic environment and lack of details within the policy and supporting table.</p> <p>There are a number of sites which require further consideration: HAS04-09, HAS12,14, 16, HAS24, HAS26-28, HAS35, HAS40-41, HAS45, HAS48</p>	The SA of the small and medium site allocation options considered all available evidence in their assessment. This included available evidence and technical studies. The scale of the proposed development, the mitigation available, and the potential cumulative effects were considered.
Natural England (6488/6487)		
HRA (December 2017) HRA summary findings incorporated into SA (Section 8)	<p>With regard to increased recreational pressure we agree that due to distance and the mitigation measures afforded through policies EE1, EE2, EE3 and EE13 the Local Plan alone, and in-combination, is unlikely to have any adverse effect on Chiltern Beechwoods Special Area of Conservation (SAC) and the Upper Nene Valley Gravel Pits Special Protection Area (SPA) and Ramsar site.</p> <p>Natural England is satisfied that with the mitigation afforded through relevant Plan policies, adverse impacts to European sites alone, and in-combination, through changes in water level, water quality and air quality can be avoided. However, our advice remains that the Local Plan should take a strategic approach to water quality and air quality issues through an up to date Water Cycle Study and Air Quality Assessment to demonstrate that allocations are sustainable and that sufficient mitigation is deliverable to ensure no adverse effects to designated sites.</p> <p>We agree that, due to distance, there are no potential pathways for impacts to European sites through habitat loss and fragmentation.</p>	Noted with thanks

Section of SA Report (Dec 2017)	Consultee (Ref Number) & Comments	Enfusion Responses & Action Taken
	Natural England therefore supports the conclusion of the HRA that the Central Bedfordshire Local Plan is unlikely to give rise to significant effects on European sites hence further Appropriate Assessment is not required.	
SA Sections 1-3	Natural England is satisfied that the SA objectives, assessment methodology and framework generally accord with the requirements of the Planning and Compulsory Purchase Act 2004 and the Strategic Environmental Assessment Regulations.	Noted with thanks
SA Section 11 Conclusions	<p>We welcome the incorporation of the summary findings of the Habitats Regulations Assessment (HRA) into the revised Sustainability Appraisal (SA) report (Enfusion, January 2018), in line with our previous advice. However, we cannot agree with the conclusions of the SA as we have significant outstanding concerns in relation to:</p> <ul style="list-style-type: none"> the lack of proper assessment of the impacts of development on the AONB, including the production of an LVIA the need for the Sustainability Appraisal to be informed by an updated Water Cycle Study The need for the Sustainability Appraisal to properly address the impact of increased recreational pressure on designated sites. <p>We understand that the HRA has concluded that the Draft Plan will not have likely significant effects, individually or in-combination, on the identified European Sites. We welcome, in line with our previous advice, that the assessment has considered the potential for impacts to European sites beyond the district boundary, in accordance with the requirements of the Habitats Regulations.</p>	<p>We note that NE supports the conclusion of the HRA Report (see above). The SA uses available baseline evidence & reports any data gaps or uncertainties, including further technical studies on LVIA's, and water. It is understood that the latest SFRA and WCS Level 2 are now available – and these will inform any uncertainties that had been reported in the SA.</p> <p>Strategic recreational studies are not planned for the CBLP but site-specific requirements in Site Allocation Policies can include consideration of any increased recreational pressures where relevant.</p>
SA Section 4 Options & Alternatives	To reiterate our comments at the previous consultation stage, section 4.10 indicates that despite mitigation to address negative effects through the emerging development management policies, uncertainty of the significance of effects remains until further studies on the water cycle and transport impacts/capacities are completed. Natural England again advises that these studies should be completed as soon as possible to provide the evidence required to inform the SA and enable sound judgements to be made regarding which allocations are sustainable and can be taken forward.	Paragraph 4.10 summarises the SA findings at an early stage of plan-making in 2017 when different options for accommodating proposed growth were investigated. SA is an iterative and ongoing process

