

CENTRAL BEDFORDSHIRE COUNCIL LOCAL PLAN

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

DRAFT SCOPING REPORT

July 2016

CENTRAL BEDFORDSHIRE COUNCIL CENTRAL BEDFORDSHIRE LOCAL PLAN

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

DRAFT Scoping Report

<i>date:</i>	v01 25 May 2016 Working Draft v02 20 June 2016 Draft v03 05 July 2016 Final Draft for consultation	
<i>prepared for:</i>	Central Bedfordshire Council	
<i>prepared by:</i>	Cheryl Beattie Alastair Peattie Barbara Carroll	Enfusion
<i>quality assurance:</i>	Barbara Carroll	Enfusion

enfusion
environmental planning and management for sustainability



Treenwood House
Rowden Lane
Bradford-on-Avon
BA15 2AU
T: 01225 867112
www.enfusion.co.uk

**CENTRAL BEDFORDSHIRE LOCAL PLAN
SUSTAINABILITY APPRAISAL: **DRAFT** SCOPING REPORT**

CONTENTS

	Page	
1 Introduction	1-3	
Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA), and Equalities Impact Assessment (EqIA)	1	
The Central Bedfordshire Local Plan	3	
Purpose and Structure of this SA Scoping Report	3	
2 Policy Context	4-10	
Introduction	4	
Key Plans and Programmes	4	
Implications for the Local Plan and SA	7	
Surrounding Development Plans	8	
Implications for the Local Plan and SA	9	
3 Baseline Information	11-45	
Introduction	11	
Themes - current situation, trends and evolution without the Plan	11	
4 Key Sustainability Issues and SA Frameworks	46-71	
Introduction	46	
Scoping Workshops	46	
Key Sustainability Issues	46	
SA Frameworks	48	
5 Proposed Methods	72-76	
Introduction	72	
SA of Alternatives	72	
SA of the Local Plan (including policies and preferred sites)	75	
Health and Equalities Impact Assessment	76	
Habitats Regulations Assessment (HRA)	76	
How Will the SA Inform the Decision-Making Process?	76	
6 Consultation	77	
Consultation	77	
Appendices		
I	SA Scoping Workshop Notes	
TABLES		
	Table 4.1: Key Sustainability Issues	46
	Table 4.2: Strategic SA Framework	50
	Table 4.3: Sites SA Framework	58
	Table 5.1: SA Significance Key	72
	Table 5.2: Example SA Matrix for Strategic Options	73
	Table 5.3: Example SA Matrix for Site Options	74

FIGURES

Figure 1.1: SA and Plan-making Stages and Tasks	2
Figure 3.1: Deprivation by LSOA in Central Bedfordshire	19
Figure 5.1: SA Topic and Sub-headings	75

1.0 INTRODUCTION

Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA), and Equalities Impact Assessment (EqIA)

- 1.1 A sustainability appraisal (SA) is a systematic process that must be carried out during the preparation of a Local Plan. The purpose of SA is to promote sustainable development through assessing the extent to which an emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives¹.
- 1.2 The requirement for SA is set out in Section 19 of the Planning and Compulsory Purchase Act 2004 and in Paragraph 165 of the National Planning Policy Framework (NPPF). Extant guidance² recommends that SA incorporates the requirements for Strategic Environmental Assessment (SEA) set out in the Environmental Assessment of Plans and Programmes Regulations 2004, which implements the requirements of the EU SEA Directive³. Central Bedfordshire Council (the Council) have commissioned independent specialist consultants Enfusion Ltd to undertake the SA process for the Central Bedfordshire Local Plan.
- 1.3 In addition, the Council has chosen to integrate the Health Impact Assessment (HIA) and Equality Impact Assessment (EqIA) processes with the overarching SA/SEA process. HIA is not a statutory requirement for Councils; however, health considerations are a requirement of the SEA process and thus the overall SA process. Public bodies have a duty⁴ to assess the impact of their policies on different population groups to ensure that discrimination does not take place and where possible, to promote equality of opportunity. The SEA, HIA and EqIA therefore all form part of the Sustainability Appraisal (SA) process for the Central Bedfordshire Local Plan. The Council is also required to undertake a Habitats Regulations Assessment (HRA) of the Central Bedfordshire Local Plan. The HRA process has its own legislative drivers and requirements and while the different processes can inform each other, it is important that the HRA remains distinguishable from the wider SA process. While the HRA process will be undertaken in parallel to the SA the detailed method and findings will be reported separately.
- 1.4 National Planning Practice Guidance sets out the key stages and tasks for the SA process and their relationship with the Local Plan process, which are illustrated in Figure 1.1. These key stages and tasks are applicable to the SA process for the Central Bedfordshire Local Plan. It is important to note that SA is an iterative and on-going process. Stages and tasks in the SA process may be revisited and updated or revised as a plan develops, to take account of updated or new evidence as well as consultation responses.

¹ Department for Communities and Local Government (2014) National Planning Practice Guidance - Strategic Environmental Assessment and Sustainability Appraisal. Online at <http://planningguidance.planningportal.gov.uk/blog/guidance/>

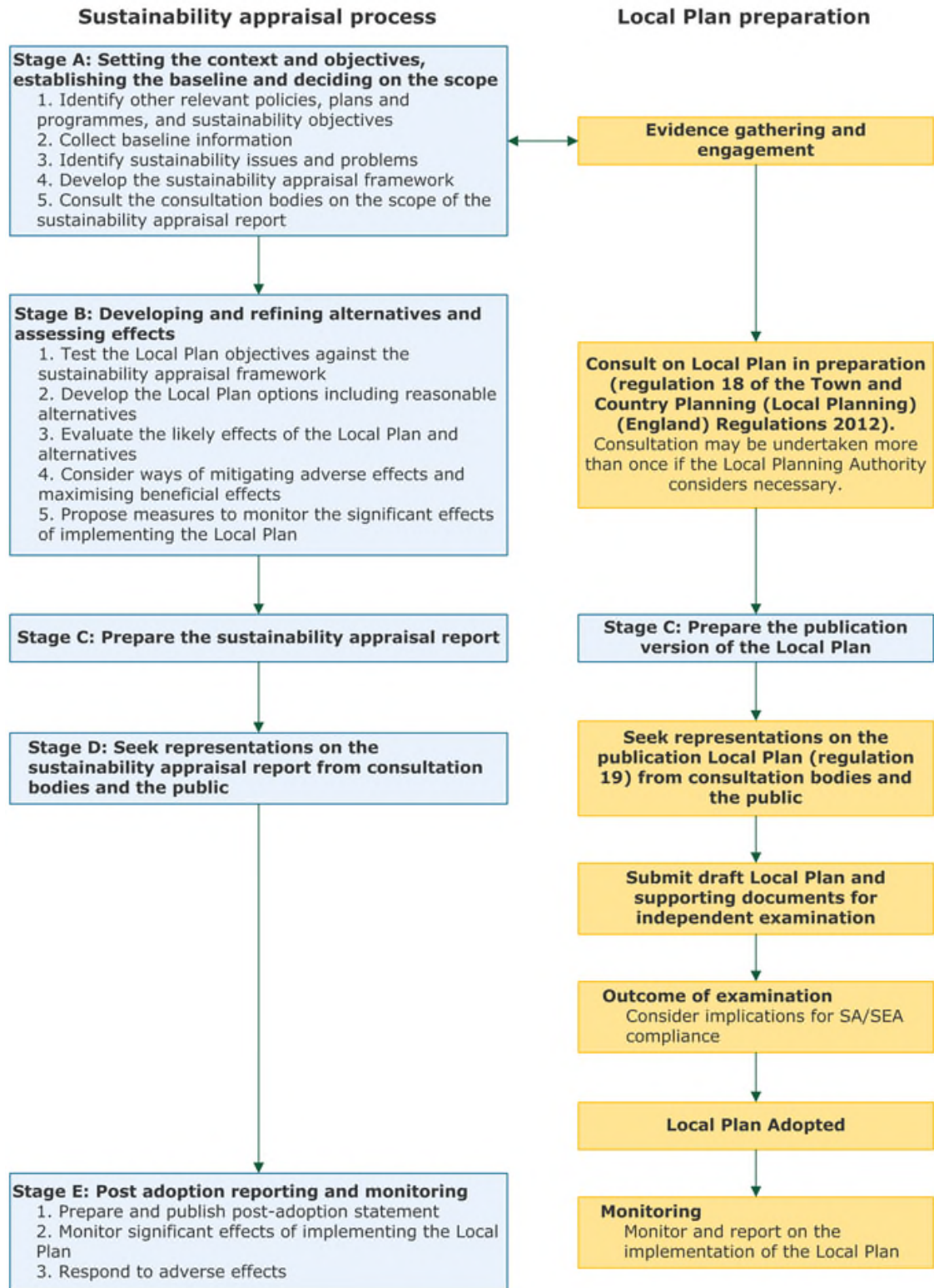
² Ibid.

³ EU Directive 2001/42/EC

⁴ Equality Act, 2010

1.5 The scoping stage is the first stage of the SA process, which must identify the scope and level of detail of the information to be included in the SA Report. It sets out the context, objectives and approach of the assessment; and identifies relevant environmental, economic and social issues and objectives.

Figure 1.1: SA and Plan-making Stages and Tasks



Source: National Planning Practice Guidance (2014)

The Central Bedfordshire Local Plan

- 1.6 Central Bedfordshire Council are preparing a Local Plan that sets out a vision for how the area will develop up to 2035. The plan addresses future needs and opportunities in relation to housing, the economy, community facilities and infrastructure as well as sets out the principles that will guide future development. It will set out the overall level and strategic direction for new development in the area during the life of the plan as well as identify allocations for housing, employment and gypsy and travellers. The Council are currently at the evidence gathering stage of the local plan process.

Purpose and Structure of this SA Scoping Report

- 1.7 This document reports the scoping stage of the SA process for the Central Bedfordshire Local Plan. Following this introductory Section 1, this report is structured into five further sections:
- Section 2 provides the policy context, setting out the key plans and programmes of relevance to the SA of the Central Bedfordshire Local Plan;
 - Section 3 describes the characteristics of the plan area, setting out a summary of the collated baseline information;
 - Section 4 sets out the key sustainability issues and SA Frameworks;
 - Section 5 sets out the proposed approach and method for the SA; and
 - Section 6 provides the consultation details for this Draft SA Scoping Report and next steps for the process.

2.0 POLICY CONTEXT

Introduction

- 2.1 In order to establish a clear scope for the SA of the Central Bedfordshire Local Plan, it is necessary (and a requirement of SEA) to review and develop an understanding of the wider range of plans and programmes that are relevant to the Plan. This includes International, European, National, Regional and Local level policies, plans and strategies. Summarising the aspirations of other relevant policies, plans, programmes and sustainability objectives promotes systematic identification of the ways in which the Local Plan could help to fulfil them.
- 2.2 The key plans and programmes are provided below, along with a summary of the implications for the Local Plans and SA. The duty to cooperate places a legal duty on local planning authorities to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters, and as such the surrounding development plans have been reviewed to identify any potential growth constraints in the neighbouring authority areas. The implications of these development plans for the Central Bedfordshire Local Plan and SA have also been summarised.

Key Plans and Programmes

International:

- 2.3 Relevant international plans and policy have been transposed into national plans, policy and legislation, which have been considered below.

National:

- 2.4 There is an extensive range of National Plans and Programmes that are of relevance to the Local Plan and the SA process. A pragmatic and proportionate approach has been taken with regard to the identification of key National plans and programmes which are set out below:
- **DCLG, National Planning Policy Framework (NPPF), 2012** - the NPPF is the overarching planning framework which provides national planning policy and principles for the planning system in England.
 - **DCLG, Planning Policy for Traveller Sites, 2015** - to be read in conjunction with the NPPF, this policy document sets out the Government's planning policy for traveller sites to ensure fair and equal treatment for travellers
 - **Environment Agency, Managing Water Abstraction, 2013** - is the overarching document for managing water resources in England and Wales and links together the abstraction licensing strategies.
 - **The Heritage Alliance, Heritage 2020** - the historic environment sector's plan for its priorities between 2015 and 2020.

- **Historic England, Action Plan 2015-2018** - the Plan is the delivery document for the Historic England Corporate Plan and sets out the contribution Historic England will make to Heritage 2020.
- **Defra, Biodiversity 2020 - A strategy for England's wildlife and ecosystem services, 2011** - the strategy builds on the Natural Environment White Paper and implements international and EU biodiversity commitments. It sets out the strategic direction for biodiversity policy on land and at sea
- **Defra, Waste Management Plan for England, 2013** - the plan sets out the measures for England to work towards a zero waste economy.
- **Public Health England, Global Health Strategy 2014 to 2019** - identifies global health strategic priorities over the 5 year period and delivery mechanisms to achieve them.
- **Infrastructure and Projects Authority, National Infrastructure Delivery Plan 2016 - 2021** - Brings together the Government's plans for economic infrastructure over the next 5 years with those to support delivery of housing and social infrastructure.

Regional

- **Anglian Water, Water Resources Management Plan 2015** - The Plan identifies the water supply area and forecasts water demand and supply over a 25 year period. The Plan further identifies preferred options to manage demand and provide supply.
- **Affinity Water, Final Water Resources Management Plan 2015 - 2020** - The Plan identifies the water supply area and forecasts water demand and supply over a 25 year period and seeks to address immediate shortages with a 5 year programme.
- **Thames Water, Water Resource Management Plan 2015 – 2040** - The Plan identifies the water supply area and forecasts water demand and supply over a 25 year period.
- **Defra and Environment Agency, Anglian River Basin District River Basin Management Plan, December 2015** - The Plan provides a framework for protecting and enhancing the benefits provided by the water environment. Key information like baseline classification of water bodies, statutory objectives for protected areas, statutory objectives for water bodies and a summary programme of measures to achieve statutory objectives is used to inform land-use planning.

Local

- **Central Bedfordshire Council, Local Transport Plan 3, 2011-2026** - The Plan sets out a long term framework for investment in transport across Central Bedfordshire. It establishes a strategic approach through which to deal with key transport issues, a series of objectives, and broad areas of intervention through which schemes will be identified and improvements made to the transport network.
- **Central Bedfordshire Council, Local Area Transport Plans** - A total of 11 individual localised plans cover the plan area, which establish localised issues and sets priority actions and a programme to achieve them.

- **Central Bedfordshire Council, Minerals and Waste Local Plan: Strategic Sites and Policies, 2014** - The Plan sets out the strategic allocations for mineral extraction and for waste management development in the Plan area together with strategic policies to guide the ongoing supply of minerals and development of waste management facilities.
- **Central Bedfordshire Council, Climate Change Strategy, 2010** - the Strategy seeks to deliver a robust, cohesive and actionable response to mitigating and adapting to climate change and provides a framework for more detailed delivery plans to be put in place that will lead to a reduction in carbon emissions across the area.
- **Central Bedfordshire Council, Carbon Management Plan, 2010** - the Plan details how the commitments made in the Climate Change Strategy (above) will be delivered.
- **Bedfordshire and Luton Strategic Green Infrastructure Plan (2007)** - the Plan sets a spatial vision for establishing a strategic green infrastructure framework for Bedfordshire and Luton which can be used to guide the development of more detailed GI plans.
- **Greensand Trust, Luton and Southern Bedfordshire Green Infrastructure Plan, 2009** - the Plan supplements the Strategic GI Plan (above), providing an assessment of the GI assets and opportunities and identifying a GI network of multifunctional spaces and connections that should be protected and enhanced in the future development of the area.
- **Greensand Trust, Mid Bedfordshire Green Infrastructure Plan, 2008** - the Plan supplements the Strategic GI Plan (above), providing an assessment of the GI assets and opportunities and identifying a GI network of multifunctional spaces and connections that should be protected and enhanced in the future development of the area.
- **Central Bedfordshire Council, Leisure Strategy, 2014-2019** - the Strategy provides the evidence base and policy standards / facility requirements to secure new or improved leisure facilities as a result of new housing development, and supporting increased health and wellbeing of residents.
- **Central Bedfordshire Council, Housing Strategy 2011/12 - 2015-16** - The Strategy sets out the strategic direction for housing in Central Bedfordshire.
- **Central Bedfordshire Council, Rent Strategy 2014/15** - the Strategy assists in the delivery of new social housing and in providing an offer which is more diverse for the range of people accessing social housing, providing alternatives to traditional social rent.
- **Central Bedfordshire Together Local Strategic Partnership, Sustainable Communities Strategy, 2010-2031** - The Strategy seeks to improve the economic, social and environmental well-being of the area and the people who live there. It sets priorities for the area underpinned by the themes of creating the conditions for economic success and community prosperity, and raising standards and tackling inequalities.

Other Proposals

- **East-West Rail** - Originally adopted within the Chancellor's 2011 Autumn Statement, the East-West Rail (EWR) project supports the creation of a new rail link between Oxford, Bicester, Aylesbury, Milton Keynes and Bedford. A

preferred route for the central section has recently been announced which will connect Bedford to Cambridge via Sandy in Central Bedfordshire⁵. Ridgmont Station (located in Central Bedfordshire) is a confirmed station along the western section.

Implications for the Local Plan and SA

- 2.5 Existing plans and strategies that seek to improve the overall well-being of communities and reduce inequalities have the potential to be affected by the Local Plan. The delivery of new housing is considered to support local communities by meeting housing needs and addressing shortages. The Local Plan can have a significant influence in addressing inequalities, and will need to consider the appropriate siting of new development, particularly large development sites that are likely to include new service and facility provisions. The Local Plan can ensure that new development is located in areas which can improve accessibility for existing residents as well as new, and ensure that future development does not exacerbate inequalities. The SA process can support the identification and refinement of options that can contribute to reducing inequalities, and support the development of policy approaches that cumulatively improve the wellbeing of local communities.
- 2.6 Economic and employment plans seek to maximise the economic potential of this area, particularly in regards to the wider economic potential of the region, and significant neighbouring growth areas like Milton Keynes. The Central Bedfordshire Local Plan should seek to maximise the potential benefits of nearby strategic growth, whilst at the same time ensuring the vitality and viability of smaller localised economies. Ensuring that local town centres and settlement services and facilities are maintained and enhanced is also important and will also provide support for local communities.
- 2.7 The delivery of growth can equally support investment and improvement to local green infrastructure and biodiversity networks, recreational areas, leisure facilities and tourist attractions, and the Local Plan should seek to maximise any opportunities arising for local economies, communities, health and biodiversity. The SA process should support the identification and maximisation of potential benefits through the consideration of alternatives and assessment of both negative and positive significant effects.
- 2.8 The transport strategies identify strategic and localised priorities and action plans, and the increased growth in housing and employment development proposed in the Local Plan will have the potential to significantly affect the current state of the transport network, and the targeted mitigation measures. Growth will inevitably increase traffic on the roads which also has implications for air quality, and the Local Plan and SA process can seek to minimise the effects of this through appropriately siting new development, identifying where mitigation may be needed and requiring the necessary transport provisions and contributions from new development. The Local Plan and SA should seek to identify opportunities to maximise the potential for alternative modes of transport to the car, reduce the need to travel, and therefore

⁵ East West Rail Consortium: <http://www.eastwestrail.org.uk/>

reduce emissions; through the consideration of alternatives and assessment of significant effects. This includes potential opportunities that may arise as a result of the delivery of new infrastructure, such as the new East-West rail line.

- 2.9 The Local Plan can further support energy efficiency and waste minimisation measures for new development and the promotion of renewable energy. Although Local Plans can no longer require levels of the Code for Sustainable Homes, they can promote the Home Quality Mark to support residents in understanding the quality and performance of new build homes and can also set targets for developers to provide for a given percentage of energy used by a new development to come from on-site renewable or low carbon technologies. Local Plan policies can further support the development of renewable energy technologies where appropriate, in line with climate change mitigation strategies and targets.
- 2.10 The Water Resource Management Plans identify water constraints, of which future growth has the potential to significantly affect. The Local Plan can plan for water efficiency, and phasing of development to minimise effects on water resources, as well as ensure that water quality is maintained and enhanced in the plan area. Evidence suggests that pressure on water resources is increasing, there is an opportunity for the Local Plan to be set aspirational targets for water efficiency and the level of water consumption in any new development. This not only addresses an existing sustainability issue but will allow for more long-term flexibility in the Local Plan, should the overall level of growth change in the future as a result of new or updated evidence. The SA process should seek to identify and address potential negative effects on the water environment. The Local Plan can ensure that development is sited away from areas of high flood probability and that appropriate water drainage is in place in line with flood risk strategies.
- 2.11 Land, soil quality, and landscapes are all likely to be affected to some degree by the delivery of new development within the Plan area. The Local Plan can seek to protect and enhance key landscapes and their settings, and ensure the appropriate protection of soil quality, including best and most versatile agricultural land. The Local Plan can similarly offer enhanced protection for designated and non-designated heritage assets and their settings, including any potential archaeological finds in line with heritage protection and enhancement plans. Further to this the Local Plan should ensure that new development does not conflict with current mineral operations as well as long-term mineral resource plans. The SA process should inform the development of the Plan by helping to identify sensitive receptors and seek to ensure that adverse sustainability effects are minimised and opportunities for sustainable development are maximised.

Surrounding Development Plans

- **Luton Borough Council**, Luton Local Plan 2011-2031, Pre-Submission Version October 2015.
- **North Hertfordshire District Council** Draft Local Plan 2011-2031 - Preferred Options Consultation Paper 2014 and New Sites 2015.

- **South Cambridgeshire District Council** Local Plan Proposed Submission March 2014 and March 2016 proposed modifications.
- **Bedford Borough Council** Draft Local Plan 2032 (due 2016) - issues and options and two calls for sites complete so far, draft plan due later in 2016.
- **Milton Keynes Council**, Plan: MK Strategic Development Directions (Consultation Document) Jan-April 2016.
- **Aylesbury Vale District Council**, Vale of Aylesbury Local Plan (Draft Plan due spring 2016).
- **Dacorum Borough Council** Saved Local Plan (adopted 2004) and Core Strategy (Adopted 2013). Current work on producing a Single Local Plan, with a call for sites undertaken in 2015.
- **St Albans City and District Council** Strategic Local Plan 2011-2031 Publication Draft 2016.
- **Mayor of London**, The London Plan, March 2015 (including Minor Alterations 2015-16).

