

Technical Note

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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>

The purpose of this Addendum is to provide information on the potential sustainability effects of proposed Main Modifications to the Local Plan which have arisen during the course of the Plan's Examination in Public.

2. Proposed Main Modifications to the Luton Local Plan

Proposed modifications to the Local Plan which are considered to potentially alter the findings of earlier stages of SA/SEA are listed in Table 1 below. The Sustainability Reports prepared for earlier versions of the Local Plan utilised a range of techniques for assessing the effects of proposed policies. All policies were subject to a High Level Assessment (HLA) against the SA/SEA Framework, while those with numerous or

significant negative effects were assessed more rigorously using Detailed Assessment Matrices (DAM). The sections which follow explain the proposed modifications and present a summary of earlier HLA or DAM appraisal findings, together with changes to the assessment results which are predicted to arise from proposed modifications. Appendix 1 presents an HLA for all of the proposed Main Modifications, while Appendix 2 contains updated DAMs for those policies for which one was prepared at the submission stage.

Table 1: Proposed Main Modifications which potentially alter the SA/SEA findings

Ref	Summary of proposed Main Modification
MM08	Policy LP1 – Presumption in favour of development
MM12	Policy LP2 – Spatial Development Strategy
MM13	Policy LP3 - Luton Town Centre Strategy
MM14	Policy LP4 - Green Belt
MM15	Policy LP5 - Land South of Stockwood Park Strategic Allocation
MM16	Policy LP6 - London Luton Airport Strategic Allocation
MM17	Policy LP7 – Butterfield Green Technology Park Strategic Allocation
MM18	Policy LP8 - Napier Park Strategic Allocation
MM19	Policy LP9 - Power Court Strategic Allocation
MM20	Policy LP10 - High Town Strategic Allocation
MM21	Policy LP11 - Creative Quarter Strategic Allocation
MM24	Policy LP13A, C & D – Economic Strategy
MM32	Policy LP15 – Housing Provision
MM33	Policy LP16 – Affordable Housing
MM34	Policy LP18 – Older People’s Housing
MM35	Policy LP20 – Gypsies, Travellers & Travelling Showpeople
MM39	Policy LP21 - Centre Hierarchy
MM40	Policy LP24 - Community & Education Facilities
MM42	Policy LP25 - High Quality Design
MM43	Policy LP26 - Advertisements and Signage
MM45	Policy LP27 – Open Space and Natural Greenspace
MM46	Policy LP28 – Biodiversity and Nature Conservation
MM47	Policy LP29 – Landscape and Geological Conservation
MM48	Policy LP30 A, C, E & F Historic Environment
MM50	Policy LP31B, C & E – Sustainable Transport Strategy
MM51	Policy LP32 - Parking
MM52	Policy LP33A – Freight
MM53	Policy LP37 - Climate Change, Carbon and Waste Reduction, and Sustainable Energy
MM54	Policy LP38 - Pollution and Contamination
MM56	(NEW) Policy LP40 - Review of the Local Plan

MM08 Policy LP1 – Presumption in favour of development

Before Change			SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
+	+	+	+	+	+	+	+	+	+	+	+	+	+
After Change			SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
+	+	+	+	+	+	+	+	+	+	+	+	+	+

Policy LP1 is proposed to be modified to remove the references to individual principles for sustainable development. As these principles are already represented in the plan’s development management policies (LP25 to LP39), to which LP1 now refers, no change to the scale of significant effects predicted to result from this policy is anticipated.

MM12 Policy LP2 – Spatial Development Strategy

Before Change			SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
+/-	+/-	+/-	+/-	-	+/-	+/-	+	+/-	+/-	+	+	+/-	+
After Change			SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
+/-	+/-	+/-	+/-	-	+/-	+/-	+	+/-	+/-	+	+	+/-	+

Policy LP2 now refers to an increased housing target of 8,500 net additional dwellings for Luton borough, based on an updated Strategic Housing Land Availability Assessment (SHLAA) that took into account the latest information on sites and historic completions. The overall housing need for the Luton Housing Market Area has increased to 31,800 net additional dwellings, but the shortfall in Luton borough has reduced to 9,300. The reference to job numbers has been replaced with the area of new employment land to be delivered. The area of employment land has not changed but was not presented in the plan before the proposed modification. Employment in B Use Classes will be delivered through around 69 hectares of employment development on Strategic Allocations.

The original assessment of policy LP2 predicted a range of mixed impacts for environmental receptors including biodiversity, landscapes, green infrastructure, natural resources, flood risk, carbon emissions, resource efficiency and heritage assets, health and sustainable transport, together with positive effects for socio-economic receptors. However, the causes and scale of mixed or negative effects, and the scope for mitigation, were considered to be led by site specific factors which were analysed through the detailed assessments for Strategic Allocations and other development sites. This is considered to still be the case and no change to the scale of significant effects predicted to result from this policy is anticipated.

MM13 Policy LP3 - Luton Town Centre Strategy

Before change			
Sustainability receptor	Effect	Sustainability receptor	Effect
SA1 Biodiversity & landscape	Mod. +ve	SA8 Poverty & social inclusion	Mod. +ve
SA2 Green infrastructure	Mod. +ve	SA9 Crime	Mod. +ve
SA3 Air, soil & water	Mod. -ve	SA10 Health	Neg. +ve
SA4 Flooding	Minor -ve	SA11 Housing	Mod. +ve
SA5 Carbon emissions	Minor -ve	SA12 Vitality of centres	Major +ve
SA6 Resource efficiency & waste	Minor -ve	SA13 Sustainable transport	Mod. +ve
SA7 Heritage assets	Minor -ve	SA14 Employment & learning	Mod. mixed
After change			
Sustainability receptor	Effect	Sustainability receptor	Effect
SA1 Biodiversity & landscape	Mod. +ve	SA8 Poverty & social inclusion	Mod. +ve
SA2 Green infrastructure	Mod. +ve	SA9 Crime	Mod. +ve
SA3 Air, soil & water	Mod. -ve	SA10 Health	Neg.+ve
SA4 Flooding	Minor -ve	SA11 Housing	Mod. +ve
SA5 Carbon emissions	Minor -ve	SA12 Vitality of centres	Major +ve
SA6 Resource efficiency & waste	Minor -ve	SA13 Sustainable transport	Mod. +ve
SA7 Heritage assets	Minor -ve	SA14 Employment & learning	Mod. mixed

The target for 6,279sq.m. of convenience retail development within Luton town centre by 2020 has been removed but there is now no limit on retail provision, subject to the retail hierarchy and absence of significant adverse impacts. This change is not considered to alter the scale of significant effects predicted to result from policy LP3.

MM14 Policy LP4 - Green Belt

Before Change													
SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
+	+	+	0	0	+	+	0	0	+	0	+	+	0
After Change													
SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
+	+	+	0	0	+	+	0	0	+	0	+	+	0

Policy LP4 has been amended to more closely reflect the requirements of national planning policy. This change is not considered to alter the scale of significant effects predicted to result from policy LP4.

MM15 Policy LP5 - Land South of Stockwood Park Strategic Allocation

Before change			
Sustainability receptor	Effect	Sustainability receptor	Effect
SA1 Biodiversity & landscape	Major -ve	SA8 Poverty & social inclusion	Mod. +ve
SA2 Green infrastructure	Mod. +ve	SA9 Crime	Neutral
SA3 Air, soil & water	Minor -ve	SA10 Health	Mod. +ve
SA4 Flooding	Neutral	SA11 Housing	Neutral
SA5 Carbon emissions	Minor -ve	SA12 Vitality of centres	Minor -ve
SA6 Resource efficiency & waste	Minor -ve	SA13 Sustainable transport	Minor mixed
SA7 Heritage assets	Neutral	SA14 Employment & learning	Major +ve
After change			
Sustainability receptor	Effect	Sustainability receptor	Effect
SA1 Biodiversity & landscape	Major -ve	SA8 Poverty & social inclusion	Mod. +ve
SA2 Green infrastructure	Minor +ve	SA9 Crime	Neutral
SA3 Air, soil & water	Minor -ve	SA10 Health	Neg. +ve
SA4 Flooding	Neutral	SA11 Housing	Neutral
SA5 Carbon emissions	Minor -ve	SA12 Vitality of centres	Minor -ve
SA6 Resource efficiency & waste	Minor -ve	SA13 Sustainable transport	Minor mixed
SA7 Heritage assets	Neutral	SA14 Employment & learning	Major +ve

The strategic allocation on land south of Stockwood Park has been altered to remove references to a 15,000 seat stadium (to relocate Luton Town Football Club), 0.7ha for ancillary sport facilities and 0.3ha for sports-related retail (A1, A3 and A4). The other proposed uses for the site, including 9.5ha of B1 employment spaces and a 2ha Park and Ride facility, are retained in the modified policy.

The proposed changes to policy LP5 are in the main predicted to result in similar effects on sustainability receptors to the policy at submission stage, with some notable differences. That the football club will no longer relocate to the site results in a lost opportunity for creating a new sports hub with a broad range of facilities in close proximity interlinked by high quality green infrastructure and sustainable transport routes, leading to smaller scale positive effects on SA2 (green infrastructure) and SA10 (health) than would have been the case under the original policy. On the other hand, the site was not assessed as being a particularly sustainable location for the football club due to its distance from the town centre. The predicted scale of negative effects on SA3, SA5 and SA13 remain unchanged however, because out of town office developments tend to rely on private car transport, although it is acknowledged that the provision of Park and Ride will offset this to a degree.

MM16 Policy LP6 - London Luton Airport Strategic Allocation

Before change			
Sustainability receptor	Effect	Sustainability receptor	Effect
SA1 Biodiversity & landscape	Major -ve	SA8 Poverty & social inclusion	Mod. +ve
SA2 Green infrastructure	Mod. mixed	SA9 Crime	Neutral
SA3 Air, soil & water	Minor -ve	SA10 Health	Minor +ve
SA4 Flooding	Neutral	SA11 Housing	Neutral
SA5 Carbon emissions	Major -ve	SA12 Vitality of centres	Minor -ve
SA6 Resource efficiency & waste	Minor -ve	SA13 Sustainable transport	Minor mixed
SA7 Heritage assets	Minor -ve	SA14 Employment & learning	Mod. +ve
After change			
Sustainability receptor	Effect	Sustainability receptor	Effect
SA1 Biodiversity & landscape	Major -ve	SA8 Poverty & social inclusion	Mod. +ve
SA2 Green infrastructure	Mod. mixed	SA9 Crime	Neutral
SA3 Air, soil & water	Minor -ve	SA10 Health	Minor +ve
SA4 Flooding	Neutral	SA11 Housing	Neutral
SA5 Carbon emissions	Major -ve	SA12 Vitality of centres	Minor -ve
SA6 Resource efficiency & waste	Minor -ve	SA13 Sustainable transport	Minor mixed
SA7 Heritage assets	Minor -ve	SA14 Employment & learning	Mod. +ve

A number of relatively minor clarifications are proposed for policy LP6, but do not substantially change the proposed type or scale of development to be accommodated at the London Luton Airport and Century Park sites. These changes are not considered to alter the scale of significant effects predicted to result from policy LP6, although it is noted that the added reference to the site’s heritage assets is likely to enhance the success of recommended measures to avoid or mitigate negative effects.

MM17 Policy LP7 – Butterfield Green Technology Park Strategic Allocation

Before change			
Sustainability receptor	Effect	Sustainability receptor	Effect
SA1 Biodiversity & landscape	Major -ve	SA8 Poverty & social inclusion	Mod. +ve
SA2 Green infrastructure	Mod. +ve	SA9 Crime	Neutral
SA3 Air, soil & water	Minor -ve	SA10 Health	Minor +ve
SA4 Flooding	Neutral	SA11 Housing	Neutral
SA5 Carbon emissions	Minor -ve	SA12 Vitality of centres	Minor -ve
SA6 Resource efficiency & waste	Minor -ve	SA13 Sustainable transport	Minor mixed
SA7 Heritage assets	Mod. -ve	SA14 Employment & learning	Major +ve

After change			
Sustainability receptor	Effect	Sustainability receptor	Effect
SA1 Biodiversity & landscape	Major -ve	SA8 Poverty & social inclusion	Mod. +ve
SA2 Green infrastructure	Mod. +ve	SA9 Crime	Neutral
SA3 Air, soil & water	Minor -ve	SA10 Health	Minor +ve
SA4 Flooding	Neutral	SA11 Housing	Neutral
SA5 Carbon emissions	Minor -ve	SA12 Vitality of centres	Minor -ve
SA6 Resource efficiency & waste	Minor -ve	SA13 Sustainable transport	Minor mixed
SA7 Heritage assets	Mod. -ve	SA14 Employment & learning	Major +ve

The strategic allocation at Butterfield Green Technology Park has been altered to provide greater flexibility over the mix of land uses (B2 and B8 as well as B1) but the overall scale of development remains unchanged, other than that the new buildings will be permitted to occupy 35% of the plot area instead of 30%. Land will still be safeguarded for a Park and Ride, but the area is reduced so long as 450 parking spaces can be provided. These changes are not considered to alter the scale of significant effects predicted to result from policy LP7.

