LUTON BOROUGH COUNCIL

Luton

Sustainability Appraisal:

**High Town
Supplementary Planning
Document**

Nov 2007

Contents

1   Introduction

1.1   This Sustainability Appraisal (SA) of the High Town Supplementary Planning Document (SPD) has been prepared in accordance with European and national legislation, which requires all new planning documents to be subject to sustainability appraisal. This report sets out the scope of the Sustainability Appraisal for consultation with the statutory authorities, and other interested stakeholders.

2   The Approach Taken to the Sustainability Appraisal

SA Preparation

2.1   The SA has been prepared by Building Design Partnership (BDP) and Baker Associates (BA), in partnership with Luton Borough Council (LBC). This process started in 2004 when work commenced on the High Town SPD. BDP and LBC conducted a baseline audit of the study area, and developed a number of issues and options for the area. These were influenced by the policy direction that the Luton Local Plan 2001-2011 proposed, which was adopted in March 2006.

Community Involvement

2.2   Community involvement occurred from the outset, and included key stakeholders, organisations working in the area, local businesses, residents groups, and decision makers from a range of organisations. Targeted interviews were held in November 2004 to January 2005 with key stakeholders. On the 8th December 2004, a walk-in session was held to introduce the wider public to the project. On the 11th of January 2005, a stakeholders issues and visioning workshop was held. A land-use and urban design options workshop held on the 23rd of February 2005. The final public consultation has been carried out for 6 weeks from the 16th July to the 20th of August and two events (held on the 24th of July and the 11th of August) allowed the Environment and Neighbourhood team to collate the views of 150 residents, which were asked to respond to a questionnaire on the masterplan proposals.

2.3   An assessment and summary of the findings from the consultations held in 2004 and 2005 is contained in the High Town SPD. These issues were refined into key themes; places, uses and movement. The key issues under each theme have been presented in the SPD. Based on these events, a number of options were drawn up which incorporated the community vision. These are shown in the SPD; Proposed Option 1 – Destination High Town and Proposed Option 2 – Green Town: High Town. Both of the community lead visions have influenced the creation and refinement of issues

and options, and the permutation of the final preferred option, which is the basis for the SPD.

2.4   BA also contacted by letter, representatives from the Countryside Agency, English Nature, English Heritage and the Environment Agency, to discuss the intended approach to the sustainability appraisal. Comments from this process lead to the creation of a more detailed set of objectives derived from locally specific baseline information, and formed the core of the Scoping Report for the High Town SA.

Constraints and Assumptions

2.5   No significant constraints were encountered in the creation of the SPD or SA for High Town. The baseline data gathered for the SA is derived from the 2001 Census, which is the most recent source of verified and reliable data for the specific and local issues of relevance. Given that no other data set was available, this was considered only a slight imposition. Following this, it has been assumed that the tendencies seen in the 2001 data have been generally in a similar direction and magnitude post-2001, i.e. up until the present time. It is also assumed that no significant changes are envisaged that would render this baseline analysis, assessment of issues, and creation of options obsolete in the current climate.

3   Background

Sustainability

3.1   In order to undertake the SA and to assist in explaining its findings, it is necessary to establish what is meant by sustainable development. The essence of 'sustainable development' is a development, which meets the needs of the present without compromising the ability of the future generations to meet theirs (WCED 1987). Integral to the concept is the principle of 'intergenerational equity'; which means that the degree of access to the planet's resources should be no less in the future than it is for the present population. Implicit too in the idea of sustainable development is a concern for equity (or 'intragenerational equity'); which means that the consumption of resources by some should not deny the needs of others.

3.2   Sustainable development is undoubtedly a complex concept, embracing as it does economic, environmental and social concerns, and matters that vary from local to global in their extent. A concern for sustainability means taking a very long-term perspective.

3.3   The UK Government, in its strategy for sustainable development, 'A Better *Quality of Life*' (May 1999), explained sustainable development in terms of four objectives. These are:

❑ Social progress, which recognises the needs of everyone.

❑ Effective protection of the environment.

❑ Prudent use of natural resources.

❑ Maintenance of high and stable levels of economic growth and employment.

3.4   This approach has now been updated following the publication of the new UK strategy for sustainable development 'Securing the Future'. This was produced in conjunction with the UK shared strategy framework 'One future – different paths' (March 2005) which gives the purpose of sustainable development as a goal that:

'…will be pursued in an integrated way through a sustainable, innovative and productive economy that delivers high levels of employment, and a just society that promotes social inclusion, sustainable communities and personal well-being. This will be done in ways that protect and enhance the physical and natural environment, and use resources and energy as efficiently as possible'.

3.5   'Securing the Future' the new Sustainable Development Strategy sets out five guiding principles that will replace the four aims or the old strategy:

❑ Living within environmental limits.

❑ Ensuring a strong, healthy and just society.

❑ Achieving a sustainable economy.

❑ Promoting good governance.

❑ Using sound science responsibly.

3.6   These themes are reiterated in current guidance on delivering sustainable development through spatial planning as contained in PPS1: Delivering Sustainable Development.

Requirements of Sustainability Appraisal

3.7   The requirement for SA's arises from the Planning and Compulsory Purchase Act (2004), which places a duty on Local Authorities to exercise their functions with a view to contributing to the achievement of sustainable development. In addition to this, the European Directive 2001/42/EC on 'the assessment of the effects of certain plans and programmes on the environment' (the Strategic Environmental

Assessment (SEA) Directive), came into effect in England in July 2004 (Statutory Instrument 1633/2004). This requires that 'plans and programmes' that fall under the definitions in the Directive must undergo environmental assessment. In conjunction with guidance produced by the Department for Communities and Local Government (DCLG), formerly the Office of the Deputy Prime Minister (ODPM) in 2005, the process for development of SA's is:

❑ Collecting baseline information.

❑ Identifying sustainability issues and problems.

❑ Testing the SPD objectives against the SA framework.

❑ Developing the SPD options.

❑ Predicting the effects of the draft SPD.

❑ Evaluating the effects of the draft SPD.

❑ Considering ways of mitigating adverse effects and maximising beneficial effects.

❑ Proposing measures to monitor the significant effects of implementing the SPD.

3.8   The sustainability assessment process has also been informed by the production and consultation on the scope of the proposed SA. The Scoping Report was sent to English Heritage, Natural England, Environment Agency and Government Office for the East of England. Natural England considers the policies, plan and programmes accurate and comprehensively listed. It regards the redevelopment of High Town as an excellent opportunity to address the lack of green space and suggested to change the indicator monitoring its provision through the adoption of a more quantifiable and comparable one. Their comments have been incorporated into the SA and, in turn, the SPD. The Environment Agency suggested including measures to reflect the aim of the Agency to open up culvert watercourses and to enhance biodiversity along the main rivers and into the urban environment. Concerns have also been rise upon flood risks and contaminative land. Amendments have been made to the objectives and indicators to include these suggestions but not in regard to watercourses, that are missing in the study-area. A requirement for a Flood Risk Assessment for major developments and the compliance with the Strategic Flood Risk Assessment for all new development has been added to the SPD. Being the area comprised in a Source Protection Zone, which means that the aquifer is susceptible of being polluted, redevelopment of vacant/potentially contaminated land will need to be accompanied by a Contaminative Risk Assessment.

Policy Context

3.9   The content and guidance contained within the High Town SPD have been influenced by a wide range of other policies, plans and programmes. These include documents on an international, national, regional, strategic and local level. The SA of the Luton Local Plan also assessed the relationship between the Local Plan and both the Corporate Strategy and the Community Plan, and confirmed that the Local Plan was developed in conformity with these plans and strategies. As such, the SPD takes these into consideration in its policy direction.

3.10   This SA and the subsequent SPD have also taken account of the wider policies, plans and programmes. A full list of these documents is contained in Appendix 1. The analysis of the relevant key objectives of other strategies, plans and programmes has highlighted a number of strong recurring themes, which should be reflected in the SPD and SA objectives. These themes include:

❑ Encourage mixed use development and higher density land use;
❑ Redevelopment of existing developed land and vacant buildings rather than the expansion of urban areas;
❑ Regeneration of urban centres, particularly in relation to residential development to encourage people to remain and move back to city and town centres;
❑ Promotion of sustainable forms of transport, with particular regard to pedestrians and cyclists; and
❑ Creation of attractive places to live, which respect the local character and distinctiveness.
❑ Reducing the effects of climate change and planning for the future implications of climate change.

3.11   The SPD does not propose a new policy basis against which applications for planning permission will be assessed but simply expands and clarifies issues addressed in the Local Plan. As part of the previous Sustainability Appraisal of the Local Plan, the policy setting out the general approach to development in the High Town area was subject to sustainability appraisal. Policy HT1 (High Town Action Area) of the Luton Local Plan states that:

Policy HT1

The central area of High Town identified on the Proposals Map, is allocated   as an Action Area within which development will be permitted when it:

[A]   meets the identified requirements of local residents with regard to housing, employment, retail, community and recreational facilities; and

[B]   serves effectively as a centre for the community; and

[C]   incorporates other uses necessary to meet local need; and

[D]   incorporates development necessary to fund that which is required by this
        policy; and

[E]   will enhance the character, appearance and function of the area.

3.12   The SA of this policy identified that, '*overall this policy should aid in the regeneration
        and renewal of the area in order to create a more attractive place in which to live, and
        help to provide employment and community facilities*.' This is the starting point for the
        SA of the draft SPD.

3.13   The appraisal considers the details that the SPD adds to this basic policy and its
        implications for sustainability beyond the generally positive approach set out in policy
        HT1. Clearly it is not only policy HT1 that will guide development in the High Town
        area, as other relevant policies of the Local Plan set out the general approach to
        development in Luton. The Local Plan SA identified that the Plan would encourage a
        higher standard of sustainable development in Luton. This SA will address only the
        objectives specific to High Town. The overall objectives that have already been
        addressed in the Local Plan SA are not subject to this SA.

Vision of the High Town SPD

3.14   The vision for the High Town draft AAP is set out as:

        "*To create a sustainable residential neighbourhood that supports a mix of uses
        including economically successful industry and retail, with better pedestrian access
        and permeability of the area, more public open spaces and an enhanced natural
        environment*".

3.15   This vision is compatible with achieving a more sustainable development, although it
        does not explicitly state this as an over-arching goal. Comparing the vision to the
        objectives it is clear that they are closely related, and aim to achieve the same
        improvements to High Town. The vision sets the overall intent of the High Town Draft
        SPD as primarily a residential neighbourhood that supports a mix of uses including
        an economically successful industry and retail, with better pedestrian access and
        permeability of the area for residents and other visitors to High Town. In addition, the
        vision reflects the importance of enhancing the natural environment and open space,
        and the benefits this can bring to the community.

Objectives of the High Town SPD

3.16   Prior to undertaking the SA, it is necessary to have an understanding of how the High Town SPD fits into the land-use planning process. The land use planning document for the Borough is the current Luton Local Plan 2001-2011, which was adopted in March 2006. This document provides the Borough wide framework for development up until 2011. By that date, and in accordance with the Planning and Compulsory Purchase Act and Planning Policy Statement 12 (PPS12), a Local Development Framework (LDF) will replace the Local Plan. The Local Development Framework will be a portfolio of various documents setting out the planning policies and proposals for Luton Borough. Once adopted, the High Town SPD will supplement the adopted Local Plan.

3.17   The SPD will supplement in particular Policy HT1 of the Luton Local Plan and in accordance with PPS12, needs to be in conformity with these policies. An analysis of the particular Local Plan policies, which the SPD will supplement, has been provided in the "Policy Context" of section A, Appendix B.

3.18   The purpose of the High Town Supplementary Planning Document is to co-ordinate development within High Town, ensure that it is of a high standard of urban design quality, with an appropriate mix and density of land uses and developed whilst protecting and enhancing the amenity, the urban and the natural environments. The SPD will provide guidance for the development in High Town and will be used in determining individual planning applications.

The objectives of the draft High Town SPD are as follows:

3.19   **Heart of High Town:** This objective is clear in its intention to improve the retail and business sector in the area by attracting more people to shop and work in High Town Road through environmental improvements, and the number and quality of shops and businesses. This objective should help in meeting sustainability objectives relating to the local economy, as well as supporting more sustainable transport patterns in this area. As High Town is highly populated, well served by public transport and is also within walking distance from the town centre, access by foot to essential services is a critical driver and is to be welcomed. Its implementation should help meet sustainability objectives relating to more sustainable transport choices. This objective also seeks to draw people into the High Town area, particularly for shopping, from the Luton town centre. This approach should bring benefits to the local economy and support pedestrian movement to ensure people

primarily visit the area by foot, rather than by car, with subsequent benefits in terms of air quality and amenity.

3.20 **Historic High Town:** High Town has a high quality resource in the built environment, particularly the High Town Road Conservation Area. Protecting and enhancing this will help meet sustainability objectives relating to the built environment. In addition, enhancing this resource through improvements to dilapidated and vacant historic properties will increase the attractiveness of the area to visitors, and may help to meet economic objectives

3.21 **Housing:** Providing more housing is a key objective of the High Town SPD. This should help in meeting sustainability objectives for housing provision. However, ensuring that housing provision is in keeping with identified local needs is essential, and housing should be developed with the particular needs and characteristics of the residential type and tenancy of this area in mind, including the provision of affordable housing and the tenure mix. This is vital in order to retain and enhance a community identity as well as supporting the local economy and services of High Town, and is reflected in the Planning Policy Framework showed in Appendix B of the document, which gives the specific breakdown of forecasted demand for housing in Luton. Balancing the provision of housing for local people and commuters (given the proximity to the train station and the sustainable transportation implications this has) is crucial in maintaining mixed and sustainable communities.