Implications for the Local Plan and SA

- 2.12 The duty to cooperate places a legal duty on local planning authorities to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters. In relation to the need for housing and existing growth restraints within some of the surrounding areas (e.g. Luton), there is the potential that Central Bedfordshire may need to accommodate growth from outside the plan area in the future, to meet the needs of the wider housing market area.
- 2.13 For communities the potential effects largely relate to effective integration, particularly considering the cultural diversity and density of the surrounding towns in comparison to Central Bedfordshire and its predominantly rural landscape and character. Accommodating growth on behalf of neighbouring authorities may also increase densities along the administrative boundary (if the extra growth is delivered in close proximity to the neighbouring authority), and lead to coalescence and loss of individual settlement identities.
- 2.14 Increased growth may also deliver more opportunities for development gains, such as improvements to service and facility provisions, improvements to green infrastructure networks and improvements to townscape character through regeneration, with the potential for increased indirect positive effects on communities, health and equalities. Additional growth will also increase pressures on the highways network and air quality, service and facilities provisions, job opportunities, waste facilities, energy consumption, and natural resources, including water, agricultural land, Green Belt land and greenfield land. Increased growth also has the potential for greater negative effects on landscape and townscape characters, settings, the settings of designated heritage assets, and habitats and ecological corridors (through an increased potential for fragmentation).

- 2.15 The Local Plan and SA should seek to ensure that all significant cross boundary issues are identified and addressed. They should also seek to maximise any potential opportunities that could arise through the duty to cooperate. This includes potential enhancements to those designated and non-designated natural environment (landscape, biodiversity & heritage) sites and networks that cross LA boundaries as well as potential opportunities for the provision of infrastructure that could have benefits for local communities.

Key Issues:

- There is the potential that Central Bedfordshire will be needed to accommodate housing growth from outside the Plan area.
- New transport infrastructure is being proposed within the Plan area, which includes the East West Rail Link.

3.0 BASELINE INFORMATION

Introduction

- 3.1 The SEA Directive requires the collation of baseline information to provide a background to, and evidence base for, identifying sustainability problems and opportunities in the Plan area and providing the basis for predicting and monitoring effects of the Central Bedfordshire Local Plan. To make judgements about how the emerging content of the Local Plan will progress or hinder sustainable development, it is essential to understand the economic, environmental and social circumstances in the Plan area today and their likely evolution in the future. The aim is to collect only relevant and sufficient data on the present and future state of the Plan area to allow the potential effects of the Central Bedfordshire Local Plan to be adequately predicted.
- 3.2 The SA/SEA Guidance produced by Government⁶ proposes a practical approach to data collection, recognising that information may not yet be available and that information gaps for future improvements should be reported as well as the need to consider uncertainties in data. Collection of baseline information should be continuous as the SA process guides plan making as new information becomes available. The baseline information is presented below and structured around SEA themes.

Themes (current situation, trends and evolution without the Plan)

Communities

- 3.3 This topic explores the demographics of the plan area, and the types of settlement that exist, including the levels of provision and cultural aspects within these varying settlements.
- 3.4 The current population of Central Bedfordshire is 269,100 and it is classed as 'largely rural' with approximately 58% of residents living in rural areas⁷. The population is predicted to increase 6.8% by 2021, to a total of 287,300. There is predicted to be a 35% increase from 2011 to 2021 in the number of people aged 65 and over compared to a 13.9% increase in people aged 0 to 15 and a 6.5% increase in people aged 16 to 64. This is generally in line with regional and national comparators⁸.
- 3.5 The majority of the population (92%) in Central Bedfordshire were born in UK with only a small proportion being a resident in the UK for less than 5 years (1.8%)⁹. According to the 2011 Census, 89.7% of the population in Central Bedfordshire identify themselves as 'White British, with the remaining 10.3% of

⁶ Department for Communities and Local Government (2014) National Planning Practice Guidance - Strategic Environmental Assessment and Sustainability Appraisal. Online at <http://planningguidance.planningportal.gov.uk/blog/guidance/>

⁷ Central Bedfordshire (January 2016) Key Facts and Figures.

⁸ Ibid.

⁹ Office for National Statistics - 2011 Census

the population identifying themselves as not 'White British'¹⁰. This makes Central Bedfordshire less culturally diverse than England as a whole as well as a number of surrounding Local Authorities. For example, the population of Luton Borough identify themselves as 55% 'White British' with the remaining 45% of the population not 'White British'¹¹. This demonstrates a significant difference in terms of ethnic diversity and potential issues that communities may face in surrounding areas. It should be noted that the towns of Dunstable and Houghton Regis are more ethnically diverse when compared to Central Bedfordshire as a whole¹². However, this is perhaps not surprising given their location and close proximity to Luton Town.

- 3.6 In 2011, there were 478 people in 157 households within Central Bedfordshire who identified themselves as a Gypsy or Irish Traveller, which was approximately 0.2% of the total population at that time¹³. The main communities in Central Bedfordshire are Romany Gypsies (English/Welsh) and Irish Travellers with small numbers of Travelling Show People¹⁴, and slightly higher than the England average of 0.1%¹⁵. Within Central Bedfordshire there are currently (May 2016) a total of 39 Traveller sites; 37 of these are authorised sites with planning permission, the remaining 2 are unauthorised sites. There are 7 Travelling Showpeople sites of which 4 are authorised and a further 3 sites that are tolerated because of the length of their existence. The number of Gypsy and Traveller caravans in Central Bedfordshire was 418 in July 2015¹⁶ and 558 in January 2016, the latter figure includes Travelling Showpeople.
- 3.7 In line with national trends there is an under delivery of housing. There are currently around 105,000 households in Central Bedfordshire, and this is expected to rise to just under 132,000 by 2031 (equating to an increase of 1,350 households per annum). The predominant tenure is home ownership, accounting for 74% of the housing stock. Social housing and private renting are equally split, accounting for 13% of households each. Although the average wage in Central Bedfordshire is higher than the national average (£29,900 annually for residents and £27,716 for workers), when compared to the average house price in Central Bedfordshire of £210,000, the affordability of housing has become a critical issue in the area, and access to the housing ladder is unattainable for many.
- 3.8 In terms of crime, the most common offence in Central Bedfordshire is anti-social behaviour, which has seen a reduced number of instances since July 2015. There have been no significant variations in the total number of crimes reported since 2010. The wards with a higher number of reports in January 2016 were Dunstable-Ickniel, Leighton Buzzard South, Leighton Buzzard North and Dunstable-Northfields. However, this is not surprising given that these wards are situated in two of the larger towns in Central Bedfordshire¹⁷.

¹⁰ Central Bedfordshire (January 2016) Key Facts and Figures.

¹¹ Luton Borough Profile - 2011 Census Data.

¹² Central Bedfordshire Council (August 2015) Dunstable and Houghton Regis Town Profiles.

¹³ Office for National Statistics - 2011 Census.

¹⁴ Bedfordshire Clinical Commissioning Group – Gypsy and Traveller Communities in Central Bedfordshire.

¹⁵ Office for National Statistics - 2011 Census.

¹⁶ Central Bedfordshire Council - Authority Monitoring Report 2014/15.

¹⁷ UK Crime Statistics - Central Bedfordshire.

- 3.9 The largest towns in Central Bedfordshire are Leighton-Linslade (population of 40,070) and Dunstable (population of 37,880). These are followed by Houghton Regis (18,180), Biggleswade (18,130), Flitwick (13,180) and Sandy (12,210). While recognised as towns and communities in their own right, Dunstable and Houghton Regis are connected to the existing settlement and infrastructure of each other as well as Luton Town. These towns are therefore less likely to have their own sense of identity when compared to some of the other towns in Central Bedfordshire, such as Leighton-Linslade and Biggleswade. There are also a number of smaller towns and villages spread across Central Bedfordshire.
- 3.10 It should also be noted that there are 19 designated neighbourhood plan areas within Central Bedfordshire that are all at various stages of developing Neighbourhood Plans.
- 3.11 The west and south of Central Bedfordshire is largely designated Green Belt land, situated between Milton Keynes and Luton. The majority of the land surrounding Caddington, Slip End, Luton, Barton-le-Clay, Flitwick and Ampthill, Westoning, Harlington, Toddington, Leighton Buzzard and Heath and Reach is designated Green Belt. Within Green Belt land, development will be expected to minimise the effects of urban sprawl, whilst meeting the needs of local communities. The Green Belt also has connotations for landscape character, in regards a predominantly rural character. This rural character is identified within the landscape section of the baseline information, and the Green Belt can therefore be considered a contributor to the overall character of Central Bedfordshire.

Evolution without the Plan

- 3.12 Without the Plan there is likely to be a less coordinated approach to the delivery new employment, housing and infrastructure. New development is less likely to be delivered in areas where it is needed most. This could make it more difficult to provide for an ageing population and result in the loss of identity and sense of place for some of the towns and villages within Central Bedfordshire. It could also make it more difficult to effectively meet the needs of the Gypsy and Traveller community. The Local Plan provides an opportunity to set out specific policies for particularly sensitive communities that seek to address particular sustainability issues and which could include requirements for new development in and around those areas.

Key Issues

- In line with national trends there is an increasing and ageing population.
- Maintaining the identity of settlements and communities in both rural and urban areas.
- Meeting the needs of communities with different sustainability issues and ensuring that any opportunities to address these issues are maximised. For example, Dunstable and Houghton Regis are more culturally diverse than the other settlements within Central Bedfordshire.
- There may be a need to accommodate housing growth from outside the Plan area.

- Minimising the loss of important Green Belt land that provides protection for soil quality and open land.
- There is poor access to services and facilities in some areas of Central Bedfordshire, particularly in rural settlements.

Economy and Employment

- 3.13 This topic explores the distribution and types of employment available within Central Bedfordshire, as well as the working patterns of the residents, including where these extend outside of the plan area.
- 3.14 The main industries of employment within Central Bedfordshire include wholesale and retail trade (including repair of motor vehicles and motor cycles) (17.1%), education (10.5%), manufacturing (10%), construction (9.7%) and human health and social work activities (9.6%). In line with national trends employment in manufacturing (decreased by 7.7%) and agriculture, forestry and fishing (decreased by 0.7%) have decreased since 2001. It should be noted agriculture, forestry and fishing only accounts for 0.7% of employment within Central Bedfordshire. The most notable increases in employment from 2001 to 2011 were in education (3% increase), construction (1.7% increase), human health and social work activities (1.5%) and public administration and defence (1.11%)¹⁸. Along with these key sectors there are also a number of specialisms, which reflect Central Bedfordshire's strengths in the engineering/manufacturing sector. The rural economy also plays an important role through leisure and tourism as well as veterinary activities¹⁹. In 2011, Construction had the highest turnover at just over £2.5 million with Production having the second highest turnover at just over £2 million within Central Bedfordshire²⁰.
- 3.15 The number of people in employment within Central Bedfordshire increased from 75.8% in September 2013 to 81.6% in December 2014. This rate decreased to 78.6% in September 2015. The employment rate in Central Bedfordshire is higher than all comparator areas - England 73.6%, East of England 76.8% and South East Midlands Local Enterprise Partnership (SEMLEP) 77.1%. Economic activity (85%) and employment (82%) rates are higher in Central Bedfordshire when compared to England (77% and 73% respectively). It should be noted that economic activity includes both people in employment and those who are unemployed but actively looking for work²¹.
- 3.16 The unemployment rate in September 2015 was lower in Central Bedfordshire (3.4%) when compared to national (5.3%) and regional (East of England 4.2% & SEMLEP 4.3%) comparators. There were significant declines in the unemployment rate in Central Bedfordshire from early 2013 till late 2014. Since then, the rate of decline has reduced and begun to level out. The five wards

¹⁸ 2011 Census Information

¹⁹ Central Bedfordshire Council (Sept 2012) Central Bedfordshire Local Economic Assessment.

²⁰ Ibid.

²¹ Central Bedfordshire Council (February 2016) Quarterly Economic Monitoring Report.

with the highest unemployment rates within Central Bedfordshire are Tithe Farm; Parkside; Dunstanble Manshead; Dunstable Northfields and Sandy²².

- 3.17 Central Bedfordshire residents earn more than the England average (weekly gross pay (median for full time workers 2015)). They also earn more than the people who commute to work in Central Bedfordshire, which is likely to be a result of better paid opportunities available to those who commute to work in the surrounding areas, including London. Half of all Central Bedfordshire residents commute outside of the area to work. Residents are commuting to Hertfordshire (14.4%); Luton (9.6%); London (7.3%); Milton Keynes (6.1%); Bedford (5.3%) and other areas (7.4%)²³.
- 3.18 In January 2016 there were 142 new small business start-ups, which is 8.5% start-ups for every 10,000 people of working age in Central Bedfordshire compared to 9.1% for the East of England. The number of business births in Central Bedfordshire increased marginally by 0.65% between 2013 and 2014, which is slightly below national comparators (UK 1.18% and England 1.41%) but above regional comparator (0.08%). The number of business deaths in Central Bedfordshire decreased by 5.1% between 2013 to 2014, which is significant when compared to national and regional comparators which experienced increases (UK increase of 3.44%, England 3.68%) and East of England 1.27%)²⁴.
- 3.19 The number of people who are self-employed in Central Bedfordshire steadily increased from September 2013 to June 2015. Since then, there has been a slight decrease from 17.7% to 17.3%. Despite this, the percentage of self-employed people in Central Bedfordshire is still higher when compared to England (15.1%), the East of England (14.5%) and the South East Midlands Local Economic Partnership (14.5%). It should be noted that the number of self-employed males increased by 600 between June 2015 and September 2015 while the number of self-employed females significantly fell by 1,000²⁵.
- 3.20 The number of vacant units (A class premises) within town centre boundaries in Central Bedfordshire decreased from 80 in February 2015 to 66 in August 2015. Since then, there has been an increase in the number of retail vacancies from 69 in November 2015 to 78 in February 2016. Dunstable has a significantly higher number of retail vacancies when compared to other towns in Central Bedfordshire at a rate of 17.7%. It should be noted that except for Dunstable, all the remaining towns in Central Bedfordshire are below the national vacancy rate of 8.7%²⁶. Evidence suggests that Leighton Buzzard and Biggleswade appear to be viable town centres that are performing well and fulfilling their roles. Dunstable, with its high level of vacancies and poor environment, is facing a challenging future without any intervention. The smaller centres are fulfilling their roles and convenience and service centres serving local catchments – they have a range of provision

²² Ibid.

²³ Central Bedfordshire (January 2016) Key Facts and Figures.

²⁴ Central Bedfordshire Council (February 2016) Quarterly Economic Monitoring Report.

²⁵ Ibid.

²⁶ Ibid.

and low vacancy rates. The retail study also demonstrates that there are relatively high outflows of retail and convenience areas for some areas.²⁷

- 3.21 The Employment and Economic Study²⁸ identifies a large amount of vacant land in Central Bedfordshire, and a relatively high proportion of poor sites which may affect the attractiveness of the employment land market across the area. A significant oversupply of industrial land within the Plan area is also demonstrated. There has been a slight increase in the number of people from 17,600 in June to 17,900 in September 2015 receiving job-related training. There were 700 apprenticeship starts in Central Bedfordshire between August and October 2015 and 2,070 starts in the full year 2014/2015²⁹.
- 3.22 The Government's 2010 strategy 'Britain's Superfast Broadband Future' has allocated significant funding towards a Joint Local Broadband Plan³⁰ between these three authorities to improve broadband provisions across the area which can further support home-working. Despite this, in 2011, approximately 4.3% of residents in Central Bedfordshire aged between 16 and 74 years identifies themselves as working mainly at or from home, compared to approximately 3.4% in England³¹. Under the Joint Local Broadband Plan³² approximately 96.5% of Central Bedfordshire will be able to receive superfast broadband (speeds of at least 24 megabits per second) by 2018/19.

Evolution without the Plan

- 3.23 Without the Plan there is likely to be a less coordinated approach to the delivery new employment, housing and infrastructure. New employment and infrastructure is less likely to be delivered where it is needed most. This could affect the current trends of increased employment activity and reduced employment. It could also reduce opportunities to address existing issues, such as the high level of commuting out of Central Bedfordshire for employment and high retail vacancy rates in Dunstable.

Key Issues:

- Approximately 50% of residents commute to the surrounding areas including Hertfordshire, Luton, London, Milton Keynes and Bedford.
- People who work in Central Bedfordshire earn less than those who work in the nearby areas, such as those working in Hertfordshire, Luton, London, Milton Keynes and Bedford.
- Dunstable has a significantly higher retail vacancy rate compared to the national rate.
- The wards of Tithe Farm, Parkside Dunstable Manshead, Dunstable Northfields and Sandy are currently experiencing higher rates of unemployment compared to the other wards in Central Bedfordshire.

²⁷ Central Bedfordshire Council (January 2013) Retail Study.

²⁸ GVA (2012) Central Bedfordshire Council Employment & Economic Study - Stage 1 Report

²⁹ Central Bedfordshire Council (February 2016) Quarterly Economic Monitoring Report.

³⁰ Milton Keynes, Central Bedfordshire and Bedford Joint Local Broadband Plan (JLBP) April 2012

³¹ ONS (2011) Neighbourhood Statistics - Central Bedfordshire Local Authority

³² Milton Keynes, Central Bedfordshire and Bedford Joint Local Broadband Plan (JLBP) April 2012

- There are relatively high outflows of retail and convenience spending.
- Evidence suggests that there is a significant oversupply of industrial employment land, and that the quality and typologies will be an important factor for future development.
- Key economic sectors include wholesale and retail trade, construction, production and education.
- Both the urban and rural economies are important for the Central Bedfordshire economy as a whole.

Health and Equalities

- 3.24 This topic explores the health of residents within Central Bedfordshire, as well as existing inequalities and areas of deprivation. It also identifies the types of leisure and recreational facilities available, and how the built environment currently contributes to encouraging healthy and active lifestyles.
- 3.25 The health of people in Central Bedfordshire is generally better than the England average. Deprivation is lower than average; however, about 13.1% (6,500) of children live in poverty. Life expectancy for both men and women is higher than the England average. However, it should be noted that life expectancy is 6.0 years lower for men and 5.2 years lower for women in the most deprived areas of Central Bedfordshire than in the least deprived areas³³.
- 3.26 Estimated levels of adult excess weight are the only health indicator measured within the Public Health England profile³⁴ that is ranked significantly worse than the England average. Estimated levels of adult smoking are better than the England average, along with rates of hip fractures, sexually transmitted infections and TB. Rates of statutory homelessness, violent crime, long term unemployment, drug misuse, early deaths from cardiovascular diseases and early deaths from cancer are also better than the England average.
- 3.27 Local health priorities in Central Bedfordshire are to ensure good mental health and wellbeing at every age, to give every child the best start in life, to enable people to stay healthy for longer, and to improve outcomes for frail older people.
- 3.28 Statistics for GCSE attainment, under 18 conceptions, obese adults, incidence of malignant melanoma, excess winter deaths, infant mortality, and those killed and seriously injured on roads do not significantly differ from the England average.

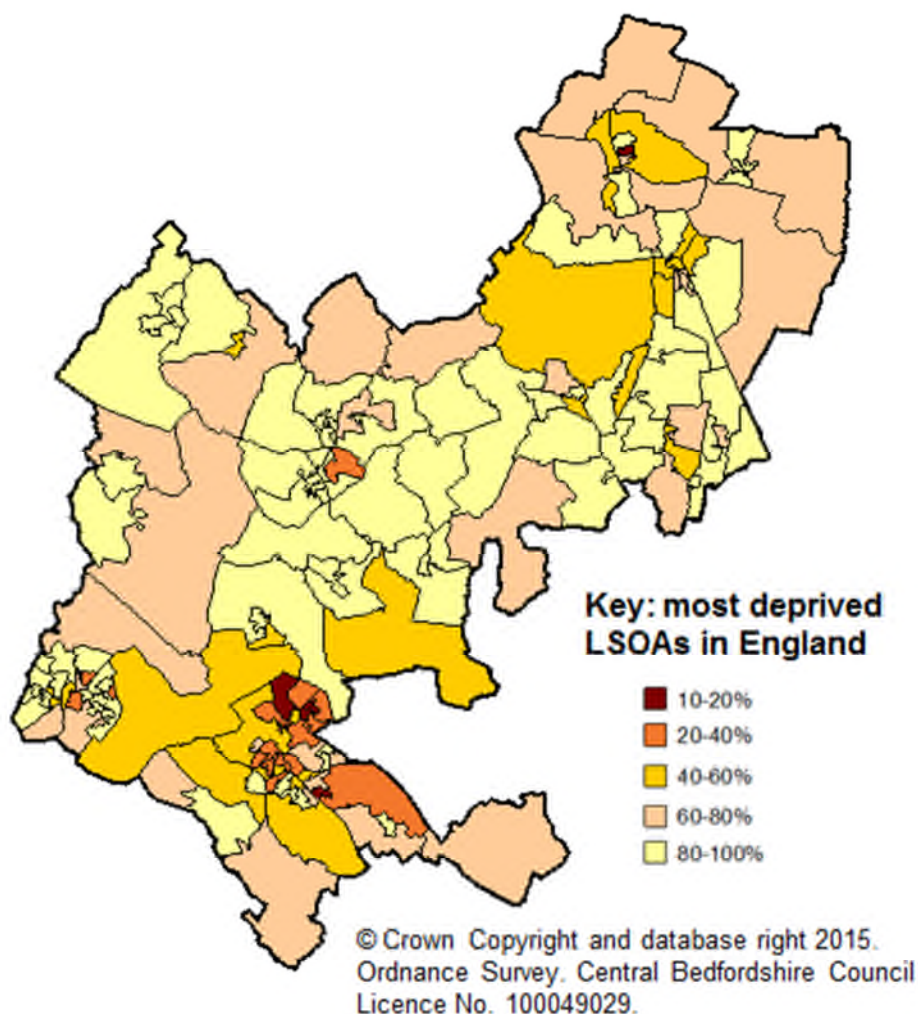
³³ Public Health England (2015) Central Bedfordshire Health Profile 2015.

³⁴ Ibid.