MM18 Policy LP8 - Napier Park Strategic Allocation

Before change			
Sustainability receptor	Effect	Sustainability receptor	Effect
SA1 Biodiversity & landscape	Minor mixed	SA8 Poverty & social inclusion	Mod. +ve
SA2 Green infrastructure	Mod. +ve	SA9 Crime	Minor +ve
SA3 Air, soil & water	Minor -ve	SA10 Health	Neg. +ve
SA4 Flooding	Neutral	SA11 Housing	Mod. +ve
SA5 Carbon emissions	Minor -ve	SA12 Vitality of centres	Mod. +ve
SA6 Resource efficiency & waste	Minor -ve	SA13 Sustainable transport	Minor +ve
SA7 Heritage assets	Neg. -ve	SA14 Employment & learning	Mod. mixed
After change			
Sustainability receptor	Effect	Sustainability receptor	Effect
SA1 Biodiversity & landscape	Minor mixed	SA8 Poverty & social inclusion	Mod. +ve
SA2 Green infrastructure	Mod. +ve	SA9 Crime	Minor +ve
SA3 Air, soil & water	Minor -ve	SA10 Health	Neg. +ve
SA4 Flooding	Neutral	SA11 Housing	Mod. +ve
SA5 Carbon emissions	Minor -ve	SA12 Vitality of centres	Mod. +ve
SA6 Resource efficiency & waste	Minor -ve	SA13 Sustainable transport	Minor +ve
SA7 Heritage assets	Neg. -ve	SA14 Employment & learning	Mod. mixed

The strategic allocation at Napier Park has been altered to allow more housing and provide greater flexibility over the mix of employment land uses to reflect the recent re-acquisition of part of the site by GM Vauxhall. These changes are not considered to alter the scale of significant effects predicted to result from policy LP8.

MM19 Policy LP9 - Power Court Strategic Allocation

Before change			
Sustainability receptor	Effect	Sustainability receptor	Effect
SA1 Biodiversity & landscape	Minor mixed	SA8 Poverty & social inclusion	Mod. +ve
SA2 Green infrastructure	Minor +ve	SA9 Crime	Minor +ve
SA3 Air, soil & water	Minor -ve	SA10 Health	Neg. +ve
SA4 Flooding	Minor -ve	SA11 Housing	Mod. +ve
SA5 Carbon emissions	Minor -ve	SA12 Vitality of centres	Mod. +ve
SA6 Resource efficiency & waste	Minor -ve	SA13 Sustainable transport	Minor +ve
SA7 Heritage assets	Minor -ve	SA14 Employment & learning	Mod. mixed
After change			
Sustainability receptor	Effect	Sustainability receptor	Effect
SA1 Biodiversity & landscape	Minor mixed	SA8 Poverty & social inclusion	Mod. +ve
SA2 Green infrastructure	Minor +ve	SA9 Crime	Minor +ve
SA3 Air, soil & water	Minor -ve	SA10 Health	Neg. +ve
SA4 Flooding	Minor -ve	SA11 Housing	Mod. +ve
SA5 Carbon emissions	Minor -ve	SA12 Vitality of centres	Mod. +ve
SA6 Resource efficiency & waste	Minor -ve	SA13 Sustainable transport	Minor +ve
SA7 Heritage assets	Minor -ve	SA14 Employment & learning	Mod. mixed

The strategic allocation at Power Court has been altered to provide greater flexibility over the mix of land uses. These changes are not considered to alter the scale of significant effects predicted to result from policy LP9, although it is noted that the added reference to the nearby Grade I listed St Mary's Church and Plaiter's Lea conservation area is likely to enhance the success of recommended measures to avoid or mitigate negative effects.

MM20 Policy LP10 - High Town Strategic Allocation

Before change			
Sustainability receptor	Effect	Sustainability receptor	Effect
SA1 Biodiversity & landscape	Neg. -ve	SA8 Poverty & social inclusion	Minor +ve
SA2 Green infrastructure	Minor +ve	SA9 Crime	Mod. +ve
SA3 Air, soil & water	Minor -ve	SA10 Health	Neg. +ve

SA4 Flooding	Minor -ve	SA11 Housing	Minor +ve
SA5 Carbon emissions	Neutral	SA12 Vitality of centres	Mod. +ve
SA6 Resource efficiency & waste	Minor +ve	SA13 Sustainable transport	Minor +ve
SA7 Heritage assets	Minor +ve	SA14 Employment & learning	Minor mixed
After change			
Sustainability receptor	Effect	Sustainability receptor	Effect
SA1 Biodiversity & landscape	Neg. -ve	SA8 Poverty & social inclusion	Minor +ve
SA2 Green infrastructure	Minor +ve	SA9 Crime	Mod. +ve
SA3 Air, soil & water	Minor -ve	SA10 Health	Neg. +ve
SA4 Flooding	Minor -ve	SA11 Housing	Minor +ve
SA5 Carbon emissions	Neutral	SA12 Vitality of centres	Mod. +ve
SA6 Resource efficiency & waste	Minor +ve	SA13 Sustainable transport	Minor +ve
SA7 Heritage assets	Minor +ve	SA14 Employment & learning	Minor mixed

A number of minor clarifications are proposed for policy LP10 but the overall mix and scale of land uses remains the same. These changes are not considered to alter the scale of significant effects predicted to result from policy LP10.

MM21 Policy LP11 - Creative Quarter Strategic Allocation

Before change			
Sustainability receptor	Effect	Sustainability receptor	Effect
SA1 Biodiversity & landscape	Minor mixed	SA8 Poverty & social inclusion	Mod. +ve
SA2 Green infrastructure	Minor +ve	SA9 Crime	Minor +ve
SA3 Air, soil & water	Minor -ve	SA10 Health	Neg. +ve
SA4 Flooding	Minor -ve	SA11 Housing	Mod. +ve
SA5 Carbon emissions	Neutral	SA12 Vitality of centres	Mod. +ve
SA6 Resource efficiency & waste	Minor +ve	SA13 Sustainable transport	Minor +ve
SA7 Heritage assets	Minor mixed	SA14 Employment & learning	Mod. mixed
After change			
Sustainability receptor	Effect	Sustainability receptor	Effect
SA1 Biodiversity & landscape	Minor mixed	SA8 Poverty & social inclusion	Mod. +ve
SA2 Green infrastructure	Minor +ve	SA9 Crime	Minor +ve
SA3 Air, soil & water	Minor -ve	SA10 Health	Neg. +ve
SA4 Flooding	Minor -ve	SA11 Housing	Mod. +ve
SA5 Carbon emissions	Neutral	SA12 Vitality of centres	Mod. +ve
SA6 Resource efficiency & waste	Minor +ve	SA13 Sustainable transport	Minor +ve
SA7 Heritage assets	Minor mixed	SA14 Employment & learning	Mod. mixed

Proposed amendments to policy LP11 strengthen the requirements for conserving and enhancing the setting of the Plaiters Lea conservation area and its heritage assets. These changes are not considered to alter the scale of significant effects predicted to result from policy LP11, although it is noted that the amendments are likely to enhance the success of recommended measures to avoid or mitigate negative effects.

MM24 Policy LP13 A, C & D – Economic Strategy

Before Change													
SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
0	0	+/-	0	+/-	+/-	0	+	0	0	0	+	+/-	++
After Change													
SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
0	0	+/-	0	+/-	+/-	0	+	0	0	0	+	+/-	++

Policy LP13 is amended to remove reference to 18,000 jobs (it remains referenced in the supporting text) and to clarify the approach on retention of employment land. These changes are not considered to alter the scale of significant effects predicted to result from policy LP13.

MM32 Policy LP15 – Housing Provision

Before Change													
SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
0	0	+/-	0	0	+	0	+	0	0	++	+	+	0
After Change													
SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
0	0	+/-	0	0	+	0	+	0	0	++	+	+	0

Policy LP15 is amended with an increased housing target based on an updated SHLAA that took into account the latest information on sites and historic completions. This change is not considered to alter the scale of significant effects predicted to result from policy LP15.

MM33 Policy LP16 – Affordable Housing

Before Change													
SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
0	0	0	0	0	0	0	++	0	0	++	+	0	0
After Change													
SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
0	0	0	0	0	0	0	++	0	0	++	+	0	0

Policy LP16 is amended to state the level of affordable housing need within the borough, and the amount of unmet need likely to result from application of the policy. The percentage contribution of affordable housing is unchanged, however, LP16 no longer requires affordable housing from sites of 10 dwellings or less which have a combined floorspace of less than 1,000sq.m.. This will reduce the overall level of affordable housing generated by development by approximately 100 units (across the remaining plan period). This change is not considered to significantly alter the scale of positive effects predicted to result from policy LP16.

MM34 Policy LP18 – Older People’s Housing

Before Change													
SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
0	0	0	0	0	0	+	+	0	0	+	0	+	0
After Change													
SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
0	0	0	0	0	0	+	+	0	0	+	0	+	0

Policy LP18 is amended with a minor clarification which removes reference to the Strategic Housing Market Area. This change is not considered to alter the scale of significant effects predicted to result from policy LP18.

MM35 Policy LP20 – Gypsies, Travellers & Travelling Showpeople

Before Change													
SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
+/-	+/-	0	0	0	+	+/-	+	0	+	+	0	+	0
After Change													
SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
+/-	+/-	0	0	0	+/-	+/-	+	0	+	+	0	+	0

Policy LP20 is amended to remove the requirement for gypsy, traveller or travelling showpeople sites to be on previously developed or underused land not allocated for another use. This is predicted to change the assessment against SA6 (resource efficiency) from a positive to a mixed effect, as the proposed modification increases the likelihood that sites will be developed on greenfield or land allocated for another use. No other changes to the scale of significant effects predicted to result from policy LP20 are anticipated.

MM39 Policy LP21 - Centre Hierarchy

Before Change													
SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
0	0	+	0	+	0	0	+	0	0	0	++	++	0

After Change			SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
0	0	+	0	+	0	0	+	0	0	0	++	++	0

Policy LP21 is amended to remove the limit on retail development so long as it passes the impact test. This change is not considered to alter the scale of significant effects predicted to result from policy LP21.

MM40 Policy LP24 - Community & Education Facilities

Before Change			SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
-	-	0	0	0	+	0	+	+	+/-	0	0	+	+
After Change			SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
-	-	0	0	0	+	0	+	+	+/-	0	0	+	+

Policy LP24 is amended to provide greater flexibility on the redevelopment of education and other community facilities provided that needs can be met by existing, equivalent or better facilities in a suitable location. This change is not considered to alter the scale of significant effects predicted to result from policy LP24.

MM42 Policy LP25 - High Quality Design

Before Change			SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
+	+	0	0	+	+	+	+	+	+	+	+	+	0
After Change			SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
+	+	0	0	+	+	+	+	+	+	+	+	+	0

Policy LP25 is amended to remove reference to national standards for internal space and to provide consistency with NPPF. This change is not considered to alter the scale of significant effects predicted to result from policy LP25.

MM43 Policy LP26 - Advertisements and Signage

Before Change			SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
+	0	0	0	0	0	+	0	0	0	0	0	0	0
After Change			SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
+	0	0	0	0	0	+	0	0	0	0	0	0	0

Policy LP26 is amended to loosen restrictions on internally illuminated advertising/signage proposals within a conservation area. This change is not considered to alter the scale of significant effects predicted to result from policy LP26.

MM45 Policy LP27 – Open Space and Natural Greenspace

Before Change													
SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
++	++	+	0	0	+	+	+	0	++	0	+	+	0
After Change													
SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
++	++	+	0	0	+	+	+	0	++	0	+	+	0

Policy LP27 is amended such that, where losses of open space occur in areas of deficit, proportionate alternative or enhanced open spaces are provided. In addition, removing part Biii of LP27 prevents development on open spaces being justified on the basis that the objectively assessed need for housing cannot be met. On balance these changes are not considered to alter the scale of significant effects predicted to result from policy LP27.

MM46 Policy LP28 – Biodiversity and Nature Conservation

Before Change													
SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
++	+	0	0	0	0	0	0	0	+	0	+	0	0
After Change													
SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
++	+	0	0	0	0	0	0	0	+	0	+	0	0

Policy LP28 is amended to clarify that the protection given to nature conservation sites, ecological networks and wildlife habitats will be commensurate with their status, giving appropriate weight to their importance and the contribution they make to ecological networks. This change is not considered to alter the scale of significant effects predicted to result from policy LP28.

MM47 Policy LP29 – Landscape and Geological Conservation

Before Change													
SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
++	+	0	0	0	0	+	+	0	+	0	+	+	0
After Change													
SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
++	+	0	0	0	0	+	+	0	+	0	+	+	0

Policy LP29 is amended to clarify the protection given to Areas of Great Landscape Value and Areas of Local Landscape Value and the recent work to update these designations based on a consistent range of landscape criteria. This change is not considered to alter the scale of significant effects predicted to result from policy LP29.

