

Technical Note

Project	SA/SEA for the Luton Local Plan	Date	October 2017
Note	Addendum at the Inspector's Report stage	Ref	UE-0130
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Status	Final		

1. Introduction

This technical note forms an Addendum to the combined Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) for the Luton Local Plan. Readers are referred to the following documents for more detailed information about the assessment processes, and which support the information contained in this note:

- ▶ SA/SEA Scoping Report (March 2013):
 - <http://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/Local%20Plan/Other%20relevant%20documentation/ORD%20004.pdf>
- ▶ SA/SEA Sustainability Report on the Draft Local Plan (June 2014):
 - <http://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/Local%20Plan/Other%20relevant%20documentation/ORD%20005.pdf>
- ▶ SA/SEA Sustainability Report on the Proposed Submission Local Plan (October 2015):
 - <http://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/Local%20Plan/Luton%20Local%20Plan/SUB%20004.pdf>
- ▶ SA/SEA Sustainability Report on the Submission Local Plan (March 2016):
 - <http://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/Local%20Plan/Luton%20Local%20Plan/SUB%20004A.pdf>
- ▶ SA/SEA Addendum at the Main Modifications Stage (March 2017):
 - <http://consult.luton.gov.uk/portal/lbc/environmentandplanning/policy/lp2031/mainmods?tab=files>

Following consultation on the Main Modifications and further examination hearings, the purpose of this Addendum is to provide information on the potential sustainability effects of minor modifications made in the Inspector's report which are additional to those which had been proposed by the Council.

2. Additional Minor Modifications made in the Inspector’s Report

Additional minor modifications made in the Inspector’s report are tabulated in Table 1 overleaf, together with a statement on the predicted sustainability effect of each change.

3. Conclusion

In conclusion, the additional minor modifications made in the Inspector’s report are not predicted to significantly alter the profile or scale of the sustainability effects of the Local Plan over and above those predicted for the Submission Plan.

Table 1: Additional minor modifications made in the Inspector’s report

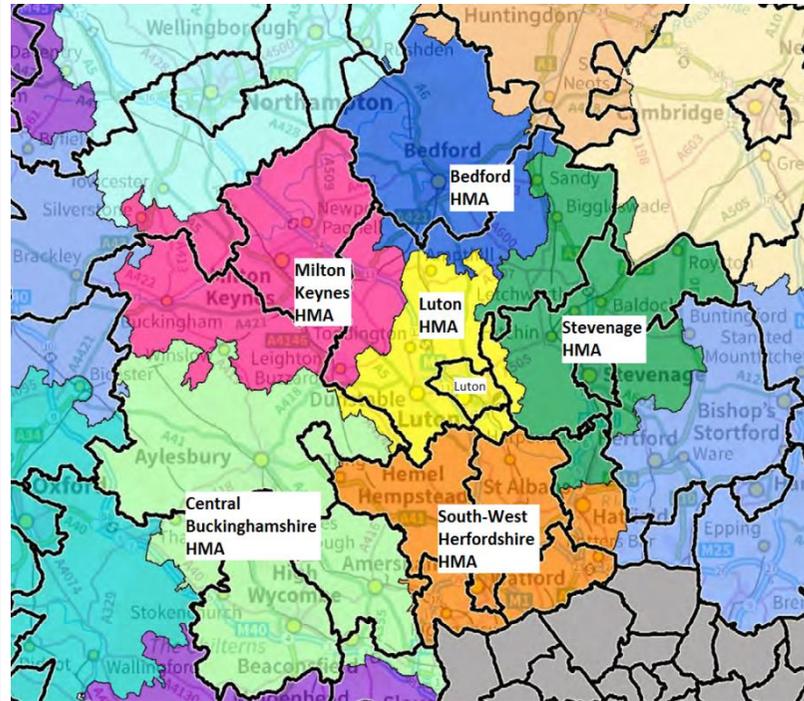
Ref	Para or Policy	Text AFTER using <u>underlining</u> and striketrough	Predicted effects
MM01	Para 1.18	<p>1.18 The Council also needs to recognise the strategies of neighbouring authorities and the 2011 Localism Act and NPPF place a duty on authorities to cooperate on planning issues of cross-boundary significance. Luton’s adjoining neighbours are Central Bedfordshire Council and North Hertfordshire District Council. Luton’s <u>Functional</u> Housing Market Area, however, covers a greater area than the borough itself stretching into its adjoining authorities’ areas as well as Dacorum Borough Council and Aylesbury Vale District Council. Luton Borough Council has been working with these local authorities as well as <u>Dacorum Borough Council</u>, St Albans City and District Council, Stevenage Borough Council, Milton Keynes Council and Bedford Borough Council preparing a Luton & Central Bedfordshire Strategic Housing Market Assessment (SHMA) and working constructively on cross-boundary matters including where Luton Borough’s unmet housing needs could be delivered in other local authority areas. This cross boundary planning on housing need encompasses other supporting infrastructure via respective provision of transport, education, and leisure including green infrastructure, wildlife corridors and walking and cycling routes into and out of the Borough.</p> <p><i>[NB: there are other consequential references to describe ‘Functional’ housing market area in paragraphs 2.19, 4.3 (first bullet), and 4.4 which are additional to proposed changes set out in relation to paragraph 4.5 (MM09), paragraph 4.7 (MM10) and Policy LP2 set out in MM12]</i></p>	No change made; no effect
MM02	Para 2.26	<p>2.26 6,700 <u>8,500</u> dwellings need to be delivered in <u>will be provided within</u> the borough to meet and will contribute towards meeting the full objectively assessed need for market and affordable housing requirements through allocations, development at Hlgh Town, regeneration of the town centre (Power Court) and former employment area (Napier Park). Neighbouring local authorities need to help meet Luton's unmet market and affordable housing needs in accordance with the 'Duty to Cooperate'.</p>	No change made; no effect
MM03	Para 3.5	<p>3.5 London Luton Airport will be improved to provide more jobs related to aviation industries and other associated business clusters and maintain London Luton Airport's key role as a sub-regional economic driver bringing wealth and job creation (including high skilled jobs) to the town and neighbouring local authorities. The completion of Butterfield Technology Park will support more job opportunities in high technology industries. Across Luton, a mix of high quality and low cost business accommodation will support a range of jobs suitable for the skills of local and neighbouring residents with Power Court, <u>Butterfield Technology Park, Century Park</u> and Napier Park making a strategic contribution leading to an increase in employment. The creative and cultural industries will grow, stimulated by the presence of a modernised University of Bedfordshire, the historic and distinctive Creative Quarter and High Town.</p>	No change made; no effect

MM04	Para 3.9	<p>3.9 Luton will prosper through a well-connected network of vibrant and regenerated locally distinct places centred around Luton Town Centre, District Centres and Neighbourhood Centres which have evolved from the borough’s rich history. Luton Town Centre will be a sub-regional focus for inward investment for development including retail², the creative and cultural economy, new homes and town centre uses. Power Court is a 'flagship' project shaping the future image and function of the town centre and what it has to offer to shoppers and people visiting the town for entertainment and leisure. The District Centres at Bury Park, Marsh Farm, Marsh Road, Stopsley and Wigmore will also be a focus for development to enable their shops and services to thrive for the benefit of their local communities. Neighbourhood Centres will be distributed across the town, between the larger centres, to serve day-to-day needs.</p> <p>Add footnote to para 3.9:</p> <p><u>Footnote: * Luton town centre’s description as a ‘Regional Centre’ is the terminology adopted by the White Young Green’s (WYG) Luton Retail Study Update 2015. This is sourced from Venuescore, an acknowledged industry ranking of retail locations across the UK.</u></p>	No change made; no effect
MM05	3. Vision and Objectives, Strategic Objective 2	<p>Strategic Objective 2: To utilise Luton’s economic, social and environmental resources efficiently and sustainably <u>including appropriate mitigation</u> within the limited physical land capacity of the Borough, whilst ensuring the permanence of the Green Belt.</p> <p><i>[NB: also leads to consequential changes where Strategic Objective 2 is quoted in Chapters 5, 6, 8, 9, 11 and 12]</i></p>	No change made; no effect
MM06	3. Vision and Objectives, Strategic Objective 3	<p>Strategic Objective 3: To ensure that new housing delivers an appropriate level of provision to meet local requirements needs in terms of quantum, the number of homes, subject to capacity constraints and a mix of dwelling types, sizes and tenures that offer local residents a choice of where to live and addresses issues of affordability and overcrowding. <u>Luton Borough Council will work collaboratively with neighbouring authorities to help ensure unmet need is provided in appropriate locations outside Luton, and to actively monitor progress in terms of unmet need.</u></p> <p><i>[NB: also leads to consequential changes where Strategic Objective 3 is quoted in Chapters 6, 9 and 11]</i></p>	No change made; no effect
MM07	Para 4.3, Presumption in favour of Sustainable Development	<p>Presumption in Favour of Sustainable Development</p> <p>4.3 At the heart of the NPPF is a presumption in favour of sustainable development which it explains should be a golden thread running through both plan-making and decision-taking. <u>Opportunities should be sought to address development needs whilst seeking positive improvements in the built, natural and historic environment and enhancing people’s quality of life. Luton provides a clear example of an area with high pressure for different land uses where the economic, social and environmental roles for the planning system to perform (as set out on paragraph 7 of the NPPF) cannot be treated in isolation. The Vision and Strategic Objectives of this plan reflect the range of outcomes sought from development. This Local Plan This consultation document</u> takes this approach to determining its preferred policy approach. The Plan does this by:</p>	No change made; no effect
MM08	Policy LP1 –	Policy LP1 – Presumption in favour of development	No change made; no effect

	<p>Presumption in favour of development</p>	<p>A. Planning permission will be granted where applications contribute positively to economic, social and environmental objectives of the local plan and which accord with local plan policies (and, where relevant, with policies in neighbourhood plans) when taken as a whole, unless other material considerations indicate otherwise.</p> <p>B. The Council will require all new development in the borough to contribute to enhancing a sense of place and improving preserve or improve the character of the area. Development proposals should respond to and enhance local character, the natural environment, heritage assets, and identity of the Borough.</p> <p>Sustainable Development Principles</p> <p>To enable the delivery of sustainable development and sustainable communities, all development proposals will, <u>where applicable, have regard to relevant plan policies</u>:</p> <p>C. be of high quality design;</p> <p>D. improve the quality of life for residents and visitors;</p> <p>E. promote healthy, safe and inclusive communities;</p> <p>F. conserve, and enhance the natural, built and historic environments including designated sites, the setting of the Chilterns AONB and archaeological remains;</p> <p>G. assess and address the impact of climate change through mitigation and / or adaption measures;</p> <p>H. provide or contribute to the assessed local and borough wide development requirements including infrastructure, housing and economic development;</p> <p>I. contribute to the retention and growth of the local economy and complement town centre regeneration;</p> <p>J. be accessible by walking, cycling and/or public transport;</p> <p>K. use land and resources (such as water, energy, soils, minerals and waste) in an efficient and effective way (including contributing towards attainment of 'water neutrality') and by ensuring that the best and most versatile soils are safeguarded in preference for lower quality land; and</p> <p>L. avoid prejudicing the development of adjacent land or of a larger site and safeguard the operation of existing facilities.</p>	<p>effect</p>
<p>MM09</p>	<p>Para 4.5</p>	<p>4.5 It proposes that the objectively assessed housing need for the borough is 17,800 net additional dwellings and 31,200 <u>31,800</u> net additional dwellings in the <u>Functional</u> Luton Housing Market Area over the plan period (2011 – 2031, <u>of which, based on a pro-rata split based on population, 200 dwellings fall within North Hertfordshire and 400 dwellings within Aylesbury Vale and the balance of 13,400 dwellings within Central Bedfordshire</u>) as evidenced by the Luton & Central Bedfordshire SHMA <u>update of Summer 2015 which provides more information/analysis*</u>. The <u>Functional</u> Luton Housing Market Area (<u>shown on the accompanying plan** taken from the report, Housing Market Areas in Bedfordshire and surrounding areas Report of Findings December 2015</u>) includes all of Luton Borough, a significant proportion of Central Bedfordshire, and some of North Hertfordshire District <u>and</u> Aylesbury Vale District and <u>Dacorum Borough. ... In</u></p>	<p>No change made; no effect</p>

~~contrast to this housing need there is only capacity for 6,700 net additional dwellings (ensuring an additional buffer of 5% housing supply as required by the NPPF) in the borough over the plan period as evidenced in the Strategic Housing Land Availability Assessment (SHLAA). The 2016 SHLAA identified a potential capacity of 9,322 over the plan period. However, some of this identified capacity is unlikely to be developed over the plan period due to market and other uncertainties. Consequently, a realistic assessment is that there is sufficient capacity to deliver 8,500 dwellings. This, therefore, is the housing requirement for the plan period.~~ Based on the objectively assessed housing need; and the lack of housing land to fully meet this need, there is a shortfall of ~~11,100~~ 9,300 net additional dwellings in the borough over the plan period.