- 3.29 The areas with higher levels of deprivation are generally in the south of Central Bedfordshire near to the boundary with Luton Borough Council. This includes the settlements of Houghton Regis, Dunstable and Caddington.
- 3.30 The Council has investigated the domains (particular aspects) of deprivation and have identified particular localised issues as follows³⁵:
- Education, skills and training: a particular issue in eight Lower Super Output Areas (LSOAs) in parts of Dunstable, Manshead, Flitwick, Houghton Hall, Leighton Buzzard North, Parkside, Sandy and Tithe Farmwards;
 - Crime and disorder: a particular issue in 14 LSOAs in parts of Caddington, Dunstable, Central, Dunstable Ickniel, Dunstable Northfields, Dunstable Watling, Houghton Hall, Leighton Buzzard North, Leighton Buzzard South, Parkside and Tithe Farmwards;
 - Barriers to housing and access to services: a particular issue in eight LSOAs in parts of Aspley & Woburn, Caddington, Cranfield & Marston Moretaine, Eaton Bray, Heath & Reach, Northill, Potton, Sandy, Shefford, Silsoe & Shillington wards.
 - Income: a particular issue in part of Dunstable Manshead ward.
 - Children: two LSOAs, in Houghton Hall and Dunstable Northfields, were among the worst 10% of areas in England and Wales for deprivation affecting children.
 - Older people: two LSOAs were among the 10-20% worst areas in England and Wales for deprivation affecting older people. These were in Sandy and Dunstable Manshead wards.

³⁵ Ibid.

Figure 3.1: Deprivation by LSOA in Central Bedfordshire



Source: Office for National Statistics

3.31 The Outdoor Access Improvement Plan³⁶ identifies that of the total population of Bedfordshire, 96% of people accessed the countryside, and of those residents who undertook the various activities within the countryside, 63% indicated that they used footpaths, bridleways, cycle paths or other tracks rather than pavements or roads always or often. In addition, 83% of resident visit country parks at some time. 94% of those surveyed agreed that having green space close to where they live is important to them and is an important part of their life.

3.32 There are six leisure centres located within the Plan area, at Dunstable, Flitwick, Houghton Regis, Sandy, Biggleswade and Leighton Buzzard, and a range of smaller private and community indoor sports facilities across Central Bedfordshire. The Council further identifies over 1000 hectares of countryside managed for public access, wildlife, biodiversity and habitat; including

³⁶ Central Bedfordshire Council (2013) Your Countryside - The Outdoor Access Improvement Plan for Central Bedfordshire 2013 to 2031.

woodlands, meadows, wetlands, chalk grasslands and moors³⁷. Notable countryside sites³⁸ are relatively well distributed across the whole of Central Bedfordshire, with a cluster of larger sites located north of Leighton Buzzard across the authority areas of Central Bedfordshire, Aylesbury Vale and Milton Keynes. The north east of Central Bedfordshire around Sandy and Biggleswade has the lowest level of countryside sites.

- 3.33 In 2015 five national Green Flag Community Awards were awarded at Studham Common, Linslade Wood, Tiddenfoot Waterside Park, Stotfold Mill Meadows, and Flitton Moor. Houghton Hall Park is a 17 hectare urban public park, located centrally within Houghton Regis, which has been awarded a funding bid from Heritage and Big Lottery Funds 'Parks for People' grant scheme. Notable major countryside recreational sites include (but are not limited to):
- Rushmere Country Park; 210 hectares situated at the western tip of the Greensand Ridge
 - Aspley Woods; 324 hectares providing a network for pedestrians, cyclists and horse riding through the woods
 - Marston Thrift; 56 hectares of woodland
 - Heath Wood; 8 hectares located north of Leighton Buzzard
 - Knolls Wood; 5 hectares notable for its trees including monkey puzzle and giant redwoods
 - Cranfield Millenium Park; a small area of greenspace on the edge of village offering outstanding views
 - Duck End Nature Reserve; a small 0.84 hectare wetland habitat providing a broadwalk over the wettest parts where invertebrates thrive
 - Flitwick Moor; the most important wetland in Bedfordshire formed by peat cutting which took place until the 1960s
 - Flitwick Wood; 13.8 hectares of woodland with surfacing appropriate for wheelchairs and pushchairs
 - Campton Plantation; 15.4 hectare woodland site which includes trail activities
 - Baulk Wood; woodland and meadow over a former landfill site including children's play area and annual events
- 3.34 In addition to the major countryside recreation sites, Central Bedfordshire has a range of amenity, play and recreation open space located through the urban and village areas. These sites offer a variety of facilities and opportunities close to where people live and work. To facilitate and encourage more formal sporting activities, Central Bedfordshire has a diversity of outdoor sporting venues which offer pitches, courts and greens to serve a number of sports. In addition to formal clubs, community sports facilities offer both formal and informal sporting opportunities.
- 3.35 These sites all provide a wealth of leisure and recreational opportunities for all members of the community, including the young, elderly and disabled.

³⁷ Central Bedfordshire Council (2016) Leisure & Countryside Online Information

³⁸ Central Bedfordshire Council (2014) Countryside Sites Map

Evolution without the Plan

- 3.36 The Local Plan can provide enhanced protection for Green Infrastructure networks, ensuring existing spaces are not lost to new development, and that new development contributes to enhancing assets, as well as seeking to achieve overall connectivity and equality of provision at the strategic scale. With a wealth of existing Green Infrastructure sites and more local sporting and recreational areas, new development can be planned to ensure accessibility and increase opportunities for healthy and active lifestyles. The Plan can also strategically target planning gains at most deprived areas, and thus seek to reduce inequalities. The local plan can therefore ensure that the built environment contributes to delivering health benefits, and supports healthy, inclusive and active communities. Without a Plan in place development is less likely to deliver health benefits. There would also be an increased likelihood of negative effects on Green Infrastructure networks and existing facilities (for example through loss of undesignated areas or established facilities, or fragmentation of spaces), and less clarity over the type of provisions expected within new development.

Key Issues

- There are areas of higher deprivation in the south of the Plan area, particularly around the boundary with Luton Town.
- Trends show that deprivation is increasing in the north of the Plan area, although this remains below areas in the most deprived 30% in England.
- The potential loss of Green Infrastructure as well as the new provision of areas of open space or recreation for people.
- Improving the quality of existing Green Infrastructure, open space and recreational areas.
- A need to reduce excess weight in adults, which is ranked significantly worse than the England average.

Transport and Movement

- 3.37 This topic explores existing and planned transport infrastructure, existing local transport constraints, and patterns of movement across the plan area. This topic is closely linked with the topics of air quality and climate change, as potential effects on traffic are likely to lead to indirect effects on air quality and levels of greenhouse gas emissions.
- 3.38 Central Bedfordshire has numerous key road connections running through the Plan area including the strategic road connections of the M1, A1, A5 and A421. The plan area has good existing north-south links; however, it is recognised that there are strategic gaps in movement east to west. Though partially rectified with the opening of the A421, this is likely to be improved

with the A5-M1 link which began construction in 2015 and is expected to be complete in the summer of 2017³⁹.

- 3.39 There are also three strategically important rail lines; the East Coast Mainline, the Midland Mainline and the West Coast Mainline; serving the towns of Sandy, Biggleswade, Arlesey, Flitwick, Harlington, Aspley Guise, Ridgmont, Lidlington, Millbrook, Stewartby, and Leighton Buzzard. A new station at Wixams is proposed (currently has planning permission) which when delivered be an addition to the Midland main Line⁴⁰, located just north of Houghton Conquest, outside of the Plan area. Further to this the preferred route for the East West Rail project has recently been announced and will include a central corridor between Bedford and Cambridge that will run via Sandy in Central Bedfordshire. The western corridor runs from Oxford to Winslow, Bletchley, Milton Keynes and Bedford. Ridgmont Station (located in Central Bedfordshire) is a confirmed station along the western section.⁴¹ Bus services operate between the main urban areas in Central Bedfordshire, and connect to neighbouring areas such as Bedford, Luton, Milton Keynes and Hertfordshire. The rural areas of Central Bedfordshire are predominantly served by bus services supported by the Local Authority.
- 3.40 The Walking Strategy⁴² identifies that Central Bedfordshire is conducive to encouraging walking due to the relatively flat topography and in containing a number of small towns all of which provide services accessible within a short walk. Despite this, walking only represents around 8% of journeys to work, although over half of all children walk to school on a regular basis. Similarly the Cycling Strategy⁴³ identifies that Central Bedfordshire is conducive to encouraging cycle use due to the same reasons, and identifies almost 60% of residents having access to a bike. Despite this in 2010 only 2.6% of journeys to work were by bike, although almost 1 in 5 residents cycle at least once a week. Away from the main towns, the Public Rights of Way network stretches over 1300km and opens up the countryside for rambling.
- 3.41 There have been a number of changes since the adoption of the Local Transport Plan 3 in 2011. These will be reflected in a new strategic approach to investing in transport across Central Bedfordshire through a new Local Transport Plan 4.⁴⁴ These include changes in Government policy and local priorities following elections in 2015; new opportunities for funding; establishment of Highways England (2015); completion of the Woodside Link & A5-M1 (spring 2017) as well as new major scheme priorities identified and the production of a new Local Plan. In addition to this, it is a priority for the authority to produce a Passenger Transport Strategy and a new Parking Strategy in the near future. These are currently being produced and will be completed ahead of LTP4 and then be incorporated into the Plan.

³⁹ Highways England: A5-M1 Link (Dunstable Northern Bypass)

⁴⁰ Gallagher Estates: Wixams Settlement and Station

⁴¹ Network Rail (2016) East-West Rail Project

⁴² Central Bedfordshire Council (2011) Local Transport Plan Appendix E - More People Walking - The Walking Strategy for Central Bedfordshire

⁴³ Central Bedfordshire Council (2011) Local Transport Plan Appendix F - More People Cycling - The Central Bedfordshire Cycling Strategy

⁴⁴ Central Bedfordshire Council (April 2016) Executive Report for the new Local Transport Plan 4

3.42 The Council is proposing to focus the new LTP4 on delivering sustainable growth, which is considered to be the single most predominant issue facing the authority. Given this focus, there will be three broad areas through which transport can contribute to facilitating growth, and these three areas are intended to form the objectives of the Plan. The objectives will be supported by a series of targets and indicators, and where possible these will be the same as those adopted at the start of LTP3, to ensure continuity in monitoring and enable the Council to identify trends over a longer period of time. of the LTP4 are as follows:

- **Objective 1: Capacity – Provide the transport capacity to facilitate growth:**
New development will increase pressures on the transport network and the demand to travel in the local area. Providing new capacity and making better use of the existing capacity will allow the authority to absorb this increase and accommodate additional trips, to enable development to come forward and minimise the impact on existing residents.
- **Objective 2: Connectivity – Improve connectivity to jobs and services:**
Connected communities which can readily access the new jobs and opportunities provided by growth ensure that all local residents can realise the benefits associated with new investment in an area. Improved connectivity also helps to give business a competitive advantage and embed sustainability into the growth agenda.
- **Objective 3: Communities – Create safe and attractive communities:**
Safe, attractive and inclusive communities are places in which people want to live and businesses want to invest. Through the creation of more civilised streets, reducing the impact of traffic and improving safety and personal security, transport investment can help create communities and preserve a local environment that draws in external investment.

3.43 The Freight Strategy⁴⁵ identifies that the M1 corridor running through Central Bedfordshire is a strategic location for the warehousing and transportation industry, providing good and fast access to the major strategic/national network. A number of large industrial parks, many home to national and regional distribution centres of large corporations are located close to M1 Junctions 9 through to 13 and along the A421 linking Bedford to the M1. Improvements to M1 Junctions 10 to 13 and dualling of the A421 to the west of the motorway are partly in response to the impacts upon freight flows attributed to these large facilities. Other sites generating freight movements are located throughout Central Bedfordshire with industrial parks and warehousing facilities clustered around trunk roads by Ampthill / Flitwick, Sandy / Biggleswade, Houghton Regis / Dunstable and Leighton Buzzard / Linslade.

3.44 Significant employment areas are largely based in the surrounding major urban areas, as well as a wider range of services and facilities; and although these are accessible by public transport, the distances to these centres result

⁴⁵ Central Bedfordshire Council (2011) Local Transport Plan - Appendix D - Freight Strategy

in journeys (particularly to work) which are much longer than average, with high levels of out-commuting placing additional pressure on the strategic transport routes⁴⁶. Roughly 49.3% of all residents (aged between 16 - 74 years) reported driving to work in a private vehicle in 2011, compared to the England average of around 35.9%. Around 8.7% of all households also reported owning 3 or more cars in 2011, compared to the England average of 5.4%⁴⁷. It is also recognised that within Central Bedfordshire encouraging walking and cycling is challenging due to the relatively long distances travelled, as well as the quality of networks and perceptual barriers (e.g. estimations of time and distance). The longer journey times to access services and facilities also has implications for communities, and it is recognised that poor accessibility can exacerbate social exclusion, particularly for residents of rural areas, and lower income groups and the elderly.

- 3.45 It is also important to note that road traffic is very closely linked to air quality, and concentrations of air pollutants are particularly high where the road network is congested. The Local Transport Plan⁴⁸ seeks to address this by reducing the demand for travel, and encouraging the use of non-car modes of transport (through appropriate promotion and investment), as well as investment in low carbon forms of motorised transport.
- 3.46 The Local Transport Plan⁴⁹ further identifies schemes that are currently being delivered to improve transport and accessibility across the plan area, including:
- Freight re-routing investigation, walking and cycling improvements and public transport information provision in Sandy
 - Public transport interchange improvements, walking and cycling improvements, and town centre junction improvements in Biggleswade
 - Bus stop and information enhancements, development of a cycle network, and new pedestrian crossing near school in Arlesey & Stotfold
 - Introduction of shared space, bus stop and information enhancements, and pedestrian and cycling improvements in Dunstable & Houghton Regis
 - Access improvements to station, bus stop and information enhancements, and parking improvements for residents in Leighton Linlade.
- 3.47 11 Local Area Transport Plans (LATPs) cover the whole of the plan area and identify a number of localised transport and accessibility issues. From these Plans common issues across the differing plan areas can be identified and include:
- Poor access to services and facilities for the smaller settlements surrounding the main towns.
 - Improving the quality of public transport infrastructure (e.g. waiting areas).
 - Maintaining and improving the frequency and routes of rural bus services.

⁴⁶ Central Bedfordshire Council (2011) Local Transport Plan 3

⁴⁷ ONS: Neighbourhood Statistics for Central Bedfordshire Local Authority

⁴⁸ Ibid.

⁴⁹ Ibid.

- Tackling built environment features that restrict pedestrian movement (e.g. excessive guard railing in Flitwick and Biggleswade Market Place).
- Tackling demand for town centre parking, and improving existing town centre parking provisions.
- Improving dedicated cycle provisions.
- Integrating bus and rail services to allow for interchange between services.
- Improving the quality and experience of pavements / walking routes.

Evolution without the Plan

3.48 Without the Local Plan development may be less likely to deliver the necessary highways capacity improvements to accommodate the cumulative impact of new development. The Local Plan can strategically plan for development in areas where the existing transport networks can accommodate growth, or where the necessary improvements can be more easily provided, and in locations which improve accessibility for local communities. The Local Plan provides an opportunity to coordinate the delivery of new housing, employment and infrastructure which will be more effective in helping to improve accessibility and reduce the need to travel. The Local Plan can also provide rural development that supports key services and facilities that contribute to improving accessibility within the countryside. A key issue within the plan area relates to the levels of out-commuting. The Local Plan can direct new strategic employment development to combat out-commuting and contribute towards the Local Transport Plan goal of reducing the demand for travel.

Key Issues

- In a number of areas there is insufficient highway capacity to meet current and future demands. This results in congestion at peak times, predominantly in the main urban areas and on the strategic road network.
- Public transport is less accessible and frequent in rural areas compared to some of the larger settlements.
- Approximately 50% of residents commute for work to the surrounding areas - including Hertfordshire, Luton, London, Milton Keynes and Bedford - predominantly using the private vehicle.
- Ensuring new development is in accessible locations that reduce the need to travel.
- Supporting a modal shift, and a built environment that supports a modal hierarchy in which the pedestrian and cyclist have appropriate priority.

Air Quality

3.49 This topic explores air quality within the plan area, and the contributors to poor air quality.

- 3.50 Road traffic is very closely linked to air quality, and concentrations of air pollutants are particularly high in Central Bedfordshire where the road network is congested⁵⁰. There are 3 Air Quality Management Areas (AQMAs) designated for exceedances of Nitrogen Dioxide (NO₂) within Central Bedfordshire:
- Sandy - The designated area incorporates 10 metres from the kerbside of both sides of the A1 at the Georgetown exit, then south along the London Road A1 to the Bedford Road junction.
 - Ampthill - The declared area incorporates part of Bedford St between Market Square and Brewers Lane on both sides of the road.
 - South Bedfordshire - The AQMA incorporates Dunstable Town Centre, the A505 from the town centre to the junction of Poynters Road/Dunstable Road, the A5 from Union St to Borough Road, and the B489 - West St from the town centre to St Marys Gate.
- 3.51 Currently Central Bedfordshire uses some 47 passive diffusion tubes to monitor nitrogen dioxide and 4 real time analysers to monitor nitrogen dioxide, particulate matter (PM10 and PM2.5) and ground level ozone⁵¹.
- 3.52 The Herts and Beds Air Quality Network analysed the annual mean long-term trends for each pollutant. The Annual Report (2014) states that the trends of peak ozone concentrations are slowly rising in recent years and follow the same pattern as other UK sites. There is a general decrease in PM10 annual mean concentrations that may be flattening in recent years. Ozone shows an increase up until 2003, levelling off until 2010 followed by an increase. The recent increase may be due to the closure of ozone monitoring sites in the urban areas. Nitrogen dioxide and nitrogen oxides at roadside locations declined until 2007 followed by an increase in recent years. The trend for background locations is generally downwards. Carbon monoxide and sulphur dioxide has had dramatic declines. The Annual Report (2014) notes that these long-term trends follow a similar pattern to the national Automatic Urban and Rural Network (AURN)⁵².

Evolution without the Plan

- 3.53 Without the Plan there is likely to be a less coordinated approach to the delivery of new housing, employment and infrastructure in Central Bedfordshire. This could exacerbate congestion issues on the highway network and potentially affect air quality including the existing AQMAs. The Local Plan provides an opportunity to consider the cumulative effect of new development on the existing road network and determine what additional infrastructure and wider mitigation is necessary to minimise impacts. New housing, employment and infrastructure can be delivered alongside improvements to public transport in areas that will help to reduce the need to travel and potentially help to address an existing area of congestion, such as within one of the existing AQMAs.

⁵⁰ Central Bedfordshire Council (2011) Local Transport Plan 3

⁵¹ <http://www.centralbedfordshire.gov.uk/environment/types-pollution/air/quality.aspx>

⁵² The Herts and Beds Air Quality Network Annual Report 2014.

Key Issues

- 3 AQMAs designated for exceedances of Nitrogen Dioxide in Sandy, Ampthill and Dunstable. Traffic is the primary cause for exceedances in National Air Quality Objectives.
- Road traffic is very closely linked to air quality, and concentrations of air pollutants are particularly high in Central Bedfordshire where the road network is congested.

Energy and Climate Change

- 3.54 This topic explores current energy consumption across the plan area, as well as renewable energy capacity and the predicted effects of climate change. Flooding is dealt with separately in the water section.
- 3.55 The Department of Energy and Climate Change (DECC) produce the following consumption figures for Central Bedfordshire in 2013⁵³:
- Coal - a total of 127.5GWh (gigawatt hours) predominantly through industrial and commercial use.
 - Manufactured fuels - a total of 6.1GWh predominantly through domestic use
 - Petroleum - a total of 3222.4GWh predominantly from road transport.
 - Gas - a total of 1780.8GWh predominantly through domestic use.
 - Electricity - a total of 1023GWh predominantly through industrial and commercial use.
 - Bioenergy - a total of 24.8GWh.
- 3.56 The statistics identify an average domestic consumption per household of 17.7MWh (megawatt hours). The total consumption of all fuels in Central Bedfordshire in 2013 was 6,184.6GWh, which has been steadily increasing since 2011 when 6111.7GWh were consumed, but remains below the 2010 level of 6405.9GWh. However, the current Renewables Capacity Study⁵⁴ estimates that the total energy demand in Central Bedfordshire could rise over coming years, largely due to an increased electricity consumption. It will be important to implement measures to reverse the current trend of increased consumption each year and achieve overall reductions.
- 3.57 The Renewables Capacity Study⁵⁵ further identifies that a range of renewable energy projects are already operational in Central Bedfordshire. Currently there are 8 solar farms with a combined generating capacity of just over 94MW, providing enough energy to power 28,576 homes. There is also a 28 MW windfarm (Co-op windfarm in Langford is the largest at 20 MW) and 27 MW of energy produced from landfill gas. The Capacity Study identifies a

⁵³ DECC (2013) Sub-national total final energy consumption statistics 2005 - 2013

⁵⁴ LDA Design (2014) Renewables Capacity Study for Central Bedfordshire

⁵⁵ Ibid.

recent surge in the popularity of solar farms. Further interest in wind turbines and biomass plants demonstrate that renewable energy development is relatively active in Central Bedfordshire, and the Report identifies that there is significant capacity for more renewable energy development. The Council have also produced Renewable Energy Planning Technical Guidance⁵⁶ Notes which help to steer the most appropriate renewable technology to the most suitable area and inform planning decisions.

3.58 The Councils Climate Change Strategy⁵⁷ identifies that UK CP09 projections for the East of England identify the following main changes to the climate by the 2020's;

- Decreases in summer rainfall
- Increases in winter rainfall
- Increases in summer and winter temperatures
- More extreme weather events (more storms, heat waves, droughts, flooding and high speed winds)

3.59 The Central Bedfordshire Climate Change Adaptation Evidence Base Report⁵⁸ identifies that the impacts of climate change that are likely to affect Central Bedfordshire most are:

- Flooding
- Water resources
- Overheating
- Subsidence
- Risks to the natural environment

3.60 The Department of Energy and Climate Change (DECC) produce the following emissions figures for sectors in Central Bedfordshire in 2013⁵⁹:

- Industry and Commercial; 439.2 kt CO² in 2012
- Domestic; 575 kt CO² in 2012
- Transport; 730.4 kt CO² in 2012

3.61 Evidence therefore suggests that road transport is the biggest contributor to greenhouse gas emissions within Central Bedfordshire at approximately 42% of the total emissions. However, it is also important to note that domestic use contributes approximately 33% and industry and commercial contributes approximately 25% to the total greenhouse gas emissions in Central Bedfordshire⁶⁰.

⁵⁶ Central Bedfordshire Council; Renewable Energy Planning Technical Guidance Note 1 (Wind Energy Development in Central Bedfordshire, 2013) and Guidance Note 2 (Solar Farm Development in Central Bedfordshire, 2014)

⁵⁷ Central Bedfordshire Council (2010) Climate Change Strategy

⁵⁸ LDA Design (2012) Central Bedfordshire Climate Change Adaptation Evidence Base Final Report

⁵⁹ DECC (2013) Local and Regional CO₂ emissions 2005 - 2012

⁶⁰ Ibid.