3.22 **Mix of uses:** This is a welcomed intention and should help to retain and enhance the current character of the area and also reduce travel distances, public transport use and walking. Thereby, helping to meet sustainability objectives relating to air quality, access and others relating to the impacts of transport and travel. This objective concentrates on the redevelopment of sites where these sites are vacant or represent the inefficient use of land. The sustainability appraisal promotes mixed-use area as shown in the SPD, and this mix should be maintained where appropriate as residential and commercial uses.

3.23 **Resolve conflicting uses:** Retaining suitable employment in this accessible location is an objective of the SPD, particularly considering the long-term success of the area as a vibrant self-contained neighbourhood. This objective, however, has the aim of reducing potential conflicts between land uses, particularly in live/work areas. This objective also considers other conflicting uses, in particular pedestrian or cycle routes and other road uses, and the need for better-defined routes in High Town to protect more vulnerable road users. This could include road management schemes to

restrict traffic within High Town to local traffic (only where possible), and the potential for creating pedestrian priority areas, such as 'home-zones'.

3.24 **Movement:** Given the low car ownership of residents in the High Town area, this objective is an essential component of the strategy in the SPD. Particularly as many of the existing pedestrian and cycle routes in the area are of a low environmental quality, and some may also be responsible for increasing fear of crime. Therefore, to encourage walking and cycling by those living in the area, and those visiting the area (particularly from the Luton town centre) will help achieve sustainability objectives relating to accessibility, safety, air quality and the built environment, as well helping draw people to the area to support the local economy.

3.25 **Safe High Town:** This objective is again associated with the need for improvement to the walking environment of the area, and in particular the route through 'The Paths' estate that is currently a poor quality pedestrian route. Meeting this objective should help in achieving sustainability objectives relating to improving safety, and ensuring accessibility. This objective also aims to deal with issues relating to the safety of pedestrians and cyclists from road traffic.

3.26 **Green High Town:** In terms of improving the visual appearance and open space of the built environment this objective is welcomed by the appraisal in helping to meet the relevant sustainability objectives, and shows where there have been opportunities identified for open space or 'greening'. An attempt is also made to enhance the nature conservation interest of the site. This is particularly relevant in terms of green routes through the area that, although identified for the ease of movement for pedestrians and cyclists, can also be an important resource in terms of propagation of plants and movements of animals within High Town. Increasing biodiversity is also a key objective.

4 Baseline, Issues, Objectives and Indicators

4.1 The first step in the assessment of sustainability is to determine the underlying economic, environmental and social factors at the present time. From this analysis, issues and problems can be identified, and sustainability objectives and indicators can be formulated.

Fig. 1 : Aerial photography showing the boundary of the Study Area in red.
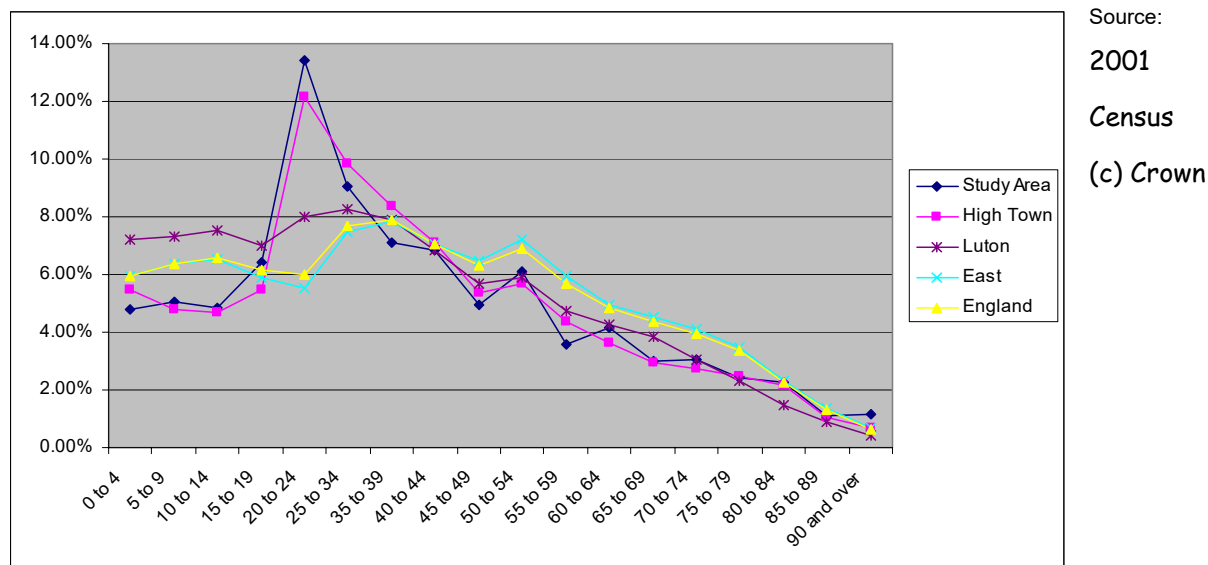
Baseline

Age Structure

Figure 2: Population Age Structure Comparison with Study Area, High Town Ward, Luton Borough, the East of England and England 2001

4.2   The baseline population data shows that the study area has a significantly higher number of 20-24 year olds than the comparative areas of the East of England and England. Luton as a whole has a larger percentage of people under 35 than England and the East of England. However, the study area is well below the comparative figures with regard to under 15 year olds. These figures reflect the small number of families in the area (especially compared to Luton), and the large number of young adults, particularly 20-24 year olds.
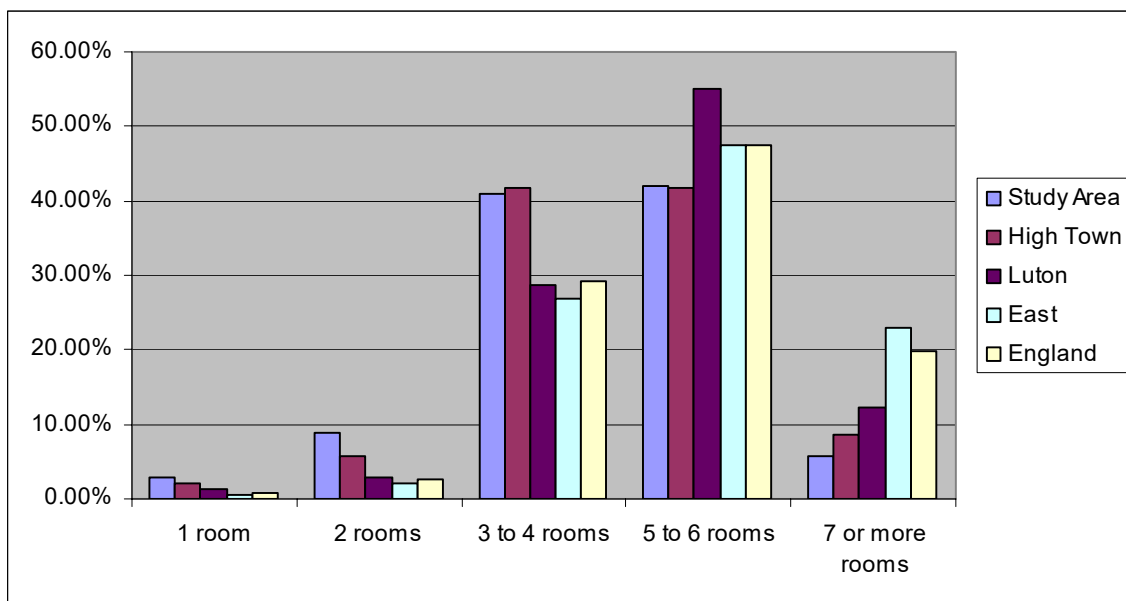
Households

Figure 3: Household Composition Comparison with Study Area, High Town Ward, Luton Borough, the East of England and England 2001
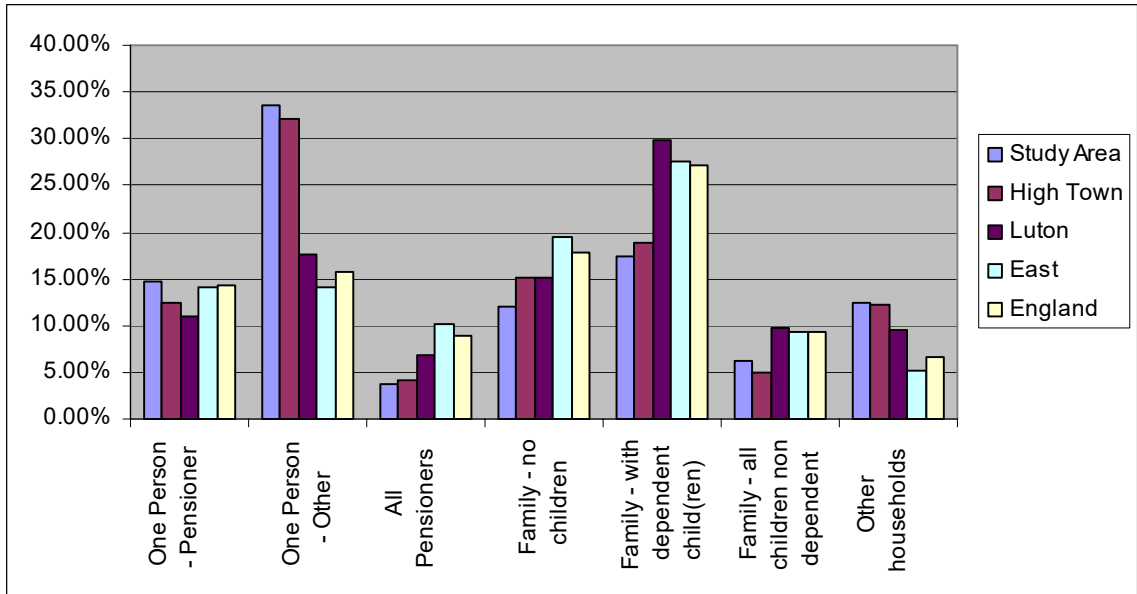
4.3   The study area and High Town ward show a high percentage of single person households, in contrast with household composition in Luton, East of England and England, which are made up of a higher proportion of family households. This figure could reflect the lack of appropriate housing for families and reflects the lack of families in the ward, particularly in the Study Area.

Figure 4: Dwelling Size Comparison with Study Area, High Town Ward, Luton Borough, the East of England and England 2001

4.4   Similarly, the make up of housing from the baseline data shows that the Study Area has a larger number of smaller dwellings in comparison to Luton, the East of England and England. Conversely, there are a smaller proportion of large dwellings when compared to the wider area of Luton.

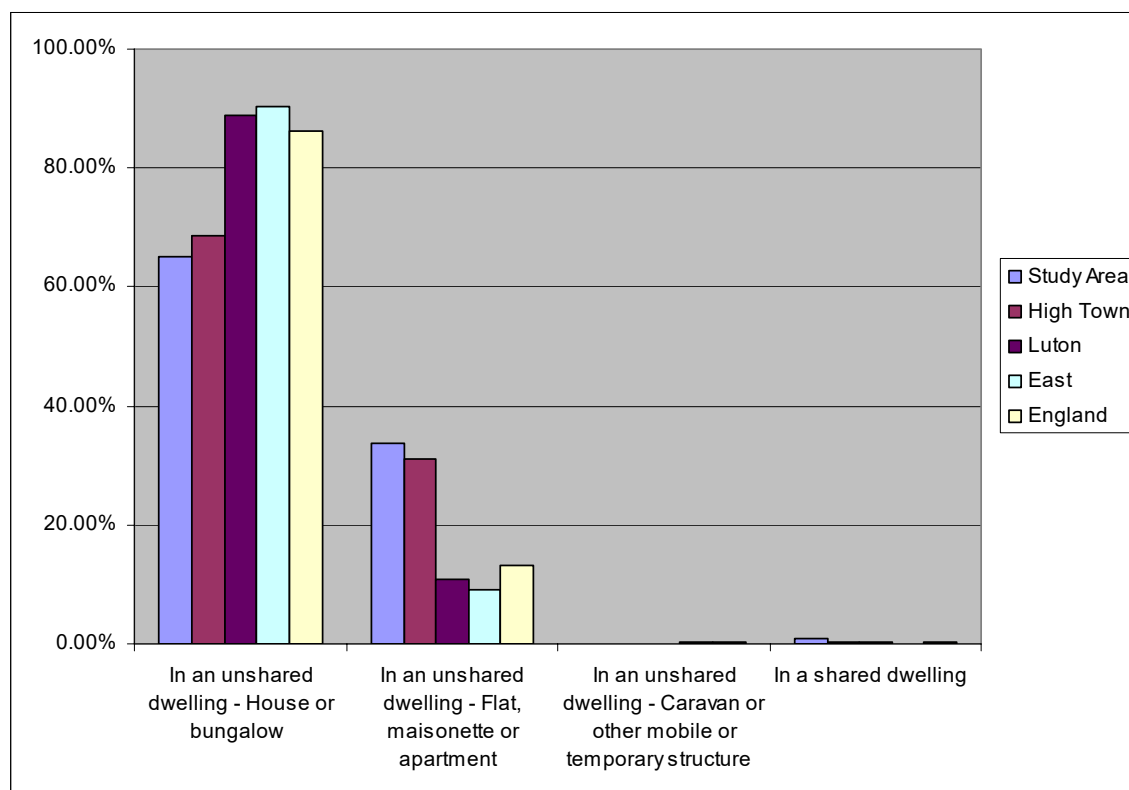**Figure 5: Market Housing Demand and Supply by Property Size 2004 - 05**

Size of Property	Housing Demand	Housing Supply	Net Shortfall (Surplus)
One bedroom	562	465	97
Two bedrooms	1,018	1,010	8
Three bedrooms	1,729	1,859	(130)
Four bedrooms	597	412	185
Five or more bedrooms	77	42	35
All property sizes	3,982	3,786	196

Source: Luton Housing Requirements Study 2004 – 05

4.5   The Council Housing Requirements Study (2004 - 05) shows an under-supply of one and two bedroom dwellings, an under-supply of four bedroom or larger dwellings, and an over-supply of three bedroom dwellings.