MM48 Policy LP30 A, C, E & F Historic Environment

Before Change			SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
SA1	SA2	SA3	0	0	+	++	+	0	0	0	+	0	0
0	0	0	0	0	+	++	+	0	0	0	+	0	0
After Change			SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
SA1	SA2	SA3	0	0	+	++	+	0	0	0	+	0	0
0	0	0	0	0	+	++	+	0	0	0	+	0	0

Policy LP30 is amended to clarify the protection given to designated and undesignated heritage assets to address inconsistencies with national policy. This change is not considered to alter the scale of significant effects predicted to result from policy LP30.

MM50 Policy LP31B, C & E – Sustainable Transport Strategy

Before Change			SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
SA1	SA2	SA3	0	+	0	0	0	0	+	0	+	++	0
0	0	+	0	+	0	0	0	0	+	0	+	++	0
After Change			SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
SA1	SA2	SA3	0	+	0	0	0	0	+	0	+	++	0
0	0	+	0	+	0	0	0	0	+	0	+	++	0

Policy LP31 (and the proposed modification to supporting text which precedes it at MM49) is amended to clarify that the route of the East Luton Circular Road (north) is safeguarded but not currently a formal transport allocation, and that any road proposal will be considered against national policy and guidance, local plan policy and legislative requirements relating to heritage, biodiversity and landscape. This change is not considered to alter the scale of significant effects predicted to result from policy LP31.

MM51 Policy LP32 - Parking

Before Change			SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
SA1	SA2	SA3	0	+	0	0	0	0	+	0	+	+	0
0	0	+	0	+	0	0	0	0	+	0	+	+	0
After Change			SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
SA1	SA2	SA3	0	+	0	0	0	0	+	0	+	+	0
0	0	+	0	+	0	0	0	0	+	0	+	+	0

Policy LP32 is amended to clarify the approach to parking provision. This change is not considered to alter the scale of significant effects predicted to result from policy LP32.

MM52 Policy LP33A – Freight

Before Change													
SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
0	0	+	0	+	0	0	0	0	0	0	+	+	0
After Change													
SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
0	0	+	0	+	0	0	0	0	0	0	+	+	0

Policy LP33 is amended to clarify the factors to be taken into account in avoiding harm to the environment or residential amenity from freight proposals. This change is not considered to alter the scale of significant effects predicted to result from policy LP33.

MM53 Policy LP37 - Climate Change, Carbon and Waste Reduction, and Sustainable Energy

Before Change													
SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
0	0	+	+	++	++	0	0	0	0	+	0	0	0
After Change													
SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
0	0	+	+	+	+	0	0	0	0	+	0	0	0

Policy LP37 is amended to reflect recent changes to national policy and Building Regulations on carbon reduction, resource efficiency and sustainable energy. This is predicted to diminish the positive effects predicted to result from the original policy against SA5 (carbon emissions) and SA6 (resource efficiency). No other changes to the scale of significant effects predicted to result from policy LP37 are anticipated.

MM54 Policy LP38 - Pollution and Contamination

Before Change													
SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
+	+	++	0	0	+	0	0	0	+	0	0	0	0
After Change													
SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
+	+	++	0	0	+	0	0	0	+	0	0	0	0

Policy LP38 is amended to clarify the application of the policy. This change is not considered to alter the scale of significant effects predicted to result from policy LP38.

MM56 (New) Policy LP40 - Review of the Local Plan

New Policy			SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
SA1	SA2	SA3	0	0	0	0	0	0	0	0	0	0	0

New policy LP40 commits to an early review of the Local Plan to be commenced before the end of 2019. Spatial planning matters to be considered in the review include a revised assessment of housing need, housing capacity within the borough, the location of unmet need, provision of sufficient schools places, relocation of the football club and land uses for strategic sites. As the policy does not propose development or determine the way in which planning applications are decided, LP40 is not considered to lead to significant effects on any of the sustainability receptors.

3. Conclusion

In conclusion, the proposed Main Modifications to the Luton Local Plan are not predicted to significantly alter the profile or scale of sustainability effects when compared to the Submission Plan.

Appendix 1: High Level Assessment for Proposed Main Modifications

Please see insert.

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Luton Borough Local Plan
Proposed Main Modifications

SEA Objectives

		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
MM01	Supporting text change / clarification	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM02	Supporting text change / clarification	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM03	Supporting text change / clarification	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM04	Supporting text change / clarification	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM05	Strategic Objective 2 - minor change	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM06	Strategic Objective 3- minor change	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM07	Supporting text change / clarification	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM08	Policy LP1 – Presumption in Favour of Sustainable Development	+	+	+	+	+	+	+	+	+	+	+	+	+	+
MM09	Supporting text change / clarification	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM10	Supporting text change / clarification	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM11	Supporting text change / clarification	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM12	Policy LP2 – Spatial Development Strategy	+/-	+/-	+/-	+/-	-	+/-	+/-	+	+/-	+/-	+	+	+/-	+
MM13	Policy LP3 - Luton Town Centre Strategy	+	+	-	-	-	-	-	+	+	+	+	++	+	--
MM14	Policy LP4 - Green Belt	+	+	+	0	0	+	+	0	0	+	0	+	+	0
MM15	Policy LP5 - Land South of Stockwood Park Strategic Allocation	--	+	-	0	-	-	0	+	0	+	0	-	+/-	++
MM16	Policy LP6 - London Luton Airport Strategic Allocation	--	+/-	-	0	--	-	-	+	0	+	0	-	+/-	+
MM17	Policy LP7 – Butterfield Green Technology Park Strategic Allocation	--	+	-	0	-	-	-	+	0	+	0	-	+/-	++
MM18	Policy LP8 - Napier Park Strategic Allocation	+/-	+	-	0	-	-	0	+	+	+	+	+	+	--
MM19	Policy LP9 - Power Court Strategic Allocation	+/-	+	-	-	-	-	-	+	+	+	+	+	+	--
MM20	Policy LP10 - High Town Strategic Allocation	-	+	-	-	0	+	+	+	++	+	+	+	+	--
MM21	Policy LP11 - Creative Quarter Strategic Allocation	+/-	+	-	-	0	+	+/-	+	+	0	+	+	+	+

Luton Borough Local Plan
Proposed Main Modifications

SEA Objectives

		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
MM22	Supporting text change / clarification	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM23	Supporting text change / clarification	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM24	Policy LP13A, C & D – Economic Strategy	0	0	+/-	0	+/-	+/-	0	+	0	0	0	+	+/-	++
MM25	Supporting text change / clarification	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM26	Supporting text change / clarification	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM27	Supporting text change / clarification	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM28	Supporting text change / clarification	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM29	Supporting text change / clarification	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM30	Supporting text change / clarification	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM31	Supporting text change / clarification	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM32	Policy LP15 – Housing Provision	0	0	+/-	0	0	+	0	+	0	0	++	+	+	0
MM33	Policy LP16 – Affordable Housing	0	0	0	0	0	0	0	++	0	0	++	+	0	0
MM34	Policy LP18 – Older People’s Housing	0	0	0	0	0	0	+	+	0	0	+	0	+	0
MM35	Policy LP20 – Gypsies, Travellers & Travelling Showpeople	+/-	+/-	0	0	0	+/-	+/-	+	0	+	+	0	+	0
MM36	Supporting text change / clarification	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM37	Supporting text change / clarification	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM38	Supporting text change / clarification	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM39	Policy LP21 - Centre Hierarchy	0	0	+	0	+	0	0	+	0	0	0	++	++	0
MM40	Policy LP24 - Community & Education Facilities	-	-	0	0	0	+	0	+	+	+/-	0	0	+	+
MM41	Supporting text change / clarification	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM42	Policy LP25 - High Quality Design	+	+	0	0	+	+	+	+	+	+	+	+	+	0

Luton Borough Local Plan
Proposed Main Modifications

SEA Objectives

		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
MM43	Policy LP26 - Advertisements and Signage	+	0	0	0	0	0	+	0	0	0	0	0	0	0
MM44	Supporting text change / clarification	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM45	Policy LP27 – Open Space and Natural Greenspace	++	++	+	0	0	+	+	+	0	++	0	+	+	0
MM46	Policy LP28 – Biodiversity and Nature Conservation	++	+	0	0	0	0	0	0	0	+	0	+	0	0
MM47	Policy LP29 – Landscape and Geological Conservation	++	+	0	0	0	0	+	+	0	+	0	+	+	0
MM48	Policy LP30 A, C, E & F Historic Environment	0	0	0	0	0	+	++	+	0	0	0	+	0	0
MM49	Supporting text change / clarification	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM50	Policy LP31B, C & E – Sustainable Transport Strategy	0	0	+	0	+	0	0	0	0	+	0	+	++	0
MM51	Policy LP32 - Parking	0	0	+	0	+	0	0	0	0	+	0	+	+	0
MM52	Policy LP33A – Freight	0	0	+	0	+	0	0	0	0	0	0	+	+	0
MM53	Policy LP37 - Climate Change, Carbon and Waste Reduction, and Sustainable Energy	0	0	+	+	+	+	0	0	0	0	+	0	0	0
MM54	Policy LP38 - Pollution and Contamination	+	+	++	0	0	+	0	0	0	+	0	0	0	0
MM55	Supporting text change / clarification	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM56	(NEW) Policy LP40 - Review of the Local Plan	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM57	Supporting text change / clarification	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM58	Supporting text change / clarification	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM59	Supporting text change / clarification	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM60	Supporting text change / clarification	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM61	Supporting text change / clarification	0	0	0	0	0	0	0	0	0	0	0	0	0	0
MM62	Supporting text change / clarification	0	0	0	0	0	0	0	0	0	0	0	0	0	0
		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14

SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
-----	-----	-----	-----	-----	-----	-----	-----	-----	------	------	------	------	------

Key to the High Level Assessment Matrix

++	Likely strong positive effect
+	Likely positive effect
0	Neutral/no effect
-	Likely adverse effect
--	Likely strong adverse effect
+/-	Uncertain effects

SEA Objectives

- 1 Maintain and enhance biodiversity, habitat and landscape
- 2 Conserve, restore and enhance green infrastructure
- 3 Protect and enhance air, soil and water resources
- 4 Protect areas that are at risk from flooding and reduce flood risk
- 5 Reduce carbon emissions
- 6 Increase resource efficiency and reduce resource use and waste
- 7 Identify, protect, maintain and enhance heritage assets and their setting
- 8 Reduce poverty and inequality and promote social inclusion
- 9 Reduce crime and fear of crime
- 10 Encourage healthier lifestyles and reduce adverse health impacts of new developments
- 11 Provide decent, affordable and safe homes for all
- 12 Support vitality and viability of centres
- 13 Provide and encourage the use of sustainable integrated transport systems, improve access and mobility
- 14 Promote employment, learning, skills and innovation

Appendix 2: Revised Detailed Assessment Matrices for Proposed Main Modifications

Please see insert.

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DETAILED ASSESSMENT MATRIX

Policy LP3 - Luton Town Centre - regeneration, including c.2,100 new dwellings, job creation, 9,672m² convenience retail by 2020, 34,516m² comparison retail by 2025, hotels, leisure, open space, improvements to River Lea as a strategic corridor, university expansion

