

# **Luton Local Plan**

## **Sustainability Appraisal and Strategic Environmental Assessment Scoping Report**

### **Luton Borough Council**

#### **Final report**

Prepared by LUC

July 2024

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**Land Use Consultants Limited**

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# Chapter 1

## Introduction

**1.1** Luton Borough Council commissioned LUC in May 2024 to produce a Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) Scoping Report for the new Luton Local Plan.

**1.2** SA/SEA is an assessment process designed to consider and communicate the significant sustainability issues and effects of emerging plans and policies within them, including their alternatives. SA/SEA iteratively informs the plan-making process by helping to refine the contents of plans, so that they maximise the benefits of sustainable development and avoid, or at least minimise, the potential for adverse effects.

**1.3** The purpose of this Scoping Report is to provide the context for, and determine the scope of, the SA of the new Luton Local Plan and to set out the framework for undertaking the later stages of the SA.

**1.4** The Scoping stage of SA involves:

- Reviewing other plans, policies and programmes.
- Considering the current state of the environment, as well as social and economic factors in the plan area (in this case Luton Borough).
- Identifying any key environmental, social and economic issues which may be affected by the new Local Plan.
- Setting out the 'SA framework', which comprises specific sustainability objectives against which the likely effects of the Local Plan can be assessed.

## The Plan Area

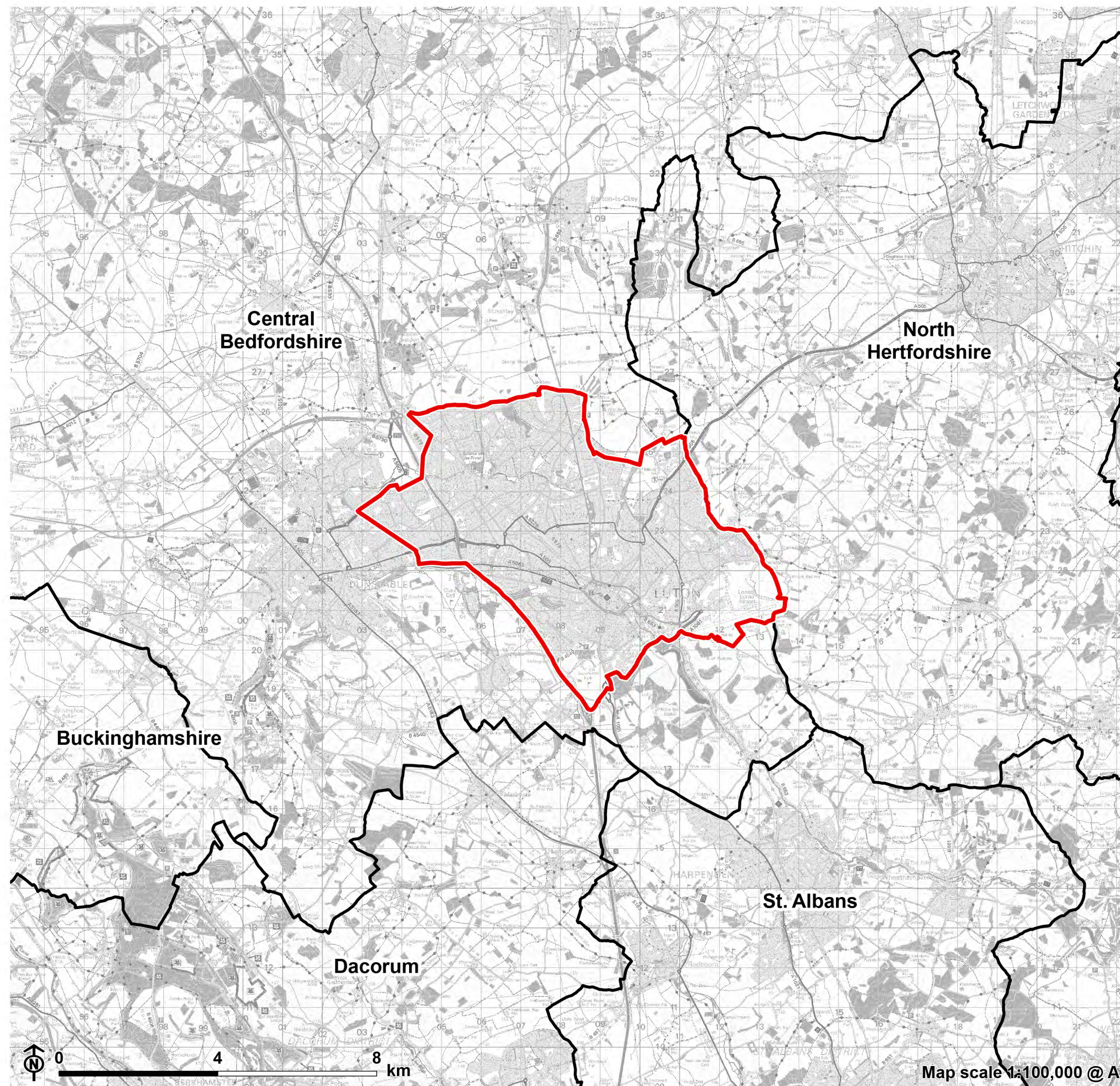
**1.5** Luton Borough covers an area of 43.35 km<sup>2</sup> and is a densely populated town with a rich cultural diversity. Luton is one of three boroughs located in Bedfordshire in the East of England, alongside Bedford and Central Bedfordshire. It is the smallest of the three unitary authorities in area but has a higher population than Bedford (231,000 [\[See reference 1\]](#)).