Evolution without the Plan

- 3.62 Existing planning guidance provides a framework for the delivery of renewable energy technology. However, the Local Plan can provide further support in the long-term approach to climate change mitigation and adaptation, particularly through; setting aspirational energy efficiency targets for new development; the appropriate siting of new development; and the delivery of mitigation measures like new green infrastructure, sustainable drainage systems in new development and contributions to improved flood defence. Without the Plan therefore, development may be less ambitious in its energy performance, and planning gains are less likely to be delivered in a timely and coordinated manner.

Key Issues

- Evidence suggests that demand for energy is rising.
- Road transport is the biggest contributor to greenhouse gas emissions; however, commercial and industrial buildings are also significant contributors.
- Adapting to the predicted effects of climate change.
- Evidence suggests that there is significant capacity for new renewable energy development.

Water: Resources, Quality and Flooding

- 3.63 This topic explores all aspects of the water environment in Central Bedfordshire, including the demand for and supply of water, waste water treatment, the quality of water bodies in the plan area, and fluvial and pluvial flood risk.
- 3.64 The majority of Central Bedfordshire falls within the Ruthamford South Water Resource Zone (WRZ), which is supplied by Anglian Water. A small proportion of Central Bedfordshire to the south falls within the Lee WRZ, which is supplied by Affinity Water.
- 3.65 The Anglian Water Resource Management Plan forecasts that under dry year annual average conditions and without investment to maintain the supply-demand balance, the Ruthamford South WRZ will be in deficit by 2026/27, reaching 28.5 Ml/d in 2039/40. This is predominantly as a result of historic levels of growth and adjustments to the water available from Grafham Reservoir. The Anglian WRMP sets out a number of schemes to maintain the supply-demand balance which includes the recommissioning of the Foxcote Reservoir and additional leakage control and water efficiency⁶¹.
- 3.66 The Affinity WRMP forecasts that the Lee WRZ will also be in deficit during the Plan period without appropriate mitigation and investment. One of the primary reasons for this is that the population is projected to grow by 25% within the Lee WRZ during the life of the WRMP. The Plan proposes a number

⁶¹ Anglian Water (2015) Water Resources Management Plan.

of options to maintain the supply-demand balance including reducing leakage and improving water efficiency.

- 3.67 It is also recognised within the Central Bedfordshire Climate Change Adaptation Evidence Base Report⁶² that one of the most likely effects of climate change to impact upon Central Bedfordshire will be a shortage of water resources.
- 3.68 Central Bedfordshire falls within the Upper and Bedford Ouse catchment management area, which is itself comprised of six smaller catchments. The area to the north and north east of Luton falls within the Ivel catchment. The area to the west Luton and south east of Milton Keynes falls within the Ouzel and Milton Keynes catchment. The overall water quality classification status for the water bodies within these two catchments are predominantly moderate. Within the Ivel catchment the New Inn and Hexton Brook to the east and west of Barton le-Clay as well as the Ickwell Brook in the north are identified as having good status⁶³.
- 3.69 The Clipstone Brook which falls within the Ouzel and Milton Keynes catchment is also identified as having good status. The Broughton Brook to the west (east of Milton Keynes) is the only water body to be identified as currently having an overall poor status within Central Bedfordshire⁶⁴.
- 3.70 There is no overall trend in terms of water quality within Central Bedfordshire. Some waterbodies have seen improvements over recent years and others have seen a decline⁶⁵. There are a variety of reasons as to why a waterbody does not achieve good status. These could include diffuse and point source pollution as a result of waste water treatment, agriculture and rural land management.
- 3.71 It should also be noted that the Anglian WRMP states that water resources, the supply-demand balance, are also affected by deteriorating raw water quality. Diffuse pollution is most commonly associated with the fertilisers and pesticides that are used in agriculture. These leach into water percolating through the ground and are transported to our groundwater and surface water sources. The vulnerable nature of the groundwater systems in East Anglia mean that they are similarly at risk from point source pollution⁶⁶.
- 3.72 Records of historic flooding are spread throughout Central Bedfordshire, but there is a greater intensity of reported events to the centre and northeast of the area. It should be noted that the parishes of Ampthill, Arlesey, Clifton, Harlington, Northill, Sandy and Shefford have the greatest density of historical flooding incidences. Generally historic incidences within these parishes have been attributable to high water levels in field or highway drainage (ditches)⁶⁷.

⁶² LDA Design (2012) Central Bedfordshire Climate Change Adaptation Evidence Base Final Report

⁶³ Environment Agency - Catchment Data Explorer

⁶⁴ Ibid.

⁶⁵ Ibid.

⁶⁶ Anglian Water (2015) Water Resources Management Plan.

⁶⁷ Central Bedfordshire (Feb 2014) Local Flood Risk Management Strategy for Bedfordshire.

- 3.73 The areas of Ampthill, Campton and Chicksands parish and Henlow, each sited close to watercourses which flow eastwards towards the River Ivel, as well as Eaton Bray, are reported to have higher numbers of properties at risk than elsewhere within Central Bedfordshire. The parishes at greatest risk from surface water flooding are identified in the Local Flood Risk Management Strategy as Biggleswade; Dinstable; Flitwick; Houghton Regis and Leighton Buzzard.

Evolution without the Plan

- 3.74 Development will still come forward without the Plan and will need to be in line with current national and local policies and guidance in relation to the protection of water resources and quality; incorporation of efficiency measures; management of surface water run-off and avoidance of flood risk areas. However, the Local Plan gives the Council the opportunity to more effectively coordinate development and direct it towards those areas that are potentially less sensitive and have lower risk of flooding. It also provides an opportunity for the Council to set more aspirational requirements for future development in terms of water efficiency standards and the management of surface water run-off.

Key Issues

- Increased pressure on water resources particularly in the Anglian region as a result of high population density and relatively low rainfall.
- According to the EA water quality is declining in some areas and improving in others. The EA identifies agriculture and rural land management as being the primary reason for water bodies not achieving good status under WFD.
- High flood risk areas situated around existing water courses, and areas at risk of surface water flooding.

Soil and Land

- 3.75 This section explores the availability and quality of land across the plan area, to include the underlying geology, agricultural land and its quality, existing or potential contaminated land, Green Belt land, and the use of previously developed land.
- 3.76 The geology of Central Bedfordshire has shaped a number of the other topics discussed in the baseline information, including landscape, the historic environment, water resources, water quality, flooding, and economic mineral excavation. The geology of Central Bedfordshire is largely comprised of clay and chalk. The dominating soils include lime-rich loamy and clayey soils with impeded drainage, slightly acid loamy and clayey soils with impeded drainage, freely draining slightly acid loamy soils, freely draining slightly acid sandy soils, and shallow lime-rich soils over chalk or limestone.

- 3.77 The plan area is identified as a predominantly rural landscape (see landscape baseline information). Defra identifies small pockets of best and most versatile agricultural land situated largely around the borders of the Plan area, particularly surrounding Bedford and Milton Keynes, and also an area surrounding Biggleswade⁶⁸.
- 3.78 Of new employment completions in 2014/15, a high level (89%) were completed on previously developed land. Of all new housing completions in this same period, around 50% were located on previously developed land. Higher proportions of completions that were located on previously developed land were achieved in the south of the plan area, compared to the north⁶⁹.
- 3.79 In 2010, the Council identified some 1800 sites of potential concern of contamination due to their historical or current exposure to landfill, sand/clay extraction, and various other types of industrial land use. Further to this, some areas of Bedfordshire have been designated as lowest level radon affected areas and require case-by-case investigation⁷⁰.

Evolution without the Plan

- 3.80 Land and soils are key in the provision of new development, and development can lead to significant effects on the quantity and quality of soil. Development has the potential to result in the loss of best quality soils, and to affect the quality of base and surrounding soils as a result of disturbance or contamination. The Local Plan can act as a delivery mechanism for the protection of soil quality and appropriate direction of new growth, for example by directing development towards previously developed land where possible, or the appropriate minimisation of risks, for example requiring remediation of contaminated sites where necessary. Without the Local Plan, there is likely to be a less coordinated approach to the delivery of development. For example, development may not be directed to those areas of lower agricultural land quality.

Key Issues

- The retention and protection of best and most versatile agricultural land, which is a National issue.

Biodiversity and Geodiversity

- 3.81 This topic identifies designated biodiversity and geodiversity across the plan area as well as important habitats and species. It also seeks to identify key ecological corridors.
- 3.82 There are no European designated sites within Central Bedfordshire; however, previous Habitats Regulations Assessment work for the withdrawn Local Plan in

⁶⁸ Defra Magic Map Application

⁶⁹ Central Bedfordshire Council (2015) Annual Monitoring Report 2014/15

⁷⁰ Central Bedfordshire Council (2010) Contaminated Land Strategy 2010 - 2015

2014 scoped into the assessment the following European sites within the influence of the Plan:

Site Name	Designation	Distance from CBC boundary (km)
Chiltern Beechwoods	SAC	2
Eversden and Wimpole Woods	SAC	7.5
Chippenham Fen	Ramsar	42
Wicken Fen	Ramsar	35
Woodwatton Fen	Ramsar	29.5
Ouse Washes	SAC/SPA/Ramsar	43
Portholme	SAC	16
Fenland	SAC	29.5
Upper Nene Gravel Pits	SPA/Ramsar	25

3.83 There are a number of nationally designated sites, including 33 Sites of Special Scientific Interest (SSSIs) and 3 National Nature Reserves (NNR). Barton Hills NNR is recognised for neutral and calcareous grassland and ancient semi-natural woodland. King's Wood, Heath and Reach NNR is recognised for its ancient semi-natural woodland, neutral grassland and boulder clay grassland. Knocking Hoe NNR is an area of species rich calcareous grassland in the north of the Chilterns. For further details on the SSSI's and their qualifying features, please refer to Appendix 2 of the Nature Conservation Strategy (2015).

3.84 There are also a number of sites that are designated locally for their biodiversity and geodiversity importance, these include:

- 12 Local Nature Reserves (LNR); Galley and Warden Hills, Coopers Hill, Marston Thrift, Maulden Church Meadows, Flitwick Wood, Cottage Bottom Fields, Henlow Common and Langford Meadows, Kingswood and Glebe Meadows, Totternhoe Knolls, The Riddy, Flitton Moor and Stotfold Mills Meadows
- 267 County Wildlife Sites (CWSs); 8 are shared with Bedford, and 5 are shared with Luton
- 20 Road Verge Nature Reserves (RNRs); nine are within or adjacent to a SSSI
- 20 Local Geological Sites (LGSs)

3.85 Central Bedfordshire contains a variety of habitats and species which are recognised in Section 41 of the Natural Environment and Rural Communities Act 2006 as of "principal importance for the purpose of conserving biodiversity". Around 107 species and 18 habitats of 'principal importance' have been recorded in Central Bedfordshire. Some of habitats and species are set out below:

Species

- Great Crested Newt (*Triturus cristatus*)
- House Sparrow (*Passer domesticus*)

- Turtle Dove (*Streptopelia turtur*) and Spotted Flycatcher (*Muscicapa striata*) along with a range of other birds
- White Helleborine (*Cephalanthera damasonium*) amongst a few other flowering plants including other orchids such as the Man Orchid (*Aceras anthropophorum*) and Musk Orchid (*Herminium monorchis*)
- Butterflies such as the Small Heath (*Coenonympha pamphilus*), Small Blue (*Cupido minimus*) and Dingy Skipper (*Erynnis tages*)
- Depressed river mussel (*Pseudanodonta complanata*)
- Large Garden Bumble Bee (*Bombus ruderatus*)
- Slow worm (*Anguis fragilis*) and Common Lizard (*Zootoca vivipara*)
- Water vole (*Arvicola amphibius*), Hedgehog (*Erinaceus europaeus*) and Brown Hares (*Lepus europaeus*)

Habitats

- Lowland dry acid grassland
- Cereal field margins
- Floodplain grazing marsh
- Hedgerows
- Lowland beech and yew woodland
- Lowland calcareous grassland
- Lowland fens
- Lowland heathland
- Lowland meadows
- Lowland mixed deciduous woodland
- Open mosaic habitats on previously developed land
- Ponds
- Purple moor grass and rush pastures
- Reedbeds
- Rivers
- Traditional orchards
- Wet woodland
- Wood-pasture and parkland
-

3.86 While it is important to protect and conserve the designated sites and important species and habitats, it is also vital that the connectivity of habitats and therefore movement of mobile species are maintained and enhanced within and surrounding Central Bedfordshire. The figure below illustrates the connectivity of biodiversity networks across Central Bedfordshire.

3.87 Maintaining and enhancing these ecological corridors is also an issue for surrounding LAs. Local Plans must ensure that development seeks to avoid important biological networks and seeks opportunities to enhance them where possible.

3.88 The Greensand Ridge is a narrow, elongated, elevated area which runs in a north-east/south-west direction covering a significant part of Central Bedfordshire and is an identified Nature Improvement Area. The wildlife rich habitats that remain along the Greensand Ridge support a variety of species,

many of which are locally or nationally rare. The ecological evidence base for the Greensand Ridge⁷¹ identifies that the character of the Ridge, and the extent of its habitats have been eroded over time by changes in agricultural practices and the impact of people. Although core biodiversity hotspots still exist, they have become increasingly smaller and more isolated. This has had a dramatic impact on the ability of the Ridge to maintain sustainable populations of many of the species which contribute to its diverse habitats. The Nature Improvement Area designation aims to improve the connectivity of wildlife at the landscape scale, and ensure that in changing climatic conditions, biodiversity can move around to maintain healthy populations.

Evolution without the Plan

- 3.89 Development will still come forward without the Plan and will need to be in line with current national and local policies and guidance in relation to the protection of biodiversity and geodiversity. However, the Local Plan gives the Council the opportunity to more effectively coordinate development and direct it towards those areas that are potentially less sensitive. It also provides an opportunity to consider and address potential strategic cumulative effects on biodiversity that may not be taken into account at a lower level of plan-making. Development could be directed away from important ecological corridors or perhaps help to improve habitat connectivity, not only within Central Bedfordshire but into the surrounding areas.

Key Issues

- A number of nationally and locally designated sites for nature conservation and geodiversity as well as a range of important habitats and species.
- Important ecological corridors that run throughout Central Bedfordshire as well as into the surrounding LAs.
- Improving ecological connectivity within the Greensand Ridge Nature Improvement Area.

Landscape and Townscape

- 3.90 This topic explores both designated and non-designated landscapes, their special qualities and overall character, and the potential threats to both designated land and landscape character areas.
- 3.91 Central Bedfordshire stretches across the centre and south of the ceremonial county of Bedfordshire over an area of 716km². The area is predominantly rural, containing countryside, villages and small to medium sized towns including Leighton Buzzard and Dunstable. The area has a varied and distinct landscape, informed by the underlying geology of clay, chalk and greensand.

⁷¹ Bedfordshire, Cambridgeshire and Northamptonshire Wildlife Trusts (2014) The Greensand Ridge Nature Improvement Area: The Ecological Evidence Base

Chilterns AONB

3.92 South east of Dunstable and north of Luton lies the distinctive chalk escarpment of the Chilterns Area of Outstanding Natural Beauty (AONB). The AONB was originally designated in 1965 and then extended in 1990 to encompass a total area of 833km². It protects the special qualities of the area, including steep chalk escarpment, flower-rich downland, woodlands, commons, tranquil valleys, a network of ancient routes, villages with brick and flint houses, chalk streams and a rich historic environment of hillforts and chalk figures. The Chilterns is one of the most densely wooded parts of the UK with nearly 22% woodland cover, of which two thirds is ancient woodland (the highest proportion in the country). Some of the Chilterns' most distinctive natural features are its chalk rivers and streams, fed by groundwater from the chalk aquifer. A globally scarce habitat, chalk rivers support a range of specialised wildlife and in the Chilterns provide a home for the threatened water vole. The Chilterns is also a significant tourism attraction in the UK with 55 million leisure visits a year⁷². The Management Plan identifies that key factors affecting the special qualities of the landscape, which include;

- changes to farming and agricultural practice;
- mitigating and adapting to the effects of climate change;
- the attitude of land owners and fragmentation of land ownership;
- under-management of woodland;
- pests, diseases and non-native invasive species;
- the decline of cherry orchards;
- the removal of conifers;
- ageing beech woodlands;
- protecting the setting of the AONB;
- responding to development pressures;
- avoiding landscape clutter;
- protecting the tranquillity of the AONB; and
- HS2 development.

Community Forests

3.93 In the north of the Plan area lies the southern half of the Marston Vale Community Forest. As one of only 12 Community Forests across England, the area was designated in the 1990s to regenerate land around the towns and cities, scarred by industrialisation. The Forest of Marston Vale is being created to address the effects of the brick making industry, and with over 1 million trees already planted the woodland cover has increased from around 3% to around 10%. The target is to get to 30% cover by planting over 5 million more trees by 2031⁷³. The forest offers the benefits of leisure opportunities, transformed perceptions, increased wildlife, engaged local communities, revitalised economies and a future timber supply.

⁷² Chilterns AONB Management Plan 2014-2019

⁷³ The Forest of Marston Vale Trust

National Character Areas

- 3.94 The Central Bedfordshire plan area contains four different National Character Areas (NCAs) (87, 88, 90 and 110), each are summarised below.

NCA87: East Anglian Chalk⁷⁴:

- 3.95 A small area of this NCA lies in the east of Central Bedfordshire just north of Letchworth Garden City to include Stotfold and Arlesey. The NCA is characterised by the narrow continuation of the chalk ridge; a visually simple and uninterrupted landscape of smooth, rolling chalkland hills with large regular fields enclosed by low hawthorn hedges, with few trees, straight roads and expansive views to the north. Rain is largely absorbed through the porous underlying Chalk geology which replenishes the strategically important chalk aquifer below. Historic use of the land has led to botanically rich grasslands, which are now often fragmented and care must be taken to maintain soil quality. There is pressure for more development which can add to the demand for water and is likely to reduce the tranquillity of the NCA. There is great opportunity to work with the horse-racing industry to improve the quality of the grassland and shelterbelts for the benefit of biodiversity. The area contains ancient trackways, including Icknield Way, and strategic road and railway transport links.

NCA88: Bedfordshire and Cambridgeshire Claylands⁷⁵:

- 3.96 This NCA surrounds NCA90 (Bedfordshire Greensand Ridge below) to encompass the remaining areas of Central Bedfordshire including Biggleswade, Cranfield, Shefford, Toddington and Wrestlingworth. The NCA is a broad, undulating, lowland plateau dissected by shallow river valleys that gradually widen in the east. The NCA contains the Forest of Marston Vale and a small proportion of the Chilterns AONB. Restored clay, sand and gravel extraction areas provide opportunities for recreation and biodiversity. Tranquillity within the NCA has declined, affected by; visual intrusion; noise and light pollution from agriculture; settlement expansion; improvements in road infrastructure; mineral extraction; and landfill activities. Many areas, however, retain a rural feel with numerous opportunities for local, quiet and informal recreation. The area provides unique genetic diversity found in local varieties of fruit, and the rivers and wetlands provide water and regulate water quality. The NCA faces significant challenges around accommodating levels of future growth and managing water resources, including potential impacts further downstream in other NCAs, whilst at the same time protecting and enhancing its character and increased demand for leisure and recreation.

NCA90: Bedfordshire Greensand Ridge⁷⁶:

- 3.97 This NCA runs in a north east to south west band through the Plan area to include Potton, Sandy, Chicksands, Ampthill, Eversholt, Woburn and Leighton

⁷⁴ NCA Profile: 87 East Anglian Chalk (NE529)

⁷⁵ NCA Profile: 88 Bedfordshire and Cambridgeshire Claylands (NE555)

⁷⁶ NCA Profile: 90 Bedfordshire Greensand Ridge (NE481)

Buzzard. The NCA is a narrow ridge rising out of the Bedfordshire and Cambridgeshire Claylands (NCA88 above). Its historic landscapes combined with small settlements, greenbelt and woodlands give parts of the NCA a more timeless feel than the surrounding claylands. There is a patchwork of semi-natural habitats throughout, including flood plain grazing marshes, lowland heathland and meadows and mixed deciduous woodland. The north-west facing scarp slope overlooks Milton Keynes and Marston Vale forming a significant landscape feature from a distance. Food, timber and biomass provision on the Ridge are regionally important, and the Ridge is nationally important for recreation. The main pressures on the NCA would result from development, use of bland, non-local materials, increased congestion and increased traffic noise and light pollution.

NCA110: Chilterns⁷⁷:

- 3.98 This NCA lies in the south of Central Bedfordshire to include Houghton Regis, Streatley, Barton-le-Clay, Dunstable and south of Luton. The area is an extensively wooded and farmed landscape underlain by chalk bedrock and breached by the River Thames. Approximately half of the NCA is designated Chilterns AONB, and a small area south of the River Thames is designated North Wessex Downs AONB (though this is not within the plan area). Motorways and railways make the area very accessible to visitors and connect the Chilterns to nearby London. The area includes a wealth of recreational activity opportunities, including; extensive rights of way and National Trails; open access commons; woods and downland; Registered Parks and Gardens; golf courses; shooting estates; and urban green spaces. The River Thames and Grand Union Canal are also major water-based recreation corridors. Farming continues to be a major land use today. Chalk streams are found only in the main valleys and can be dry in the upper reaches. The NCA is renowned for its native beechwoods, a number of which are designated as a Special Area of Conservation at the European level.

Local Landscape Character

- 3.99 The Central Bedfordshire Landscape Character Assessment (LCA)⁷⁸ characterises the rural landscapes of the plan area and identifies key features and attributes which contribute to character and sense of place and which could be vulnerable to change. The LCA has identified key villages which are vulnerable to the impacts of development including; Cockayne Hatley, Biggleswade, Astwick, Sandy, Barton, Charlton, Salford, Stewartby, Woburn, Aspley Guise, Heath and Reach, Husborne Crawley, Flitwick, Ampthill, Whipsnade, Studham, Caddington, and Toddington, as well as the landscapes at Wrest Park, Woburn Safari Park, East Hyde, and Tempsford Airfield.
- 3.100 A historic pattern of linear development is also a concern for future development, particularly at Cranfield, Marston Moretaine, Lower Shelton, Moggerhanger, Charlton, Blunham, Stanbridge, Tilsworth, Billington and Little Billington, Totternhoe, Streatley, Kensworth, Dunstable, Pulloxhill and

⁷⁷ NCA Profile: 110 Chilterns (NE406)

⁷⁸ LUC (2016) Central Bedfordshire Landscape Character Assessment

Greenfield. The trend for linear development along river corridors, road and rail corridors is generally discouraged to prevent coalescence which can erode local sense of place and individual village identities.