Luton Functional Housing Market Area (yellow area) with Local Authority Area Boundaries



Source: Figure 38 page 47 of the “Housing Market Areas in Bedfordshire and Surrounding Areas - Report of Findings - December 2015” Study.

Footnotes:

		<p>* The ‘Best Fit’ Housing Market area OAN of 47,300 dwellings is based on whole districts and covers all of Luton and Central Bedfordshire Districts.</p> <p>** The HMA boundaries shown on the plan are illustrative and not to be taken as precise.</p>	
MM10	Para 4.7	<p>4.7 Luton Borough Council will seek to ensure delivery of the housing need that cannot be met within the Borough within the wider Housing Market Area. As evidenced through the SHMA, Luton has the strongest functional links with Central Bedfordshire, therefore it is expected that a significant proportion of the Luton's unmet housing needs will be met in Central Bedfordshire. However, North Hertfordshire District, and Aylesbury Vale District and Dacorum Borough also fall within the Luton Housing Market Area so Luton BC will look to these local authorities to participate in joint working and, subject to the outcome of this work and preparation of joint evidence base, make provision for Luton's unmet housing needs in their local plans <u>or local plan reviews. Only in the event of the joint work failing to meet the scale of objectively set housing needs within the Functional Luton HMA would those parts of Aylesbury Vale, Central Bedfordshire and North Hertfordshire which lie outside the Luton HMA, as well as land within other neighbouring authority areas further afield, be considered.</u></p>	No change made; no effect
MM11	Para 4.8	<p>4.8 The Borough Council considers that the interests of the town and sustainability, would best be served by meeting Luton’s unmet housing needs as close as possible to the communities from which the need arises. Indeed under the duty to cooperate and in response to neighbouring plan preparation, particular account should be taken of this Council’s policy supporting development to the west* of Luton and requesting a thorough examination of strategic cross boundary options around the town (i.e. that an assessment of options north, east, south and west of Luton should be examined).</p> <p>* NB: Luton Borough Council resolved at its meeting on 20 July 2010 to support development West of Luton.</p>	No change made; no effect
MM12	Policy LP2	<p>Policy LP 2 - Spatial Development Strategy</p> <p>There is a need for 17,800 net additional dwellings to support the population growth of Luton Borough over the period 2011 – 2031. Over the same period there is a need for 31,200 31,800 net additional dwellings in the <u>Functional</u> Luton Housing Market Area (which includes the need for 17,800 dwellings in Luton Borough).</p> <p>The Local Plan will make provision for 6,700 8,500 net additional dwellings over the plan period in the Borough with <u>and requires</u> 20% of <u>all qualifying housing developments under Policy LP16 (Affordable Housing) to be these being</u> affordable dwellings. Luton therefore has an unmet housing need of 41,400 23,300 net additional dwellings over the plan period. <u>The level of housing provision within Luton will not be treated as a ceiling. This is in order to enable development proposals to come forward on sites which are not specifically allocated for housing but which comply with plan policies, subject to the availability of appropriate infrastructure.</u> Luton Borough Council will continue to work with neighbouring and nearby local authorities to help ensure delivery of the Borough’s unmet needs in other local authority areas under the ‘duty to cooperate’. Luton BC will continue to work with its neighbouring authorities to help ensure the needs of the Luton HMA are met within the HMA. <u>This work is to be informed by the Joint Growth Options Study</u></p>	No change made; no effect

		<p>including ‘Areas of Search’ for growth of Luton to the North, South, East and West.</p> <p>A. Housing in the Borough will be delivered through <u>(data derived from SHLAA, July 2016):</u></p> <ul style="list-style-type: none"> i. historic completions 2011/12 - 2012/14 (1,000 <u>2015/16 (2,027</u> dwellings); ii. existing permissions on sites delivering less than 5 homes (400 <u>114</u> dwellings); iii. strategic allocations at Power Court, Napier Park, High Town, Marsh Farm and the Creative Quarter <u>(a minimum of 2,500 dwellings);</u> iv. housing allocations (2,400-2,266 dwellings*); v. identified non-allocated sites of at least 5 homes (900-1,573 dwellings) <p><u>B. Around 18,000 jobs will be delivered over the plan period through: Employment in B Use Classes will be delivered through:</u></p> <ul style="list-style-type: none"> i. <u>Around 69 hectares of employment development on</u> Strategic Allocations at Land South of Stockwood Park, London Luton Airport, Butterfield Technology Park, Power Court, Napier Park, High Town and the Creative Quarter; and ii. delivering net additional employment land stock on allocated sites prior to releasing older unsuitable employment land and premises to other uses. <p>C. Town Centre and Retail uses will be directed in accordance with the Centre Hierarchy (Policy LP21) reinforcing and enhancing the vitality, viability and regeneration of Luton Town Centre as a regional centre** and the network of 56 District Centres and 1312*** Neighbourhood Centres serving the Borough. The Town Centre, District and Neighbourhood network will be a focus for future investment provision including transport access and linkages, community facilities, opportunities for shared services as well as appropriate scale housing, retail and employment development.</p> <p>[D & E – unchanged]</p> <p>Footnotes: * Capacity remaining at April 2016.</p> <p>** ‘Regional Centre’ is the terminology adopted by the White Young Green’s (WYG) Luton Retail Study Update 2015. This is sourced from Venuescore, an acknowledged industry ranking of retail locations across the UK.</p> <p>*** The location of one Neighbourhood Centre to be determined see LP21A.</p>	
MM13	Policy LP3 - Luton Town Centre Strategy	<p>Policy LP 3 - Luton Town Centre Strategy</p> <p>A. Power Court (see Policy LP9), the Creative Quarter (see Policy LP11) and the University Campus (see below) will be a key focus for development and change over the plan period. Development proposals for the town centre should address the following criteria:</p> <ul style="list-style-type: none"> iii. Provide circa 3,400 sqm net convenience retail floorspace in the current period and circa 6,279 sqm by 2020, and provide circa 4,420 sqm of non-bulky comparison goods for the period to 2020 and 30,096 sqm by 2025, hotels, and leisure uses to maintain and enhance the retail sub-regional^{l*} role of the town centre; 	No change made; no effect

		<p><u>Footnote: Luton town centre’s description as a ‘Regional Centre’ is the terminology adopted by the White Young Green’s (WYG) Luton Retail Study Update 2015. This is sourced from Venuescore, an acknowledged industry ranking of retail locations across the UK.</u></p>	
MM14	Policy LP 4 - Green Belt	<p>Policy LP 4 - Green Belt</p> <p>B. Inappropriate development is by definition, harmful to the Green Belt. Only in very special circumstances will inappropriate development be permitted <u>in the Green Belt</u>. and in all instances development must preserve the openness of the Green Belt and reinforce the purpose of the Green Belt. Exceptions to inappropriate development are <u>set out in the National Planning Policy Framework (NPPF)</u></p> <p>i. agriculture and forestry; or</p> <p>ii. appropriate facilities for outdoor sport and outdoor recreation, for cemeteries, which preserve the openness of the green belt and which do not conflict with the purpose of including land in it; or</p> <p>iii. limited extension, alteration or replacement of an existing building where it does not disproportionately exceed the scale of the original building;</p> <p>or</p> <p>iv. safeguarded local transport infrastructure required in a Green Belt location.</p>	No change made; no effect
MM15	Policy LP5 Land South of Stockwood Park Strategic Allocation and supporting text	<p>Land South of Stockwood Park</p> <p>4.44 Land south of Stockwood Park bounded by the M1 motorway to the east and M1 spur to Junction 10a in the west, has been is allocated as a prestige gateway business development. for the purposes of accommodating a relocation of Luton Town Football Club along along with associated uses, shared venue space, and ancillary sports related uses which may include small scale enabling development (such as A1, A3 and A4 uses). Policy LP5 therefore addresses the need to remove a high traffic generating use with associated amenity and community safety issues, away from a dense and congested part of the town to a more sustainable location. Regard will need to be had to the plan policies as a whole, and in particular because of the chalk aquifer, sustainable drainage and pollution matters in policies LP36 and LP38 and the adjacent landscape and heritage assets which will need to be considered with regard to the matters in policies LP29 and LP30. The proposed site is more accessible to the strategic road network (e.g. Junction 10a and the East Luton corridor<u>New Airport Way</u>) and also offers opportunities for improved public transport links to the town centre and Luton Airport Parkway railway stations. <u>This will be achieved by safeguarding 2 ha of land for the provision of a Park and Ride facility. The provision of the Park and Ride is not a requirement of the proposed B1 business use. Parking provision will accord with Policy 32 (Parking) and the character and form of development will respect relevant requirements set out in Policy 25 (High Quality Design). This site is also proposed for employment</u> The B1 office use on the remainder of the site <u>will in order to</u> accommodate a shortfall in provision to meet an identified need for B1 office</p>	No change made; no effect