Section of SA Report (Dec 2017)	Consultee (Ref Number) & Comments	Enfusion Responses & Action Taken
		that uses relevant, proportionate & available information. Any gaps in evidence are reported and can give some uncertainty to assessment findings.
SA Non-Technical Summary	<p>We note that paragraph 70 of the SA Technical Summary report states that there are uncertainties in relation to some of the negative cumulative impacts on the AONB from the proposed development North of Luton and given the scale of the proposed development we advise that further work is required to understand the cumulative impacts and to determine whether the impacts can be mitigated.</p> <p>As previously advised, the SA cannot rely alone on the emerging development management policies to mitigate the potential adverse effects of proposals on the natural environment, including designated sites and landscapes. An up to date Stage 2 Water Cycle Study, Landscape and Visual Impact Assessment (LVIA) and assessment of air quality and recreational pressure should be provided to inform the SA and demonstrate that allocations will not have any adverse effect on the Chilterns Area of Outstanding Natural Beauty (AONB) or its setting and designated nature conservation and geological sites. Agricultural Land Classification (ALC surveys) are also required, where possible, to assess the impacts of allocations on best and most valuable land (BMV land) and identify measures to mitigate adverse effects.</p>	<p>Following Natural England representations, the developers/site promoters of North Luton will be preparing a Landscape Visual Impact Assessment for Examination. This will assess the impacts of the development on the Chilterns AONB and its setting. It will also identify mitigation measures and may inform any amendments to the Local Plan, and its supporting SA.</p> <p>The WCS Level 2 is complete now.</p>
Policy SA1 Land North of Luton and proposals in Barton-le-Clay	<p>Sites are within / within the setting of, the Chilterns AONB. A Landscape and Visual Impact Assessment (LVIA) has yet to be undertaken to assess the impact of development in these locations on the AONB and its setting, and to identify whether mitigation measures could adequately address adverse effects. Our advice, in the context of paragraphs 115 and 116 of the NPPF, is that a new link road or new housing in the AONB would be classed as major development. Consequently, any proposals taken forward in these locations will need to:</p> <ul style="list-style-type: none"> show what reasonable alternatives have been considered. The LPA must consider the cost of, and scope for, developing outside the designated area, or meeting the need for the development in some other way. The SA should set out the alternative locations/sites considered to meet the major development need elsewhere or alternative ways of meeting the need, as well as the rationale for selecting the allocation site. 	<p>As above for SA1. The larger site in Barton will be subject to a development brief (required by Policy HA1) where a LVIA can be requested. For the smaller site, the impacts on the AONB will be assessed at the planning application stage.</p>

Section of SA Report (Dec 2017)	Consultee (Ref Number) & Comments	Enfusion Responses & Action Taken
	Natural England will not support any proposals for development within the AONB or its setting without adequate and robust evidence to address the above requirements. Our advice is that these requirements can be most appropriately addressed through an LVIA.	
Policy SP8 Gypsy, Traveller & Travelling Showpeople	Natural England advises that potential site allocations will need to be assessed through the HRA and SA to ensure development will not have an adverse effect on the natural environment including designated sites and landscapes.	Noted and agreed; all reasonable options identified will be subject to SA and HRA.
Policy EE1 Green Infrastructure	<p>Natural England generally supports this policy; however, we advise that the first sentence should be reworded as follows:</p> <ul style="list-style-type: none"> Proposed development must demonstrate a net gain in green infrastructure; <p>The issue of additional recreational pressure associated with proposed growth, and measures needed to address this, should have been addressed through the SA, having regard to the objectives of the strategic and district Green Infrastructure strategies. The findings and recommendations of the SA, relating to GI, should then be translated into robust requirements in the relevant site allocation policies and Policy EE1. These policies should also include a clear delivery/funding mechanism.</p>	The SA Framework included Objectives and criteria relating to Public Open Space, Leisure Facilities, and Green Infrastructure. The SA identified the potential for cumulative increases in pressure on recreational facilities (eg East of Arlesey); however, it was considered that Policy mitigation measures should be sufficient. Recreational pressure was also considered through the HRA, which concluded that no significant effects on European designated sites would occur as a result of recreational pressure from growth in the Plan area. Thus, the SA has addressed cumulative recreational pressure.
Policy CC7 Water Quality	We support this policy and requirement for relevant proposals to be accompanied by a Water Framework Directive assessment and to contribute positively to the water environment and its ecology. However, this appears to be deferring the sustainability assessment of proposals to the project stage. In our view this poses a potential risk to designated sites and to the deliverability of sustainable development.	The SA used the evidence available at the time to inform the assessment for SA Objective 9, water resources and quality. This included stage 1 of the Water Cycle Study for the Plan area, as well as publicly