- 3.101 A key aspect identified as contributing to landscape character is the presence of significant and far reaching views particularly due to large areas of flat land. As such there are concerns over; the alteration or cluttering of skylines; common development concealment techniques like bunding; and potential disruption to significant views. This indicates a need to monitor the height of new development throughout the rural area, and protect significant views where appropriate. Local building materials, and locally appropriate plant species are also noted as a key contributor to landscape character.
- 3.102 A number of GI assets are also identified as contributing to the landscape character and sense of identity, in particular hedgerows, woodland and wooded shelter belts. Further opportunities to enhance GI assets that contribute to landscape character are identified, including;
- appropriate woodland and hedgerow creation, and orchard restoration,
 - new wetland habitats, particularly as an opportunity to strengthen the connections of Sandy and Biggleswade with the river Ivel and its floodplain,
 - landscape enhancement along the A1 corridor, and prominent road or rail corridors,
 - opportunities to restore derelict sites such as disused market gardens, and former quarries and pits,
 - boundary enhancements around exposed urban edges,
 - village entrance enhancements, and
 - Country Park enhancements
- 3.103 Similarly a number of historic assets (both designated and undesignated) contribute to the landscape character and sense of identity and particular concerns are expressed in regards to Biggleswade Common, surviving areas of ancient enclosure, unscheduled medieval earthworks and moated sites, pockets of ridge and furrow which are unprotected from conversion to arable, and pockets of parkland, ponds and surviving areas of meadow that are vulnerable to new development.
- 3.104 Ultimately new development will have an urbanising effect, however the LCA identifies particular concerns over the potential loss of tranquillity and the appropriate protection of the predominantly rural character. This also applies to the infrastructure that accompanies new development with expressed concerns over minor / secondary roads and bridges that contribute to landscape character, as well as potential expansions at Luton Airport Parkway and HS2 development.
- 3.105 Water is identified throughout the varying landscape types as a key issue for Central Bedfordshire, which relates to the underlying Chalk geology and major aquifer. Water resources and quality are explored in the relevant water section of the baseline information, however in landscape terms it is

recognised; that river corridors often provide far reaching and significant views; that the floodplain around river corridors contributes to the character; and that there are opportunities to improve the recreational links to rivers in many cases.

- 3.106 The LCA further identifies that the farming industry plays a crucial role in maintaining significant landscape features and characteristics. In particular the grazing of grasslands, field boundary and associated habitat management, and the provision of rural skilled workers. Agricultural reorganisation is also identified as a sensitivity for certain landscape types, and it will be important to monitor the effects of changing practices.
- 3.107 Important town and village centres across the plan area include; Dunstable, Leighton Buzzard, Houghton Regis, Ampthill, Sandy, Biggleswade, Shefford and Woburn. These towns are recognised for their architectural, historic and commercial significance.

Evolution without the Plan

- 3.108 Without the Plan, key designated landscapes will retain a level of protection in accommodating new development, however as identified in the baseline information above, a number of non-designated features, assets and characteristics significantly contribute to the overall landscape character and sense of place. The Local Plan offers a tool or delivery mechanism for extended protection of these key assets, for example policy protection for non-designated assets, or protection against coalescence; thus reducing the risk of loss, or detriment to, factors affecting landscape character. The Plan can also coordinate opportunity and investment across the whole of the plan area to ensure that development delivers the best possible, high quality, and multifunctional benefits, for example in delivering development that can support the targets of the Marston Vale Community Forest. Therefore, without the Plan future development has an increased likelihood of resulting in negative effects on landscape character, and a decreased likelihood of delivering coordinated and prioritised improvements. With changing agricultural practices, the Local Plan can also provide a flexible policy approach to agricultural land management and appropriately monitor the effects of the changes in the industry and its implications for the landscape.

Key Issues

- Balancing the need for new development with the retention of a predominantly rural landscape character with important ridges, large areas of flat land, far-reaching views and high levels of tranquillity.
- Maintaining traditional field boundaries, habitats and building materials that contribute to landscape character.
- The loss of agricultural land is changing the landscape character of the Plan area.
- Protecting appropriate landscape settings e.g. the setting of the AONB
- There are a number of settlements that are vulnerable or sensitive to

changes in the landscape/ townscape identified within the Landscape Character Assessment (2016).

The Historic Environment

3.109 This topic explores existing designated and non-designated heritage assets within the plan area, including potential and existing archaeological sites, and heritage 'at risk'.

3.110 It is identified that within Central Bedfordshire there are⁷⁹:

- 84 Scheduled Monuments
- 14 Registered Parks and Gardens
- 1912 Listed Buildings (63 Grade I, 100 Grade II*, and 1749 Grade II)
- 60 Conservation Areas
- Several thousand non-designated archaeological sites

3.111 The Heritage at Risk Register⁸⁰ identifies 10 entries in Central Bedfordshire at risk:

- Grade II* Listed Church of St Mary, Church St, Dunton; Priority Category C predominantly due to slow decay. A solution is to be agreed.
- Grade I Listed Church of St Peter and All Saints, Battlesden; Priority Category C predominantly due to slow decay. No solution is currently agreed.
- Grade II* Listed Church of St Mary the Virgin, Church Rd, Meppershall; Priority Category A at immediate risk of further rapid deterioration or loss of fabric; no solution agreed.
- Totternhoe Castle Scheduled Monument; principal vulnerability of extensive visitor erosion. Generally satisfactory condition but with significant localised problems.
- Apsley Bury moated site and fishpond, south of Apsley End, Shillington Scheduled Monument; principal vulnerability of arable clipping. Generally satisfactory condition but with significant localised problems.
- A ringwork and bailey castle, ring ditch and enclosures east of Brookland Farm, Biggleswade Scheduled Monument; principal vulnerability of arable ploughing. Generally unsatisfactory condition with major localised problems.
- Dunstable Priory Scheduled Monument; principal vulnerability of collapse. Generally satisfactory condition but with significant localised problems.
- Bowl barrow in Tingley Field Plantation, near Pegsdon, Shillington Scheduled Monument; principal vulnerability of scrub / tree growth. Generally unsatisfactory condition with major localised problems.

⁷⁹ CBC Monitoring Report 2014/15 and CBC (2010) Design Supplement 5; The Historic Environment

⁸⁰ Historic England (2016) Heritage at Risk Register

- Moated site at Ivy Hall, Cranfield Scheduled Monument; principal vulnerability of arable ploughing. Generally unsatisfactory condition with major localised problems.
- Grade II* Listed The Grotto, Woburn Park; Priority Category C predominantly due to slow decay, repair works have been completed. However, delamination in places. Discussions are ongoing.

3.112 Central Bedfordshire has a rich and varied archaeological heritage with nationally significant sites and monuments dating from the prehistoric through to the post medieval periods. The earliest archaeological remains relate to the Palaeolithic over 125,000 years ago discovered at Caddington and internationally recognised.

3.113 Central Bedfordshire is a largely rural area and the agricultural fields, pits, ditches and structure can be traced to prehistoric settlements and ceremonial monuments survive below the surface. Two major Roman roads pass through Central Bedfordshire; Watling Street (A5) and the road linking Godmanchester and Baldock via Sandy (partly on the line of the A1).

3.114 Recent archaeological work in Ampthill, Marston Moretaine, Stratton (in Biggleswade) and Henlow have confirmed that these settlements originate in the Saxon period. Leighton Buzzard it also through to have Saxon foundations. The major towns of Leighton Buzzard, Ampthill, Biggleswade and Dunstable were certainly established by the medieval period and archaeological evidence for the everyday lives of their inhabitants can be readily found in the towns and villages. Central Bedfordshire was once home to at least seven religious houses, including the Gilbertine monks and nuns at Chicksands, the only English monastic order. Further to this, areas like Dunstable Downs and the north of Biggleswade contain relics of the First and Second World Wars, including practice trenches and search lights, all of which are considered archaeological sites.

3.115 It is evident that Central Bedfordshire has a wide range and number of heritage assets, and these are widespread across the whole plan area. It is important that the design of future development is of a high quality to enhance historic environments; including designated and non-designated heritage assets, and their settings.

Evolution without the Plan

3.116 Without the plan, designated heritage assets would still be protected through National and Local policy; however, as identified in the baseline information above there are a number of undesignated heritage assets, heritage settings and potential archaeology that could be more vulnerable to the impacts of development. Importantly the Local Plan and SA can consider the cumulative effects of proposed development on designated and non-designated heritage assets and their setting. The Local Plan can provide a delivery mechanism for enhanced protection for undesignated assets, settings and features that contribute to the historic environment. It can also secure enhancements for the historic environment, for example in promoting new development that brings derelict buildings back into use, or through

appropriate investment and contributions. With such an abundance of heritage assets in the plan area, the Local Plan can carefully plan for responsibly designed development in the most appropriate locations.

Key Issues

- Central Bedfordshire contains a large number of designated heritage assets.

Minerals and Waste

- 3.117 This topic identifies the mineral resources within the plan area, and any planned extraction, as well as existing waste facilities and waste production statistics within Central Bedfordshire.
- 3.118 The underlying geology that characterises the landscape of Central Bedfordshire and its surrounds also yields economic minerals. The major resources are aggregate sands, gravel, chalk, and silica sand. Aggregate sand and gravel is located in the river valleys of the Ivel and Ouse and in glacial deposits west of Biggleswade. The Greensand Ridge yields a range of medium to fine grained sands, which are of very high silica purity in the vicinity of Leighton Buzzard, and have been worked extensively for industrial purposes. Further north, the Oxford Clay has historically been a major brick-making resource, but that use has now ceased. Chalk is extracted from a large scale quarry near Dunstable, from where it is transported via a slurry pipeline to cement works in Rugby; and at Totternhoe quarry for building stone⁸¹.
- 3.119 In total, 117,728 tonnes of household waste were produced in Central Bedfordshire⁸² in 2014/15, equivalent to 1,052kg per household, or 435kg per person. In 2014/15, 48.5% of household waste was reused, recycled or composted. The figure for England is lower, at 44.5%, and needs to increase to meet the EU target of 50% by 2020. In Central Bedfordshire the majority of waste that is not reused, recycled or composted is processed to remove recyclable material such as metals and the remainder is made into a fuel which is used to create energy. 22.1% of municipal waste is sent to landfill.
- 3.120 There are four household waste recycling centres within Central Bedfordshire, located within Ampthill (though currently closed for redevelopment), Biggleswade, Dunstable and Leighton Buzzard. The development and operation of minerals and waste facilities is influenced by a number of land constraints or designations, including; South Bedfordshire Green Belt, the Chilterns Area of Outstanding Natural Beauty, the Forest of Marston Vale, the Greensand Trust Area, and the Leighton Buzzard and Heath and Reach Sandpit Strategy Area.

⁸¹ Central Bedfordshire Council, Luton Borough Council & Bedford Borough Council (2014) Minerals and Waste Local Plan: Strategic Sites and Policies

⁸² Central Bedfordshire Council (January 2016) Key Facts and Figures

3.121 Minerals and waste are both strategically planned across the three Local Authority areas of Central Bedfordshire Council, Luton Borough Council, and Bedford Borough Council. The 2014 Joint Minerals and Waste Local Plan⁸³ sets out the strategic allocations for mineral extraction and for waste management development in the Plan area together with strategic policies which will guide the ongoing supply of minerals and development of waste management facilities. The Plan area encompasses a total population of around 617,000 people, and the Plan identifies that freight and transport are substantial elements of minerals and waste. Although transport and freight is planned separately by each individual council in their Local Transport Plans, they are identified as important drivers for ongoing development in minerals and waste management. Forecasts predict that the tonnage of waste requiring management in the Plan area is likely to increase from 2,100,000 tonnes in 2013/14 to 2,300,000 tonnes in 2028/29. This is likely to comprise municipal (MSW), commercial and industrial, construction, demolition, and excavation wastes, as well as a small and diminishing amount of residual waste from London. The Councils have designated Minerals Safeguarding Areas (MSAs) which are identified on the Policies Map in the Plan for the extraction of the following minerals:

- river valley / glacial sand and gravel
- Woburn sands
- chalk
- Oxford clay
- Cornbrash limestone
- Gault clay

Evolution without the Plan

3.122 The strategic directions for the ongoing management and future development of waste and minerals facilities and operations are planned for in the Minerals and Waste Local Plan, and as such already have a guiding framework in place. Although the Local Plan will have less bearing on this aspect, it will be planning for the future growth of housing and communities. Minerals and waste can affect human health through noise pollution and odour, and as such the Local Plan provides the opportunity to plan for development that minimises these effects. The Local Plan can also ensure that new housing and employment development considers the implications of its waste production and management, to plan for sustainable waste management and support the aims of the Waste and Minerals Local Plan. The Local Plan can also act as a means of highlighting sensitive receptors (e.g. landscapes that are sensitive to bunding) that could potentially affect future minerals and waste planning.

⁸³ Central Bedfordshire Council, Luton Borough Council & Bedford Borough Council (2014) Minerals and Waste Local Plan: Strategic Sites and Policies

Key Issues

- Ensuring that the direction of new development does not conflict with the strategic allocations and plans outlined within the Minerals and Waste Local Plan, and minimises the associated effects of minerals and waste development / operations on human health.
- Supporting the waste hierarchy and encouraging increased recycling rates, ensuring new development contributes towards meeting the EU target rate of 50% of waste production recycled / reused by 2020.

4.0 KEY SUSTAINABILITY ISSUES AND SA FRAMEWORKS

Introduction

- 4.1 It is important to distil the key sustainability issues and opportunities from the collated baseline information and the review of plans and programmes, as the SA Objectives are developed to address them.

Scoping Workshops

- 4.2 Draft key sustainability issues and SA Frameworks were developed and then discussed at workshops on 20 April 2016 with Central Bedfordshire Council Officers as well as Members from the Duty-to-Cooperate Group. Attendees and the summary notes from the workshops including how the discussions have influenced the scoping stage, in particular the SA Frameworks, are provided in Appendix I.

Key Sustainability Issues

- 4.3 The key sustainability issues identified are summarised in Table 4.1 below

Table 4.1: Key Sustainability Issues

Topic	Key Sustainability Issue
Communities	<ul style="list-style-type: none"> ■ In line with national trends there is an increasing and ageing population. ■ Maintaining the identity of settlements and communities in both rural and urban areas. ■ Meeting the needs of communities with different sustainability issues and ensuring that any opportunities to address these issues are maximised. For example, Dunstable and Houghton Regis are more culturally diverse than the other settlements within Central Bedfordshire. ■ There may be a need to accommodate housing growth from outside the Plan area. ■ Minimising the loss of important Green Belt land that provides protection for soil quality and open land. ■ There is poor access to services and facilities in some areas of Central Bedfordshire, particularly in rural settlements. ■ Average wages compared to average house prices in the Plan area, make access to the property market unattainable for many. ■ There is a higher than average number of Gypsies and Travellers within Central Bedfordshire compared to England.
Economy and Employment	<ul style="list-style-type: none"> ■ Approximately 50% of residents commute to the surrounding areas, including Hertfordshire, Luton, London, Milton Keynes and Bedford. ■ People who work in Central Bedfordshire earn less than those who work in the nearby areas, such as those working in Hertfordshire, Luton, London, Milton Keynes and Bedford. ■ Dunstable has a significantly higher retail vacancy rate compared to the national rate.

	<ul style="list-style-type: none"> ■ The wards of Tithe Farm, Parkside, Dunstable Manshead, Dunstable Northfields and Sandy are currently experiencing higher rates of unemployment compared to the other wards in Central Bedfordshire. ■ There are relatively high outflows of retail and convenience spending. ■ Evidence suggests that there is a significant oversupply of industrial employment land, and that the quality and typologies will be an important factor for future development. ■ Key economic sectors include wholesale and retail trade, construction, production and education. ■ Both the urban and rural economies are important for the Central Bedfordshire economy as a whole.
Health and Equalities	<ul style="list-style-type: none"> ■ There are areas of higher deprivation in the south of the Plan area, particularly around the boundary with Luton Town. ■ Trends show that deprivation is increasing in the north of the Plan area, although this remains below areas in the most deprived 30% in England. ■ The potential loss of Green Infrastructure as well as areas of open space or recreation for people. ■ A need to reduce excess weight in adults, which is ranked significantly worse than the England average. ■ Improving the quality of existing Green Infrastructure, open space and recreational areas.
Transport and Movement	<ul style="list-style-type: none"> ■ In a number of areas there is insufficient highway capacity to meet current and future demands. This results in congestion at peak times, predominantly in the main urban areas and on the strategic road network. ■ Public transport is less accessible and frequent in rural areas compared to some of the larger settlements. ■ Approximately 50% of residents commute for work to the surrounding areas - including Hertfordshire, Luton, London, Milton Keynes and Bedford - predominantly using the private vehicle. ■ Ensuring that new development is in accessible locations that reduce the need to travel. ■ Supporting a modal shift, and a built environment that supports a modal hierarchy in which the pedestrian and cyclist have appropriate priority. ■ New transport infrastructure is being proposed within the Plan area, which includes the East West Rail Link.
Air Quality	<ul style="list-style-type: none"> ■ 3 AQMAs designated for exceedances of Nitrogen Dioxide in Sandy, Ampthill and Dunstable. Traffic is the primary cause for exceedances in National Air Quality Objectives. ■ Road traffic is very closely linked to air quality, and concentrations of air pollutants are particularly high in Central Bedfordshire where the road network is congested.
Energy and Climate Change	<ul style="list-style-type: none"> ■ Evidence suggests that demand for energy is rising. ■ Road transport is the biggest contributor to greenhouse gas emissions; however, commercial and industrial buildings are also contributors.

	<ul style="list-style-type: none"> ■ Adapting to the predicted effects of climate change. ■ Evidence suggests that there is significant capacity for new renewable energy development.
Water: Resources, Quality and Flooding	<ul style="list-style-type: none"> ■ Increased pressure on water resources particularly in the Anglian region as a result of high population density and relatively low rainfall. ■ According to the EA water quality is declining in some areas and improving in others. The EA identifies agriculture and rural land management as being the primary reason for water bodies not achieving good status under WFD. ■ High flood risk areas situated around existing water courses, and areas at risk of surface water flooding.
Soil and Land	<ul style="list-style-type: none"> ■ The retention and protection of best and most versatile agricultural land, which is a National issue.
Biodiversity and Geodiversity	<ul style="list-style-type: none"> ■ A number of nationally and locally designated sites for nature conservation and geodiversity as well as a range of important habitats and species. ■ Important ecological corridors that run throughout Central Bedfordshire as well as into the surrounding LAs. ■ Improving ecological connectivity within the Greensand Ridge Nature Improvement Area
Landscape and Townscape	<ul style="list-style-type: none"> ■ Balancing the need for new development with the retention of a predominantly rural landscape character with important ridges, large areas of flat land, far-reaching views and high levels of tranquillity. ■ Maintaining traditional field boundaries, habitats and building materials that contribute to landscape character. ■ The loss of agricultural land is changing the landscape character of the Plan area. ■ Protecting appropriate landscape settings e.g. the setting of the AONB ■ There are a number of settlements that are vulnerable or sensitive to changes in the landscape/ townscape identified within the Landscape Character Assessment (2016).
The Historic Environment	<ul style="list-style-type: none"> ■ Central Bedfordshire contains a large number of designated heritage assets.
Minerals and Waste	<ul style="list-style-type: none"> ■ Ensuring that the direction of new development does not conflict with the strategic allocations and plans outlined within the Minerals and Waste Local Plan, and minimises the associated effects of minerals and waste development / operations on human health. ■ Supporting the waste hierarchy and encouraging increased recycling rates, ensuring new development contributes towards meeting the EU target rate of 50% of waste production recycled / reused by 2020.

SA Frameworks

- 4.4 The SA Framework provides the basis by which the sustainability effects of the Central Bedfordshire Local Plan will be described, evaluated and options

compared. It includes a number of objectives, elaborated by decision making criteria, that are relevant to the objectives of the Local Plan and sustainable development. These objectives have been identified through the SA Scoping Stage for the Central Bedfordshire Local Plan from the information collated in the plans and programmes review, baseline information, key sustainability issues and scoping workshops. The Strategic SA Framework is presented in Table 4.2 below.

- 4.5 The Strategic SA Framework was then refined to make it more relevant and effective for the consideration of site options. Enfusion worked closely with the Council to develop standards and thresholds to determine the nature and significance of effects against SA Objectives. This helps to ensure that a consistent and comparative appraisal of reasonable site options is carried out. Any assumptions and uncertainties are noted along with a clear indication of the standards and thresholds that will be used to determine the nature and significance of the effects for site options. The Sites SA Framework is presented in Table 4.3 below.

Table 4.2: Strategic SA Framework

Topic	Key Sustainability Issues	SA Objectives	Decision-Aiding Questions
<p>Communities</p> <p>SEA Directive Topic(s): Population and Human Health</p> <p>NPPF Paragraphs: 47-78</p>	<ul style="list-style-type: none"> ■ In line with national trends there is an increasing and ageing population. ■ Maintaining the identity of settlements and communities in both rural and urban areas. ■ Meeting the needs of communities with different sustainability issues and ensuring that any opportunities to address these issues are maximised. For example, Dunstable and Houghton Regis are more culturally diverse than the other settlements within Central Bedfordshire. ■ There may be a need to accommodate housing growth from outside the Plan area. ■ Minimising the loss of important Green Belt land that provides protection for soil quality and open land. ■ There is poor access to services and facilities in some areas of Central Bedfordshire, particularly in rural settlements. ■ Average wages compared to average house prices in the Plan area, make access to the property market unattainable for many. ■ There is a higher than average number of Gypsies and Travellers 	<p>1. To ensure that the housing needs of all residents and communities are met.</p>	<ul style="list-style-type: none"> ■ Does the option provide sufficient housing to meet the identified needs of all communities within the Plan area? ■ Does the option provide an appropriate mix of types of housing to meet the identified needs of all communities within the Plan area? ■ Does the option offer the opportunity to help meet housing needs arising from outside the Plan area?
		<p>2. To maintain and enhance community and settlement identities.</p>	<ul style="list-style-type: none"> ■ Is the option likely to have an effect on the identity of any communities or settlements? For example, will development lead to coalescence? ■ Will development result in the loss of Green Belt land? ■ Can development effectively integrate within the existing settlement pattern? ■ Are there any opportunities to enhance the identity of a community or settlement?
		<p>3. To improve accessibility to services and facilities⁸⁴.</p>	<ul style="list-style-type: none"> ■ Does the option ensure that a

⁸⁴ This relates to the provision of services and facilities, both existing, and what could potentially be provided as part of new development. Consistent with the settlement audit this includes community facilities (Place of worship, public library, village hall/community centre/social club), health facilities (GP/ Health centre)

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

(Primary Health Care), Dentist, Pharmacy), educational facilities (pre-school/nursery, lower school, middle school, upper school, Colleges/Academies, Universities)), financial (bank/building society), groceries (superstore, convenience store, newsagents), other retail (petrol station/garage, post office) and hospitality (restaurant/café/takeaway, public house with and without food).