Dwelling Tenure and Type

Figure 6: Dwelling Type Comparison with Study Area, High Town Ward, Luton Borough, the East of England and England 2001

4.6   The baseline data indicates that there are a comparatively greater percentage of people living in flats, maisonettes and apartments in the study area than in Luton, the East of England and in England. Conversely, there are a lower percentage of people living in houses and bungalows than in Luton, the East of England and England.

Figure 7: Dwelling Tenure Comparison with Study Area, High Town Ward, Luton Borough, the East of England and England 2001
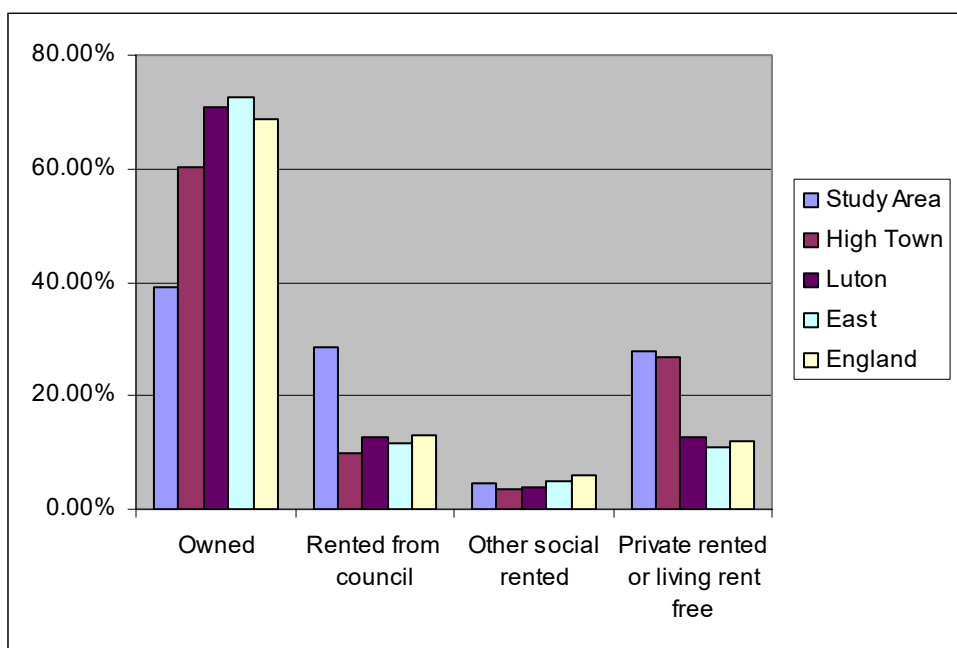
Source: 2001 Census (c) Crown Copyright. Crown copyright material is reproduced with the permission of the Controller of HMSO

4.7   The tenure baseline data shows, that comparatively, the study area has a lower percentage of households that are owner occupied, and a greater percentage of households that are privately and publicly rented.

The study area percentages for council rented properties contrasts with the wider High Town percentages being considerably higher, whilst the incidence of privately rented dwellings in the study area matches that of High Town Ward. Both are well above the Luton wide percentages.

Skills

Figure 8: Level and Grade of Employment Comparison with Study Area, High Town Ward, Luton Borough, the East of England and England 2001

4.8   The baseline assessment of skills is derived from an assessment of the level and employment grade. The Study Area is well below the High Town Ward, Luton, the East of England and England percentages for the top two most skilled employment categories, and has higher percentages in the unskilled and lowest grade employment categories and the benefits / unemployed categories.

Employment

Figure 9: Employment Comparison with Study Area, High Town Ward, Luton Borough, the East of England and England 2001

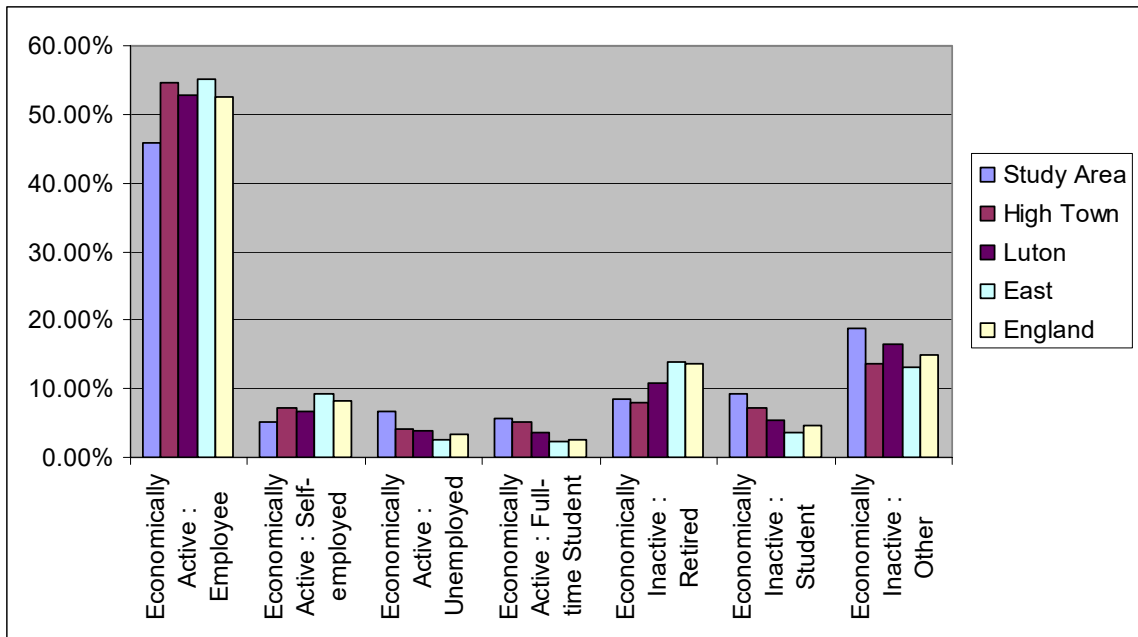4.9   The baseline data regarding employment shows that the majority of economically active people are employees. However, the overall percentage of economically active people in the Study Area is lower than the percentages for Luton, the East of England and England. Conversely, the percentage of economically inactive people (excluding retirees) is comparatively higher. The large number of inactive students in the Study Area negatively distorts the overall number of unemployed. This should be looked at in conjunction with the employment level / employment grade baseline as detailed previously, which gives a deeper understanding of employment trends.

Business

Figure 10: Business Comparison within the Study Area 2004
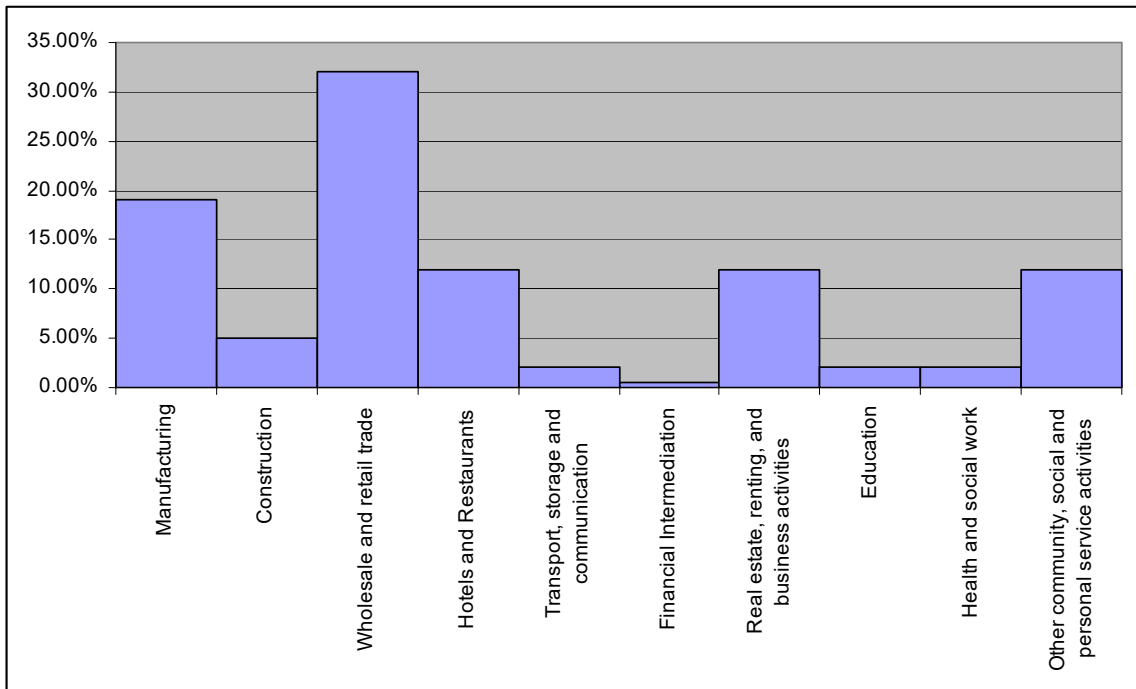
4.10   The baseline business data shows the percentage of businesses in the study area within each sector. As can be seen, wholesale and retail trade, and manufacturing (reflecting the historic position of High Town as a manufacturing location), make up the majority of businesses. Businesses in hotels and restaurants, real estate, renting, and business activities, and other community, social and personal service activities also have a significant presence in the study area. The data shows a significantly low level of business presence in the other sectors.

Community Facilities

4.11 The following community services are provided within the study area:

- Methodist Church Hall and Offices:

    o Princess Trust (Educational, Vocational, Voluntary work)
    o Alzheimer Society (Health service)
    o Tea dancing (Elderly people)
    o Signpost Head offices (Homeless and drug addicts, and run various hostels)
    o Grassroots (Interfaith organisation)
    o Drop-in Club (Social)
    o Mum and Tots Group (Social and Educational)
    o Lunch Club for the elderly (subsidised meal)

- Wellbeck Centre

    o Educational Centre for youth with problems or excluded from school and for mothers.

- Art Gallery

    o Shop and painting courses

- High Town Community, Sports and Arts Centre

    o Leisure, sports, recreational and social facilities.

- St. Matthew's Infant and Junior School

    o Educational and Social.

- Barnfield College.

    o Educational.

- NOAH Centre

    o Wood workshop, IT and basic skills centre

- Greenbank Music Village

   o Music Tuition

4.12 As can be seen, within the study area, a large and diverse number of community facilities exist.

Biodiversity, Landscape and Open Space

Figure 11: Areas of Open Space and Landscape

4.13   Although the majority of the study area is made up of urban built forms, there are areas that have been recognised for their biodiversity value. Most notable is the small area to the north east of the study area, in the form of a linear green corridor, which is designated as Other Site of Nature Conservation Importance. The Urban habitats (built up areas and gardens) Biodiversity Action Plan applies to the study area, and lists the species, which it monitors. Significant open space areas are adjacent to the study area and within easy walking distance of most dwellings in the area, although links to the River Lea are poor as it is largely culverted through the town.

4.14   The adjoining Bells Close Recreation Ground and Popes Meadow are flat open areas that allow active recreation and are well used. There are several wooded areas including Peoples Park (partly identified as a County Wildlife Site) habitat to the

protected specie of the Great Pignut, and the areas between Hitchin Road and Pomfret Avenue. The retention and protection of these wooded areas in such close proximity to the Town Centre is important and the impact of new development should be assessed.

4.15   The High Town Road area and adjoining employment land are largely devoid of trees and lack even small areas of open space. Some streets in the area are lined with mature street trees, i.e. Crescent Road, Midland Road, and Havelock Road, which add to the green backdrop to the area. The residential areas to the south east of the study area are lined with trees and contribute to greening the setting of the study area.

Air & Water

4.16   High Town falls within a Flood Zone 1, which comprises land that has a less than a 1 in 1000 annual probability of river flooding (<0.1%). Whilst not at risk of fluvial flooding, land in Flood Zone 1 can be susceptible to flooding from surface water. The River Lea flows to the south of the site. Water Quality has been determined to be satisfactory by the Three Valleys Water PLC who monitors the groundwater quality by regular samples, taken from random address across the district each month. Samples are also taken from the final sampling point at the Water Treatment Works on a daily basis and they all comply with the national target, which is known as Prescribed/Specification Concentration or Value (PCV). The water quality within the site is satisfactory and this needs to be maintained through sustainable drainage schemes (SUDS) and improved permeable surfaces in new developments. All new developments will have to be in compliance with the Strategic Flood Risk Assessment currently being undertaken by Luton. There are no rivers in the study area.

4.17   The study area meets the air quality objectives in the National Air Quality Strategy. However, there are no permanent air quality monitoring points within the study area.

4.18   High Town is situated in a Source Protection Zone 1, which means that the underlying aquifer is very susceptible to the potential effects of pollution.