Section of SA Report (Dec 2017)	Consultee (Ref Number) & Comments	Enfusion Responses & Action Taken
	This could have been addressed by assessing water quality effects and deliverability of measures to address adverse effects through the SA (informed by an up to date Water Cycle Strategy). Notwithstanding the above we note that Policy CC7 includes requirements for proposals to demonstrate no adverse impact to the natural environment / WFD compliance and to protect and enhance the water environment and associated ecology. Whilst this does not represent good planning we are satisfied that the policy requirements offer sufficient protection to the natural environment.	available information. Furthermore, mitigation available through Local Plan Policy was taken into account, including site specific Policies. The assessment has identified uncertainty that will remain until further assessments are completed, including stage 2 of the Water Cycle Study.
SA para 8.80 Policy SA1 North of Luton	Natural England does not agree with the apparent judgement in section 8.80 of the SA that the policy is acceptable on the basis of a requirement that the whole development including the A6 to M1J11a Link Road, should have no undue impacts on the AONB and biodiversity and that it should provide mitigation where feasible. This requirement and the generic requirements of policy EE2 Enhancing Biodiversity are not sufficiently robust for Natural England to be satisfied that an appropriate level of mitigation can and will be delivered to ensure no adverse impact on statutorily designated sites and landscapes.	The SA of the site option concluded that there was the potential for a major negative effect on landscape, due to the location of the site with regards to the AONB. Para 8.80 of the SA Report indicates concern that the Policy is qualified by "where feasible" – but then suggests that this should be mitigated by other Policies including EE2 that requires a net gain in biodiversity.
CPRE		
SA Report	CBC's Sustainability Appraisal is driven, and thus fundamentally flawed, by the need to accommodate the high growth figures and housing numbers. We believe these figures are way in excess of what CBC should be planning for in the future and therefore what needs to be accommodated within the Local Plan. This study seeks to justify developing in the Green belt through a list of nebulous, unquantified positives, namely:	The Plan is required to accommodate the objectively assessed housing needs. The SA is required to test the emerging elements of the Plan, including reasonable alternatives to achieve the objective identified for development growth. One of

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	<p>1. Growth in this area will offer opportunities associated with new development which Green Belt designation restricts.</p> <p>2. Appropriately located housing and supporting infrastructure around Houghton Regis and Luton could have major positive effects for these areas with high deprivation</p> <p>3. Growth in this area will support the provision of housing supply for the Luton HMA.</p> <p>4. The location of key transport corridors here provides employment benefits for this area.</p> <p>5. There is good access to open space, recreation and green infrastructure, which would benefit existing and new communities.</p> <p>The negative effects are noted and also significant but not assessed in any detail:</p> <p>1. The loss of green belt designations could result in the coalescence of small settlements.</p> <p>2. Growth along the transport corridors, namely along the M1 corridor around Dunstable and the AQMA, could result in poorer air quality.</p> <p>3. Potential for negative effects on the predominantly rural landscape. These could be cumulative and residual effects will depend on the scale and scope of the development and how the potential effects are mitigated.</p> <p>4. Increased development will result in loss of soil resources.</p> <p>The CBC summarise their position in the study by stating:</p> <p><i>"Green Belt constraints have previously restricted the opportunities that can be associated with development such as new housing and infrastructure in Area A. This area also includes pockets of higher deprivation, so new growth can have the potential for major positive effects, with the delivery of new infrastructure, facilities and affordable housing".</i></p> <p>This does not present a balanced picture as no analysis has been provided of the detrimental impact on the Green Belt as a whole by removing large tracts of strongly performing land. Whilst the stage 3 study considered "harm from releasing sites or parts of them there was no cumulative impact assessment of releasing all the land proposed within the Plan.</p>	<p>these alternatives was the appraisal of development in Area A (green belt) and as detailed in Appendix IV of the SA Report.</p> <p>Plan-making has minimised likely significant cumulative effects on factors associated with loss of Green Belt by considering those parts that do not contribute strongly to Green Belt objectives and by limiting proposals for development in the south of the CBC area.</p>