	No.	SEA Objective	Description of predicted effect	Duration			Frequency	Temporary or permanent	Geographic significance	Magnitude	Level of certainty	Scale of significance	Positive or negative	Mitigation or other action required?	Supporting comments / Proposed mitigation
				Short term	Medium term	Long term									
SEA Objectives	1	Maintain and enhance biodiversity, habitat and landscape	TC regeneration aims for substantial environmental improvements and townscape enhancement, including opening-up of culverted R Lea and new greenspaces. These are likely to be of general benefit to a range of wildlife and may improve the value of, and views from Hart Hill Area of Local Landscape Value.		+	++	Ongoing	Operation	Sub-Regional	Med	Low	Moderate	Positive	Yes	Reconfiguration should seek to retain & increase coverage of trees, hedges & other natural features, especially TPO & veteran trees. Opportunities to create wetland habitats linked with de-culverting and SuDS (where suitable in relation to SPZ) should be maximised.
	2	Conserve, restore and enhance green infrastructure	Greenspace is limited at present, being largely restricted to St Mary's Church Gardens, non-culverted sections of the Lea, and occasional gardens and groups of trees. Significant benefits can be expected if the policy's objectives are met.		+	++	Ongoing	Operation	Sub-Regional	Med	Low	Moderate	Positive	Yes	Opportunities to provide new greenspaces, parkland and town squares, street trees, green walls/roofs should be explored.
	3	Protect and enhance air, soil and water resources	Protections for R Lea are included within policy, but scale of additional residential, employment and retail development likely to worsen air quality despite transport measures and provision for car-free developments. Limited impacts on soil, but probability of contamination high on old industrial sites, leading to potential mobilisation of contaminants into surface and ground waters; TC is entirely within SPZ1.	--	--	-	Ongoing	Construction & Operation	Local	High	Med	Moderate	Negative	Yes	Following site investigations, design of remediation strategies should include CEMPs to reduce and manage risk of mobilising contaminants. Impacts may result from a number of sites within TC; a strategic approach to remediation / surface water management may be appropriate. The policy already promotes sustainable transport measures.
	4	Protect areas that are at risk from flooding and reduce flood risk	Parts of TC close to R Lea are liable to fluvial flood risk, particularly to the north-east of TC. The majority of TC is at low to medium risk of sewer flooding, especially in the central and eastern sections. Site selection for residential development in particular will need to take account of these constraints to avoid increasing hazards of flooding.	-	-	-	Ongoing	Construction & Operation	Local	Med	Med	Minor	Negative	Yes	New and re- developments should be required to separate foul and surface water drainage outfalls to reduce pressure on sewer capacity. De-culverting proposals will help to reduce flood risk upstream by creating more space for water, but adjacent land uses will need to be water compatible or made flood resilient. SuDS may not be suitable given SPZ1.
	5	Reduce carbon emissions	Proposals will need to comply with LP37 on carbon reduction & sustainable energy. But scale of potential development and associated traffic emissions likely to lead to minor significant impacts, particularly during construction phases and before initiatives such as district heating come on line.	--	-		Initial	Construction, early Operation	Local	Med	Med	Minor	Negative	Yes	District heating type initiatives could be particularly suitable for larger strategic sites such as Power Court, Creative Quarter and University Campus. Design of other sites should consider use of renewable energy (e.g. solar thermal/PV, micro wind, ground source heat, CHP etc.). Areas of tree cover (carbon sink, urban cooling) should be retained / re-provided where possible.
	6	Increase resource efficiency and reduce resource use and waste	Policy seeks to make the most efficient use of land and regenerate the TC, and will need to comply with LP37. But use of resources likely to increase in short-medium term during construction.	-	-		Initial	Construction	Local	Med	Low	Minor	Negative	Yes	Waste materials produced during demolition and groundworks should be re-used on site wherever possible, or re-processed off site for future use in aggregates. Designs should incorporate adequate storage space for recycling, and consider providing communal composting facilities.
	7	Identify, protect, maintain and enhance heritage assets and their setting	TC includes several listed buildings, Plaister's Lea and Town Centre conservation areas, and sites archaeological importance within Luton medieval town. Policy accepts the need to protect the fabric and setting of known assets, and maximise their contribution to regeneration, but impacts possible through loss/damage of buried assets particularly in early stages.	-	-		Initial	Construction	Local	Med	Low	Minor	Negative	Yes	As required by LP30, it should be possible to reduce negative effects via a high quality design which responds to and enhances the setting of historical features, and uses an appropriate selection of materials. Heritage Statements should be prepared and, where evidence points to potential presence of remains, mitigation will be required (e.g. investigative trenching, watching brief, recovery & interpretation of remains).

DETAILED ASSESSMENT MATRIX

Policy LP3 - Luton Town Centre - regeneration, including c.2,100 new dwellings, job creation, 9,672m² convenience retail by 2020, 34,516m² comparison retail by 2025, hotels, leisure, open space, improvements to River Lea as a strategic corridor, university expansion

No.	SEA Objective	Description of predicted effect	Duration			Frequency	Temporary or permanent	Geographic significance	Magnitude	Level of certainty	Scale of significance	Positive or negative	Mitigation or other action required?	Supporting comments / Proposed mitigation
			Short term	Medium term	Long term									
8	Reduce poverty and inequality and promote social inclusion	Construction phase will provide local and accessible employment opportunities; operation phase will provide job opportunities through retail, offices, creative industries, education, training and leisure.	++	++	++	Ongoing	Construction & Operation	Local	High	Med	Moderate	Positive	Yes	Opportunities to provide work-based training during construction should be explored; provision for business incubator and/or live/work units may be suitable.
9	Reduce crime and fear of crime	Improvements to street scene, enhanced pedestrian environment, new public spaces, and extended night time economy is likely to increase activity and extent of active, overlooked space, thereby reducing fear of crime.	+	++	++	Ongoing	Operation	Local	High	Med	Moderate	Positive	No	
10	Encourage healthier lifestyles and reduce adverse health impacts of new developments	As above, improvements to street scene and walking & cycling routes may help to encourage more active lifestyles, with health benefits.		+	+	Ongoing	Operation	Local	Low	Low	Negligible	Positive	Yes	Opportunities to provide play space, pockets parks or improved access to cycle routes should be explored.
11	Provide decent, affordable and safe homes for all	TC housing provision will provide dwellings in accordance with LP16,35&37 regarding affordability, design & sustainability; sites likely to yield 20% affordable units or financial contribution.	+	++	++	Ongoing	Operation	Local	High	Med	Moderate	Positive	No	
12	Support vitality and viability of centres	Enhancing the vitality and viability of the Town Centre is what this policy is all about. Significant benefits can be expected if policy objectives are met.	+	++	++	Ongoing	Operation	Sub-Regional	High	Med	Major	Positive	No	
13	Provide and encourage the use of sustainable integrated transport systems, improve access and mobility	The guided busway, rail interchange, improved walking & cycling routes and car free developments all contribute to this objective.	+	+	+	Ongoing	Operation	Sub-Regional	Med	Med	Moderate			
14	Promote employment, learning, skills and innovation	Construction phase will provide local and accessible employment opportunities. Operation phase will provide job opportunities through retail, offices, creative industries, education, training and leisure, but also add to pressure on primary and secondary schools capacity in this part of the borough.	+/-	+/-	+/-	Ongoing	Construction & Operation	Local	High	Med	Moderate	Mixed	Yes	Opportunities to provide work-based training during construction and long term education provision should be explored; provision for business incubator and/or live/work units may be suitable.

Key

The 'Duration' column is noted as:	Major negative effect	--	Scale of significance is illustrated as:	Severe	Negative	Positive	Optimal
	Negative effect	-		Major			Major
	Positive effect	+		Moderate			Moderate
	Major positive effect	++		Minor			Minor
	Mixed effects	+/-		Negligible			Negligible
	Neutral effect						

DETAILED ASSESSMENT MATRIX

Policy LP5 - Land south of Stockwood Park - 2ha P&R with improved links to TC; 9.5ha B1 office

	No.	SEA Objective	Description of predicted effect	Duration			Frequency	Temporary or permanent	Geographic significance	Magnitude	Level of certainty	Scale of significance	Positive or negative	Mitigation or other action required?	Supporting comments / Proposed mitigation
				Short term	Medium term	Long term									
SEA Objectives	1	Maintain and enhance biodiversity, habitat and landscape	One of the few remaining greenfield sites in the borough, currently in arable production but with treelines and hedges along Newlands Rd, and treebelts adjacent to Stockwood Park golf course and the M1 spur. Adjacent to Kidney & Bull Woods CWS and Stockwood Park CWS/DWS, while majority of north-eastern section of site has Other SNCI designation under current Local Plan. Site is sandwiched between Stockwood Park AGLV and Green Belt. Impacts to protected/notable species (e.g. bats, badger) are likely, together with potential loss of mature/veteran trees, while views from the AGLV will be degraded.	--	--	--	Ongoing	Construction & Operation	Sub-Regional	High	Med	Major	Negative	Yes	Ecological surveys and assessment will be required to establish which (if any) protected species may be using the site and to design a suitable mitigation strategy. Habitats of greatest interest should be retained e.g. woodland, hedgerows and mature/veteran trees should be incorporated into development layout. New habitats should be created via landscaping plans, both to reduce landscape & visual impacts from north & south, and to increase robustness of existing habitats. An LVIA should be carried out to assess and mitigate impacts to AGLV. New habitats could include new woodlands, treebelts and hedgerows, wildflower meadows and wetlands associated with sustainable drainage measures.
	2	Conserve, restore and enhance green infrastructure	Limited GI on site at present but development provides opportunity to link with diverse GI offering in Stockwood Park area, which includes golf, rugby and athletics. Impacts are likely to be negative during construction but, if opportunities are seized, potential for positive effects.	-	+	+	Ongoing	Operation	Local	Med	Low	Minor	Positive	Yes	Overall GI provision could be enhanced by creating extensive multifunctional, biodiverse open spaces, providing a range of health, recreation and ecosystem services through landscaping and habitat creation.
	3	Protect and enhance air, soil and water resources	Site likely to be subject to air (and noise) pollution from adjacent M1, and likely to contribute to this during both construction works & operation (via road traffic). Development will result in loss of soil resources. Site not in SPZ1/2/3.	-	-	-	Ongoing	Construction & Operation	Local	Med	Med	Minor	Negative	Yes	Soils within built footprint could be removed prior to development for re-use in landscaping and habitat creation elsewhere on site. Planting of treebelt along M1&spur would help reduce air pollution (and possibly noise attenuation barrier although development not highly sensitive). Sustainable transport links and P&R will help to limit site's contribution to pollution via traffic emissions. Opportunity to provide cycle links through golf course to existing cycle routes to Stockwood Park, or via London Road.
	4	Protect areas that are at risk from flooding and reduce flood risk	None - site not subject to flood risk from fluvial, sewer or groundwater sources.									Neutral		Yes	Opportunity to create extensive new wetland habitats as part of site-wide sustainable drainage - see also above.
	5	Reduce carbon emissions	Proposals will need to comply with LP37 on carbon reduction & sustainable energy. But scale of development, edge-of-centre position and associated traffic emissions likely to lead to significant impacts, particularly during construction phases and before initiatives such as district heating (if adopted) come on line.	--	-	-	Ongoing	Construction & Operation	Local	Med	Med	Minor	Negative	Yes	Could be suited to district heating type initiatives to serve office complexes. Designs should consider use of renewable energy (e.g. solar thermal/PV, micro wind, ground source heat, CHP etc.). Areas of tree cover (carbon sink, urban cooling) should be retained / re-provided where possible.
	6	Increase resource efficiency and reduce resource use and waste	Loss of Grade 3 agricultural land on part of site, and land in arable production. Use of resources likely to increase in short-medium term during construction.	-	-		Initial	Construction	Local	Med	Low	Minor	Negative	Yes	Soils within built footprint could be removed prior to development for re-use in landscaping and habitat creation elsewhere on site. Designs should incorporate adequate storage space for recycling, and consider providing communal composting facilities.
	7	Identify, protect, maintain and enhance heritage assets and their setting	None - site is undeveloped and does not feature any known heritage assets (e.g. listed building, conservation area, scheduled monument, registered park or garden) though buried assets may be present.									Neutral		No	

DETAILED ASSESSMENT MATRIX

Policy LP5 - Land south of Stockwood Park - 2ha P&R with improved links to TC; 9.5ha B1 office

No.	SEA Objective	Description of predicted effect	Duration			Frequency	Temporary or permanent	Geographic significance	Magnitude	Level of certainty	Scale of significance	Positive or negative	Mitigation or other action required?	Supporting comments / Proposed mitigation
			Short term	Medium term	Long term									
8	Reduce poverty and inequality and promote social inclusion	Construction phase will provide local employment opportunities; operation phase will provide office employment opportunities.	++	++	++	Ongoing	Construction & Operation	Local	High	Med	Moderate	Positive	Yes	Opportunities to provide work-based training during construction should be explored; provision for business incubator may be suitable.
9	Reduce crime and fear of crime	No significant effect predicted.									Neutral		No	
10	Encourage healthier lifestyles and reduce adverse health impacts of new developments	Some limited health benefits are possible if development is linked via green infrastructure and cycle routes to facilities at Stockwood Park.		+	+	Ongoing	Operation	Local	Low	Med	Negligible	Positive	Yes	See recommendations at Objectives 2&3 above.
11	Provide decent, affordable and safe homes for all	None - no residential element to scheme.									Neutral		No	
12	Support vitality and viability of centres	The site's edge-of-centre location may suppress demand for TC office redevelopment over the medium term.		--		Intermittent	Operation	Local	Med	Low	Minor	Negative	No	No effective mitigation available if site is to be allocated.
13	Provide and encourage the use of sustainable integrated transport systems, improve access and mobility	Mixed effects: the site is not in an accessible (from Luton) location and is currently best served by car, but policy seeks P&R and enhanced public transport to TC.		+/-	+/-	Ongoing	Operation	Local	Med	Med	Minor	Mixed	Yes	Policy could be more explicitly ambitious regarding sustainable transport by providing for guided busway connections to rail stations and TC, and securing cycle links as recommended above (Objective 3).
14	Promote employment, learning, skills and innovation	Construction phase will provide local employment opportunities; operation phase will provide office employment opportunities.	+	++	++	Ongoing	Construction & Operation	Sub-Regional	High	Med	Major	Positive	Yes	Opportunities to provide work-based training during construction should be explored; provision for business incubator may be suitable.