Topic	Key Sustainability Issues	SA Objectives	Decision-Aiding Questions
	<p>quality and typologies will be an important factor for future development.</p> <ul style="list-style-type: none"> ■ Key economic sectors include wholesale and retail trade, construction, production and education. ■ Both the urban and rural economies are important for the Central Bedfordshire economy as a whole. 		<p>opportunities in areas that are currently experiencing high rates of unemployment?</p> <ul style="list-style-type: none"> ■ Does the options provide opportunities to enhance the provision of education and training facilities?
<p>Health and Equalities</p> <p>SEA Directive Topic(s): Population and Human Health</p> <p>NPPF Paragraphs: 69-78</p>	<ul style="list-style-type: none"> ■ There are areas of higher deprivation⁸⁵ in the south of the Plan area, particularly around the boundary with Luton Town. ■ Trends show that deprivation is increasing in the north of the Plan area, although this remains below areas in the most deprived 30% in England. ■ The potential loss of Green Infrastructure as well as areas of open space or recreation for people. ■ A need to reduce excess weight in adults, which is ranked significantly worse than the England average. ■ Improving the quality of existing Green Infrastructure, open space and recreational areas. 	<p>5. To improve the health and wellbeing of communities and reduce inequalities.</p>	<ul style="list-style-type: none"> ■ Does the option offer the potential for investment, regeneration or renewal in areas of higher deprivation? ■ Does the option result in the loss of any significant areas of Green Infrastructure, open space or recreation for people? ■ Will the option result in a net gain in Green Infrastructure, open space and recreational areas for people, or improve the quality of these provisions across the Plan area?

⁸⁵ Deprivation refers to the DCLG Index of Multiple Deprivation (IMD) which is overall measure of multiple deprivation experienced by people living in an area, calculated for each neighbourhood or Lower Super Output Area (LSOA) and ranked according to its level of deprivation relative to that of other areas.

Topic	Key Sustainability Issues	SA Objectives	Decision-Aiding Questions
<p>Transport and Movement</p> <p>SEA Directive Topic(s): Population and Human Health</p> <p>NPPF Paragraphs: 29-41</p>	<ul style="list-style-type: none"> ■ In a number of areas there is insufficient highway capacity to meet current and future demands. This results in congestion at peak times, predominantly in the main urban areas and on the strategic road network. ■ Public transport is less accessible and frequent in rural areas compared to some of the larger settlements. ■ Approximately 50% of residents commute for work to the surrounding areas - including Hertfordshire, Luton, London, Milton Keynes and Bedford - predominantly using the private vehicle. ■ Ensuring that new development is in accessible locations that reduce the need to travel. ■ Supporting a modal shift, and a built environment that supports a modal hierarchy in which the pedestrian and cyclist have appropriate priority. ■ New transport infrastructure is being proposed within the Plan area, which includes the East West Rail Link. 	<p>6. To maintain and improve the existing highway network and reduce associated indirect impacts on air quality and greenhouse gas emissions.</p> <p>7. To encourage a demonstrable modal shift and reduce the need to travel.</p>	<ul style="list-style-type: none"> ■ Is the option likely to increase levels of traffic, and is this in an area already experiencing congestion issues? ■ Does the option offer an opportunity to enhance or improve the existing network? ■ Does the option support or enhance local ambitions for transport? <ul style="list-style-type: none"> ■ Does the option offer an opportunity to improve access to and quality of sustainable transport modes for all communities, to allow sustainable movement not only within Central Bedfordshire but into the surrounding areas? ■ Does the option offer an opportunity to support the delivery of proposed transport infrastructure, such as the East West Rail Link? ■ Does the option support or enhance local ambitions for transport?
<p>Air Quality</p> <p>SEA Directive Topic(s): Air</p>	<ul style="list-style-type: none"> ■ 3 AQMAs designated for exceedances of Nitrogen Dioxide in Sandy, Ampthill and Dunstable. Traffic is the primary cause for exceedances in National Air Quality 	<p><i>Air quality within Central Bedfordshire is closely linked to road traffic. This is demonstrated by the designation of the 3 AQMAs which cover areas where the road network is currently congested.</i></p> <p><i>Given the close relationship between traffic and air quality, it is not considered necessary to have a separate SA Objective specifically relating</i></p>	

Topic	Key Sustainability Issues	SA Objectives	Decision-Aiding Questions
NPPF Paragraphs: 109-125	<p>Objectives.</p> <ul style="list-style-type: none"> Road traffic is very closely linked to air quality, and concentrations of air pollutants are particularly high in Central Bedfordshire where the road network is congested. 	<p>to air quality. For example, positive effects against SA Objectives 6 and 7 are likely to result in a positive indirect effect on air quality; equally, negative effects are likely to result in negative indirect effects on air quality. Mitigation provided through Local Plan policies and at the project level to reduce traffic impacts, such as improving access to sustainable transport modes will also help to mitigate impacts on air quality.</p>	
<p>Energy and Climate Change⁸⁶</p> <p>SEA Directive Topic(s): Climatic Factors</p> <p>NPPF Paragraphs: 93-104</p>	<ul style="list-style-type: none"> Evidence suggests that demand for energy is rising. Road transport is the biggest contributor to greenhouse gas emissions; however, commercial and industrial buildings are also significant contributors. Adapting to the predicted effects of climate change. Evidence suggests that there is significant capacity for new renewable energy development. 	<p>8. To maximise the potential for energy efficiency, reduce greenhouse gas emission and ensure that the built and natural environment and its communities can withstand the effects of climate change.</p>	<ul style="list-style-type: none"> Does the option set aspirational targets for energy efficiency in new development? Is the option likely to continue the trend of falling GH emissions? Does the option provide opportunities for a net gain in renewable energy production within the Plan area? Does the option ensure that new development is resilient to the effects of climate change?
<p>Water: Resources, Quality and Flooding</p> <p>SEA Directive Topic(s): Water</p> <p>NPPF Paragraphs: 99-125</p>	<ul style="list-style-type: none"> Increased pressure on water resources particularly in the Anglian region as a result of high population density and relatively low rainfall. According to the EA water quality is declining in some areas and improving in others. The EA identifies agriculture and rural land management as being the primary reason for water bodies not achieving good status under WFD. 	<p>9. To minimise the demand for water and maintain or improve water quality.</p> <p>10. To reduce the risk of flooding from all sources.</p>	<ul style="list-style-type: none"> Is the option likely to have an effect on water resources? Is the option likely to have an effect on water quality? Does the option direct development towards lower flood risk areas⁸⁷? Are there any opportunities to significantly reduce flood risk? Does the option safeguard land to manage flood risk?

⁸⁶ Please note that flooding is dealt with separately under the Water: Resources, Quality and Flooding topic.

⁸⁷ For the purposes of this SA, a flood risk area relates to an area located within Flood Risk Zones 2 and / or 3, or an area at risk of flooding from surface water.

Topic	Key Sustainability Issues	SA Objectives	Decision-Aiding Questions
	<ul style="list-style-type: none"> ■ High flood risk areas situated around existing water courses, and areas at risk of surface water flooding. 		<ul style="list-style-type: none"> ■ Does the option promote the use of sustainable drainage systems?
<p>Soil and Land</p> <p>SEA Directive Topic(s): Soil</p> <p>NPPF Paragraphs: 79-92, 109-125</p>	<ul style="list-style-type: none"> ■ The retention and protection of best and most versatile agricultural land, which is a National issue. 	<p>11. To protect and conserve soil.</p>	<ul style="list-style-type: none"> ■ Is the option likely to result in the loss of greenfield land⁸⁸? ■ Is the option likely to result in the loss of agricultural land, in particular best and most versatile agricultural land⁸⁹? ■ Does the option provide an opportunity for the reuse or regeneration of previously developed land?
<p>Biodiversity and Geodiversity</p> <p>SEA Directive Topic(s): Biodiversity, Flora and Fauna</p> <p>NPPF Paragraphs: 109-125</p>	<ul style="list-style-type: none"> ■ A number of nationally and locally designated sites for nature conservation and geodiversity as well as a range of important habitats and species. ■ Important ecological corridors that run throughout Central Bedfordshire as well as into the surrounding LAs. ■ Improving ecological connectivity within the Greensand Ridge Nature Improvement Area 	<p>12. To protect, enhance and manage biodiversity & geodiversity.</p>	<ul style="list-style-type: none"> ■ Is the option likely to have an effect on any nationally or locally designated sites? ■ Could the option result in the loss or fragmentation of important GI for biodiversity or ecological corridors as identified in the Nature Conservation Strategy (2015)? ■ Are there any opportunities to enhance biodiversity & geodiversity, or provide a net gain?
<p>Landscape and Townscape</p>	<ul style="list-style-type: none"> ■ Balancing the need for new development with the retention of a predominantly rural landscape 	<p>13. Protect and enhance the landscape and townscape.</p>	<ul style="list-style-type: none"> ■ Is the option likely to have an effect on a nationally or locally designated landscape,

⁸⁸ For the purposes of this assessment, greenfield land includes agricultural land graded 3b-5.

⁸⁹ For the purposes of this assessment, best and most versatile agricultural land relates to agricultural land graded 1-3a.

Topic	Key Sustainability Issues	SA Objectives	Decision-Aiding Questions
<p>SEA Directive Topic(s): Landscape</p> <p>NPPF Paragraphs: 109-125</p>	<p>character with important ridges, large areas of flat land, far-reaching views and high levels of tranquillity.</p> <ul style="list-style-type: none"> ■ Maintaining traditional field boundaries, habitats and building materials that contribute to landscape character. ■ The loss of agricultural land is changing the landscape character of the Plan area. ■ Protecting appropriate landscape settings e.g. the setting of the AONB ■ There are a number of settlements that are vulnerable or sensitive to changes in the landscape/ townscape identified within the Landscape Character Assessment (2016). 		<p>townscape or its setting?</p> <ul style="list-style-type: none"> ■ Is the option likely to have an effect on the overall rural landscape character? ■ Is there an opportunity to regenerate previously developed land or restore derelict sites such as disused market gardens, former quarries or pits⁹⁰?
<p>The Historic Environment</p> <p>SEA Directive Topic(s): Cultural Heritage</p> <p>NPPF Paragraphs: 126-141</p>	<ul style="list-style-type: none"> ■ Central Bedfordshire contains a large number of designated heritage assets. 	<p>14. To ensure the protection and enhancement of the historic environment and its setting.</p>	<ul style="list-style-type: none"> ■ Is the option likely to have an effect on a nationally or locally designated heritage asset and/or their settings? ■ Is the option likely to have an effect on any important or protected non-designated heritage assets and/or their setting or any potential archaeology? ■ Are there any opportunities for enhancement of the historic environment and its setting?

⁹⁰ This relates to regeneration that may lead to positive effects on landscape character rather than land and soils.

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

Table 4.3: Sites SA Framework

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

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

Topic	SA Objective	Significance criteria, including any assumptions, uncertainties standards and thresholds for SA of Site Options		
		<p>Centre/ Local Centre).</p> <p>The SA assumes that larger strategic development options have greater potential for enhancements to existing provisions. However, this will not have an impact on the nature and significance of the effect against this SA Objective. This will be a consideration through the Council's wider site assessment process.</p> <p>Evidence base: The settlement audit and Council's site assessment process will be used to inform the assessment of effects against this SA Objective. Reasonable walking distance informed by the Department for Transport (2007) Manual for Streets. Barriers to movement informed by the Council's Site Assessment Framework for Housing criterion 6.</p>	--	<p>The site option is located beyond reasonable walking distance (over 800m) of all key services and facilities.</p>
<p>Economy and Employment</p> <p>SEA Directive Topic(s): Population and Human Health</p> <p>NPPF Paragraphs: 18-22</p>	<p>4. To support the economy and ensure that there are suitable opportunities for employment.</p>	<p>SA Objective 4 relates to the provision and loss of employment land within the Plan area.</p> <p>The nature and significance of the effects against this SA Objective will relate to the capacity of the site to accommodate employment land, and the potential for development to lead to the loss of existing employment.</p> <p>For the purposes of the SA an employment site is considered strategic if it is equal to or above 10ha, which is the threshold used in the Council's call for sites.</p>	++	<p>Potential for the site option to accommodate a strategic level of employment development (equal to or more than 10ha).</p> <p>Potential for the site option to accommodate employment development (less than 10ha).</p> <p>If no employment is being proposed as part of development, as it is a housing site option, then it is considered to have a neutral effect against this SA Objective.</p> <p>There is an element of uncertainty as the capacity of the site option for employment development is unknown.</p>
			+	
			0	
			?	

Topic	SA Objective	Significance criteria, including any assumptions, uncertainties standards and thresholds for SA of Site Options		
		<p>For the purposes of this appraisal, the loss of agricultural land is not considered of significance for the economy at a Plan level, as the sectors contribution is less than 1% (Agriculture, Forestry and Fishing accounts for 0.7%)⁹¹. The cumulative loss of agricultural land however, is a significant factor that will be assessed within the full SA Report.</p> <p>Evidence base: The Employment Land Review and the Councils estimated capacity of site options, and assessment of site options will inform the assessment of effects against this SA Objective.</p>	-	Development at the site option may result in a net loss of existing employment.
			--	Not applicable.
<p>Health and Equalities</p> <p>SEA Directive Topic(s): Population and Human Health</p> <p>NPPF Paragraphs: 69-78</p>	<p>5. To improve the health and wellbeing of communities and reduce inequalities.</p>	<p>SA Objective 5 relates to the built environment's contribution to healthy and active lifestyles, and any disparities in provisions across the Plan area.</p> <p>The nature and significance of the effects against this SA Objective will relate to the provision of development in deprived areas⁹² and access to existing open/recreational space and sports/leisure facilities.</p> <p>The SA assumes that any proposal for development can make appropriate and timely provision or contributions for necessary</p>	++	The site has good access to open/recreational space or sports/leisure facilities (480m), and will deliver new development in an area of higher deprivation.
			+	The site has good access to existing open/recreational space or sports/leisure facilities (480m) or will deliver new development in an area of higher deprivation.
			0	A neutral effect is not considered possible.

⁹¹ Office for National Statistics - 2011 Census.

⁹² DCLG Indices of Deprivation - Lower Super Output Areas (LSOAs) in the most deprived 10 to 30% in England 2015; Parkside (601 and 602), Dunstable Manshead (594), Houghton Hall (580), Tithe Farm (619), Houghton Hall / Tithe Farm (618), Sandy (433), Leighton Buzzard North (605 and 609), Flitwick (400), Dunstable Northfields (596), Dunstable Central / Dunstable Northfields (568) and Caddington (562).

Topic	SA Objective	Significance criteria, including any assumptions, uncertainties standards and thresholds for SA of Site Options		
		<p>supporting infrastructure, including health, and green infrastructure. The SA further assumes that any new provisions can be delivered to the aspirational quality standards.</p> <p>The appraisal narrative will note if there are any potential issues at site options with regard to the compatibility of surrounding land uses. It will also identify where mitigation may overcome any identified potential negative effects.</p> <p>Evidence base: Reasonable walking distance is informed by the Central Bedfordshire Leisure Strategy (2014). The strategy identifies a range of different accessibility standards for different typologies of space, however for the purposes of this SA, the most common distance used (480m) has been utilised in the analysis. Map layers of open and recreational space will be provided by Central Bedfordshire Council and data analysis within ArcGIS will inform the assessment of effects against this SA Objective. The settlement audit and Council's site assessment process will also help to inform the SA.</p>	?	An element of uncertainty exists until lower level assessments have been carried out
			-	The site is beyond reasonable walking distance (480m) to existing open/recreational space or sports/leisure facilities. Or Development would result in a net loss of existing open/recreational space, and / or sports/leisure facilities on site.
			--	Development at the site option would result in a net loss of open/recreational space, and / or sports/leisure facilities, and is located beyond reasonable walking distance (480m) to further open/recreational space or sports/leisure facilities.
<p>Transport and Movement</p> <p>SEA Directive Topic(s): Population and Human Health</p>	<p>6. To maintain and improve the existing highway network and reduce associated indirect impacts on air quality and</p>	<p>SA Objective 6 relates to the capacity of the highways network to accommodate new development, which can have indirect effects on air quality and greenhouse gas emissions.</p> <p>The nature and significance of effects against this SA Objective will relate to the potential traffic impacts of development at the site options.</p> <p>The SA assumes that appropriate access can be</p>	++	Development at the site option has the potential to significantly enhance the highways network, which will reduce levels of traffic in an area that is experiencing congestion issues.
			+	Development at the site option has the potential to enhance the highways network, which will reduce levels of traffic.

Topic	SA Objective	Significance criteria, including any assumptions, uncertainties standards and thresholds for SA of Site Options		
NPPF Paragraphs: 29-41	greenhouse gas emissions.	provided for any of the site options; however, if the evidence suggests that access may be a significant issue then this will be noted within the summary appraisal narrative. Evidence base: Available evidence, including traffic modelling, further detail through existing planning applications, the Council's site assessment process and input from Council Officers will also inform the assessment of effects against this SA Objective.	0	The site option is well located in respect of the road network and vehicle movements. Whilst development at the site has the potential to increase traffic, there is suitable mitigation available to reduce negative effects with the potential for a residual neutral effect.
			?	There is an element of uncertainty, most likely until lower level assessments have been carried out.
			-	Development has the potential to increase traffic in the surrounding road network and the site is not well located in respect of the road network and vehicle movements. Mitigation available, potential for a residual minor negative effect.
			--	Development will increase the levels of traffic in an area that is already experiencing congestion issues, and the site is not well located in respect of the road network and vehicle movements. Mitigation difficult and/or expensive, potential for a residual major negative effect.
	7. To encourage a modal shift and reduce the need to travel.	The nature and significance of the effects against this SA Objective will primarily relate to existing access to sustainable transport modes (train, bus, walking and cycle routes). For the purposes of the SA Primary/ Secondary Pedestrian Routes and Primary/Secondary/Inter Urban Cycle Routes are considered to be of greater significance than routes below them in the pedestrian and cycle network hierarchies set out in the Walking and Cycling Strategies published in 2011.	++	The site option is within reasonable walking distance to a train station (800m) and bus stop (400m) with a frequent service (every half hour) and is also within a reasonable distance (100m) to either a key pedestrian or cycling route.
			+	The site option is within reasonable walking distance to either a train station (800m) or bus stop (400m) with a frequent service (every half hour) and is within a reasonable distance (100m) to either a key pedestrian or cycling route.
			0	A neutral effect is not considered possible.

Topic	SA Objective	Significance criteria, including any assumptions, uncertainties standards and thresholds for SA of Site Options													
		<p>A key aspect of encouraging walking and cycling is that routes need to be direct and accessible. Taking this into account, for the purposes of the SA a reasonable distance to these key walking and cycling routes is considered to be within 100m.</p> <p>Distances will be measured using a buffer zone of the set reasonable walking distance calculated from the site boundary within ArcGIS. It is recognised however that the distance by buffer zone is not the only aspect to consider in accessibility, and as such the narrative will note if potential barriers to movement, or poor quality infrastructure is likely to restrict the potential use of the mode.</p> <p>The SA assumes that development at any of the site options could potentially provide or contribute to improved sustainable modes of transport.</p> <p>The SA assumes that larger strategic development options have greater potential for enhancements to existing infrastructure and services/provisions.</p> <p>Evidence base:</p> <ul style="list-style-type: none"> • Local Transport Plan 2011 - 2026 • Walking Strategy (2011) • Cycling Strategy (2011) • Local Area Transport Plans • Council GIS shapefiles 	<table border="1"> <tr> <td data-bbox="1245 229 1352 341">?</td> <td data-bbox="1352 229 2056 341">There is an element of uncertainty, for example the quality of the route is questionable or unknown, most likely until lower level assessments have been completed.</td> </tr> <tr> <td data-bbox="1245 341 1352 432"></td> <td data-bbox="1352 341 2056 432"></td> </tr> <tr> <td data-bbox="1245 432 1352 528">-</td> <td data-bbox="1352 432 2056 528">The site option is not within reasonable walking distance to either a train station (800m) or bus stop (400m) with a frequent service (every half hour) but is within a reasonable distance (100m) to either a key pedestrian or cycling route.</td> </tr> <tr> <td data-bbox="1245 528 1352 596"></td> <td data-bbox="1352 528 2056 596"></td> </tr> <tr> <td data-bbox="1245 596 1352 692">--</td> <td data-bbox="1352 596 2056 692">The site option is not within reasonable walking distance to either a train station (800m) or bus stop (400m) with a frequent service (every half hour) and is not within a reasonable distance (100m) to either a key pedestrian or cycling route.</td> </tr> <tr> <td data-bbox="1245 692 1352 1375"></td> <td data-bbox="1352 692 2056 1375"></td> </tr> </table>	?	There is an element of uncertainty, for example the quality of the route is questionable or unknown, most likely until lower level assessments have been completed.			-	The site option is not within reasonable walking distance to either a train station (800m) or bus stop (400m) with a frequent service (every half hour) but is within a reasonable distance (100m) to either a key pedestrian or cycling route.			--	The site option is not within reasonable walking distance to either a train station (800m) or bus stop (400m) with a frequent service (every half hour) and is not within a reasonable distance (100m) to either a key pedestrian or cycling route.		
?	There is an element of uncertainty, for example the quality of the route is questionable or unknown, most likely until lower level assessments have been completed.														
-	The site option is not within reasonable walking distance to either a train station (800m) or bus stop (400m) with a frequent service (every half hour) but is within a reasonable distance (100m) to either a key pedestrian or cycling route.														
--	The site option is not within reasonable walking distance to either a train station (800m) or bus stop (400m) with a frequent service (every half hour) and is not within a reasonable distance (100m) to either a key pedestrian or cycling route.														