		<p>accommodation over the plan period(4). <u>Following the public examination of the plan the relocation of Luton Town Football Club and uses and policies relating to the strategic allocation at Land South of Stockwood Park, including the provision of a Park and Ride facility will be considered in the early review of the local plan.</u></p> <p>Policy LP 5 - Land South of Stockwood Park Strategic Allocation</p> <p>A. Land identified on the Policies Map south of Stockwood Park adjacent to Junction 10a of the M1 is allocated for a 14 ha prestige mixed use gateway development according to the following scales:</p> <p>i. a new 15,000 seat stadium on 2.5 ha of land for the use of Luton Town Football Club including appropriate shared venue events;</p> <p>ii. 0.7 ha for ancillary sports facilities for which there is an identified need e.g. conference and corporate entertainment suites, indoor and outdoor training pitches and sport activities for skills, health and fitness; and</p> <p>iii. 0.3 ha of enabling provision is for small scale A1, A3 and A4 uses associated with the sport, health and fitness focus of the football stadium and shared venue events;</p> <p><i>[NB: reorder and renumber as shown]</i></p> <p>iv. B1 business use on 9.5 ha of land to meet an identified shortfall of office employment space over the plan period;</p> <p>iiiv. the safeguarding of 2 ha of land for a park and ride facility which will allow comprising 2 ha including scope to secure enhanced public transport to the town centre;</p> <p>B. Subject to the following:</p> <p>i. development proposals should be accompanied by a comprehensive masterplan for approval, which includes an indicative layout and phasing plan, sustainable construction method and materials, landscape and biodiversity schemes <u>and includes an analysis of impacts from and on the surrounding landscape and heritage assets</u> and sets out details of how this will be achieved <u>the Master Plan will be implemented and any identified impacts be mitigated;</u></p> <p>iv. car parking provision meets the maximum standard specified in Appendix 2, and is in keeping with its surroundings and is in compliance with Policy LP25 (High Quality Design);</p> <p>viv. the development will provide a high quality southern gateway to the town and will use public art, green space, built design, lighting and topography to conserve and enhance the appearance of the adjoining Green Belt, Area of Great Landscape Value, County Wildlife Site, QE II playing fields, the Registered Park and Garden of Luton Hoo and the Chilterns AONB;</p> <p><i>[renumber subsequent sub-paragraphs]</i></p> <p>ix. enabling development will be of a scale that does does not adversely affect the regeneration of Luton Town Centre.</p>	
MM16	Policy LP6 London Luton Airport	4.45 London Luton Airport is a busy growing airport currently operating at around 10 million passengers per annum with a capacity to manage up to 12.4mppa, and with the planning consent 12/01400/FUL allowing the airport to grow to an operating capacity of 18mppa. <u>This is supported by Policy LP6 which includes criteria to allow additional proposals to</u>	Highlighted section adds a cross-reference to LP30. No significant effects

	<p>Strategic Allocation and supporting text</p> <p><u>be considered in accordance with the most up to date Master Plan (i.e. that Master Plan which is applicable at the time of determining any planning application).</u> The airport provides infrastructure and services for commercial and business related aviation (in 2012 nearly 17% of airport passenger was for business travel) as well as air cargo/freight, and generates significant employment for residents of the town and surrounding areas. This includes aviation related engineering and services and other aviation related jobs. The airport also provides and underpins employment for a pool of workers and businesses which use and rely on the airport from neighbouring local authorities' areas, in particular Bedfordshire, Hertfordshire and Buckinghamshire.</p> <p>4.51 Policy LP6 makes provision for the airport to respond positively to future growth helping to safeguard Luton's key sub-regional economic contribution to jobs and wealth creation while setting a clear environment and transport framework with which to regulate future growth. Century Park is included within the strategic allocation for a range of Use Class B employment development <u>incorporating with particular support for</u> a range of aviation <u>and automotive manufacturing</u> related uses to be delivered adjacent to the airport and including hotel provision. The Hotels Study 2015 concludes that there is a need for extra hotel room provision of 1,030 rooms by 2020, growing to potentially 1,830 rooms by 2030 and generated mostly by aviation related and business travel in the vicinity of the airport. Given the strategic relationship between Century Park, the airport, the sub-regional economy and local transport network with connections to M1 Junction 10a via the east Luton corridor, it is proposed that the Century Park site and Wigmore Valley Park as allocated in the previous Local Plan is integrated together with the London Luton Airport Strategic Allocation as a single strategic allocation.</p> <p>Policy LP6 London Luton Airport Strategic Allocation</p> <p>Airport Expansion</p> <p>B. Proposals for expansion of the airport and its operation, together with any associated surface access improvements, will be assessed against the Local Plan policies as a whole <u>taking account of the wider sub-regional impact of the airport.</u> Proposals for development. will only be supported where <u>all of the following criteria are met, where applicable/ appropriate having regard to the nature and scale of such proposals:-</u></p> <p>iii. are in accordance with the latest permission and the an up to date <u>the latest permission and the an up to date</u> Airport Master Plan published by the operators of London Luton Airport and adopted by the Borough Council;</p> <p>iv. do not result in a significant increase in Air Traffic Movements that would adversely affect the amenities of surrounding occupiers or local environment (in terms of noise, disturbance, air quality and climate change impacts) <u>they fully assess the impacts of any increase in Air Transport Movements on surrounding occupiers and/or local environment (in terms of noise, disturbance, air quality and climate change impacts), and identify appropriate forms of mitigation in the event significant adverse effects are identified;</u></p> <p>v. achieve further noise reduction or no <u>material</u> increase in day or night time noise in accordance with any imposed planning condition or otherwise cause excessive noise including ground noise at any time of the day or night and in</p>	<p>predicted</p>
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		<p>accordance with the airport's most recent Airport Noise Action Plan;</p> <p>Century Park</p> <p>D. Development of Century Park will be supported where proposals make provision for office, manufacturing and distribution employment. including that associated with airport and aviation related businesses and industry, and which can be demonstrated to have a locational requirement for close access to London Luton Airport. Such uses include: B1 uses including in particular, light industrial; small scale affordable managed B2 units; and B8 distribution all accommodating a significant element of aviation related uses. Particular support will be given and provision made for engineering and manufacturing for both aerospace and automotive purposes that demonstrate a need to locate close to the airport. In addition a range of accommodation types, including small scale affordable B2 units, to facilitate the expansion and relocation of existing Luton-based businesses, new business start-ups as well as significant inward investments will be allowed provided that it does not generate bad neighbour issues. Warehousing-only developments must demonstrate a need to co-locate near the airport. Small scale retail, related services and leisure (as defined in Use Classes A1 to A3 and D2) will be permitted in order to serve the needs primarily; of employees in the area, as well as a hotel (Use Class C1). The Council will require proposals to be subject to a comprehensive development brief or Master Plan which shall set out the proportion and phases of development and which shall include the following:</p> <p>Design and Drainage</p> <p>F. Development proposals for the London Luton Airport Strategic Allocation will ensure:</p> <p><u>iv. that development proposals, where applicable / appropriate will fully assess the impacts upon heritage assets and their setting, and should be designed to avoid harm to the setting of any heritage assets. Proposals will be considered in line with Policy LP30 (historic environment).</u></p>	
MM17	Policy LP7 and supporting text	<p>4.54 The analysis indicates Luton will have a shortage of land for B1 office premises, which often also accommodates R&D activities. This may include applied research and development involving product innovation and advanced manufacturing processes requiring B1c light industry facilities to be provided. <u>In addition, the retention of land at Napier Park by Vauxhall has increased pressure to secure alternative opportunities for other B Class uses, especially B2. On this basis, there is no case for releasing parts of this important employment site to other uses and it is essential to allocate it for employment use.</u></p> <p>4.56 The Butterfield area represents the only opportunity to provide a park and ride facility on the A505 gateway into Luton. The policy therefore safeguards land required, considered to be <u>circa 1 hectare 2 hectares</u>, having regard to preliminary studies on the implementation of park and ride in Luton.</p> <p>4.58 Commercial market views were that this site would attract development when the property market recovers. Recent enquiries by large employers support this view. <u>However, to stimulate the market, some flexibility is permitted for high quality B2 where compatible with the Technology Park and also a limited number of plots for high quality B8 provision contained physically and visually within the site.</u></p>	<p>Highlighted section added to LP7 (Butterfield) which makes consequential changes to LP7 Aii and LP13 Aiii to improve consistency. The change effectively increases flexibility by changing B1 office uses to high quality B uses at certain locations. No significant effects predicted</p>

	<p>4.59_Built development should be low rise and low density, in order to retain the essentially open nature of the area, with <u>generally</u> no more than 3035% of the <u>plot</u> area occupied by buildings.</p> <p>Policy LP 7 - Butterfield Green Technology Park</p> <p>The undeveloped land (23 hectares) at Butterfield Green is allocated for: the development of high quality, technology-related B1 uses which could provide approximately 55,000 sqm of employment floorspace (or 4,800 jobs) in the research and development sectors complementing the existing Innovation Centre and Enterprise hub and contributing to the expansion of the sub-regionally important Technology Park. Support will also be given to the provision of a park and ride facility to mitigate traffic in the borough.</p> <p><u>(a) the development of high quality B1 and B2 uses which are compatible with the technology park concept. This will provide opportunities for both inward investment and the expansion and relocation of existing businesses within Luton’s administrative boundary.</u></p> <p><u>(b) high quality B8 use, where the scale and nature of the use are compatible with the technology park concept, will be only acceptable on the undeveloped 2.45 hectare plot in the north-east corner of the site and on 6.59 hectares of land to the west of the Business Base within the existing hedgerow/tree feature.</u></p> <p><u>(c). Support will also be given to the provision of a park and ride facility to mitigate traffic in the borough (on circa 1 hectare of land).</u></p> <p><u>(d) other uses such as small scale retail (A1 and A3), leisure uses such as a gym (Class D2) to serve the development and support the overall success of Butterfield as a modern Technology Park will also be permitted. All development proposed will be of a quality of design compatible with the technology park.</u></p> <p>A. Development should accord with the Spatial Development Strategy, other policies in the plan and follow the site-specific requirements:</p> <p>i. development proposals should be accompanied by a comprehensive an indicative masterplan which should include an indicative layout, sustainable construction methods and materials, a landscape and biodiversity plan and a phasing plan for the necessary infrastructure to deliver the scheme; to demonstrate how each plot can be delivered without prejudicing the delivery of the wider site requirements referred to in (a), (b) (c) and (d) above;</p> <p>iv. density should be low with the footprint of the buildings typically occupying no more than 30% of the gross area, with significant landscaping between buildings/uses throughout the site proposals must achieve a sense of spaciousness that reflects the technology park concept and for this reason buildings should generally not occupy more than 35% of the plot area but the precise percentage achieved will be determined by the quality of the design of the development taking account of proposed layout, landscaping and positioning of buildings;</p> <p>vii. existing landscape features such as hedgerows and ponds shall be retained and opportunities taken to enhance such features where practicable, and may include minor alteration or minor replacement elsewhere in order to achieve this and to accommodate infrastructure requirements;</p>	
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		<p>viii. the views from the adjacent Stopsley Common and Oaket Wood County Wildlife Site and the setting of the Registered Park and Garden at Putteridge Bury should be protected and should retain their rural character through sensitive planting and landscaping. Typically, B buildings will be restricted to two storeys, increased to three storeys where use can be made of roof space it can be demonstrated that the development will not adversely impact upon views into the site;</p> <p>ix. existing rights of way shall be safeguarded or redirected as necessary. Opportunities to promote pedestrian and cycle access to the wider area will be addressed where this is practicable;</p> <p>x. a plot of land sufficient for a new 450 space Park and Ride facility to be provided. the Park and & Ride facility should be located near the entrance of the existing Innovation Centre* in order to mitigate traffic in the borough and promote sustainable trips to/from the development and will serve the wider urban / rural area. This land will be safeguarded for 5 years following transfer of the title to the Council to enable delivery of the Park & Ride scheme. The transfer of the land will occur when 30% (from the position at January 2017) of the remaining undeveloped technology park is developed. If the facility is not built within 5 years from the transfer date, the land will transfer back to the landowner at nil cost. Subject to its provision, additional S106 contributions towards off-site transport infrastructure or funding of the facility from within Butterfield will not be sought;</p> <p>xi. pedestrian and cycle routes will also be essential to link the site to the surrounding and wider urban / rural area. B2 and B8 elements will only be permitted where the developer can demonstrate that these proposals will not lead to demonstrable harm by way of noise, vibration, visual impact (including lighting), and any noxious emissions or potential contamination.</p> <p>* Or at an alternative location to be proposed and agreed with the Council in the indicative masterplan.</p> <p>The following consequential changes are necessary to ensure consistency with the changes set out above, with regard to appropriate uses - as follows:</p> <p>Policy LP7Aii [delete 'office'] ,</p> <p>Policy 13Aiii [delete 'high quality technology related B1 Uses (see Policy LP7)' and replace with 'high quality uses in line with Policy LP7']</p> <p>Appendix 3 -List of Key employment Sites Category A: [delete 'B1(a), B1(b), B1(c)' and replace with 'high quality uses in line with Policy LP7']</p>	
MM18	Policy LP8 Napier Park And supporting text	<p>4.64 Around 23 hectares of the former Vauxhall Plant lends itself to be redeveloped for housing, offices, light industry, warehousing, retail, leisure, tourist accommodation and car parking. The reacquisition of a 7.58 ha plot by GM Vauxhall for operational reasons, and its implications for delivering B class accommodation, will be kept under review and be the subject of the early plan review.</p> <p>4.70 The key aim for this site is to deliver high quality housing, offices and light industry, including with a new neighbourhood centre composed mostly of convenience retail units clustered around a vibrant public space to serve</p>	No change made; no effect