Key									
The 'Duration' column is noted as:	Major negative effect	--	Scale of significance is illustrated as:			Negative	Positive		
	Negative effect	-		Severe			Optimal		
	Positive effect	+		Major			Major		
	Major positive effect	++		Moderate			Moderate		
	Mixed effects	+/-		Minor			Minor		
	Neutral effect			Negligible			Negligible		

DETAILED ASSESSMENT MATRIX

Policy LP6 - London Luton Airport - 325ha strategic allocation, including Wigmore Valley Park and 43ha allocation at Century Park - supports airport expansion, business & industry growth (aviation, engineering, distribution, services), sustainable transport, access and parking. Century Park: aviation-related B1 inc light industry; small-scale affordable B2; B8; small-scale retail, services, leisure; hotel; road access to be provided at surface level through Wigmore Valley Park; landscaping & surface water management

	No.	SEA Objective	Description of predicted effect	Duration			Frequency	Temporary or permanent	Geographic significance	Magnitude	Level of certainty	Scale of significance	Positive or negative	Mitigation or other action required?	Supporting comments / Proposed mitigation
				Short term	Medium term	Long term									
SEA Objectives	1	Maintain and enhance biodiversity, habitat and landscape	Century Park is one of the few remaining greenfield sites in the borough, currently in arable production but with treelines and hedges along the cycle route, and flanked by pockets of woodland. Century Park lies adjacent to Winch Hill Wood CWS and Wigmore Park CWS, while Dairyborn Scarp DWS is sandwiched between Percival Way, car parking and Vauxhall Way at the western end of the airport. Two ALLVs lie just south of the airport which are also Green Belt, while Wigmore Valley Park itself is an ALLV. The new access road to Century Park is likely to deteriorate local landscape character and may result in a loss of locally important habitats within the CWS, depending on its final alignment. Impacts to protected/notable species (e.g. bats, badger, reptiles) are likely, together with potential loss of mature/veteran trees, while views from the countryside will be degraded.	--	--	--	Ongoing	Construction & Operation	Sub-Regional	High	Med	Major	Negative	Yes	Recommendations apply mainly to Century Park and its proposed new access road as it is anticipated that most airport-related development will be within existing built-up areas, though principles are transferrable. Ecological surveys and assessment will be required to establish which (if any) protected species may be using the site and to design a suitable mitigation strategy. Loss of habitats within the CWS should be avoided, and elsewhere habitats of greatest interest should be retained, e.g. woodland, hedgerows and mature/veteran trees should be incorporated into development layout. New habitats should be created via landscaping plans, both to reduce landscape & visual impacts from north, east & south, and to increase robustness of existing habitats. An LVIA should be carried out to assess and mitigate impacts to ALLVs. New habitats could include new woodlands, treebelts and hedgerows, wildflower meadows and wetlands associated with sustainable drainage measures.
	2	Conserve, restore and enhance green infrastructure	Wigmore Valley Park natural greenspace, sports pitches & allotments are sandwiched between Century Park and the airport, and parts of this resource are likely to be lost as a result of the new access road notwithstanding the policy's requirement to maintain and enhance overall provision. Limited GI within the allocation at present but development provides opportunity to provide additional accessible semi-natural GI alongside employment uses at Century Park. Impacts are likely to be negative during construction but there is potential for significant positive effects if opportunities are maximised.	--	+/-	++	Ongoing	Operation	Local	High	Low	Moderate	Mixed	Yes	Loss of open spaces will need to be offset through re-provision, while overall GI provision could be enhanced by creating additional multifunctional, biodiverse open spaces permeating throughout Century Park development, providing a range of health, recreation and ecosystem services through landscaping and habitat creation. This would benefit future employees at the site, as well as local residents already using Wigmore Valley Park.
	3	Protect and enhance air, soil and water resources	Site likely to be subject to air (and noise) pollution from adjacent airport, and likely to contribute to this during both construction works & operation (via road traffic). Development will result in loss of soil resources. Largely outside of (but close to) SPZ3: development proposals provide the opportunity to improve surface water quality via a site-wide sustainable drainage system.	-	-	-	Ongoing	Construction & Operation	Local	Med	Med	Minor	Negative	Yes	Soils within Century Park built footprint could be removed prior to development for re-use in landscaping and habitat creation elsewhere on site. Retention/strengthening of treebelt along cycle route, subject to airport safety considerations, may help reduce air pollution within Century Park (and possibly noise attenuation barrier although development not highly sensitive). Century Park benefits from existing cycle links, which should be improved and coupled with cycle storage/repair on site, and links to bus/rail services to airport, which will help to limit site's contribution to pollution via traffic emissions. Opportunity to extend guided bus way to airport should be pursued.
	4	Protect areas that are at risk from flooding and reduce flood risk	None - site not subject to flood risk from fluvial, sewer or groundwater sources.									Neutral		Yes	Opportunity to create extensive new wetland habitats as part of site-wide sustainable drainage - see also above.
	5	Reduce carbon emissions	Proposals will need to comply with LP37 on carbon reduction & sustainable energy. But the scale of development at Century Park, its edge-of-centre position, new road access and associated traffic emissions are likely to lead to significant impacts, particularly during construction phases and before initiatives such as district heating (if adopted) come on line. Airport expansion is predicted to increase carbon emissions by c.70% between 2011 and 2028, thereby contributing to global climate change.	--	--	--	Ongoing	Construction & Operation	Local & International	Low	Med	Major	Negative	Yes	Century Park could be suited to district heating type initiatives to serve office, leisure and hotel uses. Designs should consider use of renewable energy (e.g. solar thermal/PV, micro wind, ground source heat, CHP etc.). Areas of tree cover (carbon sink, urban cooling) should be retained / re-provided where possible.

DETAILED ASSESSMENT MATRIX

Policy LP6 - London Luton Airport - 325ha strategic allocation, including Wigmore Valley Park and 43ha allocation at Century Park - supports airport expansion, business & industry growth (aviation, engineering, distribution, services), sustainable transport, access and parking. Century Park: aviation-related B1 inc light industry; small-scale affordable B2; B8; small-scale retail, services, leisure; hotel; road access to be provided at surface level through Wigmore Valley Park; landscaping & surface water management

No.	SEA Objective	Description of predicted effect	Duration			Frequency	Temporary or permanent	Geographic significance	Magnitude	Level of certainty	Scale of significance	Positive or negative	Mitigation or other action required?	Supporting comments / Proposed mitigation
			Short term	Medium term	Long term									
6	Increase resource efficiency and reduce resource use and waste	Loss of Grade 3 agricultural land on Century Park part of site, and land in arable production. Use of resources likely to increase in short-medium term during construction.	-	-		Initial	Construction	Local	Med	Low	Minor	Negative	Yes	Soils within built footprint could be removed prior to development for re-use in landscaping and habitat creation elsewhere on site. Designs should incorporate adequate storage space for recycling, and consider providing communal composting facilities.
7	Identify, protect, maintain and enhance heritage assets and their setting	Archaeological area HER10808 lies mainly within Century Park. This includes two adjacent circular cropmarks close to the probable location of a substantial Roman building. The area has produced late Iron Age and Romano-British pottery, flue tiles, a glass bead, metalworking fragments, a Licinius (AD316) bronze coin, along with fragments of an early 4th century bowl. Impacts likely through loss/damage of buried assets particularly in early stages of development.	-	-		Initial	Construction	Local	Med	Low	Minor	Negative	Yes	As required by LP30, it should be possible to reduce negative effects via a high quality design which responds to and enhances the setting of historical features. Heritage Statements should be prepared and, where evidence points to potential presence of remains, mitigation will be required (e.g. investigative trenching, watching brief, recovery & interpretation of remains).
8	Reduce poverty and inequality and promote social inclusion	Construction phase will provide local employment opportunities; operation phase will provide job opportunities through employment, leisure and hotel uses.	++	++	++	Ongoing	Construction & Operation	Local	High	Med	Moderate	Positive	Yes	Opportunities to provide work-based training during construction should be explored; provisions for business incubator are included.
9	Reduce crime and fear of crime	No significant effect predicted.									Neutral		No	
10	Encourage healthier lifestyles and reduce adverse health impacts of new developments	Health benefits through expansion of GI at Century Park could be significant, if realised.		+	+	Ongoing	Operation	Local	Med	Med	Minor	Positive	Yes	See recommendations at Objective 2 above.
11	Provide decent, affordable and safe homes for all	None - no residential element to scheme.									Neutral		No	
12	Support vitality and viability of centres	Luton TC may benefit from increased overall office provision but this is somewhat offset by Century Park's edge-of-centre location, which may suppress demand for TC office redevelopment. Effect unlikely to take hold in short term (scheme will not come forward immediately) and unlikely to be permanent.		--		Inter-mittent	Operation	Local	Med	Low	Minor	Negative	No	No effective mitigation available if site is to be allocated.
13	Provide and encourage the use of sustainable integrated transport systems, improve access and mobility	Mixed effects: the site (including Century Park) is not in a highly accessible location and is currently best served by car, but policy seeks enhanced public transport.		+/-	+/-	Ongoing	Operation	Local	Med	Med	Minor	Mixed	Yes	Policy could be more explicitly ambitious regarding sustainable transport by providing for guided busway connections to rail stations and TC, and securing cycle facilities as recommended above (Objective 3).
14	Promote employment, learning, skills and innovation	Construction phase will provide local employment opportunities; operation phase will provide job opportunities through employment, leisure and hotel uses.	++	++	++	Ongoing	Construction & Operation	Sub-Regional	High	Med	Moderate	Positive	Yes	Opportunities to provide work-based training during construction should be explored; provisions for business incubator are included.

Key		Scale of significance is illustrated as:		Negative	Positive
The 'Duration' column is noted as:	Major negative effect	--		Severe	Optimal
	Negative effect	-		Major	Major
	Positive effect	+		Moderate	Moderate
	Major positive effect	++		Minor	Minor
	Mixed effects	+/-		Negligible	Negligible
	Neutral effect				

DETAILED ASSESSMENT MATRIX

Policy LP7 - Butterfield Green Technology Park - employment uses (B1, B2, B8) on remaining 23ha, plus 450 space P&R and supporting uses (e.g. small scale retail, gym)

	No.	SEA Objective	Description of predicted effect	Duration			Frequency	Temporary or permanent	Geographic significance	Magnitude	Level of certainty	Scale of significance	Positive or negative	Mitigation or other action required?	Supporting comments / Proposed mitigation
				Short term	Medium term	Long term									
SEA Objectives	1	Maintain and enhance biodiversity, habitat and landscape	Partially in arable production where still undeveloped but with treelines, gappy hedges and pond within and at edges of site. Adjacent/near to Oaket Wood CWS and Oosey Hill CWS, and Great Hayes Wood DWS / Other SNCIs. Site is surrounded Green Belt, with AONB to the north and Stopsley Common and Putteridge Edge AGLVs to the south. Impacts to protected/notable species (e.g. bats, badger, reptiles, amphibians) are likely, together with potential loss of mature/veteran trees, while views from the AONB and countryside to west, north and east will be degraded.	--	--	--	Ongoing	Construction & Operation	Sub-Regional	High	Med	Major	Negative	Yes	Site partially developed but ecological surveys and assessment will be required for future phases to establish which (if any) protected species may be using the site and to design a suitable mitigation strategy. Habitats of greatest interest should be retained as required by the policy, e.g. woodland, hedgerows, ponds and mature/veteran trees should be incorporated into development layout. New habitats should be created via landscaping plans, both to reduce landscape & visual impacts from surrounding areas, and to increase robustness of existing habitats. An LVIA should be carried out to assess and mitigate impacts to AONB/ALLVs. New habitats could include new woodlands, treebelts and hedgerows, wildflower meadows and wetlands associated with sustainable drainage measures.
	2	Conserve, restore and enhance green infrastructure	Limited GI on site at present but development provides opportunity to link with diverse GI offering at Butterfield Green and Stopsley Common, including semi-natural greenspace, sports, leisure and Vale Cemetery, thereby extending accessible semi-natural GI alongside employment uses. Impacts are likely to be negative during construction but there is potential for significant positive effects if opportunities are maximised.	-	+	++	Ongoing	Operation	Sub-Regional	Med	Low	Moderate	Positive	Yes	Overall GI provision could be enhanced by creating additional multifunctional, biodiverse open spaces permeating throughout Butterfield development, providing a range of health, recreation and ecosystem services through landscaping and habitat creation. This would benefit future employees at the site, as well as local residents already using Stopsley Common and Inspire Luton Sports Village.
	3	Protect and enhance air, soil and water resources	Development likely to create air pollution during both construction works & operation (via road traffic). Development will result in loss of soil resources. Site outside of but adjacent to SPZ3.	-	-	-	Ongoing	Construction & Operation	Local	Med	Med	Minor	Negative	Yes	Soils within built footprint could be removed prior to development for re-use in landscaping and habitat creation elsewhere on site. Sustainable transport links and P&R will help to limit site's contribution to pollution via traffic emissions. Site benefits from existing cycle links, which should be improved, extended and coupled with cycle storage/repair on site.
	4	Protect areas that are at risk from flooding and reduce flood risk	None - site not subject to flood risk from fluvial, sewer or groundwater sources.									Neutral		Yes	Opportunity to create extensive new wetland habitats as part of site-wide sustainable drainage - see also above.
	5	Reduce carbon emissions	Proposals will need to comply with LP37 on carbon reduction, and policy-specific requirements on high quality design and sustainability. But scale of development, edge-of-centre position and associated traffic emissions likely to lead to significant impacts, particularly during construction phases and before initiatives such as district heating (if adopted) come on line.	--	-	-	Ongoing	Construction & Operation	Local	Med	Med	Minor	Negative	Yes	Could be suited to district heating type initiatives to serve office complexes. Designs should consider use of renewable energy (e.g. solar thermal/PV, micro wind, ground source heat, CHP etc.). Areas of tree cover (carbon sink, urban cooling) should be retained / re-provided where possible.
	6	Increase resource efficiency and reduce resource use and waste	Loss of Grade 3 agricultural land on part of site, and land in arable production. Use of resources likely to increase in short-medium term during construction.	-	-		Initial	Construction	Local	Med	Low	Minor	Negative	Yes	Soils within built footprint could be removed prior to development for re-use in landscaping and habitat creation elsewhere on site. Designs should incorporate adequate storage space for recycling, and consider providing communal composting facilities.