Topic	SA Objective	Significance criteria, including any assumptions, uncertainties standards and thresholds for SA of Site Options		
		Reasonable walking distances informed by the Council's site assessment criteria.		
Air Quality SEA Directive Topic(s): Air NPPF Paragraphs: 109-125	<p><i>Air quality within Central Bedfordshire is closely linked to road traffic. This is demonstrated by the designation of the 3 AQMAs which cover areas where the road network is currently congested.</i></p> <p><i>Given the close relationship between traffic and air quality, it is not considered necessary to have a separate SA Objective specifically relating to air quality. For example, positive effects against SA Objectives 6 and 7 are likely to result in a positive indirect effect on air quality; equally, negative effects are likely to result in negative indirect effects on air quality. Mitigation provided through Local Plan policies and at the project level to reduce traffic impacts, such as improving access to sustainable transport modes will also help to mitigate impacts on air quality.</i></p>			
Energy and Climate Change SEA Directive Topic(s): Climatic Factors NPPF Paragraphs: 93-104	<p>8. To maximise the potential for energy efficiency, reduce greenhouse gas emissions and ensure that the built environment and its communities can withstand the effects of climate change.</p>	<p><i>The potential indirect effects of development on emissions of greenhouse gases from road traffic is assessed under the Transport and Movement topic. The SA assumes that all new development can meet policy targets for energy efficiency, using sustainable construction methods and could promote building form and layout that aids adaptation. It should be noted that further aspects of climate change, e.g. flooding, green infrastructure and landscapes, are assessed under the topics relating to Water: Resources, Quality and Flooding; Health and Equalities; and Landscape and Townscape.</i></p> <p><i>It is therefore assumed that all site options have the potential for neutral effect against SA Objective 8, and this SA Objective will not be a key differentiator between site options.</i></p>		
Water: Resources, Quality and	<p>9. To minimise the demand for water and</p>	<p>SA Objective 8 relates to the water efficiency of new development, and its potential effects on water quality.</p>	++	<p>Evidence from the Water Cycle Study suggests that development at the site option will lead to significant positive effects on water quality.</p>

Topic	SA Objective	Significance criteria, including any assumptions, uncertainties standards and thresholds for SA of Site Options		
Flooding SEA Directive Topic(s): Water NPPF Paragraphs: 99-125	maintain or improve water quality.	The SA assumes that development at any of the sites can incorporate aspirational water efficiency measures and that any proposal can make appropriate and timely provision for necessary supporting infrastructure, including waste water treatment. The appraisal summary narrative will note if water intensive development is being proposed at the site option. Evidence base: The Water Cycle Study (forthcoming) will be used to inform the assessment of effects against this SA Objective.	+	Evidence from the Water Cycle Study suggests that development at the site option will lead to positive effects on water quality.
			0	Evidence from the Water Cycle Study suggests that development at the site option is unlikely to lead to any significant effects on water quality, or that appropriate mitigation is in place to reduce negative effects with the potential for a residual neutral effect.
			?	There is an element of uncertainty, most likely until lower level assessments have been carried out.
			-	Evidence from the Water Cycle Study suggests that development at the site option will lead to minor negative effects on water quality.
			--	Evidence from the Water Cycle Study suggests that development at the site option will lead to major negative effects on water quality.
			++	The site option is not located within an area of flood risk and there is evidence that development at the site option could offer an opportunity to potentially reduce flood risk.
			+	The site option is not located within an area of flood risk and is not at risk of surface water flooding.
10. To reduce the risk of flooding from all sources.	SA Objective 9 relates to existing areas of flood risk within the Plan area. The nature and significance of effects against this SA Objective will therefore relate to whether a site option is located within an area of flood risk ⁹³ (from all sources) or has the potential to reduce flood risk. The SA assumes that development at any of the site options has the potential to incorporate Sustainable Drainage systems.	0	The site option is located partially within an area of flood risk, or at risk of surface water flooding in parts of the site. However, development could avoid this area, or suitable mitigation is available, with the potential for a residual neutral effect.	

⁹³ For the purposes of this SA, a flood risk area relates to an area located within Flood Risk Zones 2 and / or 3, or an area at risk of flooding from surface water.

Topic	SA Objective	Significance criteria, including any assumptions, uncertainties standards and thresholds for SA of Site Options		
		<p>Evidence base: The Environment Agency Flood Map for Planning and Risk of Flooding from Surface Water and the Council's SFRA will be used to inform the assessment of effects against this SA Objective.</p>	?	There is an element of uncertainty until more detailed lower level surveys and assessments have been carried out.
			-	The site option is located partially within an area of flood risk, or at risk of surface water flooding in parts of the site. The areas of flood risk would be difficult to avoid, and mitigation is likely to be expensive/difficult.
			--	The site option is located wholly within an area of flood risk or at risk of surface water flooding across the entire site.
<p>Soil and Land</p> <p>SEA Directive Topic(s): Soil</p> <p>NPPF Paragraphs: 79-92, 109-125</p>	<p>11. To protect and conserve soil</p>	<p>SA Objective 10 relates to soil and land quality.</p> <p>The nature and significance of the effect will relate to the land type and potential loss of best and most versatile agricultural land.</p> <p>Evidence base: Council's site assessment process, in particular criterion 25 of the Council's Site Assessment Framework for Housing Sites; criterion 20 of the Council's Site Assessment Framework for Employment Sites and criterion 20 of the Council's Site Assessment Framework for Gypsy and Traveller Sites.</p> <p>Council shapefiles, DEFRA Magic Map application, as well as information available from planning applications where available, will be used to inform the assessment of effects against this SA Objective.</p>	++	The site is entirely brownfield and will not result in the loss of any greenfield or agricultural land.
			+	The majority of the site is brownfield land and will not result in the loss of best and most versatile agricultural land.
			0	A neutral effect is not considered possible.
			?	An element of uncertainty exists for all sites until more detailed lower level surveys and assessment have been carried out through planning applications.
			-	The majority of the site is greenfield and does not contain any best and most versatile agricultural land.
			--	Development at the site option could result in the loss of best and most versatile agricultural land.

Topic	SA Objective	Significance criteria, including any assumptions, uncertainties standards and thresholds for SA of Site Options		
<p>Biodiversity and Geodiversity</p> <p>SEA Directive Topic(s): Biodiversity, Flora and Fauna</p> <p>NPPF Paragraphs: 109-125</p>	<p>12. To protect, enhance and manage biodiversity & geodiversity.</p>	<p>SA Objective 11 relates to existing identified biodiversity and geodiversity assets, and ecological corridors that provide strategic connectivity for biodiversity.</p>	<p>++</p>	<p>Development at the site option will deliver biodiversity gains, or improve ecological corridors / connections to strategic GI, or development will address a significant existing sustainability issue relating to biodiversity.</p>
		<p>The nature and significance of effects against this SA Objective will primarily relate to potential effects on biodiversity.</p>		<p>+</p>
		<p>Is the site within, adjacent to, or in close proximity (200m) to any nationally designated biodiversity (SSSIs, NNRs)?</p>	<p>0</p>	
		<p>Is the site within, adjacent to, or in close proximity (200m) to any biodiversity sites designated as being of local importance (Local Wildlife Site, Local Nature Reserve)?</p>		<p>?</p>
		<p>Would development at the site result in the loss or fragmentation of important habitats or GI for biodiversity as identified in the Nature Conservation Strategy (2015)?</p> <p>It is recognised that when considering the potential for effects on designated biodiversity, distance in itself is not a definitive guide to the likelihood or severity of an impact. The appraisal commentary will try to note any key environmental pathways that could result in development potentially having a negative effect on designated biodiversity that may be some distance away.</p>	<p>-</p>	
		<p>The capacity of the site to accommodate</p>		

Topic	SA Objective	Significance criteria, including any assumptions, uncertainties standards and thresholds for SA of Site Options		
		<p>housing and employment development will also influence the judgements made in terms of the nature and significance of effects against this SA Objective.</p> <p>Are there opportunities to enhance biodiversity? Possibly improve connectivity, green/blue infrastructure or enhance an important habitat?</p> <p>Evidence base: DEFRA Magic Map application, analysis of ArcGIS map layers CBC Officer input and the Nature Conservation Strategy will inform the assessment of effects against this SA Objective.</p>		<p>Mitigation possible, potential for a minor residual negative effect.</p> <p>Development at the site has the potential for negative effects on a nationally designated site. Mitigation difficult and / or expensive, potential for a major residual negative effect.</p>
<p>Landscape and Townscape</p> <p>SEA Directive Topic(s): Landscape</p> <p>NPPF Paragraphs: 109-125</p>	<p>13. Protect and enhance the landscape and townscape.</p>	<p>SA Objective 12 relates to valued landscapes and townscapes, as well as features and assets that contribute to landscape and townscape character.</p> <p>The nature and significance of the effects against this SA Objective will relate to the sensitivity of the landscape or townscape.</p> <p>The capacity of the site to accommodate housing and employment development will also influence the judgements made in terms of the nature and significance of effects against this SA Objective.</p> <p>It is considered that there is an element of uncertainty for all sites until more detailed lower level surveys and assessments have been carried out through planning applications.</p>	<p>++</p> <p>+</p> <p>0</p> <p>?</p> <p>-</p>	<p>Development significantly enhances the landscape or removes a significant eyesore and/or would regenerate previously developed land and buildings (PDL) that is currently having a major negative effect on the landscape/ townscape.</p> <p>Development would remove an eyesore, or enhance the landscape and/or would regenerate PDL that is currently having a minor negative effect on the landscape/ townscape.</p> <p>A neutral effect is not considered possible.</p> <p>Element of uncertainty exists until more detailed lower level assessments have been carried out.</p> <p>The site option has medium sensitivity in landscape terms or is within the setting of the AONB or is</p>

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

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

5.0 PROPOSED METHODS

Introduction

- 5.1 This section explains the proposed approach and methods for the SA (incorporating SEA, HIA & EqIA) of the Central Bedfordshire Local Plan. The Council are in the process of gathering and producing evidence that will inform the development and identification of reasonable options for the level and distribution of growth as well as potential sites to accommodate that growth. They are also in the process of developing and considering policy options. For the purposes of the Central Bedfordshire Local Plan and this SA, a reasonable alternative is considered to be one that is realistic and deliverable during the timescales and within the geographical scope of the Plan. It also needs to be in line with the objectives of the Plan.

SA of Alternatives

Strategic Options (overall level and distribution of growth)

- 5.2 The Strategic SA Framework presented earlier in Section 4, Table 4.2, will form the basis for appraising reasonable strategic options for the level and distribution of growth. For the purposes of the SA for Central Bedfordshire Local Plan a reasonable option is considered to be one that is realistic and deliverable within the scope, timescales and objectives of the emerging Plan. The decision-aiding questions will be used to guide the appraisal in the determination of the nature and significance of the effects against SA Objectives. The categories of significance are set out in the key below.

Table 5.1: SA Significance Key

Categories of Significance		
Symbol	Meaning	Sustainability Effect
++	Major Positive	Proposed development encouraged as would resolve existing sustainability problem
+	Minor Positive	No sustainability constraints and proposed development acceptable
0	Neutral	Neutral effect
?	Uncertain	Uncertain or Unknown Effects
-	Minor Negative	Potential sustainability issues: mitigation and/or negotiation possible
--	Major Negative	Problematical and improbable because of known sustainability issues; mitigation likely to be difficult and/or expensive

- 5.3 Each reasonable strategic option will be subject to assessment using the full Strategic SA Framework (Table 4.2) and recorded in a matrix similar to that presented in Table 5.2 below.

Table 5.2: Example SA Matrix for Strategic Options

SA Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	Option		
		1	2	3
		Description of Option		
1	Narrative describing likely significant effects; possibilities for mitigating negative effects & enhancing positive effects; residual effects; comparative assessment; supported by baseline evidence where available; uncertainty and any key gaps in information; and any recommendations for plan-making.	+	?	-
2				

5.4 The nature of the likely sustainability effects (including positive/negative, duration (short, medium or long term), permanent/ temporary, secondary⁹⁴, cumulative⁹⁵ and synergistic⁹⁶) will be described in the appraisal commentary, together with any assumptions or uncertainties. Where necessary, the SA will make suggestions and recommendations to mitigate negative effects or promote opportunities for enhancement. The appraisal will be undertaken using professional judgment, supported by the baseline information and wider Plan evidence base. A summary appraisal commentary will be provided to set out any significant effects identified for individual options, along with suggestions for mitigation or enhancement to be made where relevant.

Site Options

5.5 The call for sites (Feb to April 2016) and updated Strategic Housing Land Availability Assessment will identify a long list of potential site options. Each of these sites will be considered through the Council's site assessment process, which is scheduled for public consultation from 30 June to 29 July 2016. The site assessment process will be used to assess identified sites against a range of criteria, helping to filter or reduce the number of potentially suitable sites for development. The SA alongside a range of other studies and evidence base documents will inform the Council's site assessment process and therefore decision in terms of what site are progressed or rejected through the emerging Local Plan.

⁹⁴ Any aspect of a plan that may have an impact (positive or negative), but that is not a direct result of the proposed plan.

⁹⁵ Incremental effects resulting from a combination of two or more individual effects, or from an interaction between individual effects – which may lead to a synergistic effect (i.e. greater than the sum of individual effects), or any progressive effect likely to emerge over time.

⁹⁶ These arise from the interaction of a number of impacts so that their combined effects are greater than the sum of their individual impacts.

- 5.6 The SEA Directive and Regulations require the SA to consider all reasonable alternatives. For the purposes of the SA for Central Bedfordshire Local Plan a reasonable site option is considered to be one that is realistic and deliverable within the scope, timescales and objectives of the emerging Plan. It is therefore considered that all site options which pass through Stage 2 of the Council's site assessment process should be subject to SA as a reasonable alternative.
- 5.7 The Sites SA Framework presented in earlier in Section 4, Table 4.3, will form the basis for appraising reasonable options for site allocations. It sets out the standards and thresholds that will be used to determine the nature and significance of effects against SA Objectives, including any assumptions or uncertainties that will be made. This ensures a consistent approach is taken for the appraisal of all reasonable site options and also includes a clear explanation of where particular issues are considered within the Sites SA Framework. It should be noted that the Sites SA Framework (Table 4.3) has been developed alongside the Council's site assessment criteria to ensure that they are consistent and effectively inform one another. The SA Significance key presented in Table 5.1 will also be used.
- 5.8 Each reasonable site option will be subject to assessment using the full Strategic SA Framework (Table 4.3). This includes all site options that pass through Stage 2 of the Council's site assessment process. The findings of the SA for each site option will be grouped together by settlement or geographical cluster. This will allow a clear comparison of the SA findings of each site option for a settlement or area as well as allow the consideration of cumulative effects. An example of a detailed appraisal matrix for a settlement or cluster of sites is provided in Table 5.3 below.

Table 5.3: Example SA Matrix for Site Options

Settlement/ Geographical Cluster of Site Options															
Reasonable site options	SA Objectives														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Site Option 1															
Site Option 2															
Site Option 3															
Site Option 4															
Site Option 5															
Site Option 6															
Appraisal Summary:															
Narrative reporting significant effects for individual sites, issues for cumulative effects, any uncertainties, mitigation, and any recommendations from the SA.															

- 5.9 The appraisal will be undertaken using professional judgment, supported by the baseline information and wider Plan evidence base where necessary. A summary appraisal commentary will be provided to set out any significant effects identified for individual site options, along with suggestions for mitigation or enhancement to be made where relevant. The nature of the likely sustainability effects (including positive/negative, duration, permanent/

temporary, secondary, cumulative and synergistic) will be described, along with any assumptions or uncertainties noted. Where necessary, the appraisal commentary will also identify any potential cumulative effects for that settlement or geographical cluster of sites.

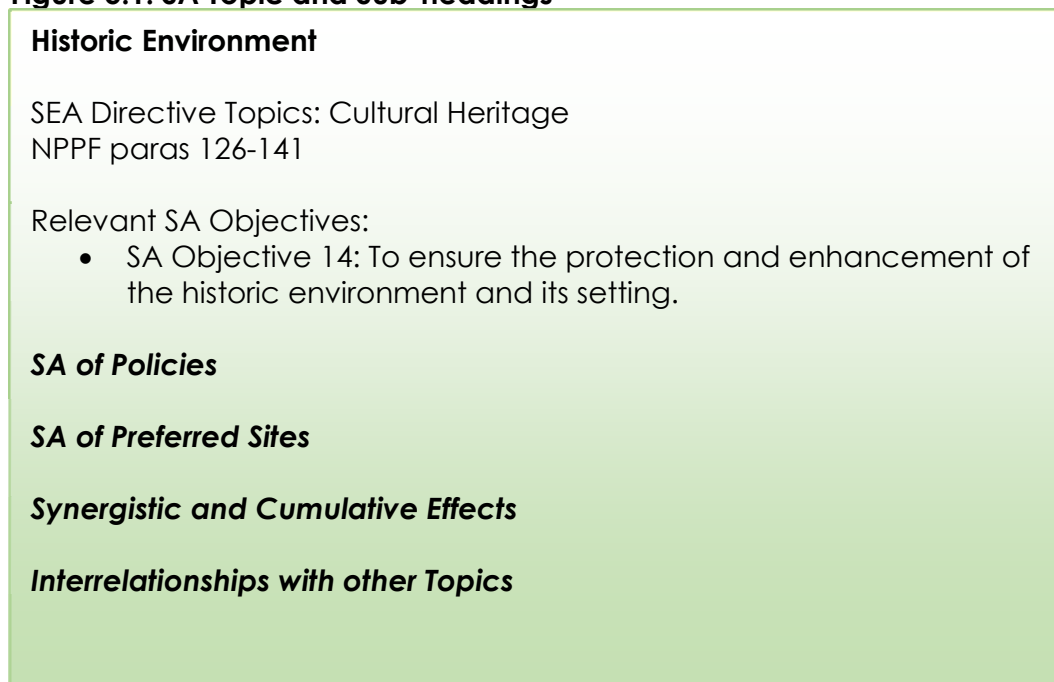
Policy Options

- 5.10 Each reasonable policy option will be considered against the Strategic SA Framework (Table 4.2). A comparative appraisal narrative will be produced for each policy topic or area to set out any significant effects for individual policy options, along with suggestions for mitigation or enhancement.

SA of the Local Plan (including policies and preferred sites)

- 5.11 The SA of the Central Bedfordshire Local Plan, including preferred policies and site allocations, will be structured under topic headings, which have been linked to Objectives in the SA Framework as well as topics in the SEA Directive and paragraphs in the NPPF. This will provide a framework and structure to evaluate the likely significant effects of the Local Plan against these key topics, which will include health and equality. The appraisal of each topic will be divided into a number of sub-headings to ensure that each aspect of the emerging Plan (preferred policies and site allocations) is considered as well as the interrelationships between topics and cumulative effects of the Plan as a whole. This method allows the SA to focus on the policies and preferred sites that are likely to have significant effects and provide further detail. It also allows for the consideration of mitigation that may be provided through policies in the Plan. An example of a topic and sub-headings is provided below in Figure 5.1 below.

Figure 5.1: SA Topic and Sub-headings



- 5.12 As for the SA of strategic and site options, the appraisal will be undertaken using professional judgment, supported by the baseline information and evidence for the Central Bedfordshire Local Plan, as well as any other relevant information sources available. The nature of the likely sustainability effects (including positive/negative, duration, permanent/ temporary, secondary, cumulative and synergistic) will be described, together with any uncertainty noted. Evidence will be cited where applicable and a commentary will be provided along with suggestions for mitigation or enhancement where relevant. SA is informed by the best available information and data; however, data gaps and uncertainties exist and it is not always possible to accurately predict effects at a strategic level of assessment.

Health and Equalities Impact Assessment

- 5.13 Consideration of effects on equality and health will be made throughout the SA process. The SA Frameworks (Tables 4.2 and 4.3) and topics (Para 5.9 - 5.10 & Figure 5.1) contain several direct and indirect links to health and equality. To demonstrate compliance with the Equality Act 2010 a separate detailed screening will be carried out, which will be presented as technical Appendix to the SA Report. An EqIA demonstrates how the Council has met with the Public Sector Equality Duty (PSED) as set out under Section 149 of the Equality Act 2010.

Habitats Regulations Assessment (HRA)

- 5.14 The Conservation of Habitats and Species Regulations (as amended) (2010) [the Habitats Regulations] require that HRA is applied to all statutory land use plans in England and Wales. The aim of the HRA process is to assess the potential effects arising from a plan against the nature conservation objectives of any site designated for its nature conservation importance. The HRA of the Central Bedfordshire Local Plan will be undertaken alongside the SA with the findings of the HRA informing the SA. The methods and findings of the HRA process will be reported separately and be sent to the statutory consultee (Natural England) and placed on consultation for the wider public alongside the SA and the emerging Local Plan.

How Will the SA Inform the Decision-Making Process?

- 5.15 SA is an assessment tool that helps to inform decision-making, it is not the sole basis for a decision. The Council will consider the findings of the SA alongside the wider evidence base to inform decision-making in relation to the selection or rejection of alternatives and development of policy for the Local Plan. SA is an iterative and ongoing process that will be undertaken at each stage of plan-making. SA Reports will accompany the Local Plan on consultation at various stages and set out the method and findings of the SA as well as reasons for the selection or rejection of alternatives in plan-making.

6.0 CONSULTATION

- 6.1 The Draft SA Scoping Report sets out the process that will be undertaken and will be published on the Central Bedfordshire Council website for public consultation in July 2016 for 5 weeks. The Report will be subject to consultation with the SEA statutory bodies; Historic England, the Environment Agency, and Natural England; as well as stakeholders and the public. Any consultation responses received will be considered and inform the development of the Final SA Scoping Report.

Appendix I: SA Scoping Workshop Notes

SA Scoping Workshop for Officers

Wednesday 20th April 2016 10:00 - 12:30
The Working Woodland Centre

Attendees:

Enfusion:

Alastair Peattie
Cheryl Beattie

Central Bedfordshire Council:

Pru Khimasia
Saskia Duncan
Connie Frost-Bryant
Lynsey Hillman-Gamble
Sally Chapman
Henry Cleary
Monika Marczewska
Stephen Mooring
Liz Anderson
Julia Scott
Alison Meyers
Laura Kitson
David Hale
James Cushing
Claire Harding
Geraldine Davies
Donna Lavender
Alys Bishop
Michelle Flynn
James Cogging
Owen Harrison

Apologies:

Sue Frost
Ann Rowland
Lorna Walker
Stuart Harrison
Ben King
Roy Romans
Lisa White
John Goody
Simon Joynes
Steve Brewer
David Leverington

A brief introduction by Alastair Peattie set out the requirements, purpose and stages of the Sustainability Appraisal (SA) process for the emerging Local Plan. The purpose of the workshop was to discuss with Central Bedfordshire Officers the draft key sustainability issues identified through the baseline information and plans and programmes review as well as Draft SA Frameworks that will be used to assess the Local Plan along with any reasonable alternatives. The key comments and suggestions raised by Officers, along with how they have been taken into account, are outlined in the table below. Where necessary the table below also identifies where there are any data gaps or further information is required.