		<p><u>the needs of the new community.</u></p> <p>Policy LP8 - Napier Park</p> <p>Napier Park is a brownfield site of around 25 hectares, located on the former Vauxhall car plant. The site is allocated for a mixed use neighbourhood development including B1 business uses around approximately 35,000 sqm of with particular support for B1a offices and office space and 20,000 sqm of B1c light industrial uses, as well as small scale, affordable B2 accommodation. Provision will be made for between 600 and 1,300 residential units, a foodstore of 2,500 sqm with a convenience retail-led floorspace Neighbourhood Centre, and a hotel.</p> <p><i>[NB: the proposed Neighbourhood Centre at Napier will be shown on the Key Diagram]</i></p>	
<p>MM19</p>	<p>Policy LP9 Power Court and supporting text</p>	<p>New paragraph: 4.87A The Town Centre Development Framework (and its proposed review – see Policy LP3) provides background information for proposals at Power Court.</p> <p>Policy LP 9</p> <p>Power Court</p> <p>Power Court is a brownfield site of around 7 hectares located in Luton Town Centre’s northeast gateway bounded to the north by the route of the Luton-Dunstable Guided Busway and the railway line and to the south by the St Mary Road.</p> <p>Power Court is a key site for achieving regeneration objectives of the plan which includes providing a sustainable mixed use development, the Master Plan and future consent which will extend the primary shopping area to improve the town centre retail offer and as an accessible, convenient and attractive location in which to live, shop and be entertained. Power Court will deliver a mix of town centre uses. The following uses are all acceptable in principle as components of a mixed use development; housing, convenience and comparison retail forming a retail, leisure, cultural and entertainment uses and, hub-mixed with housing and business B1 offices. This development will enhance the offer of the town to residents and students of Bedfordshire University and also the wider community, as well as visitors, and tourists.</p> <p>Land at Power Court, as shown on the Policies Map is allocated for town centre uses in a mixed use redevelopment. of Any scheme should include around 600 dwellings and a need for circa 3,393 sqm net retail convenience floorspace and provision for sport, leisure and entertainment. The site could provide for a proportion of Comparison floorspace will also be accommodated in accordance with the borough’s overall identified need for comparison floorspace within the town centre.</p> <p>A. Development should accord with the Spatial Development Strategy, other policies in the plan and address the following requirements:</p> <p>i. proposals should be accompanied by a comprehensive masterplan which includes indicative layout, materials, access, massing, uses and a phasing, and the proposed delivery mechanism, and should comply with the Luton Town Centre Development Framework and its updates;</p>	<p>Highlighted sections retain reference to “mixed town centre uses” which had been deleted at Proposed Modifications stage. Reinsertion does not alter the effect of the policy as the proposal is for mixed uses in the town centre. No significant effects predicted</p>

		<p>ii. <u>proposals should include measures to ensure that development on the site is accessible from the Town Centre Shopping Area and is perceived as being a part of the town centre.</u> <i>[NB: renumbering of remaining criteria will be required]</i></p> <p>ii. development should respect and enhance the setting and context of the site in terms of using and its high visual profile. <u>High</u> quality design <u>should be integral to the scheme</u> to complement adjacent landmark buildings, and the adjacent vistas and the public realm, including the Grade I listed St Mary’s Church and grounds, the University of Bedfordshire Campus and the UK Centre for Carnival Arts <u>and development should preserve, and seek opportunities to enhance, the character and appearance of the Plaiters Lea Conservation Area and to preserve, and seek opportunities to enhance, the setting of the Grade I listed St Mary’s Church;</u></p> <p>iii. consider opportunities for making <u>Make</u> more effective use of the River Lea as an accessible strategic green infrastructure for the town providing habitat and an accessible historic landscape feature, and consider options for deculverting and redirecting the River Lea channel where feasible to link with nearby walking and cycling networks;</p>	
<p>MM20</p>	<p>Policy LP10 – High Town and supporting text</p>	<p>4.98 A Supplementary Planning Document (SPD) was prepared in 2007 for the whole of the High Town Action Area (Local Plan 2001-2011), which sets planning, land use and transportation objectives for the future of the area. This SPD has been will be replaced by a consolidated Masterplan and Delivery Strategy (see paragraph 4.102). <u>the High Town Masterplan (adopted September 2016) which explains how the approach in Policy LP10 can be achieved.</u></p> <p>4.99 The land between the Conservation Area and Hitchin Road have been subject to further detailed guidance through the High Town East Village Design Codes 2009 which is retained as SPD (Appendix to the High Town SPD 2007) which sets the layout of this area and its height, massing, boundary treatment and more.</p> <p>4.100 High Town is proposed as a Neighbourhood Centre in the 'centre hierarchy' (see Policy LP21) and as such can accommodate town centre uses appropriate to the scale and size of the area. However its proximity to the Town Centre could allow for substantial town centre uses to be located in the area easily accessible to the station, provided they have been subject to a sequential test. Given the considerable potential for additional housing and jobs a consolidated Masterplan including a delivery strategy covering the whole of the High Town policy area has been prepared to coordinate and facilitate the development of the area.</p> <p>4.101 The Masterplan and Delivery Strategy will consolidate elements saved from from previous SPD (e.g. the East Village Design Codes) which will otherwise be superseded and will be material consideration for planning applications related to the policy area.</p> <p>4.102 The aim of the <u>High Town-Masterplan and Delivery Strategy</u> is to contribute to making High Town a more vibrant neighbourhood, improving the overall image and perception of the area. High Town has a strong identity of place which the Masterplan aims to build upon while also strengthening the mix and viability of employment, residential, live/work and creative industries.</p> <p>Policy LP 10 - High Town</p>	<p>Typo correction (no change made); no effect</p>

		<p>The vision for the area is to create a sustainable vibrant, historic neighbourhood destination delivered through residential-led mixed use development whilst preserving and seeking opportunities to enhance protecting the historical environment and heritage assets including small scale offices / workshops, live work units and increased retail provision which will enhance the area including increased footfall, better pedestrian access and permeability, more public open space and an enhanced natural environment.</p> <p>It is expected that over the plan period the area can accommodate around at least 750* new residential units and around 350 jobs, taking account of the following:</p> <p>A. Proposals must have regard to the High Town SPD, Masterplan and Delivery Strategy and help deliver the vision for the area. This will be achieved through the site specific requirements which may include reference to density To ensure the vision is realised development proposals must achieve appropriate densities, height, permeability, mix of uses; including housing, employment and shops as well as niche roles such as for the creative industry and scope for art and open spaces in the public realm; in the three key areas of change in High Town (Old Bedford Road Block, East Village and 'The Paths') and delivering the key infrastructure and environmental improvements set out in this policy and the SPD. The area benefits from the proximity to the town centre which offers many facilities and services, however the need for recreational facilities in particular for young people has been identified and should be improved. The High Town Masterplan SPD and East Village Design Codes SPD explain how an appropriate quality of development can be achieved.</p> <p>Footnote: *the July 2016 SHLAA indicates capacity for c840 dwelling units in High Town.</p>	
MM21	Policy LP11 - Creative Quarter and supporting text	<p>4.110 This key gateway is to be transformed into the Creative Quarter of the town with a thriving café culture and night time economy; appropriate for a mix of restaurants, galleries, retail, education facilities and creative businesses and an excellent quality public realm. Retail will be small scale shops (including permitted flexible use A1, A2, A3, B1 and D2) to serve visitors, local residents and businesses with the exception of the Northern Gateway where the scale of retail provision for convenience and comparison goods will be limited help to ensure that the identified floorspace need within the retail policy allocated for role of the Town Centre, is not exceededsupported.</p> <p>Policy LP11 - Creative Quarter</p> <p>[After the introductory paragraph amend as follows:]</p> <p>A. Proposals for the Creative Quarter as identified on the policies map and comprising the 1. Northern Gateway, 2. Station Gateway and 3. North of St Georges Square development areas will be supported where they deliver the following requirements as far as they are material to the application:</p> <p>x. development proposals must be shaped by heritage considerations at the outset, and the Council will carry out an appraisal of the Plaiters Lea Conservation Area including heritage assets at risk in accordance with Policy LP30 (Historic Environment) in order to assist with this requirement.</p> <p>1. Northern Gateway</p>	Deletion at highlight of references to the site’s “setting within” the Plaiters Lea Conservation Area. However, conservation and enhancement of the Conservation Area are still required by LP11 Biii (and elsewhere). No significant effects predicted

		<p>The area is composed of approximately 0.5 hectares of land immediately to the north of the Mall allocated for a retail-led comprehensive scheme.</p> <p>B. Proposals for the Northern Gateway will be acceptable if they comply with the criteria set above and where they deliver the following:</p> <p>i. retail floorspace (including flexible use classes A1-A3, B1 and D2), market, residential accommodation and complementary mixed-use development (C3, A4) for which there is an evidenced need;</p> <p>iii. improve the quality of the entrance to the Mall through high quality architecture which enhances the quality of the visual experience and physical connectivity to the Mall while also <u>conserving and seeking opportunities to enhance complementing and respecting the proximity of the</u> Plaiters Lea Conservation Area. <u>Applications must be accompanied by an assessment of the significance of the heritage assets, and how they may be affected and conserve and where possible take opportunities to enhance the Plaiters Lea Conservation Area.</u></p>	
MM22	Paragraph 5.6	<p>5.6 The release now of a limited number of the poorest B use employment sites must be managed against the need to protect marginal employment land (Category B identified on the policies map) in the short and intermediate period to ensure local firms can still afford to do business in Luton, until new modern affordable accommodation becomes available. <u>Safeguarded Category A sites offer the best quality employment opportunity sites, which includes greenfield employment land allocations, most recently assessed as fit for purpose. These sites are therefore safeguarded for employment use although it is recognised that, over the lifetime of the plan, exceptional circumstances may arise that justify a different approach.</u></p>	No change made; no effect
MM23	Paragraphs 5.8 – 5.10, 5.13 and 5.19	<p>5.8 South of Stockwood Park a B1 business park to meet future office demand and a relocated football club must be served by benefitting from the M1 Junction 10a improvements.</p> <p>5.9 The retention of Butterfield Green Technology Park for research and innovation is <u>will provide</u> important <u>opportunities</u> in delivering a long term diversification and restructuring of Luton’s economy, addressing under representation in higher technology sectors <u>as well as providing opportunities for high quality B2 and B8-only developments.</u></p> <p>5.10 The Napier Park Strategic Allocation is a key regeneration site for mixed B Class B1 business, employment and modest B2 accommodation with residential use <u>and including a convenience retail-led neighbourhood centre</u> linked to guided busway and Luton Airport Parkway Railway Station. <u>The reacquisition of a 7.58 ha plot by GM Vauxhall for operational reasons, and its implications for delivering B class accommodation, will be kept under review and be the subject of the early plan review.</u></p> <p>5.13 Policy LP13 sets out a positive and flexible economic strategy for delivering the jobs target and strategic allocations and LP14 will regulate the process by which land will be protected and delivered in accordance with the Employment Land Study. Luton’s economy has been performing fairly well in terms of job growth, and its future economic growth prospects appear reasonably good, supported by planned infrastructure improvements and Airport</p>	Minor wording changes at highlighted section; no effect