Crime and Safety

Figure 4.12: All Recorded Crime (4 year period)

Ward	2001/02		2002/03		2003/04		2004/05	
	Count	Rate/1000	Count	Rate/1000	Count	Rate/1000	Count	Rate/1000
High Town	1,163	164.68	1,362	192.86	1,257	177.99	1,080	152.93
Luton	24,807	134.55	27,362	148.41	27,132	147.16	24,035	130.36

Source: Bedfordshire Police 2005

4.19   The crime figures are not available for the study area as a discrete entity, however, the High Town Ward figures are deemed sufficient to draw wider conclusions on an area basis. As can be seen, the High Town trend is for a higher rate per 1,000 for all recorded crime. This is still prevalent in the latest figures (2004/2005) where High Town exceeds the Luton rate/1,000 by in excess of 32.

Heritage

Figure 12: Conservation Area and Listed Buildings
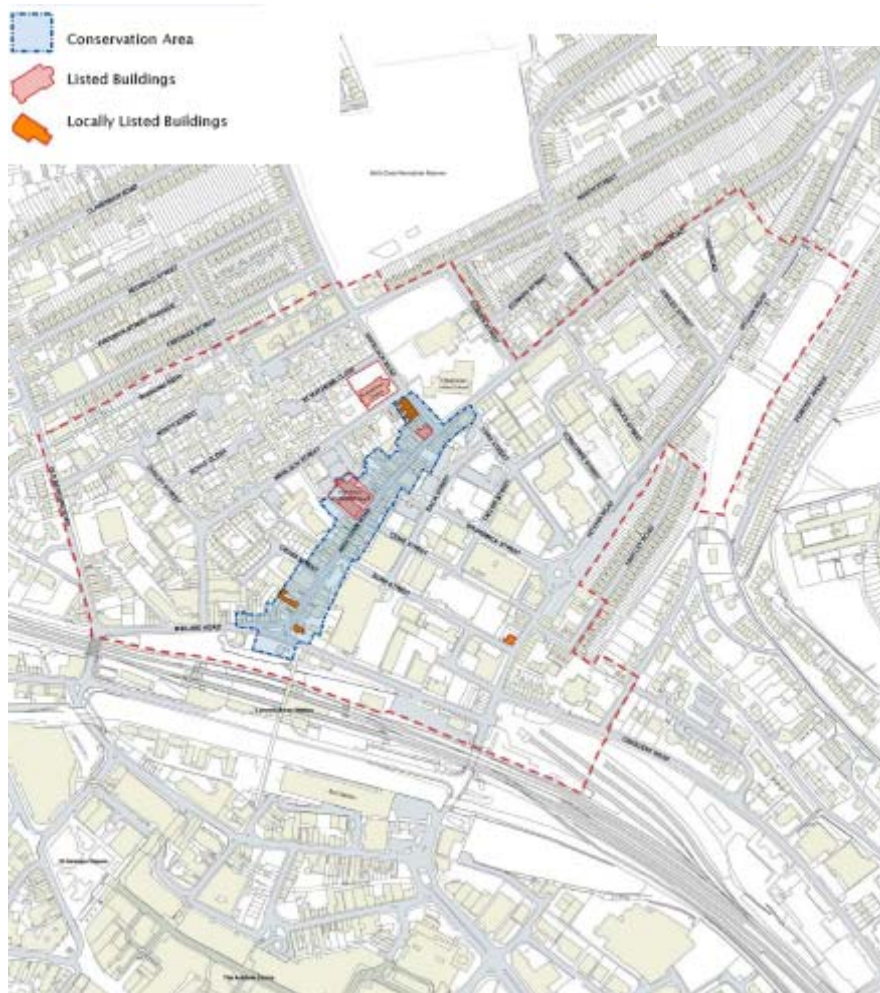
4.20   A portion of High Town Road is a designated Conservation Area. There are also a number of Listed Buildings within the study area, and these are shown on the plan below. These elements add to the character of the area and sense of identity, and together form a strong central historic core in the south of the study area, along the spine of High Town Road.

4.21   The Statutory Listed Buildings are:

❑   The High Town Methodist Church (High Town Road) Grade II
❑   The High Town Methodist Church Hall (High Town Road) Grade II (comprising gates, dwarf wall and railings)
❑   The Painters Arms Public House (High Town Road) Grade II
❑   St. Matthew's Church (Wenlock Street) Grade II

4.22   The Buildings of Local Interest are:

❑   The Railway Tavern Public House (High Town Road)

❑   The Well Public House (High Town Road)

❑   Terraced Houses (Havelock Road)

❑   The Old English Gentleman Public House (Hitchin Road)

There are also a number of buildings that have been identified as having the potential for industrial archaeological remains in the form of buildings associated with the hat industry. Those buildings are of importance and form part of Luton's industrial heritage[1].

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[1] A complete list of buildings can be retrieve in the "Extensive Urban Survey for Bedforshire –Luton Archaeological Assessment" Document 2000/71 Project 510. English Heritage and Befordshire County Council, July 2003. pp. 45-46.

Pedestrian Environment and Urban Design

4.23 An analysis of the key landmarks, views and vistas has been undertaken to assess how easy or difficult it is for pedestrians to understand and navigate around High Town.

Landmarks

4.24 High Town Road occupies a ridge, with the Methodist Church being the most prominent landmark building within the area. Not only is the church highly visible from High Town Road, due to its prominent tower and elevated position, there are views from Hitchin Road; most notably from the junction with Duke Street. It is also visible from sections of Wenlock Street, especially the pathway to the rear of the church. St Matthews Church acts as a landmark from the northern end of Wenlock Street and along Havelock Road. Also, the Milliners Court can be seen from most points in the area and from the town centre.

4.25 An escarpment forms the eastern boundary of the study area and forms a definite green edge as it contains many mature trees that terminate views from parts of High Town Road and Hitchin Road.

Gateways

4.26 The pedestrian footbridge over the railway is the main southern gateway into the area. This dominant linkage with the Town Centre is constrained as it narrows through the railway station. The junctions of Midland Road with Old Bedford Road and Hitchin Road are designed with priority for motor cars, while the pedestrian environment is characterised by steep changes in level, poor lighting and difficult crossing points.

Routes

4.27 High Town Road is the key focal point for the area, as it is both the entry point from the south to the retail shopping district and is the principle pedestrian route running north to south. Other key routes include Havelock Road, which is a well-used and tree-lined road linking Bells Close Recreation Reserve to High Town Road. The path to the rear of the Methodist Church forms an important link between High Town Road and The Paths estate. Midland Road, Old Bedford Road and Hitchin Road are also important routes bordering the study area.

Nodes

4.28 The key node is the southern end of High Town Road, where the station footbridge meets Midland Road. This is where the highest footfall was observed. The junction of Brunswick Street and Hitchin Road is also a key node both for traffic and pedestrians.

Walkability

Figure 13: Walkability

4.29   The High Town area is compact, and although situated on a slope, most destinations are located within a five to ten minute walk of High Town Road or the footbridge to the Town Centre. Some other key features are identified below:

❑   High Town Road provides a convenient and direct link to the Town Centre and Luton Railway Station for residents in the High Town 'core' and surrounding areas.

❑   There are low car ownership levels in the area.

❑   There is a lack of pedestrian crossing facilities on some of the busier roads in the area, including Havelock Road and Hitchin Road

❑   Car parks that service shops on High Town Road are spread along the length of the road and located within 50m of shop entries.

- ❑ The layout of streets and blocks in the area promotes convenient north south movement; the arrangement of blocks does not provide clear or direct east / west routes, particularly between open spaces.
- ❑ St Matthew's Infant School generates significant pedestrian movements at opening/closing time.
- ❑ Facilities for the mobility-impaired are generally poor.

Barriers

Figure 14: Barriers

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4.30   The main barrier to movement in the High Town area is the railway line, which
separates High Town from the Town Centre. To a lesser extent the major roads in
the area act as barriers to movement including Old Bedford Road and Hitchin Road.

4.31   There are only three access points across the railway line and where access is
provided it tends to be of poor quality by a tunnel, a lengthy bridge or underpass
which are undesirable environmental solutions to movement. Also the industrial
areas are detrimental to pedestrian movement as the pedestrian routes through
these areas are generally of a poor quality and the environment is not welcoming.

4.32   The figure 4.15 shows the links to, within, and through the study area; these are
shown in white with the private land and built forms as light and dark grey
respectively. This figure demonstrates the following characteristics:

❑   Lack of direct links between open spaces.
❑   Barriers that limit convenient east to west movement.
❑   Strong links from outlying areas to High Town Road.
❑   There are only three key links from High Town and surrounds to the Town
Centre.
❑   The over provision of routes within The Paths area.

31

Edges and Spaces

Figure 15: Positive and Negative Edges
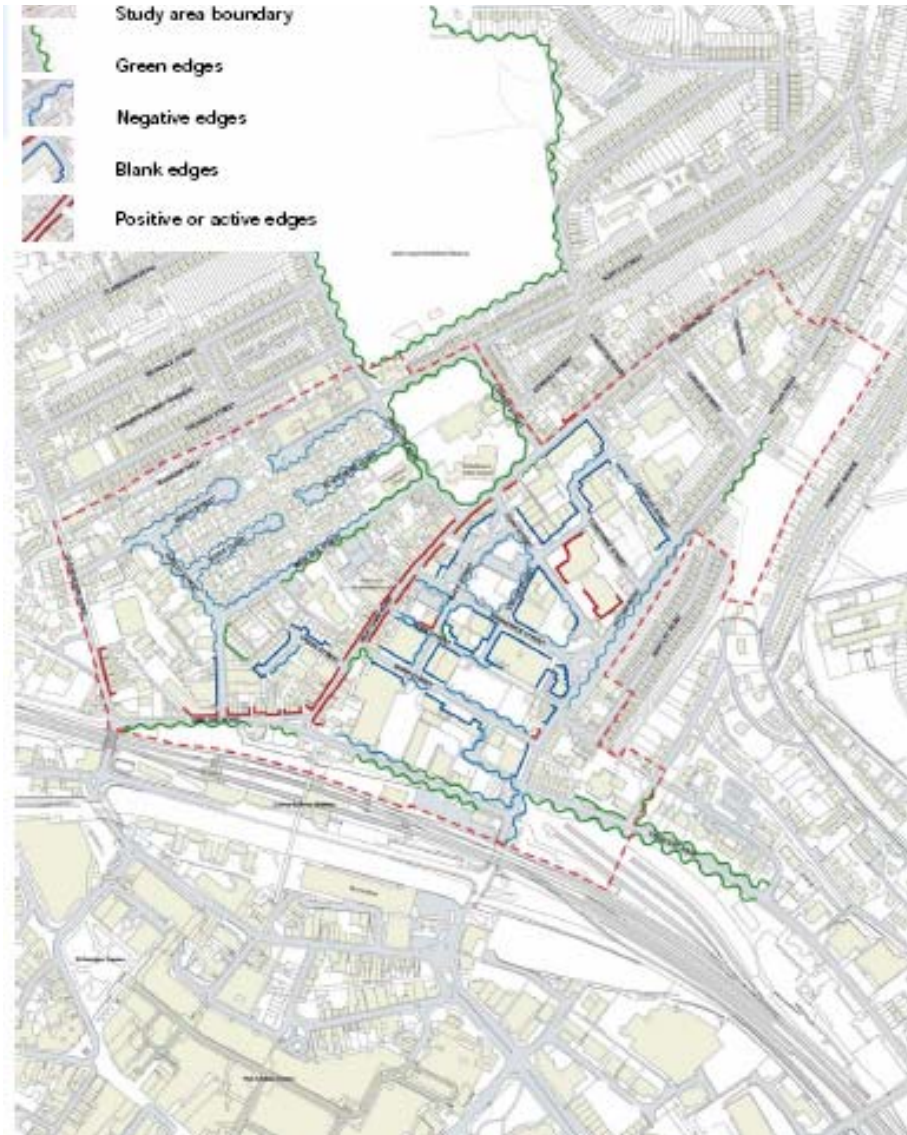
4.33   An evaluation of the quality of edges and spaces throughout the Town Centre was
        undertaken. The edges of the public realm were considered to be either positive,
        negative, green spatial or negative spatial[2]

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[2] A positive edge is an edge, which has active uses at ground level and contributes to the level of activity and surveillance in the public realm. A negative edge presents a blank façade or inactive frontage to the public realm and contributes little, or potentially diminishes its quality. A negative spatial edge is considered to lack definition, or fail to provide an appropriate level of definition between the public and private realm, or potentially provide limited enclosure to the street. A green spatial edge is an edge that although potentially inactive, provides a soft green and positive edge to the public realm and contributes to amenity and interest.

4.34   As can be seen, the majority of High Town Road has positive or active edges. Conversely, the majority of the surrounding edges are either negative or blank.