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Local action groups: Lidlington Community Action Group (Marston Vale); SWORD (Sutton); Pottton Residents for Sustainable Growth, Tempsford, Biggleswade Residents Action Group, Barton Residents Action Group, Ridgemont, Westoning, Arlesey		
SA Report SA Method	The Local Plan is not sustainable and does not sufficiently address how CBC will meet the SA Objectives to address the key sustainability issues identified within the Sustainability Appraisal report. Table 4.2 of the Sustainability Appraisal details the SA Objectives and we see no reference to the objective, within the plan, nor how the Local Plan addresses each of these.	Table 4.2 is the Strategic SA Framework of Issues, Objectives & Decision-Aiding Questions as set out in the Final SA Scoping Report (September 2016) and subject to statutory consultation. The methods used in the SA are explained in Section 2 of the SA Report (December 2017). Each element of the emerging Plan has been tested using the SA Frameworks of SA Objectives; any recommendations arising from the SA findings have been considered in the plan-making process.
(1080)		
SA Report SA Method	The Local Plan is not sustainable and does not sufficiently address how CBC will meet the sustainability objectives to address the key sustainability issues identified within the Sustainability Appraisal report. Table 4.2 of the Sustainability Appraisal details the objectives and we see no reference to the objective, within the plan, nor how the Local Plan addresses each of these.	As above
(2568)		
SA Report SA Method	The Local Plan is not sustainable and does not sufficiently address how CBC will meet the sustainability objectives to address the key sustainability issues identified within the Sustainability Appraisal report. Table 4.2 of the Sustainability Appraisal details the objectives and we see no reference to the objective, within the plan, nor how the Local Plan addresses each of these.	As above

Section of SA Report (Dec 2017)	Consultee (Ref Number) & Comments	Enfusion Responses & Action Taken
(2722)		
SA Report SA Method	The Local Plan is not sustainable and does not sufficiently address how CBC will meet the sustainability objectives to address the key sustainability issues identified within the Sustainability Appraisal report. Table 4.2 of the Sustainability Appraisal details the objectives and we see no reference to the objective, within the plan, nor how the Local Plan addresses each of these.	As above
(1072)		
SA Report SA Method	A Sustainability Appraisal (SA) was carried out, however part of the document (Appendix 2) is missing from the consultation documents. Many of the issues identified within the Sustainability Report are not addressed by the Pre-submission Local Plan. Table 4.2 of the Sustainability Appraisal details the objectives and yet the Plan has no reference to the objectives, nor does it state how the Plan will address these.	As above
UK Regeneration		
Policy SA4 Land East of Biggleswade SA Report Section 11 Conclusions	The inclusion of Site SA4 as the initial phase of a new settlement is strategically justified by the analysis in the Sustainability Appraisal. The SA concluded (para 11.10) that focusing new development in [new settlements] facilitates promoting positive effects and mitigating negative effects because the major development sites are of a size and scope that can support creative masterplanning. These strategic allocations can provide timely supporting infrastructure to ensure that there is capacity for both new and existing communities, thus mitigating potential negative effects. They can also provide improvements to sustainable transport and the green/blue infrastructure network with further positive effects for both health and wildlife. UKR endorses these points but also argues that there are additional benefits in delivering growth through new settlements: These potential benefits can be best realised if the planning for a new settlement such as the SA4 Site or the LEB whole site is linked to a broader approach to considering infrastructure (transport and community facilities).	Noted, with thanks

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	The SA analysis has been revised at each stage of the plan making process and gives a justifiable basis for the selection of the policies and strategic allocations within the Reg19 plan.	
(2011)		
SA page 21	Disagree with "it is not considered that there are any significant sustainability issues within Central Bedfordshire in relation to minerals and waste..... this topic has been scoped out of the SA process for the Local Plan." The Minerals and Waste Plan identifies Rookery South as a Strategic Waste Site (pp80-82). The Local Plan Proposals Map shows the site as a CWS and it is close to the proposed development of Marston Vale new villages and reference to these conflicting uses should be made in the Local Plan and addressed in the SA.	The proposal to scope out minerals & waste for the SA of LP was consulted upon in 2016 & it was agreed to not include a SA Objective solely on waste & minerals. The adopted Minerals and Waste Plan was subject to SA during its development. The Strategic Allocation is separated from the waste management site by the road and railway line. The potential for noise, dust & transport impacts will be investigated in detail through masterplanning and the EIA process. The promoter of the site has indicated that there could be possibilities for linking with the waste to energy operation with the potential for positive synergistic effects.
(4361)		
Cumulative effects	The cumulative impact of neighbouring councils' plans for development and growth, though included in the Sustainability Appraisal, I do not feel have been fully considered. Milton Keynes Council and Bedford Borough Council have large scale plans that will put pressure on the same infrastructure that this plan is reliant upon. The vast majority of new residents will be out-commuters in line with the current demographic of the council area and the fact that the proposed housing need is based on inward migration to the council	The SA of the Plan has taken into account the potential effects on transport as a result of proposed development both individually, and cumulatively, and including key major growth planned in