		<p>growth.</p> <p>5.19 The scope for redeveloping existing employment land for mixed employment and housing is not currently a viable option in the present economic climate without comprehensive planning (e.g. parking and amenity issues) and financial interventions. It would be prudent to maintain most of this stock (e.g. amber employment sites identified Category B sites on the policies map) until economic conditions improve and there is progress on delivering new accommodation on the outstanding land allocations and particularly, Napier Park and Century Park, <u>Butterfield Green Technology Park and Stockwood Park (Junction 10a)</u> .</p>	
MM24	Policy LP13A, C & D – Economic Strategy	<p>Policy LP13 - Economic Strategy</p> <p>A. Planning applications will be granted where they deliver sustainable economic growth and prosperity to serve the needs of Luton and the wider sub region. There is a need to generate 18,000 jobs. 8,000 of these are B use class jobs <u>Jobs will be generated</u> through business and industry development on strategic employment allocations, and within the existing key employment areas safeguarded for B class uses, (including securing automotive and advanced manufacturing clusters and supporting industries/services such as the GM / Vauxhall plant to respond to the market and core business demands) as identified on the Policies Map. A further 10,000 non B use class jobs <u>Further growth in employment will be provided</u> in commercial and service related industries including retail, leisure, culture and tourism will be generated within the Town Centre, District and Neighbourhood Centres including where ancillary or proposed within the strategic employment allocations. The strategic allocations for delivery are:</p> <p><i>[No change to B.]</i></p> <p>C. Employment Areas (Categories A & B) allocated on the Policies Map and listed in Appendix 3 and smaller existing B use employment sites not identified, will be protected to retain and deliver jobs in the borough apart from in exceptional circumstances as set out in Policy LP14 Employment Areas and Sites.</p> <p><u>D. Provided that category B sites and unidentified employment sites satisfy criteria as set out in Policy LP14 section B, they may be redeveloped for employment, mixed use or other needs accordingly.</u></p> <p>D. E. Planning permission for proposals that would increase and improve tourism and visitor attractions will be granted provided that it does not cause an adverse impact on the road network, any town centre use accords with the sequential approach and is in conformity with the policies in the Local Plan.</p>	No change made; no effect
MM25	Para 6.1	<p>6.1 A key issue facing the Borough in terms of planning for new homes up to 2031 is population growth, meaning that 17,800 new dwellings are needed in Luton Borough by 2031. There is, however, limited developable land available for new homes within the built up area. The plan makes provision for the delivery of 6,700 <u>8,500</u> dwellings. This quantum of housing provision will enable the Council to identify and update annually a supply of specific, deliverable sites sufficient to provide five years worth of housing with an additional buffer of 5% (as required by NPPF paragraph 47).</p>	No change made; no effect
MM26	Para 6.4	<p>6.4 National planning policy requires that Local Plans seek to meet their objectively assessed development needs and, in the case of housing, that this should be forecast through a Strategic Housing Market Assessment (SHMA). The</p>	No change made; no effect

		<p>Council prepared a joint SHMA in 2010 with the other Bedfordshire authorities which indicated, that 4,700 new homes would be required in Luton Borough between 2007 - 2021 based on minimum requirements of the former Regional Spatial Strategy (East of England Plan which was revoked in January 2013). The SHMA was consequently updated in 2012 to inform the Local Plan preparation following publication of the NPPF which requires local authorities to objectively assess housing need. The SHMA 2012 identified a need for 11,000 homes for Luton Borough based on trend migration. In order to take account of the most up to date Central Government population and household data released in 2013, the Council prepared a draft Luton & Central Bedfordshire SHMA Refresh in 2014 subsequently updated in 2015 determining the objectively assessed housing need for Luton as 17,800 dwellings. This was led by a SHMA steering group which includes eight other local authorities (Central Bedfordshire Council, North Hertfordshire District Council, Stevenage Borough Council, Bedford Borough Council, Milton Keynes Council, St Albans City and District Council, Dacorum Borough Council and Aylesbury Vale District Council).The SHMA indicates that <u>parts of</u> Central Bedfordshire Council, North Hertfordshire District Council <u>and</u> Aylesbury Vale District Council <u>and</u> Dacorum Borough are within the <u>functional</u> Luton Housing Market Area.</p>	
MM27	Para 6.5, 6.8 and 6.9	<p>6.5 The Strategic Housing Land Availability Assessment (SHLAA) (2014) and Sustainability Appraisal (2015) and viability evidence demonstrate that there is only a limited supply of land in Luton for new homes without stifling development, eroding open land including the Green Belt, other locally protected open spaces and important nature designations. This limited capacity also reflects the need to provide land for other uses such as employment, education, health and other infrastructure to support growth in Luton. <u>The SHLAA is updated regularly to take account of the latest circumstances. The Strategic Housing Land Availability Assessment (July 2016) represents the most up-to-date evidence used to inform the estimates of capacity for housing land in this plan.</u></p> <p>6.5A Planning for the provision of 6,700 8,500 new homes in Luton reflects the availability of land for development in the Borough, the need to provide a mix of homes to support sustainable communities and the objective to provide a choice of homes for people at all stages of life. To ensure that Luton maximises its contribution towards meeting its own housing need, all other sources of suitable housing supply have been considered through strategies for empty homes and encouraging conversion of vacant town centre office buildings where they are obsolete for meeting business needs.</p> <p>6.8 Based on the findings of the SHMA 2014 and 2015 update and the SHLAA capacity work, there is an unmet housing need for Luton Borough of around 11,100 9,300 net additional dwellings over the plan period.</p> <p>6.9 There is a housing need of 31,200 31,800 dwellings in the Luton Housing Market Area. The full extent of the unmet need arising from this will only be determined when the other local authorities in the Luton Housing Market Area reveal the quantum and location of development they intend to deliver in the housing market area.</p>	No change made; no effect
MM28	Para 6.13	<p>6.13 The Council considers that affordable rent homes (homes available at 80% of market rent levels) meet a range of needs within the sector, including the need for social rented affordable homes due to the availability of Universal Credit/Housing Benefit to tenants unable to afford the full rent for an affordable rent property. Development proposals</p>	No change made; no effect

		<p>should be accompanied by a sustainable letting scheme to support the use of affordable rent homes in meeting the need for social rented housing and also to develop and maintain balanced communities. The SHMA (2015) recommends that at least 72% of affordable housing be provided as affordable rented housing with a target of 85%, and that the balance of affordable housing be provided through intermediate housing products consistent with the definitions set out in Annex2 of the NPPF. Given the need to maximise affordable housing delivery in the Borough, the split between affordable rented housing and intermediate housing may be adjusted where there are specific viability constraints relating to individual sites. <u>It is unlikely that SHMA updates would significantly alter the recommended split between affordable rented and intermediate housing. The Council will monitor the delivery of affordable housing.</u></p>	
<p>MM29</p>	<p>Technical Standards</p>	<p>6.19 The Government’s reform of Health and Adult Social Care is underpinned by a principle of sustaining people at home for as long as possible. This was reflected in the recent changes to building regulations relating to adaptations and wheelchair accessible homes that were published in the 2015 edition of Approved Document M: Volume 1 (Access to and use of dwellings) which sets out three categories of dwellings:</p> <ul style="list-style-type: none"> • Category 1: Visitable dwellings - Mandatory • Category 2: Accessible and adaptable dwellings – Optional (similar to Lifetime Homes) • Category 3: Wheelchair user dwellings – Optional, equivalent to wheelchair accessible standard. <p>6.20 PPG (Paragraph 007) explains that local authorities should identify the proportion of dwellings in new developments that should comply with the requirements for Category 2 and Category 3 as part of the Local Plan, based on the likely future need for housing for older and disabled people (including wheelchair user dwellings) and taking account of the overall impact on viability. This Local Plan does not set out specific policy requirements for the Optional Category 2 or Category 3 standards. Those bringing forward proposals are encouraged to take into account the findings of the latest assessment of housing needs. The changing demographics of the area indicate that developments that respond to residents’ current and future needs for accessible or adaptable accommodation will provide choice and flexibility to meet a growing demand.</p> <p><u>6.21 The SHMA demonstrates that the needs for these types of accommodation affect the whole Housing Market Area. The Council commits to keeping this evidence up-to-date and recording the extent to which opportunities to meet changing needs are being provided, including as part of dialogue with neighbouring authorities.</u></p> <p>6.224 The demographic projections showed that the population of Luton and Central Bedfordshire was projected to increase by around 81,900 persons over the 20-year period 2011-31 based on long-term migration trends. The number of people aged 65 or over is projected to increase by around 41,400 persons, which equates to around half of the overall growth; which includes an extra 9,200 persons aged 85 or over. Most of these older people will already live in the area and many will not move from their current homes; but those that do move home are likely to need accessible housing. Given this context, the evidence supports the need for all dwellings to meet Category 2 requirements, providing that this does not compromise viability.</p>	<p>No change made; no effect</p>

		<p>6.232 The CLG guide to available disability data⁽⁶⁾ shows that currently around 1-in-30 households in England (3.3%) have at least one wheelchair user, although the rate is notably higher for households living in affordable housing (7.1%). It is also important to recognise that these proportions are likely to increase over the period to 2031 in the context of the larger numbers of older people projected to be living in the area. The evidence therefore supports the need for 10% of market housing and 15% of affordable housing to meet Category 3 requirements. This recognises the changing demographics of the area and also provides an element of choice for households that need wheelchair user dwellings now as well as those households considering how their needs may change in future.</p>	
MM30	Para 6.24 and 6.25	<p>6.24 New homes in Luton need to provide a choice of housing for people at all stages of life. In order to do so they will need to meet minimum standards of design. Policy LP25 (High Quality Design) establishes what design and amenity standards are expected from new and converted developments. This policy will be applied in conjunction with site specific policies in the Local Plan, with the <u>external amenity</u> space standards set out in Appendix 6 and with development briefs, masterplans and future Supplementary Planning Documents (SPDs).</p> <p>6.25 Following the Housing Standards Review (May 2015) the Code for Sustainable Homes was abolished and was to be replaced by ‘new national technical standards’ on energy performance equivalent to level 4 of the code to be enshrined within Part L of the Building Regulations, although the government has recently signalled postponement as it is reviewing energy standards. Nevertheless, in order to meet this Council’s legal obligations under European and national regulation and statute on promoting sustainable development and tackling climate change, Policy LP37 (Sustainable Energy) requires all new residential development to meet the equivalent standard of the abolished code 4 which was to be set out in the ‘new national technical standards’ and based on the supporting Local Plan evidence (i.e. the standard is viable, achievable and necessary). Developments will be encouraged and will be supported, where they to exceed <u>this Building Regulation</u> standards <u>according to Policy LP37 (Sustainable Energy) and the energy hierarchy</u>. Together, these policies ensure that developments incorporating new homes will contribute to promoting sustainable use of resources and the principles of good design.</p>	No change made; no effect
MM31	Para 6.31	<p>Older Person’s Housing</p> <p>6.31 National Guidance requires that the future need for older persons is assessed and that the assessment should set out the level of need for residential institutions (Use Class C2). Using the Housing Learning and Improvement Network (LIN) toolkit, this identifies future need for 1,000 <u>circa 1,300</u> specialist older person housing units of various types in Luton over the 20-year period 2011-31 (see Figure of the SHMA 2015). This indicates almost two thirds of this need (63%, 630 units) is for Leasehold Schemes for the Elderly, 240 Extra Care units, 100 Sheltered units and 30 Dementia units. The total need for older person’s housing represents only 5.6% of Luton’s overall housing need. Older person’s housing needs are included in the overall objectively assessed housing needs and Policy LP18 (Older Person’s Accommodation) sets out a criteria based policy for determining schemes for Older Person’s Housing.</p>	No change made; no effect
MM32	Policy LP15 –	Policy LP 15 - Housing Provision	No change made; no