Transport and Accessibility

Travel

Figure 16: Mode of Travel to Work Comparison with Study Area, High Town Ward, Luton Borough, the East of England and England 2001
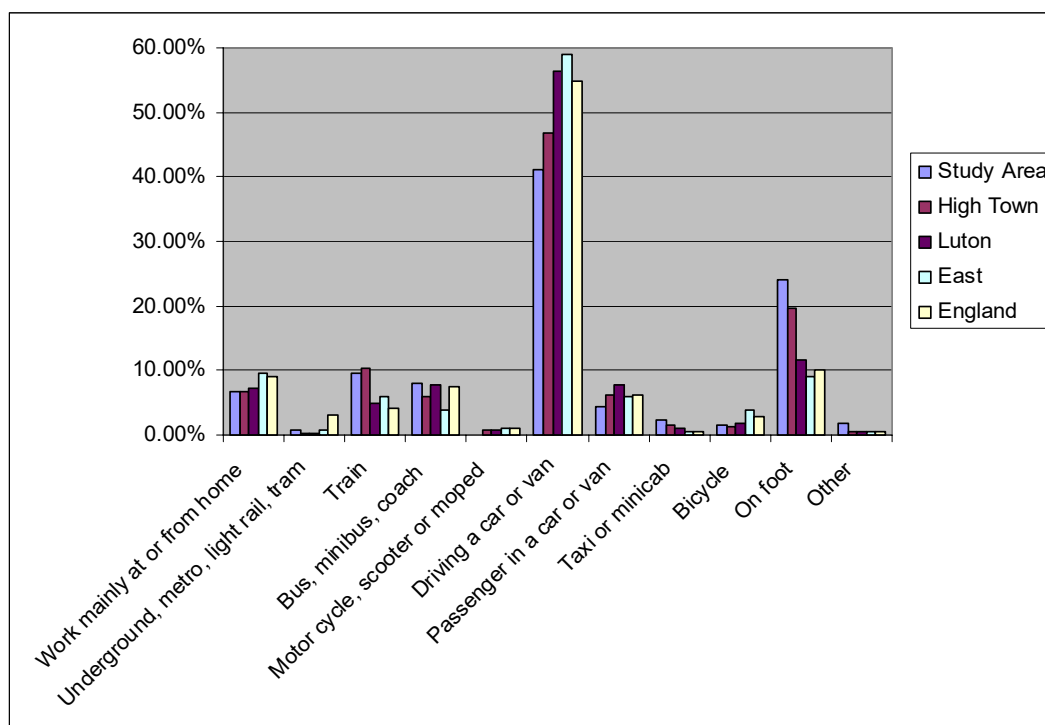
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4.35   The modal breakdown of travel to work in the High Town study area shows that the dominant mode of travel is by private vehicle. However, use of such vehicles is well below the wider High Town and Luton percentages.

4.36   The study area also has a higher percentage of people who travel to work on foot, and this figure greatly exceeds the England percentages, as well as those for Luton. The use of bicycles is similar to that of the wider High Town Ward and Luton as a whole, but is below that for England and the East of England.

4.37   Public transport use of trains for the study area and High Town is above that of Luton, England and the East of England.

Vehicle access

Figure 4.18: Vehicular Access

(2005).

4.38   An appraisal of the movement network for High Town identified the following
       characteristics:

❑   The study area is located between Hitchin Road and Old Bedford Road which
     provide convenient access to the Town Centre and result in relatively low levels
     of traffic passing through the study area.

- A number of one-way streets in the area, including part of High Town Road, make navigating around High Town difficult.
- Rat running occurs on some roads in the area, particularly in Dudley Street and Havelock Road. This problem is linked with current junction arrangements, which prevents right turns from Midland Road into Old Bedford Road.
- The junctions of Midland Road with Old Bedford Road and Hitchin Road have been identified as problematic intersections. New junctions and turning arrangements forming part of the Gateway Link (inner ring road) proposal will resolve these issues.
- Severance is caused by the levels of traffic using Midland Road.
- The area to the west of Havelock Road -including Clarendon Road/Reginald Street/Fredrick Street- has problems of rat-running and excessive on-street parking.
- The 20mph speed limit on Havelock Road is not always observed.

Public Transport

4.39   The are a limited number of bus routes connecting the study area to the Town Centre and the wider town particularly in evenings and weekends, although High Town has excellent rail links with mainline rail services. The Town Centre is highly accessible on foot.

Pedestrian and Cycle Access

4.40   As noted previously, there are a number of pleasant routes through or bordering the area. However, these are relatively short and often discontinuous. Recent highway works along High Town Road have improved the pedestrian environment but there remain a number of roads with strong frontage activity but limited footway widths.

4.41   The pedestrian crossing on Midland Road (by the station footbridge) is the most heavily used in the area. There are very limited cycle facilities in the area and a shortage of defined routes, priority measures or secure parking stands.

Main Issues

4.42   As part of the Sustainability Appraisal it is necessary to identify the key sustainable issues facing the study area. This is based on a review of the relevant policies, plans and programmes, from the baseline study, and from site visits. The wider issues facing the High Town SPD are detailed in the sustainability framework used in the SA of the Luton Local Plan. This framework has been amended and expanded using site-specific material, and has identified issues detailed in the paragraphs below.

Households and Dwellings

4.43   The comparison of the general Luton, East of England, and England populations to the study area shows that there is a significantly greater percentage of single person households, and a significantly lower percentage of families with dependent children in the study area. These disparities are also reflected in the mix of dwelling size with a comparatively large percentage of smaller dwellings, and a significantly lower percentage of larger dwellings in the study (when compared to Luton, East of England and England percentages). The disproportionate mix of both dwellings and households in the study area is confirmed by the results of the Housing Requirements Study (par. 4.4), which highlights a need in Luton for both smaller (1&2 bedroom) and much larger dwellings (4 bedroom and larger).

4.44   The baseline information also highlights a comparatively lower provision of houses and bungalows, and a higher supply of flats, maisonettes and apartments in the study area. Furthermore, the percentage of private and public rented dwellings is high while the level of home ownership is low, in comparison to Luton, the East of England and England.

4.45   These identified disparities in tenure, size and household composition needs to be addressed, and a greater mix ought to be sought.

Skills, Employment and Businesses

4.46   The study area has a low percentage of highly skilled workers and a high percentage of semi-skilled and lower grades (including unemployed and benefit recipients) compared to Luton, the East of England and England. Comparisons show that the Study Area is characterized by lower levels of employment and higher levels of unemployment.

4.47   These employment and skills comparisons are reflected in the type and number of businesses; in fact the semi-skilled and unskilled sectors (manufacturing, retail and

wholesale) dominate the market upon the higher skilled businesses (financial and service based sectors). The skills base of the local population, higher skilled employment opportunities, and value added business operations needs to be further fostered within the Study Area.

Biodiversity and Open Space

4.48   The study area is a highly urban semi-industrial mixed-use area. Its impact on *the Other Site of Nature Conservation Importance,* located to the north-east corner of the study area and on the *Wildlife County site,* adjacent to the western border, must be considered in the context of the Biodiversity Action Plan which identifies species that need to be monitored, protected and enhance. The general landscape character of the study area is also an important feature that must be considered. Tied to the identified accessibility / transport issues, the links between the open spaces and from the main High Town focal points to open spaces need to be improved.

Water & Flood

4.49   The water quality within the site is satisfactory and this needs to be maintained through sustainable drainage schemes (SUDS) and improved permeable surfaces in new developments. All new developments will have to be in compliance with the Strategic Flood Risk Assessment currently being undertaken by Luton.

Crime and Safety

4.50   The crime figures for High Town show a higher rate per 1,000 for all crimes than is seen across the Luton Borough. This needs to be addressed.

Heritage

4.51   The study area contains the High Town Road Conservation Area and a number of statutorily and locally listed buildings. Proposals must take these historical elements into consideration and should look at potential impacts to both their physical fabric and urban setting.

4.52   Some buildings are considered to be of archaeological importance for the industrial history of the hat-making industry in Luton. The retention of these buildings is preferred. However, as they are not statutory listed, archaeological building recording would ideally precede demolition.

Urban Design

4.53   The pedestrian environment functions relatively well, with a number of key landmarks and key routes that facilitate movement. This can be further enhanced and developed particularly around the industrial pockets within the study area. Pedestrian permeability is generally poor, particularly along the secondary east west axis, which is further exacerbated by poor legibility resulting from the treatment of spaces and edges. Particular attention needs to be paid to the key gateway and node locations, and the implications regarding the design of these.

Travel & Transportation

4.54   Travel in the study area is dominated by the use of private vehicles, though this percentage is below the Luton, East and England average. The vehicular environment, including connectivity, street layout and travel patterns make the area difficult to navigate, and exacerbates problems and conflicts between the modes of transport (primarily between motor vehicles, pedestrians and cyclists). Improvements in this regard are required.

4.55   The level of walking was significantly greater than that of Luton, East of England and England figures. The proximity to the train station of the study area is reflected in the high use of this mode of transport. Both the high levels of walking and use of public transport need to be maintained and improved within the study area. Cycling is used comparatively less for travel, and very limited cycle facilities in the area reflect the shortage of defined routes, priority measures or secure parking stands. Improvements in this regard are required.

Sustainability Objectives

4.56   As an integral part of sustainability assessment, it is necessary to identify sustainability objectives. The SA for the Luton Local Plan identified sustainable objectives that can be equally applied to this SPD. These objectives demonstrate factors that would contribute to the achievement of greater sustainability. These will be used to test the sustainability of the High Town SPD. Each broad objective has been assessed to provide a supporting and more specific objective, from which indicators and assessment criteria can be developed. This allows the sustainability of the SPD to be monitored, and provides a mechanism for the evolution of the SPD to address potential changes in the future.

Figure 4.19 Objectives and Supporting Objectives

Concern	Objective	Supporting objectives
Social progress which recognises the needs of everyone		
Accessibility	• to enable people to have similar and sufficient levels of access to services, facilities and opportunities	Increase the diverse mix of shops, jobs, health services, public transport and leisure facilities available in High Town[1] To improve the quality of and access to public transport in High Town [1] To improve access for all to individual buildings, public areas and open space (DDA compliance) , and the quality of public areas.
Housing	• to provide the opportunity for people to meet their housing needs	Creation of mixed, balanced and sustainable residential communities with regards to dwelling size, mix and tenure within High Town [12] Promote high quality design in new build and refurbishments Maximise the provision of affordable housing to meet Luton's housing needs and to align with local strategies and plans[1, 12]
Skills	• to assist people in gaining the skills to fulfil their potential and increase their contribution to society	To increase access to diverse employment opportunities, and increase the mix and diversity of businesses in High Town [1] To improve access to learning opportunities for all within High Town [1]
Health and safety	• to improve overall levels of health, reduce the disparities between different groups and different areas, and reduce the fear of crime	To ensure equity of access to heath and social care within High Town [1] Improving the security of individual building and public spaces[1] Improve access to open space, and walking and cycling routes
Community	• to value and nurture a sense of belonging in a cohesive community whilst respecting diversity	Enhance and develop the number of sports, cultural and arts facilities in High Town [1] Develop culture, leisure and heritage assets for residents and visitors to High Town [10]
Effective protection of the environment		
Biodiversity and habitats	• to maintain and enhance the diversity and abundance of species	Enhance the extent and biodiversity value of urban habitats and long term sustainable management[3] Identify and protect importance sites within High Town for biodiversity[3]
Landscape / open space	• to maintain and enhance the quality and character of the landscape and open space, including its contribution to the setting and character of settlements	To protect and conserve High Town's green space and biodiversity[1]
Built environment	• to maintain and enhance the quality and distinctiveness of the built	Protect and enhance sites, features and areas of historical, archaeological and

| | | environment and the cultural heritage | cultural value and their setting[11]

Encourage and support concentrated improvements projects in conservation areas, and assist in the appropriate protection of heritage sites and buildings in High Town [9]

Maintain and enhance the quality of the built form in High Town

Make design advice and guidance available in connection with proposals for the built environment in High Town [9] |
| --- | --- | --- | --- |
| Amenity | • to add to and maintain the amenity of people's environment through the reduction of noise pollution | | Reduce noise pollution in High Town

Reduce odour pollution in High Town

Improve the liveability of the environment and protect and enhance residential amenity |
| Prudent use of natural resources | | | |
| Air | • to reduce all forms of air pollution in the interests of local air quality and the integrity of the atmosphere | | Reduce the need to travel in High Town by car[1]

Reduce and manage the adverse environmental impacts of transport in High Town [1]

Meet the objectives in the National Air Quality Strategy in High Town[13] |
Water and Flood	• Ensure new development uses water efficiently in order to reduce effects of over-extraction from the River Lea and prevent flood risks.		Reduce the demand for mains water
			Improve the number of new developments managing surface water run-off and recycling schemes.
			Improve the size of permeable surfaces in new developments.
Land / Soil	• to use land efficiently, overcoming dereliction and retaining undeveloped land, including decontamination of soil where necessary		60% of new homes in High Town built on previously developed land, and existing homes refurbished or extended[14]

Amount of green space in High Town

Identify and remediate areas of contaminated land prior to development[4][5] |
| Minerals | • to maintain the stock of minerals and non renewable primary resources | | Reduce the waste going to landfill and increase reuse and recycling in High Town [11]

Ensure that the design of all new development minimises impact on natural resources during both construction and operation[11] |

| Energy sources | • to increase the opportunities for energy generation from renewable energy sources and to maintain the stock of non renewable energy sources | Increase percentage of new dwellings in Luton complying with the Code for Sustainable Homes, and for refurbishments, BREEAM "very good" standards, and a SAP of 80 or above[1]

Encourage the development of renewable energy generation schemes.