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	area. Therefore the vast majority of these journeys will in part at least include a car journey either to Milton Keynes as a final destination or to the nearby mainline rail station. Therefore, road infrastructure improvements need to be mandated into the plan before development starts.	neighbouring authority areas (Fig 8.2). The potential cumulative negative effects should be mitigated through site-specific & Policies T1-6; detailed requirements will be confirmed through ongoing studies (SA paras 8.139-140).
Pigeon Investment Management		
SA Report Table 5.7 Reasons for Selection or Non-Progression of Growth Location Options Policy HA1 Small and Medium Allocations	<p>Land East of Maulden not allocated. The Sustainability Appraisal, January 2018 (SAR) is a core part of the evidence base which informs the Pre-Submission Local Plan's Strategy and Policies. At a strategic level, the assessment of Growth Locations Options (Appendix 5 of the SAR) discounts Flitwick town/major service centre as a potential growth location. This is a significant omission, given Flitwick's prominent location in the settlement hierarchy. The potential for Flitwick to become a town which absorbs a larger scale of growth should have been analysed further and assessed as a reasonable alternative in the Sustainability Appraisal process.</p> <p>Flitwick West is discounted in Table 5.7 of the SAR for the following reasons: Green Belt designation; concern over coalescence between Flitwick and Ampthill; potential detrimental impact on the landscape, ecology and heritage in the east of Flitwick; concentrating growth along key transport corridors (A507, M1 and Midland Main Line Rail); promoting sustainable development in areas that have seen little growth due to Green Belt restrictions. Flitwick West the only option for development in the town. The omission of other locations around the, especially those which were not deemed to meet the five purposes of the Green Belt in the stage 1 and 2 assessments should have been considered here. Furthermore, it contained FW2/2a which performed as 'weak' in the Green Belt study.</p> <p>The Non-Strategic Site Options (Appendix 7 of the SAR) only assess two options. These are NLP039 Steppingley Road for 420 residential units and NLP492 Site Next to Flitwick Allotments for 24 residential units. This site 'Land East of Maulden Road' is omitted from consideration, this being despite it scoring better in respect to impacts upon the Green Belt were it to be released. Table 2 below provides a commentary id our site had been assessed in the SAR. Our site, Land East of Maulden Road fairs better against the selected</p>	<p>The reasons for selection/rejection of reasonable alternatives is a matter for plan-making; the findings of the SA are only one factor that is taken into consideration, albeit that the outline reasons must be recorded in the SA Report to comply with the SEA Regulations.</p> <p>The approach to options in plan-making and reasonable alternatives was explained in detail in Section 4 of the SA Report (December 2017). The options identified as reasonable alternatives for the small-medium sites, having passed through Stage 1-3 of the Sites Assessment Method and deemed to be suitable and deliverable, were subject to SA. The reasons for selection or rejection of non-strategic site options is outlined in Appendix VIId of the SA Report.</p>

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	site NLP039. Our site preforms particularly well against the employment and health objectives.	
Stondon Parish Council (667)		
SA Appendix IV Strategic Options Areas A-D (page 3)	The SA states that the developments deliver mitigation appropriate to the development but this has not been detailed under what policies this will delivered and the how local communities will gain access to these mitigation measures.	We assume that the respondent refers to SA page 3 " <i>Mitigation measures may be possible through reducing the amount of development to non-strategic levels of new homes (<500) to better integrate development within existing settlements and locating sites on those areas that only weakly contribute to GB aims.</i> " The mitigation is the reduction in housing numbers.
Marston Moretaine Action Group (1890)		
SA Report Section 2 Methods Transport	The Local Plan does not sufficiently address how CBC will meet the sustainability objectives identified within the Sustainability Appraisal report. Section 2.2.2 of the report states that; 'Travel patterns within Central Bedfordshire are less sustainable with a high reliance on car commuting, together with increasing pressure on interchanges and the rural road network.' The developments documented within the Local Plan are, in the majority of cases, in areas where public transport has been reduced in recent years, compelling residents to access car travel to hospitals, local amenities and other services. The plan does not account for how improvements in public transport will be funded, provided or made sustainable.	The SA Objectives are developed to provide a basis against which emerging elements of the Plan are investigated. SA Objective Nos 6 & 7 relate to highways/AQ, and modal shift respectively.
David Lock Associates on behalf of O&H Properties Ltd		