	Housing Provision	<p>Provision will be made for 6,700-8,500 dwellings in the borough to help meet the housing needs of Luton and the Luton Housing Market Area ensuring the size, type and tenure (including provision for starter homes, custom build and households with specific needs) provided reflects the identified housing need requirements of the area in the Strategic Housing Market Assessment (SHMA).</p> <p>A. Housing provision will be made through the following sources of land supply:</p> <ul style="list-style-type: none"> i. historic completions 2011/12 – 2012/14 (1,000 dwellings) ii. existing permissions on sites delivering less than 5 homes (100 dwellings) iii. strategic allocations at Power Court, Napier Park, High Town, Marsh Farm and the Creative Quarter (2,500 dwellings) iv. additional allocations for housing and mixed use identified on the Policies Map in accordance with Appendix 4 (2,500 dwellings) v. identified non-allocated sites of at least 5 homes (900 dwellings) <p>Housing allocations are set out in appendix 4. Planning permission will be granted for residential development and enabling uses mixed-use schemes on allocated sites in line with Appendix 4.</p> <p>[No further changes to the remainder of the policy]</p>	effect
MM33	Policy LP16 – Affordable Housing	<p>Policy LP16 - Affordable Housing</p> <p><u>Luton has an affordable housing need of 7,200 dwellings. The application of Policy LP16 could help deliver around 1,700 affordable dwellings potential leaving an unmet need of around 5,500 dwellings.</u></p> <p>A. The Council will require the provision of 20% affordable housing units on developments OR the equivalent financial contribution towards off-site provision on all schemes that deliver a net gain of at least 11 dwellings and on sites of 10 dwellings or less which have a combined floorspace of more than 1,000 sq m. On sites of less than 10 dwellings a financial contribution in lieu of on-site provision will be accepted.</p> <p>B. Affordable housing should be provided on-site phased alongside market housing, indiscernible from and well integrated with market housing, unless An equivalent financial off-site provision will only be acceptable where there is robust justification for off-site provision. would better meet priority housing needs and support the creation of inclusive and mixed communities.</p> <p>D. If this the required level of affordable housing would render the proposal economically unviable, developers will be expected to produce a financial assessment that clearly demonstrates the maximum number of affordable dwellings that can be achieved on-site, off-site or as a commuted sum. In that case the Council will reduce the requirement for affordable housing proportionately.</p> <p>D. E. The Council will require that affordable housing be occupied by households who would not otherwise be able to afford to rent or buy a dwelling of sufficient size for their needs on the open market, and who either:</p>	Typo (no change made); no effect
MM34	Policy LP18 –	Policy LP 18 - Older People's Housing	No change made; no

	Older People’s Housing	A. The development of new accommodation designed specifically for older people should meet all of the following criteria: i. Contribute to the housing needs identified in the Strategic Housing Market Assessment (SHMA); <i>[NB: renumber the remaining bullets]</i>	effect
MM35	Policy LP20 – Gypsies, Travellers & Travelling Showpeople	Policy LP 20 - Gypsies, Travellers & Travelling Showpeople Gypsy and Traveller and Travelling Showpeople pitches and plots, including provision for a transit Gypsy and traveller site, will be permitted or allocated in accordance with current government policy to meet the needs identified in the Gypsies and Travellers Accommodation Assessments updated as necessary. Planning permission will be granted for permanent Gypsy and Traveller provision where the following criteria can be met: iii. the site is on previously developed or underused land and is not allocated for another use; and <i>[NB: renumber following sub paragraphs]</i> iv. in the case of Travelling Showpeople the sites, the existing safeguarded sites provides for future needs and includes sufficient space for storage and maintenance of equipment and the parking and manoeuvring of all vehicles associated with the occupiers.	No change made; no effect
MM36	Para 7.8	Update the existing footnote to para 7.8: <u>Footnote:</u> The Luton Retail Study Refresh December 2012 - Update 2015. <u>Luton town centre’s description as a ‘Regional Centre’ is the terminology adopted by the White Young Green’s (WYG) Luton Retail Study Update 2015. This is sourced from Venuescore, an acknowledged industry ranking of retail locations across the UK.</u>	No change made; no effect
MM37	Para 7.10	7.10 For non-food shopping (comparison goods) the research recommended the Authority seeks to markedly improve Luton’s market share and increase its competitiveness in the face of competition from regional competitors such as Milton Keynes and Watford. However, increasing market share is in-part predicated on the timely delivery of Luton’s opportunity sites which should help provide a step change in the quality of the Luton’s comparison offer and are aimed to be delivered by 2025. The delivery of the North Houghton Regis retail scheme will further increase competition. The research recommends the planned delivery of comparison floorspace to help ensure Luton’s sub-regional status is maintained.	No change made; no effect
MM38	Paras 7.14 to 7.16	7.14 Accounting for committed retail floorspace the Retail Study identifies a need for additional net convenience and comparison retail floorspace as outlined below. The Study recommends any additional floorspace is directed to the Creative Quarter within the Town Centre and Power Court and to Marsh Farm and Sundon Park District Centres <u>the centre hierarchy</u> in line with the sequential approach as set out in paragraph 24 of the NPPF. This will serve to further reinforce the network of the Town Centre and District, Neighbourhood and Local Centres across the borough and the appropriate scale of retail provision according to a each centres function, stated in the centre hierarchy identified within	No change made; no effect

		<p>the Retail Study.</p> <p>7.15 For qualitative reasons the additional food floor space required currently in 2015 will be provided at Power Court. Up to 2020 an additional 2,900 sqm of convenience floorspace may be distributed to the centre hierarchy. A further 1,000 sqm over the next 5 years is proposed including at Marsh Farm District Centre as part of a comprehensive redevelopment of the Marsh Farm Central Area although the format of this provision is subject to the Marsh Farm Masterplan; Napier Park; A a modest allocation for a foodstore at Birdsfoot Lane (South) will support the strategic upgrading of this centre to Neighbourhood Centre status; and a further foodstore commitment (for an Aldi store) at Sundon Park will support upgrading of that Neighbourhood Centre to a district Centre function.</p> <p>7.16 The above floor space requirements are based on an assessment of growth in Luton's convenience and comparison shopping market share which will be moderated by a) delivery of existing commitments meeting demand and b) lead times in delivering existing commitments and new floorspace up to 2025. However, by this period despite increased competition e.g. from the substantial scale retail scheme at North Houghton Regis (anticipated to be trading potentially around 2022), the delivery of large, modern retail units occupied by quality national retailers should improve Luton’s market share by providing an improved shopping offer to the Town. The primary location for the identified <u>comparison</u> floor space up to and beyond 2020 will be the town centre and Power Court.</p>	
MM39	Policy LP21 - Centre Hierarchy	<p>Policy LP21 Centre Hierarchy</p> <p>A. The centre hierarchy is as follows:</p> <ul style="list-style-type: none"> • Town Centre: Luton Town Centre; • District Centres: Bury Park; Marsh Road; Marsh Farm; Wigmore; Stopsley; Sundon Park; • Neighbourhood Centres: Farley; High Town; Round Green; Lewsey; Bushmead; Bramingham; Hockwell Ring; Biscot Road; Calverton Road; Birdsfoot Lane South; <u>Napier Park</u> • Potential for <u>a</u> new Neighbourhood Centre at Chaul End Lane or Dallow Road. <p>C. The Council will grant planning permission for retail development, provided it is demonstrated that:</p> <p>i. individually or cumulatively with other retail proposals, net additional convenience and comparison floor space in the borough would not significantly exceed the identified quantitative need over the plan period; and</p> <p>ii. retail proposals meet the sequential test; and</p> <p>iii. the vitality and viability of the town centre, and individually, each distinct District and Neighbourhood centre in the borough would not be significantly adversely affected by the development either on its own or in combination with other proposals or commitments.</p> <p><i>[NB: the proposed Neighbourhood Centre at Napier will be shown on the Key Diagram]</i></p>	No change made; no effect
MM40	Policy LP24 - Protection of education and	<p>Policy LP24 - Protection of education and other community facilities [Extract]</p> <p>Development which would unavoidably lead to a loss of community facilities will be permitted where:</p>	No change made; no effect

	other community facilities	<ul style="list-style-type: none"> i. it is shown that there is no need or anticipated need for its use as any type of community facility <u>existing facilities elsewhere in a suitable location can meet the displaced needs;</u> or ii. it is unsuitable for alternative community uses for which there is a demonstrable need; or iii. equivalent or better replacement facilities in terms of quantity and quality are provided in a suitable alternative location; or iv. the facilities currently provided can be fully retained, enhanced or reinstated as part of the development of the site. 	
MM41	Para 9.9	<p>9.9 Land within the borough is a finite resource and the Council will seek to ensure that it is developed and used efficiently and effectively to meet demand and a range of local community needs including opportunities to promote sport, leisure and other physical activity in order to pursue healthy communities and lifestyles (e.g. there is an under-provision of allotments to fully meet demand in Luton and therefore, development should include layouts and design features to provide opportunities for allotments but also communal Green Space/Green Infrastructure as well as private space, for residents to grow their own healthy produce). Using density as a measurement does not adequately address issues of character and context therefore, development must also have regard to plot ratio, development mix, scale and form to help identify spaciousness as a reflection of character. The future application of development densities also needs to be informed by securing adequate internal and external space, privacy, sunlight and daylight, which becomes increasingly important as densities increase. The Council will require new developments to demonstrate that all housing has acceptable private space, privacy, daylight and sunlight having regard to the requirements of future occupiers, site specific circumstances and the character of the locality. The Council will encourage developers to meet Lifetime Home standards, having regard to the viability of the proposal.</p>	No change made; no effect
MM42	Policy LP 25 - High Quality Design	<p>Policy LP 25 - High Quality Design</p> <p>xi. Deliver new housing in accordance with National- <u>external amenity</u> space standards set out in appendix 6, <u>and</u> minimises noise, overlooking and overshadowing/loss of light, address tall buildings and the protection of important views and ensure access to storage and privacy; and</p> <p>Supplementary guidance through SPDs and Development Briefs on high quality design will <u>may</u> be produced to expand and complement the principles established in this Plan <u>and to provide clear guidance to applicants.</u></p>	No change made; no effect
MM43	Policy LP 26 - Advertisements and Signage and supporting text	<p>9.6 Poorly placed advertisements can have a negative impact on the appearance of the built and natural environment. Control over outdoor advertisements should be efficient, effective and simple in concept and operation. Only those advertisements which will clearly have an appreciable impact on a building or on their surroundings should be subject to the local planning authority’s detailed assessment. <u>Within conservation areas, internally illuminated adverts are unlikely to be acceptable but will be considered on their merits having regard to the characteristics of the conservation area.</u></p> <p>Policy LP 26 - Advertisements and Signage</p>	No change made; no effect