DETAILED ASSESSMENT MATRIX

Policy LP8 - Napier Park - c.25ha mixed-use brownfield redevelopment, including B1a, B1c, B2 employment uses, 600 to 1,300 dwellings, hotel, neighbourhood centre with convenience-led retail, public spaces

	No.	SEA Objective	Description of predicted effect	Duration			Frequency	Temporary or permanent	Geographic significance	Magnitude	Level of certainty	Scale of significance	Positive or negative	Mitigation or other action required?	Supporting comments / Proposed mitigation
				Short term	Medium term	Long term									
SEA Objectives	1	Maintain and enhance biodiversity, habitat and landscape	Derelict site within the urban area, but adjacent to Church Cemetery CWS. Dairyborn Scarp DWS is c.100m east on the other side of Vauxhall Motor Works. Impacts to protected/notable species (e.g. bats, black redstart) are possible, together with indirect effects to adjacent CWS during operation. Hart Hill ALLV is adjacent to the north-west but redevelopment is likely to significantly improve townscape quality in the long term.	-	+/-	+/-	Ongoing	Construction & Operation	Local	Med	Low	Minor	Mixed	Yes	Ecological surveys and assessment will be required to establish which (if any) protected species may be using the site and to design a suitable mitigation strategy. Opportunities for habitat creation could include new woodlands to buffer CWS, parkland, tree-lined avenues, hedgerows, wildflower meadows and wetlands associated with sustainable drainage measures (SPZ-permitting). An LVIA should be carried out to assess and mitigate impacts to ALLV.
	2	Conserve, restore and enhance green infrastructure	Site is within the urban area adjacent to Crawley Green Road Cemetery, an important and sizeable GI asset in a central location. No negative effects predicted. Significant opportunity to create additional GI through landscaping plans, both to buffer adjacent CWS and create new biodiverse greenspaces within the new neighbourhood.		+	++	Ongoing	Operation	Local	High	Low	Moderate	Positive	Yes	Significant opportunity to extend and enhance existing GI into the heart of the new neighbourhood by providing multifunctional, biodiverse open spaces with a range of health, recreation and ecosystem services, linking to tree-lined streets and networks of hedgerow permeating through the development.
	3	Protect and enhance air, soil and water resources	Site likely to contribute to air pollution during both construction works & operation (via road traffic), although policy and location provide for sustainable transport choices. Site lies within SPZ3. Extensive remediation likely to be required due to previous industrial uses, which risks mobilising contaminants into SPZ.	-	-	-	Ongoing	Construction & Operation	Local	Med	Med	Minor	Negative	Yes	Following site investigation, design of remediation strategy should include a CEMP to reduce and manage risk of mobilising contaminants. Sustainable transport measures should be maximised (e.g. onsite cycle facilities, strengthened links to public transport), as required by policy.
	4	Protect areas that are at risk from flooding and reduce flood risk	None - site not subject to flood risk from fluvial, sewer or groundwater sources.									Neutral		Yes	SuDS may not be suitable given SPZ2.
	5	Reduce carbon emissions	Proposals will need to comply with LP37 on carbon reduction & sustainable energy. But scale of potential development and associated traffic emissions likely to lead to minor significant impacts, particularly during construction phases and before initiatives such as district heating come on line.	--	-		Initial	Construction & early Operation	Local	Med	Med	Minor	Negative	Yes	District heating type initiatives could be particularly suitable for larger strategic sites such as Napier Park. Designs should consider use of renewable energy (e.g. solar thermal/PV, micro wind, ground source heat, CHP etc.). Areas of tree cover (carbon sink, urban cooling) should be retained / re-provided where possible.
	6	Increase resource efficiency and reduce resource use and waste	Site is an efficient use of PDL, and will need to comply with LP37. But use of resources likely to increase in short-medium term during construction.	-	-		Initial	Construction	Local	Med	Low	Minor	Negative	Yes	Waste materials produced during demolition and groundworks should be re-used on site wherever possible, or re-processed off site for future use in aggregates. Designs should incorporate adequate storage space for recycling, and consider providing communal composting facilities.
	7	Identify, protect, maintain and enhance heritage assets and their setting	Site c.20m west of Vauxhall Kimpton Rd Office listed building which may be subject to minor dust/vibration impacts during construction.	-			Initial	Construction	Local	Low	Low	Negligible	Negative	Yes	Development proposals should assess scale of potential risk and deploy suitable building protection measures where necessary.
	8	Reduce poverty and inequality and promote social inclusion	Construction phase will provide local and accessible employment opportunities; operation phase will provide job opportunities through employment, retail and leisure uses, while also providing a significant number of new homes.	++	++	++	Ongoing	Construction & Operation	Local	High	Med	Moderate	Positive	Yes	Opportunities to provide work-based training during construction should be explored; provision for business incubator and/or live/work units may be suitable.
	9	Reduce crime and fear of crime	Development is likely to increase activity and extent of active, overlooked space in comparison to current use, thereby reducing fear of crime.		+	+	Ongoing	Operation	Local	Med	Med	Minor	Positive	No	

DETAILED ASSESSMENT MATRIX

Policy LP8 - Napier Park - c.25ha mixed-use brownfield redevelopment, including B1a, B1c, B2 employment uses, 600 to 1,300 dwellings, hotel, neighbourhood centre with convenience-led retail, public spaces

No.	SEA Objective	Description of predicted effect	Duration			Frequency	Temporary or permanent	Geographic significance	Magnitude	Level of certainty	Scale of significance	Positive or negative	Mitigation or other action required?	Supporting comments / Proposed mitigation
			Short term	Medium term	Long term									
10	Encourage healthier lifestyles and reduce adverse health impacts of new developments	Site has good accessibility to health services, public transport and pedestrian/cycle routes, but limited access to sports & open spaces. No specific positive or negative effects predicted, but additional proposals for sustainable transport links, pedestrian and cycle routes likely to indirectly benefit health.		+	+	Ongoing	Operation	Local	Low	Low	Negligible	Positive	Yes	Opportunities to provide open spaces (see also above), play facilities, pockets parks or fitness trail should be explored.
11	Provide decent, affordable and safe homes for all	Site will provide dwellings in accordance with LP16,35&37 regarding affordability, design & sustainability; site likely to yield 20% affordable units or financial contribution.		++	++	Ongoing	Operation	Local	High	Med	Moderate	Positive	No	
12	Support vitality and viability of centres	Site is within the urban area and re-use will make strong contribution to the vitality and viability of Luton.		++	++	Ongoing	Operation	Local	High	Med	Moderate	Positive	No	
13	Provide and encourage the use of sustainable integrated transport systems, improve access and mobility	Site accessibility is high with regard to education, employment & public transport, with improved PT, walking and cycling links specifically targeted by policy.		++	++	Ongoing	Operation	Local	Med	Med	Minor	Positive	Yes	Sustainable transport measures should be maximised (e.g. onsite cycle facilities).
14	Promote employment, learning, skills and innovation	Construction phase will provide local and accessible employment opportunities. Operation phase will provide job opportunities through employment, retail and leisure uses, but also add to pressure on primary and secondary schools capacity in this part of the borough.	+/-	+/-	+/-	Ongoing	Construction & Operation	Local	High	Med	Moderate	Mixed	Yes	Opportunities to provide work-based training during construction and long term education provision should be explored; provision for business incubator and/or live/work units may be suitable.

Key							
The 'Duration' column is noted as:	Major negative effect	--	Scale of significance is illustrated as:	Severe	Negative	Positive	Optimal
	Negative effect	-		Major			Major
	Positive effect	+		Moderate			Moderate
	Major positive effect	++		Minor			Minor
	Mixed effects	+/-		Negligible			Negligible
	Neutral effect						

DETAILED ASSESSMENT MATRIX

Policy LP9 - Power Court - c.7ha mixed-use brownfield redevelopment, including c.3,393m² convenience retail, c.600 dwellings and town centre uses e.g. comparison retail, leisure, cultural, entertainment, offices; decontamination and de-culverting

	No.	SEA Objective	Description of predicted effect	Duration			Frequency	Temporary or permanent	Geographic significance	Magnitude	Level of certainty	Scale of significance	Positive or negative	Mitigation or other action required?	Supporting comments / Proposed mitigation
				Short term	Medium term	Long term									
SEA Objectives	1	Maintain and enhance biodiversity, habitat and landscape	Brownfield site within the urban area, but containing the River Lea which is largely culverted within site but also designated as CWS and DWS. Limited semi-natural vegetation remains following development of the guided busway which runs along the northern site boundary. Impacts to River Lea are possible, but limited to demolition/ remediation/ construction phase. Nearest sensitive landscape (ALLV) is Hart Hill c.60 north-east. Redevelopment is likely to significantly improve townscape quality.	-	+/-	+	Ongoing	Construction & Operation	Local	Med	Low	Minor	Mixed	Yes	Ecological surveys and assessment will be required to establish which (if any) protected species may be using the site and to design a suitable mitigation strategy. Opportunities for habitat creation could focus on proposals for River Lea de-culverting (if feasible) as well as new parkland and tree-lined avenues.
	2	Conserve, restore and enhance green infrastructure	Site is within the urban area adjacent to St Mary's Churchyard, an important GI asset in a central location (also Windmill Rd Island amenity greenspace). No negative effects predicted. Opportunity to create additional GI or high quality connections to existing through landscaping plans.		+	+	Ongoing	Operation	Local	Med	Low	Minor	Positive	Yes	New GI or connections to existing should aim to provide multifunctional, biodiverse open spaces with a range of health, recreation and ecosystem services.
	3	Protect and enhance air, soil and water resources	Site likely to contribute to air pollution during both construction works & operation (via road traffic), although location provides for sustainable transport choices. Site lies within SPZ1. Extensive remediation likely to be required due to previous industrial uses, which risks mobilising contaminants into SPZ.	--	-	-	Ongoing	Construction & Operation	Local	Med	Med	Minor	Negative	Yes	Following site investigation, design of remediation strategy should include a CEMP to reduce and manage risk of mobilising contaminants. Sustainable transport measures should be maximised (e.g. onsite cycle facilities, strengthened links to public transport), pedestrian and cycle routes.
	4	Protect areas that are at risk from flooding and reduce flood risk	Site partially subject to fluvial flood risk from River Lea (FZ2/3) and adjacent to area at medium risk from sewer flooding. Site selection for residential development in particular will need to take account of these constraints to avoid increasing hazards of flooding.	-	-	-	Ongoing	Construction & Operation	Local	Med	Med	Minor	Negative	Yes	New and re- developments should be required to separate foul and surface water drainage outfalls to reduce pressure on sewer capacity. De-culverting proposals will help to reduce flood risk upstream by creating more space for water, but adjacent land uses will need to be water compatible or made flood resilient. SuDS may not be suitable given SPZ1.
	5	Reduce carbon emissions	Proposals will need to comply with LP37 on carbon reduction & sustainable energy. But scale of potential development and associated traffic emissions likely to lead to minor significant impacts, particularly during construction phases and before initiatives such as district heating come on line.	--	-		Initial	Construction & early Operation	Local	Med	Med	Minor	Negative	Yes	District heating type initiatives could be particularly suitable for larger strategic sites such as Power Court. Designs should consider use of renewable energy (e.g. solar thermal/PV, micro wind, ground source heat, CHP etc.). Areas of tree cover (carbon sink, urban cooling) should be retained / re-provided where possible.
	6	Increase resource efficiency and reduce resource use and waste	Site is an efficient use of PDL, and will need to comply with LP37. But use of resources likely to increase in short-medium term during construction.	-	-		Initial	Construction	Local	Med	Low	Minor	Negative	Yes	Waste materials produced during demolition and groundworks should be re-used on site wherever possible, or re-processed off site for future use in aggregates. Designs should incorporate adequate storage space for recycling, and consider providing communal composting facilities.