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Policy SA2 Marston Vale	O&H's representations at Regulation 18 stage highlighted some areas where the SA under emphasises the sustainability of development in Area C, O&H's representations at Regulation 18 stage supported the Council's approach to the SA and its general conclusions. This representation is focused upon the conclusions of Section's 8 and 9 of the Sustainability Appraisal (January 2018) published at this Regulation 19 stage of consultation and relevant appendices. O&H generally continue to support the Council's approach to the SA and its conclusions. On this basis, O&H consider that the SA presents a thorough and robust assessment of the Pre-Submission Local Plan.	Noted with thanks
SA Appendix IV Approaches to Growth Areas A-D	O&H considers that the SA has clearly provided a reasoned justification for the selection of Area C (East/West) and Area B (A1 Corridor) as a focus for its spatial strategy. As set out within its representations for this consultation, O&H agree that Area C would support residential development with an economic focus and that it has good access to major transport corridor and the opportunity to maximise the benefits of enabling / supporting infrastructure. The detailed comparative appraisal of Areas A – D presented at Appendix IV of the SA demonstrates that Area C is the best performing location against the Councils Sustainability Objectives. Similarly, O&H agree that the conclusions of the detailed assessment of the options for distributing development growth at Appendix IV also support the Councils selected Spatial Strategy Approach. O&H consider that the Councils assessment has considered the reasonable alternative options and has provided a justification for rejecting these options.	Noted with thanks
SA Table 8.4 Strategic Site Options	O&H note the conclusions of Table 8.4 and are content that the Council has properly set out is reasoned judgement in relation to the selection of locations for growth to be taken forward as part of its Pre-submission Local Plan. Table 8.4 provides a robust consideration of the reasonable alternative options	Noted with thanks
SA Appendix VIIa Strategic Policies	O&H agree that the delivery of 5,000 homes can make a significant contribution to achieving the overall housing needs of Central Bedfordshire and that this would have major long term positive effects	Noted with thanks
Appendix VIIa (page 27) SA Objective 2	O&H does not agree and objects to the findings of this assessment in relation SA Objective 2 Communities. This assessment concludes that housing growth in this broad location will expand the urban area of Marston Moretaine south and result in the direct coalescence of Marston Moretaine and Lidlington. Master planning work undertaken by	All the Strategic Allocations reported in Appendix VIIa were found to have potential minor negative effects due to the size

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	O&H as part of its outline planning application demonstrates that development in this location can be designed to create a series of distinct villages which protect the identity of Marston Moretaine and Lidlington. The development of the site has been carefully designed to provide permanent parkland buffers where required between the villages. This point reflected on the Emerging Concept Plan for the development of the Marston Valley site appended to the Position Station provided at Appendix B of these representations. On this basis, O&H consider that the assessment should conclude that there would be a neutral effect against this SA Objective	of major development and the small size of nearby settlements. However, it is acknowledged that strong design & good masterplanning can provide mitigation to minimise effects on settlement identities.
Appendix VIIa (page 27) SA Objective 3	O&H agree that development at the Marston Vale growth location would offer the potential for significant new services and facilities to support improved access in the area and that this would have a major long term positive effect.	Noted
Appendix VIIa (page 28) SA Objective 4	O&H agree with the conclusions of the Assessment in relation to SA Objective 4 although question why Major Positive effects was not found given the range, scale and integration of employment uses which could be delivered through the development of the site. O&H's representations in relation to draft Policy SA2 indicate that this policy should be amended to include up to 35 ha of employment rather than the minimum of 40 ha which forms the basis of the Council's assessment against SA Objective 4 as set out in Appendix VI. O&H consider that the Council's adoption of its recommended amendment to draft Policy SA2 would not change the conclusions of its assessment.	The SA reported major positive effects for the delivery of new employment land at the site; minor positive effects were identified for existing links to employment opportunities.
Appendix VIIa (page 29) SA Objective 6	O&H do not agree with the assessment against SA Objective 6. The assessment notes that the precise likely impacts and effectiveness of mitigation measures are uncertain until further transport modelling studies are completed later in 2017. On this basis, it is not clear why a minor negative effect is identified. It is also considered that this assessment underplays the substantial opportunities for the use of sustainable modes of transport presented by existing rail infrastructure, through new public transport provision provided through the development of the site and through the delivery of major rail infrastructure. In doing so, the assessment does not consider the positive effect of this context in reducing private car-based trips and therefore effect on the highway network and on air quality. The above comments are reinforced by the assessment of SA Objective 7 which acknowledge that there would be major positive effects in relation to sustainable transport which O&H support.	SA Objective No 6 refers to the highway network & associated AQ; there will be increased traffic in an area with congestion & the SA found minor negative effects – but with some uncertainty until further project level studies. SA Objective No 7 relates to sustainable transport & the SA found major positive effects.