Increase the proportion of journeys made on foot, cycling, and by public transport |
|---|---|---|
| Maintenance of high and stable levels of economic growth and employment | | |
| Employment | • to maintain and enhance employment opportunities matched to skills, and to reduce the disparities arising from unequal access to jobs | Reduce overall unemployment levels particularly amongst those groups where unemployment levels are disproportionately high |
| Wealth creation | • to retain and enhance the factors which are conducive to wealth creation, including personal creativity, infrastructure, and the local strengths and qualities that are attractive to visitors and investors | Increase business relocation to High Town (inward investment), and diversity in business operating in the area[1, 9]

Help to develop an enterprise culture and increase business formation and survival rates[1,9]

Ensuring a high quality supply of business land and premises[10] |

1   Luton's Community Plan (2005)
2   Air quality monitoring carried out by LBC
3   Bedfordshire and Luton Local Biodiversity Action Plan: Urban Habitats – Bedfordshire and Luton Wildlife Working Group (2202)
4   Strategy for the identification of contaminated land – Luton Borough Council (2001)
5   Contaminated Land A guide to help developers meet planning requirements – Luton Borough Council (October 2005 update)
6   Luton Bus Strategy – Luton Borough Council (2003)
7   Luton Cycling Strategy – Luton Borough Council (2003)
8   Luton Walking Strategy – Luton Borough Council (2003)
9   Luton Regeneration Strategy Consultation Draft – Luton Borough Council (2004)
10   Regional Economic Strategy for the East of England – East of England Development Agency (2004)
11   The Regional Environment Strategy for the East of England – Regional Assembly and Regional Environment Forum (2003).
12   Luton Housing Requirement Study 2004-05 (2005)
13   The Air Quality Strategy for England, Scotland, Wales and Northern Ireland; Working Together for Clean Air (2000)
14   Luton Local Plan 2001-2011

Sustainability Indicators

4.57   The creation and identification of indicators follows from the aforementioned development of objectives, and provides a means to measures how, and to what degree, the High Town SPD meets these sustainability objectives.

Figure 4.20 Objectives and Indicators

Sustainability Objective		Indicator
Social progress which recognises the needs of everyone		
1.	**Accessibility** To enable everyone to have similar and sufficient levels of access to services, facilities and opportunities	Number of new buildings which are DDA / accessible
2.	**Housing** To provide the opportunity for people to meet their housing needs	Number of new homes completed per annum
		Mix of dwelling size, the following is sought in Luton; ❑ 1 bed 23.6% ❑ 2 bed 28.9% ❑ 3 bed or larger 18.5% ❑ 4 bed or larger 29%
		Increase of affordable housing in the area
		Number of properties taken back in use through the Active Homes activities.
3.	**Skills**	Number of job opportunities provided by developments

	To assist people in gaining the skills to fulfil their potential and increase their contribution to society	Proportion of residents with low/non-skilled jobs (data for Luton, breakdown to ward level only through census in 2011)
		Percentage of adults who have NVQ level 2 qualifications or equivalent
4.	**Health and safety** To improve overall levels of health, reduce the disparities between different groups and different areas, and reduce the fear of crime	Recorded crimes per 1,000 households
		Number of planning application consents contrary to the Environmental Agency's advice.
5.	**Community Cohesion** To value and nurture a sense of belonging in a cohesive community whilst respecting diversity Effective protection of the environment	Number of local community neighbourhood festivals and other localised cultural events/projects
		Reduced overall levels of violent crime (including violence against person, sexual offences, and robbery)
Effective protection of the environment		
6.	**Biodiversity and Habitats** To maintain and enhance the diversity and abundance of	Size of new public green open space
		Number of trees planted.
		Green Flag achieved in People's Park

	species	Creation of; *Other Site of Nature Conservation Importance, Areas of Local Landscape Importance, County Wildlife Sites, Chilterns Area of Outstanding Natural Beauty, Area of Great Landscape Value*
7.	**Built environment** To maintain and enhance the quality and distinctiveness of the built environment and the cultural heritage	Number of listed buildings at risk
		Number of local architectural or historic interest buildings at risk
		Number of new or improved routes
		Number of buildings of historical importance surveyed and recorded before demolition
8.	**Amenity** To add to and maintain the amenity of peoples' environment, including through the reduction of noise pollution	Number of noise complaints
Prudent use of natural resources		
9.	**Air** To reduce all forms of air pollution in the interests of local air quality and the integrity of the atmosphere	Meeting targets of the National Air Quality Strategy

10.	**Water and flood** Ensure new development uses water efficiently in order to reduce effects of over-extraction from the River Lea	Number of planning consent, contrary to the findings of the Strategic Flood Risk Assessment for Luton, (once completed).
11.	**Land** To use land efficiently, overcoming dereliction and developing brownfield land	Average residential density of new developments
		Number of mixed use schemes
		Number of planning applications granted but not implemented
12.	**Soil** To maintain the resource of productive soil	N/A
13.	**Minerals** To maintain the stock of minerals	N/A
14.	**Energy sources** To increase the opportunities for energy generation from renewable energy sources and to maintain the stock of non renewable energy sources	Proportion of journeys made to work on foot, cycle and public transport
		Percentage of major developments which comply with the 10% renewable energy target set by policy U3 of the Local Plan

		Number of buildings built to Building Research Establishments Environmental Assessment Method (BREEAM) and Eco-Homes standards
Maintenance of high and stable levels of economic growth and employment		
15.	**Wealth creation** To retain and enhance the factors which are conducive to wealth creation, including personal creativity, infrastructure, and the local strengths and qualities that are attractive to visitors and investors	Number of economically active people (data for Luton. High Town only trough the census)
		Number of new businesses related to culture (theatre, cinema, art gallery, library, museum)
16.	**Employment** To maintain and enhance employment opportunities matched to skills, and to reduce the disparities arising from unequal access to jobs	The level / grade of employment (data for Luton)
		Socio economic qualification mix (data for Luton)
		Proportion of residents with no qualifications (data for Luton)
		Number of new businesses moving to High Town

5   Issues and Options

Issues

5.1   As a result of the site assessment, analysis of opportunities and constraints, and the public participation, a list of issues relevant to the study area was generated. This reflected not only the formal assessment, but included community, stakeholder and Council's aspirations for the area. The issues are condensed into three main categories: place, use and movement. Each is discussed briefly as follows:

Place

High Town Road as a Retail Destination

- ❑ "Generate curiosity" and improve visual links and signage.

- ❑ Establish a specialist retail niche, as a distinct 'offer' from the Arndale and Power Court outlets.

- ❑ Increase exposure for High Town Road shops by increasing catchment population "More residential = more people = improved shops".

- ❑ Increase variety of shops on High Town Road.

- ❑ Promote mixed use, such as living above the shop.

- ❑ Establish an "anchor" to confirm the viability of High Town Road; use either car park site or part of school site.

Historic Environment

- ❑ Re-use older/attractive buildings where appropriate.

Safety and Security

- ❑ Improve safety and security in The Paths estate.

- ❑ Reduce fear of crime.

❑ Address anti-social behaviour:

   ❑ Prostitution.

   ❑ Drugs.

   ❑ Drinking.

Sense of Place

❑ Improve sense of place based on physical and cultural history of the area (a 'village' feel).

❑ Promote high quality "café culture" – link to specialist shops and culture of the area.

❑ Improve quality and amenity of High Town Road.

❑ Improve pedestrian environment on High Town Road – pedestrianise? Shared surfaces?

❑ Rationalise open space and movement in The Paths estate.

❑ Public art strategy.

Uses

Residential development

❑ More affordable housing.

❑ Increase exposure for High Town Road shops by increasing catchment population "More residential = more people = improved shops".

❑ Provide traditional types of housing and family housing.

❑ Reduce potential conflicts between land uses - particularly live/work areas – may affect viable employment land.

❑ Use sustainable and adaptable building designs.

❑ Will land value and use impact upon affordable housing provision?

Open Space

- New green spaces should be high quality.

- Green Network – broader links to River Lea valley and Hitchin Road green ridge.

- Rationalise open space within The Paths estate.

Employment Uses

- Employment land should be consolidated to focus upon high quality/high employment/export related – moving away from 'land inefficient' uses such as vehicle storage – mixed use opportunity.

- Improve amenity of employment area.

- Reduce potential conflicts between land uses - particularly live/work areas – may affect viable employment land.

Community Uses

- Maximise flexibility of use in community buildings and land including St Matthews School.

- New Church Hall at St Matthews: Old Bedford Road church becomes vacant – possible re-use?

- NOAH building should be appropriately designed to achieve design excellence.

- Increase leisure offer – particularly for youth.

Movement

Pedestrians and Cycles

- Improve cycle and pedestrian routes.

- Improve signage.

- Improve pedestrian environment on High Town Road.

- Improve pedestrian links to Town Centre and High Town "hinterland".

- Rationalise movement within The Paths estate.

- Create "loops and links", connecting destinations within High Town and Town Centre.

Public Transport

- Make best use of link to London and limit negative impacts upon the area.

- Improve access to public transport, bus route along High Town Road.

- Promote Park and Ride through High Town.

Traffic Management

- Minimise potential severance effect of the proposed Inner Ring Road extension: potential to reduce awareness of High Town.

- Reduce severance caused by Midland Road.

- Address problem intersections: Old Bedford Road/ Midland Road and Hitchin Road/Midland Road.

- Address rat-running through High Town.

- Minimise use of High Town Road and residential streets by heavy traffic.

Car Parking and Servicing

- Manage car parking: long/short stay.

- Reduce vandalism in car parks.

- Reduced car-parking problems associated with Houses in Multiple Occupation, new development of flats and conversions to office/business use.

- Manage car parking to remove obstructed views at some junctions.

- Improve street cleansing.

- Establish facilities to improve servicing on High Town Road: to the rear of shops and on car park land.

Strategic Options

5.2   The main option assessed was the creation of the SPD for High Town, against the 'do nothing' scenario. It was assessed that the current pattern of development within High Town required further localised refinement of the Luton Local Plan policies to address specific issues in High Town. The 'do nothing' option, reliant solely (at a local level) on the policies contained in the Luton Local Plan would not be sufficiently targeted to address the issues prevalent in High Town.

5.3   Through the compilation and analysis of the High Town baseline data, it has been demonstrated that some elements of High Town differ significantly from the wider Luton, East of England, and England characteristics and, as such, require targeting. The 'do nothing' option, whilst addressing some of the broader issues on a strategic level in the area, (such as the provision of 50% of all dwellings in major schemes as affordable housing), would not address the specific and localised needs of High Town. On this basis, the SPD has been developed.

SPD Options

5.4   An audit and assessment of High Town was conducted between 2004 and 2007 to better understand the issues within the area. During this time, a number of consultation exercises were conducted with a variety of stakeholders, communities, and representatives. The outcome of this process has been the identification of key issues, which have been informed by and are reinforced by the design principles outlined in the SPD. Following on from this process, two options have been developed; Destination: High Town, and Green Town: High Town.

Fig. 5.2 Destination High Town SPD Option 1

Key:

- Spatial node
- Landmark
- Pedestrian links
- Transport gateway
- Positive/active edges
- Major traffic routes
- Primary active routes
- Service routes
- Ped friendly routes
- Residential led uses
- Employment led uses
- Community led uses
- Future potential.........

Movement

A The two junctions form high intensity gateways into High Town and connect into the new link road

B Midland Road, High Town Road and Duke Street become low traffic, high pedestrian intensity thoroughfares

C A new route has been opened through the Bedfore Road block to increase the active frontages

D Hitchin Road is a major traffic route lined with active edges which increase in height and density southwards

E York Street has been realigned to create the major east-west linkage, improve legibility and encourage movement between the green amenity spaces

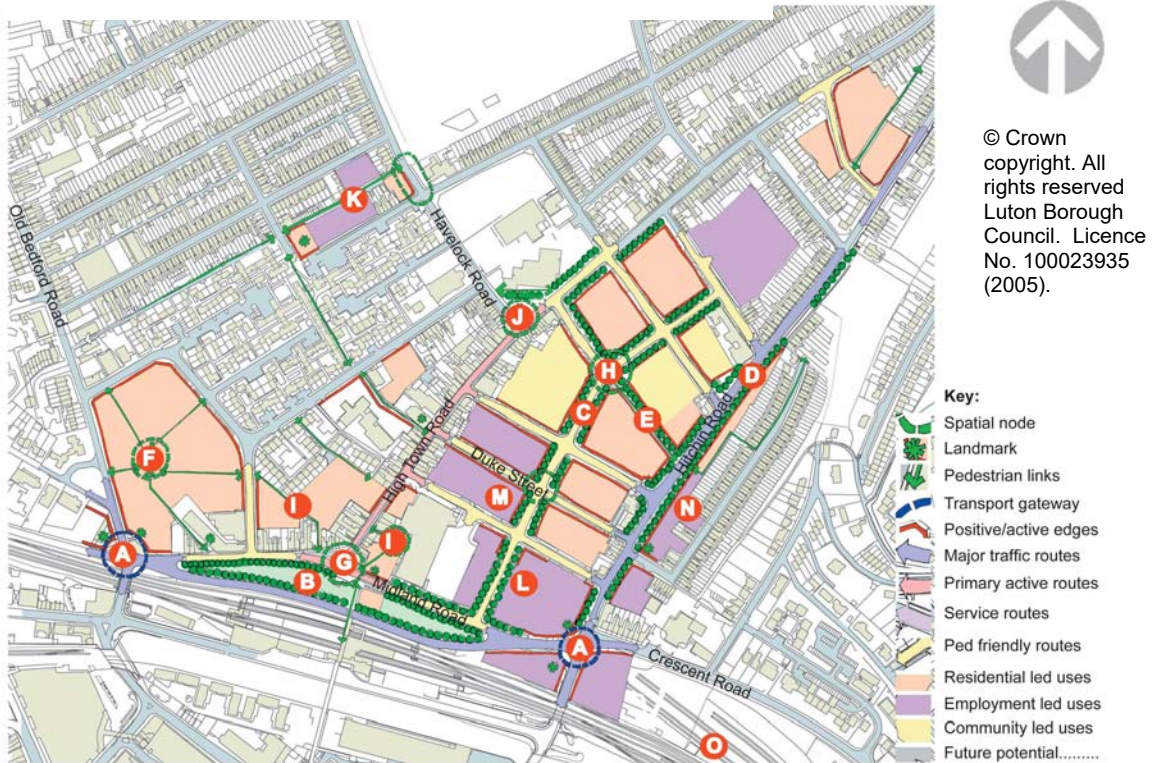**F** A visual and physical linkage has been opened through the Radburn Estate

Place

G Bedford Road block forms a circus around the junction

H Bedford Road block opens with a small public space internally with visual and physical linkages to the Luton Grace Fellowship

I The High Town Road/Midland Road junction is an important public space with a landmark development along the desire line from the station

J This junction is an active node with views to the Methodist Church and lined with active frontages and replacing Brunswick Street as the primary route from Hitchin Road to High Town Road

K High Town Road/Midland Road junction is intensively developed with a living bridge in the longer term

Use

L These blocks provide the opportunity to explore the live/work nature of the area with residential led mixed use developments

M These sites form the major employment base in the area with a mix of offices (to street edges) and a variety of other commercial offers

N Mixed use residential led developments with employment uses to Hitchin Road

O A community led mixed use corridor runs along the desire line between major amenity spaces

P Reinstate residential development to the northern edges of High Town

Q A future retail led corridor along miland Road linking the Town Centre with High Town

Fig, 5.2 Green High Town SPD Option 2

Key:

- Spatial node
- Landmark
- Pedestrian links
- Transport gateway
- Positive/active edges
- Major traffic routes
- Primary active routes
- Service routes
- Ped friendly routes
- Residential led uses
- Employment led uses
- Community led uses
- Future potential.........