Strategic SA Framework

Reference	Officer Comment	Response & Outcomes
Communities		
Key Issues	It was suggested that school places/ the capacity of schools is an important issue.	It was agreed that any deficiencies in a particular service or area will be noted under the key sustainability issues. This will need to be updated following the audit of settlement facilities currently being carried out by the Council.
	Central Bedfordshire accommodates higher than then national average number of Gypsies and Travellers.	It was agreed that this will added as a key sustainability issue.
	Further clarification required as to why Dunstable and Houghton Regis are identified as communities with differing sustainability issues.	It was agreed that further clarification will be provided to clearly explain why Dunstable and Houghton Regis are specifically mentioned.
	The Housing Strategy and new evidence from Citizens Advice Bureau (CAB) will identify if there are any key issues in relation to house prices/affordable housing. The CAB information will be forwarded to Enfusion.	It was agreed that this evidence would be reviewed and key issues amended as necessary.
	It was questioned where safety and crime is identified within the framework.	Enfusion explained that the baseline information explores crime statistics; however, crime is not identified as a key sustainability issue for the Plan area.
	There is not only an issue with regard to accessibility to physical services/facilities for rural communities but also access to digital services, such as high speed internet.	As noted above, it was agreed that any deficiencies in a particular service or area that are supported by evidence will be noted under the key sustainability issues.
Objective 1	No specific comments were made.	N/A
Objective 2	Officers queried why only rural communities were identified under Objective 2. It was suggested that this should be removed as it suggests that rural communities are of greater importance than communities in other, such as urban, areas.	It was agreed that the reference to rural communities will be removed from SA Objective 2.
	It was noted that a number of settlements within Central Bedfordshire are linear, or 'made up of ends', which would mean that development might 'join them up'.	Noted.
Objective 3	It was suggested that poor access to facilities/services needs to also be a key issue, in particular for rural communities.	It was agreed that access to services and facilities will be identified as a key sustainability issue, particularly for rural communities.

Reference	Officer Comment	Response & Outcomes
Decision-aiding Questions for Objective 3.	It was suggested that there needs to be an additional decision-aiding question that relates to the potential enhancement or net gain in provisions as a result of development.	The decision-aiding question has been amended to reflect this comment.
Economy and Employment		
Whole Topic	Officers suggested that the quality and type of employment is just as important as the amount of land provided. The Council has a number of aspirations for the quality and type of employment to be provided and it is important that these are reflected.	It was agreed that the key sustainability issues and objectives will be amended to better reflect the aspirations of the Council with regard to the economy and employment.
	The Council is targeting the growth of particular economic sectors, as well as trying to support a diverse economy.	It was agreed that the Framework should reflect this.
	It was also suggested that the safeguarding of existing employment land is also important.	It was agreed that the Framework should reflect this.
	Need to identify that there are both urban and rural economies, perhaps emphasising support for the rural economy.	It was agreed that the Framework should reflect the different types of economies in the Plan area.
	It was suggested that there should be more in relation to education and training under this topic.	An additional decision-aiding question has been included to ensure that education and training are covered.
Key Issues	It was stated that a key issue is the enormous out-flows of people accessing retail, Central Bedfordshire is missing out on key convenience, leisure and retail spending. It was identified as a particular issue for Dunstable.	It was agreed that this needs to be identified as a key sustainability issue. Enfusion also noted that this should be reflected in the baseline information.
	It would be beneficial to identify the types of employment that people are out-commuting for.	It was agreed that the SA could take account of this information once it became available.
Decision aiding Questions	The Council does not anticipate that they will need to meet employment needs arising from outside the Plan area.	It was agreed that the decision-aiding question relating to meeting employment needs outside the Plan area could be removed.
	It was suggested that there should be more in relation to education and training under this topic as it can help to improve unemployment as well as average GCSE attainment.	It was agreed that a decision-aiding question would be added to address education and training.
Health and Equalities		
Key Issues	It was noted that although there are areas of higher deprivation in the South, evidence suggests that deprivation is increasing in	It was agreed that this is an important issue and should be reflected in the baseline information and key

Reference	Officer Comment	Response & Outcomes
	other areas of Central Bedfordshire, including in the north of the Plan area (although this is not identified as higher than national averages).	sustainability issues.
	Need to identify the links between health and green infrastructure, particularly the link between green infrastructure and the Council's health priorities and aspirations, which includes reducing levels of adult obesity. It was also noted that there is more green space in the wealthier areas of Central Bedfordshire.	Enfusion noted that this information is contained within the baseline; however, it was agreed that this will be more clearly reflected in the SA Framework.
	It was noted that the quality of GI is important as well as the quantity.	It was agreed that this could be reflected within the key sustainability issues.
	It was noted that the quality of housing is a key factor for health and equalities.	Noted, housing is addressed under SA Objective 1.
<i>SA Objective and Decision-aiding Questions</i>	Enfusion suggested that the SA Framework could be clearer in terms of what is meant by deprivation.	It was agreed that the SA Framework will more clearly define what is meant by deprivation.
	It was suggested that there is more to GI than loss as a result of development. The framework should reflect the potential benefits and aspirations of the Council for net gain in GI. Need another question to identify if development result in net gain or enhancements.	It was agreed that an additional decision-aiding question will be added that relates to the potential benefits of GI and Council's aspiration for net gain.
Transport and Movement		
Whole Topic	It was suggested that the SA Framework should factor in more elements of the transport network, particularly those that influence modal choice, including qualitative differences, cost and safety.	The decision-aiding questions have been amended to reflect that the quality of transport network also influences choice. Cost and safety are issues that are more appropriately dealt with through plan-making.
Objective 6	It was suggested that this objective should seek to not only minimise but maintain and improve the existing network.	It was agreed that SA Objective 6 would be amended to reflect this comment.
Decision-aiding Questions for Objective 6	It was suggested that there needs to be another question about enhancing / improving the existing network.	Enfusion explained that the second decision-aiding question relates to potential improvements. However, it was agreed that this decision-aiding question could be amended to make this clearer.
Objective 7	It was suggested that this objective could possibly be split into two, with one to encourage a modal shift, and another to reduce the need to travel.	Following further consideration from Enfusion, it is considered that splitting this SA Objective in to two is not necessary. It is assumed that encouraging a modal shift will help to reduce the need to travel.

Reference	Officer Comment	Response & Outcomes
	It was suggested that this Objective needs to be expanded to demonstrate how a modal shift will be achieved.	It is considered that additional text explaining how modal shift will be achieved is not appropriate for a high level objective. The decision-aiding questions set out how this will be achieved through improvements to access and quality of sustainable transport modes as well as utilising opportunities to support delivery of proposed transport infrastructure.
Air Quality		
Whole Section	It was agreed that this topic could be scoped out. However, it was queried where other air quality issues, such as odour get considered.	Enfusion explained that this is considered through the Sites SA Framework, which will considering neighbouring land-uses and potential effects on community health when the location of potential site options are known.
Energy and Climate Change		
Whole Topic	Officers suggested that this topic should be scoped in. It was proposed that this could be an important issue with regard to the refinement and development of policy options.	It was agreed that an Objective and decision-aiding questions will be included for this topic.
	As for air quality, it was agreed that Greenhouse Gas Emissions are primarily related to traffic and that this particular issue could be scoped out as it is already addressed, in part, through SA Objective 6.	Following further discussion and clarification from the Council, it has been agreed that greenhouse gas emissions should not be scoped out from the Strategic SA Framework but could be scoped out from the Sites SA Framework.
	It was suggested that there are potential opportunities for renewable energy development, particularly large warehouses that could contribute to solar energy generation. There is also the potential for wood fuels.	The potential opportunities for renewable energy will be reflected in the SA Objective and decision-aiding question under this topic.
	It was noted that there are grid capacity issues in some areas and that development in those areas could help to address this issue.	The Council is in the process of producing evidence in relation to grid capacity. This will be considered through the SA once available.
	It was suggested that the potential impacts of increased air travel, in particular from Luton Airport, which would result in increased passengers and number of vehicle journeys upon communities could be considered under this topic.	Noted, this will be reflected and considered through the SA where relevant.
	Officers also suggested that the framework should also try and consider the ability of development as well as habitats and species to adapt to climate change.	A decision-aiding question will be included that relates to climate change adaptation.

Reference	Officer Comment	Response & Outcomes
Water: Resources, Quality and Flooding		
Whole Topic	Would it be possible to adopt an ecosystems approach to this topic in order to link with existing evidence, relating to provision and regulation?	For consistency, an ecosystem approach would then also need to be adopted throughout the SA process. The water environment provides a range of services that are linked to the majority of topics considered through the SA process.
Key Issues	There was some confusion over the first key issue and it was suggested that the wording implies that the water companies are to blame for water shortages.	It was agreed that this issue will be amended to avoid any confusion.
	Higher flood risk areas are not located predominantly around existing water courses, there are areas of high risk of surface water flooding in the south.	It was agreed that the key issue will be amended to reflect this.
Objective 9	Rather than reduce the risk of flooding, could amend the objective so that it seeks to reduce the causal effects of flood risk, and identify that this relates to all sources of flood risk.	It was agreed that the objective will be amended to reflect this comment.
Objectives	It was queried whether a separate objective should be included for the use of sustainable drainage systems.	Enfusion has given this further consideration and does not think a separate objective in relation to sustainable drainage systems is necessary. However, an additional decision-aiding question has been included to ensure that this is covered within the Framework.
Decision-aiding Questions	Suggested that there should be an additional decision-aiding question with regard to the safeguarding of land to manage flood risk.	It was agreed that a decision-aiding question will be added to reflect this comment.
Soil and Land		
Key Issues	In response to a question from Enfusion with regard to the previous high delivery of new development on brownfield sites, the Council stated that they are in the process of creating a register of brownfield sites and this should be ready in June.	Noted.
	It was suggested and agreed that the Green Belt would be more appropriately addressed in another topic within the framework.	Enfusion have given this further consideration and consider that Green Belt Land should be addressed under the community topic against SA Objective 2.
	A key issue with agricultural land is it is generally lost on a piecemeal basis, therefore, the cumulative loss needs to be given sufficient consideration.	Noted, cumulative effects will be considered as part of the SA process.

Reference	Officer Comment	Response & Outcomes
Biodiversity and Geodiversity		
Key Issues	Greensand Ridge and Nature Improvement Areas was identified as being important.	An additional decision-aiding question has been included to reflect this.
Decision-aiding Questions	Suggested that there needs to be a decision-aiding question about achieving an overall net gain.	It was agreed that this would be included in the decision-aiding questions.
	It was suggested that the final decision-aiding question should refer to potential enhancements in the Greensand Ridge NIA.	It is considered that the final decision-aiding criteria should remain generic and not identify a specific site. There could, for example, be the potential for a development to enhance a SSSI.
Landscape and Townscape		
Key Issues	The first key issue should be amended and identify that there are important ridges as well as expanses of flat land, and the ridges are critical landscapes.	It was agreed that this key issue would be amended to reflect this comment.
	It should be noted that the question has been posed within the Environmental Strategy as to whether local landscapes should be designated, and consultation feedback will inform the Council's decision.	Noted.
	Although changing agricultural practices will have an effect on landscapes, the key issue relates more to the loss of agricultural land than its use.	Noted, the key sustainability issues will be amended to reflect this.
	Please remove the identification of the vulnerable settlements from the Landscape Character Assessment, it is too specific and could be contested that all settlements are vulnerable to changes in the landscape.	They issue has been amended and references to individual settlements removed. However, reference to the LCA and that it identifies vulnerable settlements has been retained.
Decision-aiding Questions	It was felt that the decision-aiding question relating to the enhancement of settlement entrances is too specific and should be removed.	It was agreed that this decision-aiding question will be removed.
	It was suggested that the effects on trees and woodland should also be considered under this topic.	After giving this further consideration it is felt that this may be too specific for a strategic SA framework. The loss of particular habitat types that contribute to the landscape may be more appropriately considered through the Sites SA Framework.
The Historic Environment		
Whole Section	No comments.	N/A

Reference	Officer Comment	Response & Outcomes
Minerals and Waste		
Whole Section	No comments.	N/A

Sites SA Framework

Reference	Officer Comment	Response & Outcomes
Communities		
Objective 1 Thresholds	Council to consider what size or capacity of housing development could be considered as strategic.	Council has clarified that 500 dwellings will be considered a strategic site given the level of infrastructure that can be provided.
Objective 2	Council to consider how the settlement audit work, in particular the audit of existing facilities/services for each settlement, could influence this Objective.	SA Framework will clearly refer to the settlement audit where necessary.
	It was suggested that coalescence and Green Belt Land could potentially be considered under SA Objective 2.	Enfusion to propose thresholds/ standards under SA Objective 2.
Objective 3	Council to identify a 'reasonable' walking distance for access to services and facilities, and whether certain services should be prioritised for their significance.	Following further comments from the Council and discussion with Enfusion, reasonable walking distances have been identified in the Department for Transport (2007) Manual for Streets.
	It was suggested that the framework needs to consider the quality of walking routes.	Following further comments from the Council, it has been decided that for the purposes of the SA Primary/ Secondary Pedestrian Routes and Primary/Secondary/Inter Urban Cycle Routes will be considered to be of greater significance than routes below them in the pedestrian and cycle network hierarchies set out in the Walking and Cycling Strategies published in 2011.
Economy and Employment		
Objective 4 Thresholds	The Council identified that 10ha of employment land is considered to be of significance or 'strategic'.	The threshold will be amended to reflect this.
Assumptions	Although agricultural land is no a significant contributor to the economy, the Council are considering whether they should be promoting this sector, particularly when considering the long-term potential for food security. The assumption that agricultural land is not significant therefore potentially conflicts with this work.	This paragraph will be amended to make it clear that this relates to the loss of agricultural land at individual sites. Additional text will be added to state that the cumulative loss of agricultural land will need to be considered further.
Health and Equalities		
Objective 5 Thresholds	It was suggested that the thresholds for negative effects should refer to no net loss of GI for leisure and recreation.	It was agreed that the thresholds/standards would be amended to reflect this comment.
	The Council identified that there is a hierarchy of spaces	The Leisure Strategy will be reviewed and amendments

Reference	Officer Comment	Response & Outcomes
	contained within the Leisure Strategy and GI Plan which could contribute to identifying the significance of any potential losses.	made to the thresholds if necessary.
	The Council suggested that reasonable walking distances to green/open space or sports/leisure facilities are contained in the Leisure Strategy.	Enfusion will review the Leisure Strategy and amend the thresholds as necessary.
Transport and Movement		
Objective 6 Thresholds	A major positive effect should also include development that improves the network or transport choice.	The thresholds have been amended to reflect this comment.
Objective 7 Assumptions	The Council identify that currently promoted routes relate to leisure purposes, and as such will not be appropriate for strategic walking/cycling routes that encourage a modal shift.	Following further comments from the Council, it has been decided that for the purposes of the SA Primary/Secondary Pedestrian Routes and Primary/Secondary/Inter Urban Cycle Routes will be considered to be of greater significance than routes below them in the pedestrian and cycle network hierarchies set out in the Walking and Cycling Strategies published in 2011.
	It was suggested that the appraisal needs to acknowledge that the larger development sites will deliver more in the way of transport infrastructure and improvements.	Enfusion explained that this will be addressed within the assumptions or within the appraisal narrative for site options.
Objective 7 Thresholds	It is critical that the SA considers the quality of services as well as accessibility.	It was agreed that the frequency of services will be important in helping to determine the nature and significance of effects. Enfusion explained that this will require some Officer input if this information is not already available through the Council's site selection process.
	Council to identify and justify what is considered to be a 'reasonable' walking distance to train stations, bus stops and walking/cycling routes.	Following further comments from the Council, reasonable walking distances have been informed by the Council's site assessment frameworks/criteria.
Air Quality		
Whole Section	No comments	N/A
Energy and Climate Change		
Whole Section	Could the resilience of a building during its lifetime be considered under this topic. Considers the potential effects of climate change in 50 to 100 years.	While this is an important issue and could be included as a key sustainability issue it is not considered necessary to include it as a specific objective or decision-aiding

Reference	Officer Comment	Response & Outcomes
		question. Issues related to climate change adaptation, such as increased flooding and pressure on water resources, are already considered through other SA Objectives and decision-aiding questions.
	This could be influenced by the Renewable Energy Capacity Study for Central Bedfordshire.	Suggested evidence will be reviewed and thresholds set out for consideration under this topic.
Water: Resources, Quality and Flooding		
Objective 8 Thresholds	It was suggested that the appraisal should identify where there is the potential for water intensive development.	Following further consideration, some text will be added within the assumptions to state that the appraisal narrative will note if it is known that water intensive development is being proposed.
Objective 9 Assumptions	The thresholds need to state that flood risk from all sources are being considered.	It was agreed that the thresholds will be amended to reflect this comment.
	It was agreed that the framework needs to more clearly set out what is meant by areas of flood risk.	The Framework will be amended to more clearly set out what is meant by areas of flood risk.
Soil and Land		
Objective 10 Assumptions	The assumption that development could avoid small areas of best and most versatile agricultural land to mitigate potential negative effects is wrong, as although the land is not lost it does become sterilised with the potential for negative effects.	It was agreed that this text will be removed from the framework.
Objective 10 Thresholds	In line with discussions on the Strategic SA Framework, it was agreed that the Green Belt should be removed from this topic and considered under either communities or landscape in the Sites SA Framework.	Following further consideration Green Belt Land will now be considered under the Communities topic against SA Objective 2.
Biodiversity and Geodiversity		
Objective 11 Assumptions	No suggestions or changes proposed by Officers.	N/A
Landscape and Townscape		
Objective 12 Assumptions	It should be noted that TPOs are generally located in urban areas, and as such the rural landscape should consider and the	Noted, as explained at the workshop the presence of TPOs does not significantly affect the nature and

Reference	Officer Comment	Response & Outcomes
	appraisals should note any potential loss of hedgerows or orchards.	significance of effects against SA Objective 12. It should also be noted that the thresholds already consider the potential loss of important habitats such as hedgerows.
	The internal sites assessment method will identify potential effects on landscape, and this can be used to inform this SA Objective.	Noted, the Sites SA Framework will be updated to clearly show what evidence has been used to inform the nature and significance of effects.
The Historic Environment		
Objective 13	This needs to include Town and Village Greens and their settings.	Town and Village Greens are not heritage designations and therefore, it is not considered appropriate for them to be included under this topic. However, the appraisal narrative will note if a site option falls within a Town and Village Green.
Minerals and Waste		
Whole Section	No Officer from this topic area present - comments to be fed back to Enfusion.	N/A
Other Comments		
General	There is a lot of evidence still being produced for the Local Plan, how will this align with the SA process?	Enfusion explained that the SA process is iterative and ongoing, if key evidence is produced it will be taken into account and updates to the baseline & PP review as well as key issues and Frameworks can be made if necessary.
	The SA Frameworks identify where the settlement hierarchy could potentially inform the SA process, and the Council have found this useful for the ongoing development of this work.	Noted with thanks.

Central Bedfordshire Local Plan Sustainability Appraisal (SA) Scoping Workshop for Members

Wednesday 20th April 2016 14:00 - 15:30
The Working Woodland Centre

Attendees:

Enfusion;

Alastair Peattie
Cheryl Beattie

Members;

Cllr Sue Clark
Cllr Steve Dixon
Cllr Kevin Collins
Cllr Ken Matthews

Officers;

Pru Khimasia
Saskia Duncan
Monika Marczevska
Lynsey Hillman-
Gamble
Connie Frost-Bryant

Apologies;

Cllr Nigel Young

A brief introduction by Alastair Peattie set out the requirements, purpose and stages of the Sustainability Appraisal (SA) process for the emerging Local Plan. The purpose of the workshop was to discuss the draft key sustainability issues identified through the baseline information and plans and programmes review as well as Draft SA Frameworks that will be used to assess the Local Plan along with any reasonable alternatives with the Duty to cooperate Members Group. The key comments and suggestions raised by Members are outlined below.

Key Issues and comments raised by Members:

1. Members suggest that utilities capacity is a critical issue.
2. Members suggest that reducing commuting is also a key issue. It was noted by Enfusion that this is considered within the Draft Frameworks.
3. Members queried if the topics or objectives within the Frameworks are weighted, or if any are considered to be of greater significance. Enfusion clarified that the topics or objectives within the Draft SA Frameworks are not weighted or prioritised; the SA Framework and appraisal matrices/narrative should be read as a whole.
4. Members queried if the framework consider new development within settlements, which has recently gained planning permission, and the potential effects of receiving further development as a result of the plan. Enfusion and Officers explained that this will be considered through plan-making as well as the SA process.
5. Members question whether the Council can continue to deliver high levels of regeneration of previously developed land, the Council have advised that they are in the process of creating a register of brownfield sites, and expect this to be available around June.
6. Members consider that capacity must be factored into the provision of services/facilities if we are assessing distance, for example if distance to a GP surgery is being assessed, then we need to consider the capacity of this surgery. Officers explained that the Council is in the process of undertaking an audit of the settlements to determine the current provision of services/facilities.
7. Members feel NHS provisions are a significant issue, we can build facilities but we cannot get the skilled staff, including GPs, to fill them. Officers explained that the Council's scope in this regard is limited and that a named project is required at the development management stage to secure appropriate contributions through Section 106 agreements.
8. Members would like to see coalescence used as an indicator within the framework. Enfusion explained that coalescence is currently considered under the topic relating to communities.
9. Members queried if there is a problem if distances are used as thresholds and these are different to other evidence documents. Enfusion stated that this is not a problem as long as the thresholds are clearly set out and they are justified.
10. Members queried if the appraisal will assess access to services and facilities in the neighbouring authority areas if these are located closer than services and facilities

within the Plan area. Enfusion explained that this will be considered where it is relevant and where the information is available.

11. All agree it is important to align the information with the Councils evidence.
12. Members express concern over setting an objective to reduce flood risk, as it is felt an unachievable aim, or objective that we would fail to meet. Enfusion and Officers explained that development does have the ability to reduce flood risk in certain situations.