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		The 2 SA Objectives are judged separately.
Appendix VI (page 33) SA Objective 12	In relation to the conclusions against SA Objective 12, it should be noted that proposed pedestrian routes within the area of the Greensand Ridge Nature Improvement Area will provide enhanced access to the Greensand Ridge to the east of Lidlington.	Noted, with thanks & this is mentioned in SA Objective No 7.
SA Overall	<p>The detailed Environmental Impact Assessment and Transport Assessment work, undertaken by O&H as part of its work to prepare an outline planning application for the development of the site, presents a thorough analysis of the baseline condition and environmental effects of the proposed development. Whilst not yet submitted, detailed work can be made available to the Council through the PPA.</p> <p>O&H are content that the SA undertaken by the Council provides a thorough and robust assessment of the sustainability of the pre-submission Local Plan and provides strong justification for the Council's Spatial Strategy Approach and the allocation of the Marston Valley site through Draft Policy SA2 accordingly.</p>	Noted with thanks
Arrow Planning on behalf of Denison Investments Ltd – Ampthill		
<p>Development Strategy</p> <p>SA of Alternatives</p> <p>Ampthill as Major Service Centre has no proposed allocations; SA of options not undertaken</p>	<p>Strategic approach to site allocations: the approach taken in the PSLP has been to ignore some major service centres, and instead propose allocations elsewhere in less sustainable locations the SA does not consider the consequences of allocating development in locations such as Ampthill, against allocating development in other smaller settlements and locations beyond the Green Belt boundary. The SA, and so the PSLP is not consistent with national policy, in particular paragraph 84 of the NPPF and is thus unsound.</p> <p>Furthermore, the PSLP is not justified, as it is not the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence.</p> <p>In the case of Ampthill, sites were rejected at an early stage in the process of the Green Belt review (considered in more detail below). As a result, they were not considered in the Sustainability Appraisal (SA), despite some of the sites being on the edge of the urban area in sustainable locations. This is a shortcoming of the process, as there are potentially</p>	<p>The reasons for selection/rejection of reasonable alternatives is a matter for plan-making; the findings of the SA are only one factor that is taken into consideration, albeit that the outline reasons must be recorded in the SA Report to comply with the SEA Regulations.</p> <p>The approach to options in plan-making and reasonable alternatives was explained in detail in Section 4 of the SA Report (December 2017). The options identified as reasonable</p>

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	<p>more sustainable sites, that would perform better in the SA process than other locations, but which have not progressed to this level of assessment.</p> <p>In the case of Ampthill, the SA does not assess any sites in, or adjoining the major service centre. This is despite recognising (SA para 5.20) that development at Ampthill would be along "well connected public transport routes [which] could encourage a modal shift with positive effects". sites in Ampthill did not reach the shortlist stage as they were discounted due to Green Belt considerations. The SA did not therefore have the opportunity to consider the potential benefits and impacts of development at Ampthill, and whether the benefits of development here would outweigh the impacts of allocating sites in less sustainable locations. The SA should therefore be revised to include an assessment of sites on the urban edge in the major service centre of Ampthill. Once those sites have been assessed, then the potential Green Belt harm can be weighed in the balance against that assessment, and an overall decision reached. The lack of correct SHLAA and SA assessment of Site ALP343(Warren Farm Phase 2) means the benefit of a new community woodland (to offset Green Belt release) has not been considered.</p>	<p>alternatives for the small-medium sites, having passed through Stage 1-3 of the Sites Assessment Method and deemed to be suitable and deliverable, were subject to SA. The reasons for selection or rejection of non-strategic site options is outlined in Appendix VIId of the SA Report.</p>
AECOM on behalf of Homes England		
<p>Spatial Strategy & Reasonable Alternatives in SA</p> <p>Land at Silsoe</p>	<p>A concern with the SA Report for the Central Bedfordshire Local Plan is that it does not present fully the required information on reasonable alternatives (RAs). In accordance with the SEA Regulations, there is a requirement for the SA Report to present an assessment of '<i>the plan and reasonable alternatives</i>' (Regulation 12(2). A considerable amount of information on options/alternatives is presented; however, there is little in the way of '<i>reasons for selecting the alternatives dealt with</i>' (Schedule 2(8)) to explain the approach taken. This is relevant, for example, in the context of the impact of the spatial pattern selected on the Authority's Green Belt.</p> <p>There has been significant evolution of evidence and understanding on housing numbers and on proposals for new villages and potential expansion areas since the RAs were arrived at in 2016 and early 2017. As such, we consider that there should have been a corresponding refinement of the RAs, and an updated appraisal taking account of latest evidence. Consequently, whilst it is apparent that work has been undertaken as part of the SA process to examine spatial options and RAs, there is a concern that the Council</p>	<p>The reasons for selection/rejection of reasonable alternatives is a matter for plan-making; the findings of the SA are only one factor that is taken into consideration, albeit that the outline reasons must be recorded in the SA Report to comply with the SEA Regulations.</p> <p>The approach to options in plan-making and reasonable alternatives was explained in detail in Section 4 of the SA</p>