DETAILED ASSESSMENT MATRIX

Policy LP9 - Power Court - c.7ha mixed-use brownfield redevelopment, including c.3,393m² convenience retail, c.600 dwellings and town centre uses e.g. comparison retail, leisure, cultural, entertainment, offices; decontamination and de-culverting

No.	SEA Objective	Description of predicted effect	Duration			Frequency	Temporary or permanent	Geographic significance	Magnitude	Level of certainty	Scale of significance	Positive or negative	Mitigation or other action required?	Supporting comments / Proposed mitigation
			Short term	Medium term	Long term									
7	Identify, protect, maintain and enhance heritage assets and their setting	Site includes part of the Luton medieval town archaeological area, is c.40m north of the Grade I listed St Mary's Church, and c.25m east of Plaister's Lea conservation area. Policy accepts the need to protect the fabric and setting of known assets, and maximise their contribution to regeneration, but impacts possible through loss/damage of buried assets particularly in early stages.	-	-		Initial	Construction	Local	Med	Low	Minor	Negative	Yes	As required by LP30, it should be possible to reduce negative effects via a high quality design which responds to and enhances the setting of historical features, and uses an appropriate selection of materials. Heritage Statements should be prepared and, where evidence points to potential presence of remains, mitigation will be required (e.g. investigative trenching, watching brief, recovery & interpretation of remains).
8	Reduce poverty and inequality and promote social inclusion	Construction phase will provide local and accessible employment opportunities; operation phase will provide job opportunities through retail and town centre uses, while also providing a significant number of new homes.	++	++	++	Ongoing	Construction & Operation	Local	High	Med	Moderate	Positive	Yes	Opportunities to provide work-based training during construction should be explored; provision for business incubator and/or live/work units may be suitable.
9	Reduce crime and fear of crime	Development is likely to increase activity and extent of active, overlooked space in comparison to current use, thereby reducing fear of crime.		+	+	Ongoing	Operation	Local	Med	Med	Minor	Positive	No	
10	Encourage healthier lifestyles and reduce adverse health impacts of new developments	Site has good accessibility to health services, sports & open spaces, public transport and pedestrian/cycle routes, and may result in increased sports provision.		+	+	Ongoing	Operation	Local	Low	Low	Negligible	Positive	Yes	Opportunities to provide open spaces (see also above), play facilities or pockets parks should be explored.
11	Provide decent, affordable and safe homes for all	Site will provide dwellings in accordance with LP16,35&37 regarding affordability, design & sustainability; site likely to yield 20% affordable units or financial contribution.		++	++	Ongoing	Operation	Local	High	Med	Moderate	Positive	No	
12	Support vitality and viability of centres	Site is within TC and redevelopment will make strong contribution to the vitality and viability of Luton.		++	++	Ongoing	Operation	Local	High	Med	Moderate	Positive	No	
13	Provide and encourage the use of sustainable integrated transport systems, improve access and mobility	Site accessibility is high with regard to education, employment & public transport, and has good PT, walking and cycling links.		++	++	Ongoing	Operation	Local	Med	Med	Minor	Positive	Yes	Sustainable transport measures should be maximised (e.g. onsite cycle facilities), strengthened walking and cycling links.
14	Promote employment, learning, skills and innovation	Construction phase will provide local and accessible employment opportunities. Operation phase will provide job opportunities through retail and town centre uses, but also add to pressure on primary and secondary schools capacity in this part of the borough.	+/-	+/-	+/-	Ongoing	Construction & Operation	Local	High	Med	Moderate	Mixed	Yes	Opportunities to provide work-based training during construction and long term education provision should be explored; provision for business incubator and/or live/work units may be suitable.

Key							
The 'Duration' column is noted as:	Major negative effect	--	Scale of significance is illustrated as:	Severe	Negative	Positive	Optimal
	Negative effect	-		Major			Major
	Positive effect	+		Moderate			Moderate
	Major positive effect	++		Minor			Minor
	Mixed effects	+/-		Negligible			Negligible
	Neutral effect						

DETAILED ASSESSMENT MATRIX

Policy LP10 - High Town - regeneration of area to be delivered through a range of residential-led mixed-use redevelopment sites, to provide c.750 new dwellings, 350 jobs, better pedestrian access, more open spaces and improved street environment. Three key sites are targeted: Old Bedford Rd, East Village and The Paths

	No.	SEA Objective	Description of predicted effect	Duration			Frequency	Temporary or permanent	Geographic significance	Magnitude	Level of certainty	Scale of significance	Positive or negative	Mitigation or other action required?	Supporting comments / Proposed mitigation
				Short term	Medium term	Long term									
SEA Objectives	1	Maintain and enhance biodiversity, habitat and landscape	Area is limited in semi-natural habitat, with pockets of greenery generally restricted to gardens and occasional groups of trees. Impacts to protected/notable species (e.g. bats) are possible. Hitchin Road Spinney DWS is adjacent to the east. Hart Hill ALLV is c.20m to the east and Bradgers Hill Corridor ALLV is c.40m north, but neither is likely to be significantly negatively affected by regeneration.	-	-	-	Ongoing	Construction & Operation	Local	Low	Low	Negligible	Negative	Yes	Ecological surveys and assessment will be required to establish which (if any) protected species may be using the sites and to design a suitable mitigation strategy.
	2	Conserve, restore and enhance green infrastructure	Area does not contain any GI assets and policy objective to improve public realm and environmental quality with new and greener open spaces is likely to be of significant benefit.		+	+	Ongoing	Operation	Local	Med	Low	Minor	Positive	No	
	3	Protect and enhance air, soil and water resources	Area is PDL, not close to major sources of air pollution and regeneration is unlikely to significantly affect air quality. High Town is entirely within SPZ1 which may be at risk during remediation of any contaminated sites.	-			Initial	Construction	Local	Med	Low	Minor	Negative	Yes	Following site investigation, design of remediation strategy should include a CEMP to reduce and manage risk of mobilising contaminants. Sustainable transport measures should be maximised (e.g. onsite cycle facilities, strengthened links to public transport), pedestrian and cycle routes.
	4	Protect areas that are at risk from flooding and reduce flood risk	Parts of High Town are at risk of sewer and surface water flooding. Site selection for residential development in particular will need to take account of these constraints to avoid increasing hazards of flooding.	-	-	-	Ongoing	Construction & Operation	Local	Med	Med	Minor	Negative	Yes	New and re- developments should be required to separate foul and surface water drainage outfalls to reduce pressure on sewer capacity. SuDS may not be suitable given SPZ1.
	5	Reduce carbon emissions	Proposals will need to comply with LP37 on carbon reduction & sustainable energy; unlikely to significantly increase carbon emissions.									Neutral		Yes	Design should consider use of renewable energy (e.g. solar thermal/PV, micro wind, ground source heat, CHP etc.).
	6	Increase resource efficiency and reduce resource use and waste	Regeneration of High Town sites is an efficient use of PDL, will need to comply with LP37, and unlikely to lead to significant resource consumption.		+	+	Ongoing	Operation	Local	Med	High	Minor	Positive	Yes	Waste materials produced during demolition and groundworks should be re-used on site wherever possible, or re-processed off site for future use in aggregates. Designs should incorporate adequate storage space for recycling, and consider providing communal composting facilities.
	7	Identify, protect, maintain and enhance heritage assets and their setting	High Town contains several listed buildings and a conservation area, the setting of which is likely to be improved as a result of regeneration despite short-term risks during construction.	-	+	+	Ongoing	Operation	Local	Med	Med	Minor	Positive	Yes	As required by LP30, it should be possible to reduce negative effects via a high quality design which responds to and enhances the setting of historical features, and uses an appropriate selection of materials. Heritage Statements should be prepared and, where evidence points to potential presence of remains, mitigation will be required (e.g. investigative trenching, watching brief, recovery & interpretation of remains).
	8	Reduce poverty and inequality and promote social inclusion	Construction phase will provide local and accessible employment opportunities; operation phase will provide job opportunities through employment and retail uses, while also providing a number of new homes.	+	+	+	Ongoing	Construction & Operation	Local	Med	Med	Minor	Positive	Yes	Opportunities to provide work-based training during construction should be explored; provision for business incubator and/or live/work units is included in policy.
	9	Reduce crime and fear of crime	Development is likely to improve street scene and increase footfall and extent of active, overlooked space, thereby reducing fear of crime.		+	++	Ongoing	Operation	Local	High	Med	Moderate	Positive	No	

DETAILED ASSESSMENT MATRIX

Policy LP10 - High Town - regeneration of area to be delivered through a range of residential-led mixed-use redevelopment sites, to provide c.750 new dwellings, 350 jobs, better pedestrian access, more open spaces and improved street environment. Three key sites are targeted: Old Bedford Rd, East Village and The Paths

No.	SEA Objective	Description of predicted effect	Duration			Frequency	Temporary or permanent	Geographic significance	Magnitude	Level of certainty	Scale of significance	Positive or negative	Mitigation or other action required?	Supporting comments / Proposed mitigation
			Short term	Medium term	Long term									
10	Encourage healthier lifestyles and reduce adverse health impacts of new developments	Environmental improvements, additional open space and enhanced pedestrian cycle links could indirectly benefit health.		+	+	Ongoing	Operation	Local	Low	Low	Negligible	Positive	No	
11	Provide decent, affordable and safe homes for all	Sites will provide dwellings in accordance with LP16,35&37 regarding affordability, design & sustainability; site likely to yield 20% affordable units or financial contribution.		+	+	Ongoing	Operation	Local	Med	Med	Minor	Positive	No	
12	Support vitality and viability of centres	High Town is close to TC and regeneration will support the vitality and viability of both areas.		+	++	Ongoing	Operation	Local	High	Med	Moderate	Positive	No	
13	Provide and encourage the use of sustainable integrated transport systems, improve access and mobility	High Town has good accessibility to education, employment & public transport, and has good PT, walking and cycling links.		+	+	Ongoing	Operation	Local	Med	Med	Minor	Positive	Yes	Sustainable transport measures should be maximised (e.g. onsite cycle facilities), strengthened walking and cycling links.
14	Promote employment, learning, skills and innovation	Construction phase will provide local and accessible employment opportunities. Operation phase will provide job opportunities through employment and retail uses, but also add to pressure on primary and secondary schools capacity in this part of the borough.	+/-	+/-	+/-	Ongoing	Construction & Operation	Local	Med	Med	Minor	Mixed	Yes	Opportunities to provide work-based training during construction and long term education provision should be explored; provision for business incubator and/or live/work units is included in policy.

Key

The 'Duration' column is noted as:		Scale of significance is illustrated as:	
Major negative effect	--	Severe	Negative
Negative effect	-	Major	Positive
Positive effect	+	Moderate	Optimal
Major positive effect	++	Minor	Major
Mixed effects	+/-	Negligible	Moderate
Neutral effect			Minor
			Negligible

DETAILED ASSESSMENT MATRIX

Policy LP11 - Creative Quarter - transformative policy to regenerate underutilised area of historic character. Uses to include A1, A3, A4, D1, D2, C3 (c.587 dwellings), B1, with focus on creative industries, arts, media, education, live-work units, night-time economy, improved accessibility and public realm. Includes: Northern Gateway (0.5ha) comprehensive retail-led scheme; Station Gateway (1.5ha) resi-led mixed use; North of St George's Sq mixed leisure, cultural and retail uses