Movement

A The major junctions form built up, yet lower density gateways into High Town, thus expressing the area as something different

B Midland Road celebrates its boulevard Nature and introduces a linear park with views over Luton

C Taylor Street is a dominant connecting route in the reconfiguration of the block sizes in the area

D Hitchin Road becomes a major street in the network of green routes with taller buildings set back from the edge of the street

E A major pedestrian route links the major green amenity spaces

NB Bus services run down High Town Road from the north and stopping at the footbridge before turning into the town centre

Place

F The Bedford Road block is a large area for redevelopment with potential for internal commercial development

G The junction becomes a less intensive space yet one encouraging high quality senvironment and encouraging exploration through High Town

H A major public space linked to community facilities and green routes with the potential for a weekend market

I A series of public spaces links Midland Road with High Town with different experiences

J Havelock Road/Midland Road junction is an open space highlightiong the end of the intensive retail experience and encourages east-west movement along the green routes

K Mussons Path is redeveloped in part as a contempoary interpretation of the Milliners live/work typology

Use

L Employment/commercial uses are concentrated in the south-eastern areas

M With the enhancement of the environment along Taylor Street any new businesses attracted into the area will be encouraged to be 'clean' uses

N The eastern edge of Hitchin Road is developed with small scale employment uses with residential above

O The old railway land adjacent to the ring road route forms the ideal location for the 'dirtier' employment uses (i.e. distribution/ manufacturing) away from public intensive places

6   Preferred Option, Impacts and Mitigation

6.1   This section of the report details the examination of the social, environmental and economic effects of the content of the preferred option for the High Town Draft Supplementary Planning Document. It discusses the direction and magnitude of the impact, and any proposed mitigation measures.

Preferred Option

6.2   The preferred option, on which the draft High Town SPD is based, is the result of an evolution of the site analysis, community consultation, and urban design work. The SPD addresses the key objectives of place, uses and movement, and breaks the study area into 11 sites that have development potential. On a more detailed level, the SPD proposes key development concepts, such as improved linkages, environmental and public realm improvements, and sites with development potential. Some example redevelopment site layouts are also provided, which aim to present a starting point of reference as to the design principles the SPD is trying to deliver. The SPD also expands on the key themes and discusses the design and policy principles it is based on.

Impacts

6.3   The following categories were used in the examination of the draft SPD, and the examination of impacts;

- ❑ Positive: The impact of the SPD on the sustainability objective will be a significant positive impact.

- ❑ Possible positive: The effect the SPD will have on the sustainability objective is likely to be positive, although this is not certain, or; the impact of the SPD on the sustainability objective will be a positive impact, but not significant.

- ❑ Secondary/indirect positive: Although the SPD will not have a direct positive impact on the objective, coupled with other factors it will have an indirect or secondary positive impact.

❑ Neutral: The SPD will have no impact on the sustainability objective, or; the SPD will have both positive and negative impacts on the objective that will cancel each other out thereby resulting in a neutral impact.

❑ Secondary/indirect negative: Although the SPD will not have a direct negative impact on the objective, coupled with other factors it will have an indirect or secondary negative impact.

❑ Possible negative: The effect the SPD will have on the sustainability objective is likely to be negative, although this is not certain, or; the impact of the SPD on the sustainability objective will be a negative impact, but not significant.

❑ Negative: The impact of the SPD on the sustainability objective will be a significant negative impact.

Concern	Objective	Assessment of Draft High Town SPD	Impact
Social progress which recognises the needs of everyone			
Accessibility	• to enable people to have similar and sufficient levels of access to services, facilities and opportunities	Improving walkability, permeability and physical access to facilities and services are key objectives of the SPD both within High Town, and through High Town (notably to Luton Town Centre). By reducing barriers, increasing the logical flow of spaces, and creating and enhancing links, the SPD will allow for greater movement within High Town. By providing a greater range of facilities (including both residential, commercial and community), and by promoting mixed-use development, the SPD also addresses the service provision and opportunity to access these uses.	Positive
Housing	• to provide the opportunity for people to meet their housing needs	The SPD specifically aims to provide additional housing. In line with the Local Plan and the Housing Requirement Study, an appropriate dwelling mix, level of affordable housing, and tenure split is sought to address this identified need.	Positive
Skills	• to assist people in gaining the skills to fulfil their potential and increase their contribution to society	The SPD seeks a mix of uses, which provides for a variety in type and level of employment.	Secondary/ indirect positive to possible positive

Health and safety	• to improve overall levels of health, reduce the disparities between different groups and different areas, and reduce the fear of crime	By reducing both incidents and perceptions of crime and safety, the SPD will make High Town a safer and more 'user friendly' place. Identified routes in the Paths Estates are key targets for such initiatives. By increasing accessibility and permeability, and through active frontages and mixed uses, natural surveillance will be a major deterrent for crime. Incorporating the principles of Designing Out Crime in all new developments will aid in this process. The implementation of the Code for Sustainable Homes, and BREEAM design standards (and therefore improved housing conditions through measures such as better insulation) along with improvements to walking and cycling facilities in the town centre and to open space, should contribute to improving people's health and sense of well being. Addressing the quality of, and conflict between transport users, is also a key deliverable of the SPD.	Positive to secondary/ indirect positive
Community	• to value and nurture a sense of belonging in a cohesive community whilst respecting diversity	Providing a variety of accessible community facilities in High Town, and promoting it as a centre for community activity, will address social cohesion, and is a direct aim of the SPD, which seeks to create and enhance such facilities. A greater quality of urban design will also increase the sense of pride and ownership of High Town, particularly enhancing the 'gateways', which will improve the identity and sense of place for the area. The protection of traditional uses together with a mix of dwelling types will help avoid gentrification and enhance a sense of belonging.	Possible positive to positive
Effective protection of the environment			
Biodiversity and habitat	• to maintain and enhance the diversity and abundance of species	The SPD specifically seeks to maintain and improve green spaces in and around High Town. This facilitates a high quality and diverse ecological environment. Improving access to these sites also increases their amenity value.	Positive
Landscape / open space	• to maintain and enhance the	The SPD specifically seeks to maintain and enhance green spaces in and	Positive

		around High Town. This facilitates a high quality and diverse ecological environment. Improving access to these sites also increases their amenity value.	
	quality and character of the landscape and open space, including its contribution to the setting and character of settlements		
Built environment	• to maintain and enhance the quality and distinctiveness of the built environment and the cultural heritage	Preserving the historic context of High Town, in relation to the Conservation Area and the listed buildings will ensure these important elements are safeguarded and enhanced. The SPD also seeks to retain and enhance (were possible) other buildings of local or architectural interest to maintain the unique character of High Town, providing a rich urban environment. The SPD also sets an agenda for urban design that values and takes into consideration this historic context, and which seeks high quality design in all new developments, and the public realm. This further extends the mechanisms by which these elements of the urban environment can be enhanced, and maintain a high quality in the built environment.	Positive
Amenity	• to add to and maintain the amenity of people's environment, including through the reduction of noise pollution	The SPD aims to resolve conflicting uses. This creates mixed and sustainable communities within the wider High Town context, which on a micro-scale are commensurate to their surrounds. Considering the location and neighbouring uses in spatial planning, the SPD sets indicative areas for industrial, community, retail and residential developments to minimise noise conflict between uses.	Secondary/ indirect positive
Prudent use of natural resources			

Air	• to reduce all forms of air pollution in the interests of local air quality and the integrity of the atmosphere	By ensuring that the latest sustainability principles and codes promoted in High Town developments ensures that spatial development does not detrimentally impact on the wider environment. The improvements in accessibility to promote further use of foot, cycling and public transport will also address this. New tree planting will further reduce air pollution.	Positive to secondary/ indirect positive
Water	• to maintain and improve the quality of ground and river waters and reduce the risk of floods.	By ensuring that the latest sustainable surface water management systems and codes are implemented in new developments in High Town, improving the number of residential development with a water butt for the collection of rainwater for gardening and with a reduced use of mains water (through filtered grey water and rainwater) for non-potable uses. Improving the permeable surfaces in new developments using green roofs, permeable paving and amenity areas will help in reducing the risk of flood and help in maintain the quality of the groundwater. Though the lack of surface water bodies in the High Town means the SPD's impact on this objective is hard to predict.	Possible positive
Land / Soil	• to use land efficiently, overcoming dereliction and retaining undeveloped land, including decontamination of soil where necessary	The SPD seeks to promote the use of vacant land and sites where there are inefficient land uses. This minimises the impact on the environment, and prioritises the redevelopment of brownfield sites; a key principle in the creation of sustainable communities which minimises the impact on land and soil.	Positive
Minerals	• to maintain the stock of minerals and non renewable primary resources	Promoting the latest sustainability principles and codes in High Town developments reduces the impact on minerals and non-renewable primary resources.	Possible positive
Energy sources	• to increase opportunities for energy generation from renewable energy sources and to maintain the stock	Promoting the latest sustainability principles and codes in High Town developments reduces the impact on minerals and non-renewable primary resources. The improvements in accessibility to promote further use of	Possible positive

	of non renewable energy sources	foot, cycling and public transport will also address this.	
Maintenance of high and stable levels of economic growth and employment		
Employment	• to maintain and enhance employment opportunities matched to skills, and to reduce the disparities arising from unequal access to jobs	The SPD seeks a mix of uses that will provide for a variety in type and level of employment. High value added high employment-generating uses are encouraged and will help in improving employment opportunities and reducing out commuting. This is further enhanced by promoting the development on vacant or inefficient sites, to bring them into productive use, of which a proportion will be employment generating.	Possible positive to positive
Wealth creation	• to retain and enhance the factors which are conducive to wealth creation, including personal creativity, infrastructure, and the local strengths and qualities that are attractive to visitors and investors	The SPD seeks a mix of uses, which will provide for a variety in type and level of employment. In association with the provision of additional training and community support facilities, and by increasing access to services, the SPD will address the identified employment and skills problems. This is further enhanced by promoting the development on vacant or inefficient sites, to bring them into productive use, of which a proportion will be employment generating. Improvements to the quality of the urban environment will also make High Town more attractive to investment, particularly the 'gateway' developments. The promotion of community and support facilities will also foster the development of a 'wealthy' High Town.	Secondary/ indirect positive to positive

Design and Policy Principles of the High Town SPD

Design Principles

6.4 This section of the draft SPD considers a number of design principles by which the proposals of the master plan should be implemented. This section considers the implications in terms of sustainability of these principles and if they should help implement more sustainable development in the High Town area.

6.5 The majority of these principles, as would be expected as they relate to design, have the intention of enhancing the built environment. These include generic

considerations such as the need to ensure quality in built development and the need for bespoke design that matches the needs and character of the area as well as the need to have richness and variety in the built form, with an appropriate mix of styles and types. Enhancing the character of High Town is also noted through the need to improve the existing assets, such as those included in the Conservation Area and those statutorily or locally listed and the views and vistas through the area to existing or future landmark buildings. Other proposed enhancements are more specific such as, for example, the creation of gateways in order to identify High Town as a unique area within central Luton with its own character, as well as the need to improve public spaces especially in relation to pedestrian and cycle links. Therefore these directly relate to meeting sustainability objectives through the built environment.

6.6   Other design principles proposed by the SPD are more directly linked to the achievement of sustainable development. These include those that should help in the more efficient use of land, as well as encouraging more sustainable travel patterns. The principle of mixed use is welcomed in terms of achieving more sustainable development as it helps to reduce the need to travel, ensures a more active neighbourhood all through the day and helps in protecting the existing character of High Town. Maximising development on sites is also to be welcomed, as achieving higher density on urban sites can help ensure that housing targets can be met while reducing the pressure on green spaces. Also high-density developments ensure a more active and vibrant area. All proposed developments in High Town are on previously developed land ensuring an efficient use of this natural resource.