		<p>A. Consent will be given for advertisements, signage and displays which do not:</p> <ul style="list-style-type: none"> i. adversely affect the character or appearance of the building or area; or ii. hinder the view of a valued landscape, or feature; or iii. cover important decorative features of a historic building; or iv. include internally illuminated proposals within a Conservation Area; or v. result in proposals that are out of keeping in their setting in terms of size, design, illumination, materials, or colour; or vi. have an adverse effect on traffic safety, including pedestrian safety and convenience. <p>B. Advertisement consent for hoardings around development sites will only be granted for a limited period.</p>	
MM44	Para 10.35	<p>10.35 When development includes the provision of playing pitches, the Council will apply the standards identified in the Playing Pitch Strategy (2014) in the supplementary 'Developer Contributions' report provides useful information for outdoor playing space standards and other requirements.</p>	No change made; no effect
MM45	Policy LP27 – Open Space and Natural Greenspace	<p>LP27 – Open Space and Natural Greenspace</p> <p>A. Where there is a shortfall of open space to meet the needs of occupants of new housing development, Development proposals which generate demand for new or enhanced open space and Green Infrastructure will be supported where in accordance with the following sequence:</p> <ul style="list-style-type: none"> ii. Where on site provision is not practicable or viable, an equivalent accessible off site open space provision is made in the vicinity where on site provision is not practicable; or <p>B. Development proposals which result in the loss of open space, parks, allotments, important green space and green infrastructure will only be permitted where the most up-to-date local plan evidence base demonstrates that the open space is not in an area of identified deficit in the locality, and is surplus to requirements. Exceptionally losses will also be permitted where:</p> <ul style="list-style-type: none"> i. replacement open space provision can be made which is of an equivalent type, quality and quantity or better; and is accessible and within the vicinity; or ii. the loss is insignificant in scale and quality and development would result in the retention, enhancement and improved usability of open space for the long term benefit of the community; or iii. there is no alternative previously developed site that is suitable and available to accommodate the development within a reasonable period; or iv. ii. the proposal is for alternative or ancillary sports and recreational provision, the need for which clearly outweighs the loss. <p>[Insert new heading above LP27 part C to read:]</p>	Deletion of highlighted clause Bii, which had been proposed at Main Modifications consultation, to achieve consistency with NPPF. No significant effect predicted

		<u>Development on Open Space</u>	
MM46	Policy LP 28 – Biodiversity and Nature Conservation	<p>LP 28 – Biodiversity and Nature Conservation</p> <p>Biodiversity and Nature Conservation</p> <p>The Council will work with partner organisations to positively assess, manage and designate sites and ecological networks including giving support to development proposals which add to the net stock of wildlife habitats or where they help to deliver a net gain in the conservation and enhancement of such sites. <u>The protection given will be commensurate with their status giving appropriate weight to their importance and the contribution they make to ecological networks.</u></p> <p>LP28B Tier 1 National Nature Reserves and Sites of Special Scientific Interest.</p> <p>LP28D Where <u>there is a reasonable likelihood that</u> a development proposal could have an adverse effect on habitats or species of conservation biodiversity interest, the prospective developer will be required to submit an ecological assessment with the planning application. This should normally include a phase 1 habitat survey and protected species information. If invasive weed species listed on Schedule 9 of the Wildlife and Countryside Act in England and Wales are present, such as Japanese Knotweed and Himalayan Balsam, an invasive species management plan should be submitted.</p>	No change made; no effect
MM47	Policy LP 29 – Landscape and Geological Conservation	<p>LP 29 – Landscape and Geological Conservation</p> <p>A. Development proposals will be supported where they protect, conserve and or enhance the character, setting and natural beauty of national and local landscape areas, according to the following hierarchy of designations:</p> <p><u>Tier 1 National landscape areas</u></p> <p>i. the special character, natural beauty, landscape and setting of the Chilterns Area of Outstanding Natural Beauty;</p> <p>ii. the historic character and environmental quality of Registered Parks and Gardens and their settings;</p> <p>iii. the historic integrity, biodiversity and recreational value of Registered Commons, and their settings;</p> <p>iv. the environmental and recreational value of Access Land and Section15 Land as identified under the Countryside and Rights of Way Act (2000).</p> <p><u>Tier 2 Local landscape areas</u></p> <p>v. Areas which are of ‘local landscape value’ comprising the two-tier framework of “Areas of Great Landscape Value” and “Areas of Local Landscape Value” as determined via Landscape Character Assessments (which may update previous landscape designations) and are shown on the Policies Map, including:</p> <p><u>A robust two –tier system of designated local landscape areas has been introduced to replace the ad hoc local landscape designations in earlier local plans. It is derived from the Landscape Character Assessments of 2014, and sites assessed against a standard range of landscape criteria. The most significant local landscapes are designated as:-</u></p> <p><u>v. Areas of Great Landscape Value (AGLV) which include the most important green corridors and sites adjoining the</u></p>	No change made; no effect

		<p>Chilterns AONB:</p> <ul style="list-style-type: none"> • vi. Stopsley Common • vii. Dallow Corridor (includes Bluebell Wood) • viii. Stockwood Park • ix. Bradger’s Hill Corridor (includes Popes Meadow and Bell’s Close) • x. Bramingham Wood Corridor • xi. Great Bramingham Park. <p><u>vi.</u> Areas of Local Landscape Value (ALLV) <u>which include areas of more limited value within the local context:</u></p> <p>xii. Hart Hill</p> <ul style="list-style-type: none"> • xiii. Someries Farm & Dane Street Farm • xiv. Turnpike Drive • xv. Lower Lea Valley • xvi. Lewsey Park • xvii. Wigmore Rural • xviii. Upper Lea Valley • xix. Putteridge Edge <p>Geological Landscapes</p> <p>xx. Regionally Important Geological Sites which are a statutory designation will also be afforded a level of protection from harm consistent with their tier 1 statutory designation.</p>	
MM48	Policy LP30 A, C, E & F Historic Environment	<p>Policy LP30 A:</p> <p>Designated heritage assets:</p> <ul style="list-style-type: none"> • Listed Buildings • Conservation Areas • Scheduled Monuments • <u>Registered Parks and Gardens</u> <p>Policy LP30 C:</p> <p>Complete or partial loss through demolition will amount to substantial harm to a designated heritage asset and may amount to substantial harm to a non-designated heritage asset, depending on the significance of the heritage asset including its positive contribution within a Conservation Area, and will only be permitted where it can be justified that there is a net public benefit. Proposals must also accord with the following criteria:</p> <p>i. wholly exceptional circumstances for demolition or part demolition must be justified in the case of listed buildings and designated heritage assets of the highest significance;</p>	No change made; no effect

		<p>ii. the nature of the heritage asset is such that no reasonable alternative use including conversion can be found, and that appropriate marketing or options for grant funding or charitable/public ownership have been exhausted;</p> <p>iii. within a conservation area any complete or part demolition of a building whether designated or not, must protect and conserve the setting and character of the conservation area.</p> <p><u>Any harm or loss to a heritage asset requires clear and convincing justification. Substantial harm to or loss of a designated heritage asset should be exceptional or wholly exceptional depending on the significance of the affected heritage assets. It will only be permitted where there are substantial public benefits that outweigh the harm or loss, or the nature of the heritage asset is such that no reasonable alternative use including conversion can be found, and that appropriate marketing or options for grant-funding or charitable/public ownership have been exhausted. Less than substantial harm to the significance of a heritage asset should be weighed against the public benefits of the proposal.</u></p> <p><u>The loss of a building or other element which makes a positive contribution to the significance of a conservation area should be avoided and treated as substantial harm or less than substantial harm depending on the circumstances.</u></p> <p>Policy LP30 E: E. Where evidence points to potential presence of remains, mitigation will be required (e.g. Investigative trenching, watching brief, recovery & interpretation of remains). Where a site includes or has the potential to include heritage assets with archaeological interest, developers should submit an appropriate desk based assessment, and where necessary a strategy for field evaluation, using non-invasive and where necessary invasive techniques prior to the determination of the planning application. On the basis of this assessment an appropriate conservation strategy will be developed, which may include preservation in situ where appropriate and/or full or partial recording, with the record of evidence being made publically accessible. If non-designated heritage assets of archaeological interest are of equivalent value to a designated asset they would need to be subject to the same policies for designated heritage assets.</p> <p>Policy LP30 F: Proposals will be subject to appropriate recording of the significance of the building or asset and regulated by legal agreements on the phasing of demolition and development with planning permission and a contract for redevelopment. Applicants will be required to record and advance an understanding of heritage assets which are to be lost (wholly or in part). The recording will be in a manner proportionate to their importance and the impact. This evidence (and any archive generated) should be made accessible to the public. Recording and advancing the understanding of heritage assets will be regulated by legal agreements on the phasing of demolition and development.</p>	
MM49	Para 11.2	<p><u>11.2A The East Luton Circular Road (north) route is safeguarded as a long term option that might be required to support future development. Running between Stopsley and the A6, including a link to Barton Road along the line of Weybourne Drive, it could allow the introduction of traffic calming measures to certain routes. Some traffic could be</u></p>	No change made; no effect

		<u>diverted away from the town centre while access to the airport and key employment areas to the east of the town could be improved. Any road proposal will be considered against national policy and guidance, local plan policy and legislative requirements relating to heritage, biodiversity and landscape.</u>	
MM50	Policy LP31B, C & E – Sustainable Transport Strategy	<p>Policy LP 31 Sustainable Transport Strategy</p> <p>B. Planning Permission will be granted for proposed developments that <u>meet the criteria below, where these are relevant to the proposal:</u></p> <ul style="list-style-type: none"> i. Minimises the need to travel; ii. Provides a sustainable transport choice with priority for buses, pedestrians and cyclists; iv. Reduces road congestion particularly at peak times; iv. Reduces the safety risk to motor vehicles, non-motorised and vulnerable users; v. Provides cycle parking / storage and; vi. Ensures the quality of the local environment is not compromised. <p>C. <u>Transport Assessments, Transport Statements and Travel Plans should be provided for developments as set out in Appendix 7 and should conform to the stated requirements. For developments over a certain scale (as set out in Appendix 7), developers will be required to submit a Transport Assessment / Statement and Travel Plan in order to assess and mitigate the travel impacts which:</u></p> <ul style="list-style-type: none"> i. Demonstrates that arrangements have been made for the implementation and monitoring of the Travel Plan; ii. Monitors travel by occupiers of, and visitors to, the development; iii. Provides information on public transport, the walking and cycling network, and local facilities and services. <p>[No changes to D.]</p> <p>E.</p> <p>[Add an asterisk to the third bullet point under LP31E and place the following text as a footnote]</p> <p><u>Footnote: * The East Luton Circular Road is a safeguarded route option and is not currently a formal transport proposal. Any road proposal will be considered against national policy and guidance, local plan policy and legislative requirements relating to heritage, biodiversity and landscape.</u></p> <p>[No changes to F.]</p>	No change made; no effect
MM51	Policy LP32 – Parking and supporting text	<p>11.8 The Council Parking Strategy is aimed at improving the quality of parking in town centres so that it is convenient, safe and secure, including appropriate provision of signage for motorists. The Local Plan will set <u>and apply</u> maximum levels of car parking and minimum levels of cycle parking for broad classes of development in order <u>to encourage modal shift, subject to highway, user and residential safety and amenity and</u> except in respect of parking for disabled people or unless applicants demonstrate, through a Transport Statement or Assessment, a higher car parking need. In</p>	No change made; no effect