	No.	SEA Objective	Description of predicted effect	Duration			Frequency	Temporary or permanent	Geographic significance	Magnitude	Level of certainty	Scale of significance	Positive or negative	Mitigation or other action required?	Supporting comments / Proposed mitigation
				Short term	Medium term	Long term									
SEA Objectives	1	Maintain and enhance biodiversity, habitat and landscape	Brownfield site within the urban area, limited in semi-natural habitat. Contains the River Lea which is largely culverted within site but also designated as DWS. Pockets of greenery mainly focused on un-culverted stretch. Impacts to protected/notable species (e.g. bats) and R Lea are possible, but probably limited to demolition/remediation/ construction phase. Nearest sensitive landscape (ALLV) is Hart Hill c.220 north-east. Redevelopment is likely to improve townscape quality.	-	+/-	+	Ongoing	Construction & Operation	Local	Med	Low	Minor	Mixed	Yes	Ecological surveys and assessment will be required to establish which (if any) protected species may be using the site and to design a suitable mitigation strategy. Opportunities for habitat creation could focus on proposals for River Lea de-culverting (if feasible) as well as new parkland and tree-lined avenues.
	2	Conserve, restore and enhance green infrastructure	Area does not contain any GI assets and policy objective to improve public realm including new open spaces is likely to be of significant benefit if realised.		+	+	Ongoing	Operation	Local	Med	Low	Minor	Positive	Yes	Opportunity to de-culvert R Lea in combination with new public square at Bute Street to provide multifunctional, biodiverse open spaces with a range of health, recreation and ecosystem services.
	3	Protect and enhance air, soil and water resources	Site likely to contribute to air pollution mainly during construction works only due to accessible location with sustainable transport choices. Site lies within SPZ2. Remediation likely to be required due to previous industrial uses, which risks mobilising contaminants into SPZ.	--	-		Initial	Construction	Local	Med	Med	Minor	Negative	Yes	Following site investigation, design of remediation strategy should include a CEMP to reduce and manage risk of mobilising contaminants. Sustainable transport measures should be maximised (e.g. onsite cycle facilities, strengthened links to public transport), pedestrian and cycle routes.
	4	Protect areas that are at risk from flooding and reduce flood risk	Site partially subject to fluvial flood risk from River Lea (FZ2/3) and whole area at medium risk from sewer flooding. Site selection for residential development in particular will need to take account of these constraints to avoid increasing hazards of flooding.	-	-	-	Ongoing	Construction & Operation	Local	Med	Med	Minor	Negative	Yes	New and re- developments should be required to separate foul and surface water drainage outfalls to reduce pressure on sewer capacity. De-culverting proposals will help to reduce flood risk upstream by creating more space for water, but adjacent land uses will need to be water compatible or made flood resilient. SuDS may not be suitable given SPZ2.
	5	Reduce carbon emissions	Proposals will need to comply with LP37 on carbon reduction & sustainable energy; unlikely to significantly increase carbon emissions.									Neutral		Yes	Design should consider use of renewable energy (e.g. solar thermal/PV, micro wind, ground source heat, CHP etc.).
	6	Increase resource efficiency and reduce resource use and waste	Regeneration of Creative Quarter sites is an efficient use of PDL, will need to comply with LP37, and unlikely to lead to significant resource consumption.		+	+	Ongoing	Operation	Local	Med	High	Minor	Positive	Yes	Waste materials produced during demolition and groundworks should be re-used on site wherever possible, or re-processed off site for future use in aggregates. Designs should incorporate adequate storage space for recycling, and consider providing communal composting facilities.
	7	Identify, protect, maintain and enhance heritage assets and their setting	Site adjacent to the Luton medieval town archaeological area to south & east, is entirely within Plaiters Lea conservation area, and contains / is adjacent to 9 listed buildings. Policy accepts the need to respect and complement the character of the area, the setting of which is likely to be improved as a result of regeneration despite short-term risks through loss/damage of buried assets during construction.	-	+	+	Ongoing	Operation	Local	Med	Med	Minor	Mixed	Yes	As required by LP30, it should be possible to reduce negative effects via a high quality design which responds to and enhances the setting of historical features, and uses an appropriate selection of materials. Heritage Statements should be prepared and, where evidence points to potential presence of remains, mitigation will be required (e.g. investigative trenching, watching brief, recovery & interpretation of remains).

DETAILED ASSESSMENT MATRIX

Policy LP11 - Creative Quarter - transformative policy to regenerate underutilised area of historic character. Uses to include A1, A3, A4, D1, D2, C3 (c.587 dwellings), B1, with focus on creative industries, arts, media, education, live-work units, night-time economy, improved accessibility and public realm. Includes: Northern Gateway (0.5ha) comprehensive retail-led scheme; Station Gateway (1.5ha) resi-led mixed use; North of St George's Sq mixed leisure, cultural and retail uses

No.	SEA Objective	Description of predicted effect	Duration			Frequency	Temporary or permanent	Geographic significance	Magnitude	Level of certainty	Scale of significance	Positive or negative	Mitigation or other action required?	Supporting comments / Proposed mitigation
			Short term	Medium term	Long term									
8	Reduce poverty and inequality and promote social inclusion	Construction phase will provide local and accessible employment opportunities; operation phase will provide job opportunities through retail and town centre uses, while also providing a significant number of new homes.	++	++	++	Ongoing	Construction & Operation	Local	High	Med	Moderate	Positive	Yes	Opportunities to provide work-based training during construction should be explored; provision for business incubator and/or live/work units is included in policy.
9	Reduce crime and fear of crime	Development is likely to increase activity and extent of active, overlooked space in comparison to current use, thereby reducing fear of crime.		+	+	Ongoing	Operation	Local	Med	Med	Minor	Positive	No	
10	Encourage healthier lifestyles and reduce adverse health impacts of new developments	Site has generally good accessibility to health services, sports facilities, public transport and pedestrian/cycle routes.		+	+	Ongoing	Operation	Local	Low	Low	Negligible	Positive	Yes	Opportunities to provide open spaces (see also above), play facilities or pockets parks should be explored.
11	Provide decent, affordable and safe homes for all	Site will provide dwellings in accordance with LP16,35&37 regarding affordability, design & sustainability; site likely to yield 20% affordable units or financial contribution.		++	++	Ongoing	Operation	Local	High	Med	Moderate	Positive	No	
12	Support vitality and viability of centres	Site is within TC and redevelopment will make strong contribution to the vitality and viability of Luton.		++	++	Ongoing	Operation	Local	High	Med	Moderate	Positive	No	
13	Provide and encourage the use of sustainable integrated transport systems, improve access and mobility	Site accessibility is high with regard to education, employment & public transport, and has good PT, walking and cycling links.		++	++	Ongoing	Operation	Local	Med	Med	Minor	Positive	Yes	Sustainable transport measures should be maximised (e.g. onsite cycle facilities), strengthened walking and cycling links.
14	Promote employment, learning, skills and innovation	Construction phase will provide local and accessible employment opportunities. Operation phase will provide job opportunities through retail and town centre uses, but also add to pressure on primary and secondary schools capacity in this part of the borough.	+/-	+/-	+/-	Ongoing	Construction & Operation	Local	High	Med	Moderate	Mixed	Yes	Opportunities to provide work-based training during construction and long term education provision should be explored; provision for business incubator and/or live/work units is included in policy.

Key

The 'Duration' column is noted as:	Major negative effect	--	Scale of significance is illustrated as:	Severe	Negative	Positive	Optimal
	Negative effect	-		Major			Major
	Positive effect	+		Moderate			Moderate
	Major positive effect	++		Minor			Minor
	Mixed effects	+/-		Negligible			Negligible
	Neutral effect						

DETAILED ASSESSMENT MATRIX

Policy LP12 - Marsh Farm - development to continue regeneration & reconfiguration, incl: 1,000m² foodstore; improvements for permeability, accessibility, activity/security, amenity space, and public realm, including tree planting; designation of central area as District Centre

SEA Objectives	No.	SEA Objective	Description of predicted effect	Duration			Frequency	Temporary or permanent	Geographic significance	Magnitude	Level of certainty	Scale of significance	Positive or negative	Mitigation or other action required?	Supporting comments / Proposed mitigation
				Short term	Medium term	Long term									
SEA Objectives	1	Maintain and enhance biodiversity, habitat and landscape	Area is relatively rich in greenspace and, although much of this is amenity greenspace, has a comprehensive network of GI, linking to open countryside (Green Belt) to north. Impacts to protected/notable species/habitats (e.g. bats, birds, reptiles) are possible. Contains or is adjacent to R Lea CWS/DWS, Leagrave Common/Wauluds Bank CWS/pLNR, Bramingham Wood CWS, Whitehorse Vale DWS. AONB is at least 600m north; Upper Lea ALLV is partly within the south of the area and Bramingham Wood Corridor AGLV is adjacent to north but are unlikely to be significantly affected by scale of proposals.	-	-	-	Ongoing	Construction & Operation	Local	Low	Low	Negligible	Negative	Yes	Ecological surveys and assessment will be required to establish which (if any) protected species may be using the sites and to design a suitable mitigation strategy.
	2	Conserve, restore and enhance green infrastructure	Area has a comprehensive network of GI, although much of this is amenity greenspace, linking to open countryside (Green Belt) to north, and benefits from a few larger areas of semi-natural greenspace and allotments at its fringes, particularly to south and east. Enhanced landscaping proposals likely to be of benefit.		+	+	Ongoing	Operation	Local	Med	Low	Minor	Positive	Yes	New GI or connections to existing should aim to provide multifunctional ecosystem services. The current form of the neighbourhood is suited to new areas of parkland combining amenity grassland with wildflower meadows and low-density tree-planting, to offer health and recreation benefits, urban cooling, biodiversity and surface water attenuation.
	3	Protect and enhance air, soil and water resources	Area is a densely developed suburb, not close to major sources of air pollution. Retail construction/operation likely to contribute minor air quality impacts. Mainly within SP23 with a small section of SP22 to south which may be at risk during remediation of any contaminated sites.	-			Initial	Construction	Local	Med	Low	Minor	Negative	Yes	Following site investigation, design of remediation strategy should include a CEMP to reduce and manage risk of mobilising contaminants. Sustainable transport measures should be maximised (e.g. onsite cycle facilities, strengthened links to public transport), pedestrian and cycle routes.
	4	Protect areas that are at risk from flooding and reduce flood risk	Area largely absent of flood risk though some very small sections of fluvial FZ2/3 and medium risk of sewer flooding to southern fringe.									Neutral		No	
	5	Reduce carbon emissions	Proposals will need to comply with LP37 on carbon reduction & sustainable energy; unlikely to significantly increase carbon emissions.									Neutral		Yes	Design should consider use of renewable energy (e.g. solar thermal/PV, micro wind, ground source heat, CHP etc.).
	6	Increase resource efficiency and reduce resource use and waste	Regeneration of Marsh Farm sites is an efficient use of PDL, will need to comply with LP37, and unlikely to lead to significant resource consumption.		+	+	Ongoing	Operation	Local	Med	High	Minor	Positive	Yes	Waste materials produced during demolition and groundworks should be re-used on site wherever possible, or re-processed off site for future use in aggregates.
	7	Identify, protect, maintain and enhance heritage assets and their setting	Contains Waulud's Bank SAM (possible Neolithic henge monument; certain Iron Age fortified enclosure), and evidence of a large Roman village settlement along the Lea to the south. Further archaeological areas adjacent to north. Setting of these feature potentially at risk, although planned environmental improvements could enhance them. Short-term risks through loss/damage of buried assets during construction.	-	+	+	Ongoing	Operation	Local	Med	Med	Minor	Positive	Yes	As required by LP30, it should be possible to reduce negative effects via a high quality design which responds to and enhances the setting of historical features, and uses an appropriate selection of materials. Heritage Statements should be prepared and, where evidence points to potential presence of remains, mitigation will be required (e.g. investigative trenching, watching brief, recovery & interpretation of remains).
	8	Reduce poverty and inequality and promote social inclusion	Construction phase (foodstore) will provide local and accessible employment opportunities; benefits during operation largely related to new DC status and envtl improvements.	+	+	+	Ongoing	Construction & Operation	Local	Low	Low	Negligible	Positive	Yes	Opportunities to provide work-based training during construction should be explored; provision for business incubator and/or live/work units should be considered.

DETAILED ASSESSMENT MATRIX

Policy LP12 - Marsh Farm - development to continue regeneration & reconfiguration, incl: 1,000m² foodstore; improvements for permeability, accessibility, activity/security, amenity space, and public realm, including tree planting; designation of central area as District Centre

No.	SEA Objective	Description of predicted effect	Duration			Frequency	Temporary or permanent	Geographic significance	Magnitude	Level of certainty	Scale of significance	Positive or negative	Mitigation or other action required?	Supporting comments / Proposed mitigation
			Short term	Medium term	Long term									
9	Reduce crime and fear of crime	Reconfiguration of buildings and street layout, improved permeability, accessibility, natural surveillance and activity in public spaces will all help to reduce crime / fear of crime.		+	++	Ongoing	Operation	Local	High	Med	Moderate	Positive	No	
10	Encourage healthier lifestyles and reduce adverse health impacts of new developments	Area is generally well provided for in terms of healthcare, sports, open space and public transport, which is expected to continue under policy.	+	+	+	Ongoing	Operation	Local	Medium	High	Minor	Positive	No	
11	Provide decent, affordable and safe homes for all	Site unlikely to provide a significant number of dwellings but could yield 20% affordable units or financial contribution.		+	+	Ongoing	Operation	Local	Low	Low	Negligible	Positive	No	
12	Support vitality and viability of centres	Envtl improvements, reconfiguration and DC status are all likely to improve the vitality and viability of Marsh Farm centre.		+	++	Ongoing	Operation	Local	High	Med	Moderate	Positive	No	
13	Provide and encourage the use of sustainable integrated transport systems, improve access and mobility	Marsh Farm has good accessibility to education, bus, walking and cycling links, but is more limited in access to employment & rail services. Policy is unlikely to radically change this except through DC status.		+	+	Ongoing	Operation	Local	Med	Low	Minor	Positive	Yes	Sustainable transport measures should be maximised (e.g. onsite cycle facilities), strengthened walking and cycling links.
14	Promote employment, learning, skills and innovation	Construction phase (foodstore) will provide local and accessible employment opportunities; benefits during operation largely related to new DC status and envtl improvements.	+	+	+	Ongoing	Construction & Operation	Local	Low	Low	Negligible	Positive	Yes	Opportunities to provide work-based training during construction should be explored; provision for business incubator and/or live/work units should be considered.

Key							
The 'Duration' column is noted as:	Major negative effect	--	Scale of significance is illustrated as:		Negative	Positive	
	Negative effect	-		Severe		Optimal	
	Positive effect	+		Major		Major	
	Major positive effect	++		Moderate		Moderate	
	Mixed effects	+/-		Minor		Minor	
	Neutral effect			Negligible		Negligible	