6.7   The design principles also deal with issues relating to more sustainable transport modes and include the need to provide a good quality walking and cycling environment, as these are already a common mode of travel in the area. Where travelling is undertaken by other means High Town is well placed, with good bus links and proximity to the railway station. The key principle here of aiming to break down the barrier the railway line creates between High Town and Luton town centre by bringing improvements to the pedestrian links over and under the line are also welcomed in terms of the long-term sustainability of High Town. In implementing the new Gateway Link it is also vital to ensure junctions are

designed in such a way so as not to create a new barrier to pedestrian movement between High Town and other areas of central Luton. Principles of permeability and particularly green linkages should improve the walking environment. In terms of safety these need to be designed so they are appropriate for use at all times of day and are sufficiently overlooked so as not to increase fear of crime or the likelihood of crime and, therefore, have various positive sustainability implications including those relating to health, the built environment, open space and air quality. Consideration should be given to the use of these linkages as wildlife movement corridors, as well as for people, by ensuring the species planted and the approach used is compatible with nature conservation.

6.8   The principle of more sustainability in development is welcomed in ensuring that the built quality takes into account the need for energy and water efficiency. The aspiration of having SUDS (Sustainable Urban Drainage Systems) and to improve the size of permeable surfaces in new development has a positive impact on the biodiversity of the area and will reduce the risk of flood. Incorporating these issues in new development may be particularly achievable where the LBC is the landowner, as either through selling the land at a subsidised price and/or putting conditions on the development of the land the Council can stipulate the sustainability measures that must be incorporated in new developments. This issue is returned to below in considering the Development Principles.

Development Principles

6.9   The draft High Town SPD is proposed as a Supplementary Planning Document to Luton Local Plan. Therefore, the development principles presented in it can be a material consideration when deciding on planning applications. However, it does no have the statutory weight of a Local Plan policy.

6.10   However, overall the principles here are predominantly sound in terms of achieving more sustainable development. The following considers each principle in turn and what role it could play in achieving more sustainable development in High Town and Luton as a whole.

6.11   **Housing:** The intent here is to ensure sufficient new homes are developed to meet identified needs in the development plan. As part of this it is recommended

that 50% of new homes should be built as affordable, this principle is appropriate in securing sustainable development in High Town, as previously indicated. Residential development in the area need to be developed to meet the needs of local Luton residents, providing homes to meet proven local needs is important in order to allow the continued support of the local economy and services, as well as the community character of the area. Without ensuring a large proportion of new homes are affordable there is the risk that new residential developments in the area are taken by those seeking to relocate from elsewhere in the South East, as High Town is an ideal location for out-commuting, due to the proximity of the train station, and these groups make less contribution to the vitality of High Town particularly in the daytime. In terms of more sustainable homes the principle that 10% should be built to 'lifetime homes' standard is welcomed in terms of accessibility and a home for all. With regards to the dwelling mix and tenure it is clear that homes should be built to fill identified needs.

6.12   In this section the SPD sets out the Councils expectations that new homes /refurbishments and commercial buildings in this area will need to built to meet high standards of the Code for Sustainable Homes / BREEAM sustainable construction methodology, and that any large redevelopment should consider the potential for a proportion of renewable energy generation on site.

6.13   **Environment:** This development principle relates to the provision of open space and it should be applied in keeping the overall open space provision in the Luton Local Plan. Generally this principle is supportive of sustainability objectives, and should help in the provision of open space by setting defined requirements. The opportunity to incorporate nature conservation as part of the 'green' environmental improvements in High Town has also been included in this.

6.14   **Mix of uses:** This principle is welcomed in terms of more sustainable developments, as in the design principles above, and reiterates national and local policy and the design principle approach.

6.15   **Security:** This should help to protect the safety of residents if applied. A vibrant mix of uses day and night may also bring improvements to the area, although encouraging the night-time economy may lead to separate safety risks in the area that would need to be appropriately addressed.

6.16   **Historic Context:** This should support sustainability objectives relating built environment quality, and reiterates local and national policies on these issues.

6.17   **Economy:** Prioritising employment uses that rely on passing trade on key routes in High Town is welcomed in terms of meeting sustainability objectives relating to wealth creation and employment. This could be widened to make sure that these locations are also protected from change of use to residential, as well as alternative employment uses. Encouraging businesses to seek employees primarily from the local community is a good intention. Many initiatives are implemented by the Environment and Regeneration Department to support local businesses.

6.18   **Community:** Support for community facilities should help meet objectives relating to the community, and reiterate local and national policies on these issues.

6.19   **Movement:** In terms of maximising sustainability benefits of the redevelopment of High Town it is vital to recognise, as the SPD does, that walking and pedestrian and cycle routes are a key feature of the area. This is identified from low car ownership levels, as well as proximity to Luton town centre and good public transport links. Therefore, the approach taken is to ensure that the main pedestrian and cycle routes within and through High Town are improved, and in particular those linking High Town to Luton Town Centre, in order to attract traffic in both directions and reduce the barrier caused by the railway line. In addition, it may be suitable to help ensure that the road layout and management in High Town seeks to make the majority of road traffic in the area local only, with other traffic remaining on Hitchin Road, Old Bedford road and the future Gateway Link. As part of this, considering the use of 'home zones' may also be suitable.

6.20   **Sustainability:** Clearly achieving more sustainable development is a key consideration of the SPD as a whole and the proposals put forward. However, this principle seeks to narrow the definition to the development of more sustainable buildings, which is to be welcomed as this issue is often less well coved by development plans. Ensuring sustainable construction is a vital consideration of new development and support for new buildings meeting high BREEAM / Code for Sustainable Homes standards is an important inclusion, in

terms of achieving more resource efficient homes and should help in meeting sustainability objectives of the plan. An effective approach of implementing these may be where Luton Borough Council currently owns the land, and they could sell their land at a subsidised cost to support the implementation of more sustainable developments or a greater percentage of affordable homes, and/or set up mandatory conditions for individual sites relating to sustainable development matters.

6.21 **Soil Protection**: The requirement for the preparation of a Contaminative Risk Assessment for contaminated or vacant land and for a Flood Risk Assessment for developments bigger than 1 hectare will help the Council in granting the soil protection. This will contribute to the well being, health and safety of residents and to a more prudent use of natural resources.

6.22 **Infrastructure**: The requirement set in this paragraph reiterates a policy of the Local Plan, Its presence will avoid that existing infrastructure will have an unsustainable pressure from new developments in the area.

6.23 **Parking**: The identification of parking issues in the area through the consultation brought to the decision of adopting the parking target set by the Local Plan for urban areas (1.5 spaces per unit), whit an aspiration of ½ space for one bedroom units and 1 for units with more than 1 bedroom where parking is provided. This choice will reduce the pressure on off-site parking spaces and will contribute to promote a more pleasant and pedestrian friendly environment. The aspiration set in the SPD for underground car-parking with green above will also avoid the proliferation of non permeable surfaces usually linked to this kind of land use and will provide amenity spaces for new residents. In a long-term view when people will not only reduce the use of cars but even their ownership it will be possible to convert the parking spaces to private cellars. Both the parking spaces and private cellars, provide also a potential economic income for new residents being an asset that could be rent or sold.

Mitigation Measures and Maximising Beneficial Impacts

6.24 Since there are no negative impacts predicted, there are no mitigation measures proposed.

6.25 The appraisal has anticipated that there will be many positive effects as a result of the adoption and implementation of the SPD. There are also some opportunities to maximise these beneficial effects, such as:

❑ Selecting (where appropriate) rare or protected species as part of the planting and enhancements to biodiversity / open space identified in the Urban Habitats (Built up areas and gardens) Biodiversity Action Plan.

❑ Maintain levels of public participation and information dissemination about the project to enhance community ownership, involvement and acceptance of the proposals.

Uncertainties and Risk

6.26 The SPD is based on a robust assessment of High Town that includes an independent assessment of the study area including the social, environmental and economic factors, in conjunction with public consultation with the community, stakeholders, statutory bodies, and the Borough Council. It has taken into consideration the relevant National, Regional and Local policies, and is deemed in conformance with these documents (the High Town SPD does not purport to amend or alter policy, but simply to clarify and expand this in a specific and local context).

6.27 The identified assumptions and limitations detailed previously have been assessed to have a de minimis impact on the SPD and this SA. As such, there is limited uncertainties and risk associated with the implementation of this document.

7 Implementation and Review

7.1 The effects of implementing the SPD need to be monitored to identify any unforeseen, adverse effects and to allow for remediation actions to take place. Questions that should be addressed through the monitoring process include;

❑ Whether the SPD is contributing towards meeting the sustainability objectives?

❑ If there are any other effects from implementation of this document that need to be considered?

7.2 Local Authorities are required, by Regulation 48 of the Town and Country Planning (Local Development) Regulations 2004, to prepare an Annual Monitoring Report. This report is required to assess the implementation of the Local Development Scheme and the extent to which policies in local development documents are being achieved. Once the SPD is adopted it will be monitored on an annual basis.

7.3 When monitoring does occur it should identify the significant effects of the implementation of the SPD, and in particular, any unforeseen adverse effects, to enable appropriate remedial action to be taken through revisions to the SPD. This report sets out the Sustainability Appraisal framework, which includes objectives and indicators. These indicators, in particular, will be used to measure achievement of sustainability objectives.

7.4 The sustainability indicators are set out in this document. The indicators will monitor positive and negative effects of the implementation of the SPD, which will enable amendments to SPD to be identified if adverse effects are discovered. The target is to see improvements in all indicators after the adoption of the SPD, or at minimum no change from the baseline.

Appendix 1

i.   The following is a list of policies, plans and programmes assessed in the development of the SA and High Town SPD:

The Johannesburg Declaration on Sustainable Development

European Spatial Development Perspective

"A Better Quality of Life" – A Strategy for Sustainable Development for the UK (1999) Securing the Future: the UK Government Sustainable Development Strategy 2005

Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents (November 2005)

A Practical Guide to the Strategic Environmental Assessment Directive

Planning and Compulsory Purchase Act 2004

Town and Country Planning Act 1990

Planning Policy Statement 1(PPS1) – Creating Sustainable Communities

Planning Policy Statement 12 (PPS12) – Local Development Frameworks

Planning Policy Guidance Note 3 (PPG3) – Housing (as amended in January 2005)

Consultation Paper on a New Planning Policy Statement 3 (PPS3) Housing (December 2005)

The Town and Country Planning (Residential Density) (London, South East England, South West England, East of England and Northamptonshire) Direction 2005

Regional Social Strategy for the East of England.

Regional Housing Strategy for the East of England

The Role of Culture in the Sustainable Development (A New Cultural Strategy for the East of England- draft)

Regional Health Strategy for the East of England (draft)

Kyoto Protocol, 1997

European Union Sixth Environmental Action Plan

European Directive 2001/42/EC (SEA Directive) on the assessment of the effects of certain plans and programmes on the environment.

European Directive 92/43/EEC (and amended by 97/62/EC) on the conservation of natural habitats and of wild flora and fauna (Known as the Habitats Directive)

European Directive 79/409/EEC

European Directive 2000/60/EC: the Water Framework Directive

European directive 92/62/EC

European directive 99/31/EC

Wildlife and Countryside Act 1981 (as amended)

Countryside and Rights of Way Act 2000 (the CROW Act)

The Environmental Assessment of Plans and Programmes Regulations 2004

The Future of Transport – White Paper 2004

Planning Policy Guidance Note 13 (PPG13) – Transport

Energy White Paper: Our Energy Future: Creating a Low Carbon Economy (DTI, 2003)

Creating a low carbon economy - second annual report on implementation of the Energy White Paper (DTI July 2005)

Planning Policy Statement 22 (PPS22) - Renewable Energy

UK Waste Strategy (DEFRA, 2000)

Planning Policy Statement 10 (PPS10) - Planning for Sustainable Waste Management.

Planning Policy Statement 9 (PPS9) – Biodiversity and Geological Conservation

'Working with the Grain of Nature' A Biodiversity Strategy for England (DEFRA 2002)

The Urban habitats (Built up areas and gardens) Biodiversity Action Plan

The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2000)

Planning Policy Guidance Note 17 (PPG17) – Sport, Open Space and Recreation

Green Spaces: Better Places, Urban Green Spaces Taskforce (2002)

Planning Policy Guidance Note 15 (PPG15) – Planning and the Historic Environment

Planning Policy Guidance Note 16 (PPG16) – Archaeology and Planning

Planning Policy Statement 23 (PPS23) – Planning and Pollution Control

Planning Policy Guidance Note 24 – Planning and Noise

Planning Policy Statement 25: Development and Flood

Town and Country Planning (Flooding) (England) Directive [2006]

Regional Waste Management Strategy - SEERA

Planning Policy Guidance Note 4 (PPG 4) – Industrial, Commercial Development and Small Firms.

Planning Policy Statement 6 (PPS6) – Planning for Town Centres.

Regional Economic strategy for the East of England

East of England Framework for Regional Employment and Skills Action

Planning and Compulsory Purchase Act 2004

Rio Declaration on Environment and Development - Principle 15: Precautionary Principle (1992)

Luton Local Plan 2001-2011

Milton Keynes South Midlands Sub Regional Strategy

East of England Plan

Luton Corporate Plan

Luton Community Plan

Luton Housing Requirements Study 2004 - 05