		<p>such cases applicants must show via design, location and implementation how parking is minimised.</p> <p>Policy LP32 Parking</p> <p>Parking provision in Luton will be managed to ensure that a proportionate number of spaces are available to support the growth of the town centre.</p> <p>A.</p> <p>Parking will be stringently controlled at London Luton Airport and the Luton & Dunstable Hospital to ensure that on site provision at these destinations is prioritised.</p> <p><u>Parking provision will be stringently controlled at London Luton Airport (in line with Policy LP6C). Parking provision at the Luton & Dunstable Hospital will be stringently controlled to ensure that on site provision is prioritised.</u></p> <p>B. Development will be permitted providing that:</p> <p>i. Car parking provision should <u>The proposed development does</u> not exceed the maximum car parking standards set out in Appendix 2 unless in order to promote modal shift however, within those standards, sufficient parking should be provided to help ensure that adverse effects on highway safety and the convenience of nearby residents and users are avoided. a demonstrable need can be justified by the developer for higher car parking provision;</p> <p>ii. Minimum cycle parking standards set out in Appendix 2 is provided for non-residential developments;</p> <p>iii. Cycle storage of an appropriate standard is provided for residential developments;</p> <p>iv. Parking standards shown in Appendix 2 are minimised in identified areas demonstrated to be of high accessibility.</p>	
MM52	Policy LP33A – Freight and supporting text	<p>Policy LP33 – Freight [extract]</p> <p>A. In considering any impacts of freight proposals on the environment or residential amenity, the Council will use take into account the following criteria factors to assess new warehouse and distribution proposals:</p> <ul style="list-style-type: none"> *Strategic Routing; *Strategic Signage; *Delivery and Service Plans; *Weight Restrictions; *Delivery Restrictions; *Alternative methods of Freight Distribution. 	No change made; no effect
MM53	Policy LP37 Climate change, carbon and waste reduction and sustainable	<p>11.50 The rationale behind energy requirements <u>are set out in Building Regulations (following the Government's Housing Standards Review - and subject to the government's review of energy standards)</u> and BREEAM is to secure commitments to CO2 reduction in line with the proposed trajectory of phased amendments to the Building Regulations while ensuring that broader themes, including water conservation, flood risk, air quality, waste management and biodiversity, are addressed. The most commonly expected effects of a changing climate on Luton’s built environment</p>	No change made; no effect

	<p>energy and supporting text</p>	<p>include:</p> <p>11.52 In determining planning applications, new development should comply with adopted Local Plan policies on local requirements for decentralised energy supply unless it can be demonstrated that this is not appropriate, feasible or viable will be encouraged to exceed building regulations by following guidance in Policy LP37C ‘Energy Hierarchy’. It should also take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption (NPPF paragraph 96).</p> <p>Policy LP 37 - Climate change, carbon and waste reduction and sustainable energy</p> <p>The Council will support development proposals which contribute towards mitigation, and adaptation to climate change through energy use reduction and efficiency and renewable and decentralised energy.</p> <p>A. New residential development will be encouraged to meet be encouraged to meet/exceed the <u>national</u> standards set out in Building Regulations on carbon and energy performance equivalent to code level 4 of the abolished Code for Sustainable Homes and standards arising from updates to Part L of the Building Regulations and a potable water consumption standard of 105 litres per person per day. Developments will be encouraged to exceed this standard where viable and feasible. The energy hierarchy set out under LP37 C provides principles on how Building Regulations could be achieved and exceeded.</p> <p>B. All new non-residential developments over 1,000 square metres will be required to achieve the 2013 Building Research Establishment Environmental Assessment Method (BREEAM) 'Good' status".</p> <p>C. Planning applications for all residential schemes exceeding 10 dwellings and non residential schemes exceeding 1,000 square metres will need sufficient supporting information in order for the local planning authority to assess how proposals meet the following requirements:</p> <p>i. C. Energy Hierarchy</p> <p>a. consider reducing reduce energy and water demand through passive design, insulation, and efficiency measures including water saving devices;</p> <p>b.scope to generate consider energy generation from low and zeros carbon sources on site;</p> <p>c.scope for consider decentralised energy networks and generation; and</p> <p>d.scope for provision of consider off-site solutions, for decentralised, low and zero carbon energy generation and securing investment for retro fitting, of buildings via local and carbon reduction schemes including for energy and water resource efficiency.</p> <p>D. Major Developments of 10 or more net residential units and / or non residential over 1,000 square metres net Gross Internal Area (GIA) are required to submit an Energy Statement outlining how the principles outlined above have been integrated into the design of the development alongside a planning application.</p> <p>E.. Minor non residential development including conversions, refurbishment and extensions (under 1,000 square metres net GIA floorspace) are required to submit an Energy Statement or energy information within the Design and Access</p>	
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		<p><u>Statement alongside a planning application.</u></p> <p><u>D. All residential developments will achieve a water efficiency standard of 110 litres per person per day because Luton is in an area of water stress.</u></p>							
MM54	Policy LP38 – pollution and contamination	<p>LP38 – Pollution and Contamination</p> <p>Development proposals will be expected to demonstrate that they do not individually or cumulatively have an adverse impact on either neighbouring development, adjoining land or the wider environment. Evidence on the impacts of development will need to demonstrate whether the scheme (individually or cumulatively with other proposals) will result in any significantly adverse effects with regard to air, land or water on neighbouring development, adjoining land or the wider environment. Where adverse impacts are identified, appropriate mitigation will be required. This policy applies to the pollution of air, land and water from any source. It specifically includes covers chemical, biological and radiological contamination and the effects of noise, vibration, light, heat, fluid leakage, dust, fumes, smoke, gaseous emissions, odour, explosion, litter and pests.</p>	No change made; no effect						
MM55	Chapter 12 – Infrastructure Delivery and Monitoring the Local Plan	<p>After paragraph 12.12, include the following new section:</p> <p><u>Managing a supply of housing land</u></p> <p><u>12.13 Appendix 5 of this Plan sets out further details for monitoring delivery of the housing requirement of 8,500 dwellings (425 dwellings per annum. Based on an annual requirement of 425 dwellings per annum, there has been a shortfall in completions of 98 dwellings between 2011 and 2016. The aim is to recover this shortfall over the period 2016-21– i.e. at 445/year x 5 = 2223 dwellings.</u></p> <p><u>12.14 Table 1 of Appendix 5 indicates that Luton Borough Council does not have a record of persistent under-delivery at the point the Local Plan was adopted . The buffer will be reviewed annually.</u></p> <p><u>12.15 The Housing Land Supply position of around 5.30 years’ supply at April 2017 (based on the details contained in Appendix 5) is calculated as shown in the table below. Recalculation of the housing requirement (including the need to address any remaining shortfall) and updating of the housing trajectory will only be undertaken once the most recent data for housing completions in future monitoring years have been formally reported in the SHLAA or Authorities Monitoring Report.</u></p> <p><u>Housing Land Supply Calculation</u></p> <table border="1" data-bbox="481 1204 1747 1372"> <tr> <td colspan="2">Luton Local Plan 2011-2031 (Sedgefield Method) (5% Buffer) (April 2017-base)</td> </tr> <tr> <td>Target</td> <td>8,500</td> </tr> <tr> <td>Average annual target</td> <td>425</td> </tr> </table>	Luton Local Plan 2011-2031 (Sedgefield Method) (5% Buffer) (April 2017-base)		Target	8,500	Average annual target	425	No change made; no effect
Luton Local Plan 2011-2031 (Sedgefield Method) (5% Buffer) (April 2017-base)									
Target	8,500								
Average annual target	425								

		Requirement 2011-16 (5yrs)	2125	Delivery 2011-2016 (5yrs)	2027	Shortfall	-98		
		Financial Year	Forecast Delivery	5-years rolling forecast delivery	Sedgefield Annualised 5yr (425 + (Shortfall / 5))	Annual Target once shortfall addressed	5-years Total	5-year requirement plus 5% buffer	Amount of land supply (years)
		2016/17	875		445				
		2017/18	436		445	-			
		2018/19	486		445	-			
		2019/20	480		445	-			
		2020/21	577		445	-			
		2021/22	475	2454	-	425	2203	2314	5.30
MM56	Chapter 12 – Infrastructure Delivery and Monitoring the Local Plan	<p>12. Infrastructure Delivery, and Monitoring and Review of the Local Plan</p> <p>New Heading: <u>Review of the Local Plan</u> <u>12.16 During the public examination hearings into the Local Plan held 2016 to 2017 a number of issues were highlighted for specific attention in the next review of the Local Plan. Several of these matters were pressing issues tending towards an early update. Policy LP40 requires that the next full review of the Local Plan should be submitted for public examination by mid-2021. This balances the need for urgency on some matters, for example a review of school provision, but also giving time to allow the potential for local plans within neighbouring areas to be progressed following the completion of the Joint Growth Options Study. The Growth Options Study is particularly important in helping address Luton’s unmet housing needs across the wider Housing Market Area. There are several areas where technical studies to inform the review can progress much earlier, examples being the reviews of school provision and the review of the Town Centre Development Framework.</u> <u>Policy LP40 – Review of the Local Plan</u></p>							

Highlighted section inserts a factual reference that any forthcoming planning applications at Power Court (LP9) and South of Stockwood Park (LP5) will be taken into account during the Local Plan Review. No significant effect predicted

	<p><u>The Local Planning Authority will bring forward a full review of the plan. This will commence before the end of 2019 with submission of the review for examination by mid- 2021. Specific matters to be addressed by the review include the following issues:</u></p> <p><u>To address the outcomes of the Growth Options Study and decisions in neighbouring local plans about how and where Luton’s unmet housing needs will be provided for including implications for transport infrastructure, as appropriate,</u></p> <ul style="list-style-type: none"> <u>(i) The objective assessment of housing needs including a reassessment of migration trends and projections.</u> <u>(ii) The capacity to accommodate housing within Luton.</u> <u>(iii) The outcomes of separate Luton and Central Bedfordshire Functional Economic Market Area (FEMA) studies.</u> <u>(iv) A full assessment of the need for school places over the plan period taking into account planned housing growth, the availability of school places to meet that need and steps to ensure sufficient school places are made available, including as appropriate through the allocation of land to allow the expansion of existing schools and/or the provision of new schools.</u> <u>(v) Provision for the relocation of Luton Town Football Club</u> <u>(vi) Retail needs of the Borough and how they will be provided for.</u> <u>(vii) Strategy and policies for the town centre</u> <u>(viii) Uses and policies relating to the strategic allocation at Power Court (Policy LP9)</u> <u>(ix) Uses and policies relating to the strategic allocation at South of Stockwood Park (Policy LP5)</u> <u>(x) the allocation and delivery of a park and ride facility at the strategic allocation at South of Stockwood Park (Policy LP5).</u> <p><u>The full review of the plan will take into account the outcome of any relevant planning applications, including in relation to Power Court (Policy LP9) and South of Stockwood Park (Policy LP5)</u></p>	
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