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	<p>has not sufficiently developed and appraised reasonable spatial strategy alternatives ahead of finalising the proposed submission plan.</p> <p>Plan has overlooked opportunities for sensitive, small-scale developments responding to evidenced housing need at a number of sustainable medium-sized and larger settlements that, while still within the Luton Housing Market Area, are not constrained by Green Belt. These include places such as Clophill, Maulden, and Silsoe. It is considered that a development of approximately 65-70 dwellings, incorporating a proportion of single storey homes (i.e. little more than a single new street) would be suitable, available and achievable in the north-western corner of Homes England's southern land parcel at Silsoe.</p>	<p>Report (December 2017). The options identified as reasonable alternatives for the small-medium sites, having passed through Stage 1-3 of the Sites Assessment Method and deemed to be suitable and deliverable, were subject to SA. The reasons for selection or rejection of non-strategic site options is outlined in Appendix VIId of the SA Report.</p>
Gladman		
<p>Site Assessment process; SHLAA</p> <p>SA of small and medium site options; reasonable alternatives</p>	<p>Gladman raise specific concerns in relation to the Site Assessment process that has been undertaken. It is important that the sustainability appraisal considers all reasonable alternatives to the same level of detail as the options that are ultimately chosen for allocation and that the outcome of any associated decisions is transparent. It is considered that small and medium sized sites across the district will form an essential element of a sustainable growth strategy for Central Bedfordshire and that an extensive number of alternatives will need to be thoroughly considered through the SA process. Due consideration must also be given to all development options outside of the Green Belt as part of any justification for the existence of 'exceptional circumstances' necessary for the adjustment of green belt boundaries. In addition, sites should not be discounted from consideration without being considered on a like-for-like basis with the option that is ultimately preferred within the Local Plan.</p> <p>Gladman would which wish to raise concerns that the SA has failed to identify and assess all reasonable alternatives in a consistent manner using the information that was made available to the Council through site submissions during the consultation on the Draft Plan in July and August 2017. The Strategic Housing Land Availability Assessment has reached a number of conclusions that cannot be justified when this evidence is taken into account and this has resulted in sites not being taken forward as housing allocations. In addition, the Sustainability Appraisal has failed to set out adequate reasoning and justification for the sites that have been allocated, or rejected for allocation</p>	<p>The reasons for selection/rejection of reasonable alternatives is a matter for plan-making; the findings of the SA are only one factor that is taken into consideration, albeit that the outline reasons must be recorded in the SA Report to comply with the SEA Regulations.</p> <p>The approach to options in plan-making and reasonable alternatives was explained in detail in Section 4 of the SA Report (December 2017). The options identified as reasonable alternatives for the small-medium sites, having passed through Stage 1-3 of the Sites Assessment Method and deemed to be suitable and deliverable, were</p>

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	<p>The PPG states <i>"the Sustainability Appraisal should outline the reasons why the alternatives were selected, the reasons why the rejected options were not taken forward and the reasons for selecting the preferred approach in light of the alternatives. It should provide conclusions on the overall sustainability of the different alternatives, including those selected as the preferred approach within the Local Plan. Any assumptions used in assessing the significance of effects of the Local Plan should be documented."</i></p> <p>The Strategic Housing Land Availability Assessment and SA processes have resulted in conclusions that cannot be justified in the context of the requirements outlined above. This has resulted in a number of sustainable site options not being adequately considered as housing allocations within the Local Plan. It is therefore our view that the spatial strategy must specifically recognise the need for a wider range of medium and small scale allocations for new housing of between 50 and 300 dwellings.</p>	<p>subject to SA. The reasons for selection or rejection of non-strategic site options is outlined in Appendix VIId of the SA Report.</p> <p>The identified reasonable alternatives and the preferred options were assessed in a consistent manner; outline reasoning for selection or rejection has been provided.</p>

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