**1.6** Surrounded by Green Belt to the south and the north east and situated within the Chilterns National Landscape, the town benefits from easy access to high quality landscapes, wildlife areas, parks and other sub-regional leisure attractions, such as Luton Hoo, Dunstable Downs, and Woburn Abbey. At the same time the town benefits from good strategic north-south access to the midlands and to Greater London via the M1 and Midland Mainline Railway. It is also served by London Luton Airport which is growing and plays an important role in the economy of the town.

**1.7** The location of Luton Borough is shown in Figure 1.1 overleaf.



Figure 1.1: Location of Luton Borough





## Luton Local Plan

**1.8** Luton Borough Council adopted the Luton Local Plan 2011-2031 in November 2017 and it is therefore more than five years old. The adopted Local Plan sets out the vision, objectives, spatial strategy and planning policies for Luton Borough for the period up to 2031. The adopted Luton Local Plan was introduced as part of the Luton Development Plan alongside the Minerals and Waste Local Plan: Strategic Sites and Policies (adopted in 2014). This plan sets out strategic policies on which future waste management and mineral extraction will be assessed. It identifies strategic sites for mineral extraction, non-hazardous waste landfill and other waste management activities.

**1.9** Policy LLP40 of the Luton Local Plan required an early review of the Plan. A review of the adopted Local Plan has concluded that a full update is required. The Luton Borough Council planning policy team is therefore now embarking on producing a new Local Plan and is in the early stages of this process. Evidence collection for the new Local Plan began in September 2023 and public consultation for the new Local Plan is planned for later this year.

## Sustainability Appraisal and Strategic Environmental Assessment

**1.10** Under the amended Planning and Compulsory Purchase Act 2004 **[See reference 2]**, SA is mandatory for Development Plan Documents. For these documents it is also necessary to conduct an environmental assessment in accordance with the requirements of the Strategic Environmental Assessment (SEA) Directive (European Directive 2001/42/EC), as transposed into law in England by the SEA Regulations **[See reference 3]** and which remains in force despite the UK exiting the European Union in January 2020. Therefore, it is a legal requirement for the Luton Local Plan to be subject to SA and SEA throughout its preparation.

**1.11** In October 2023, the Levelling Up and Regeneration Bill received royal assent. The Levelling-up and Regeneration Act outlines a number of reforms to the planning system, including the replacement of the current SEA regime with a new requirement for an Environmental Outcomes Report (EOR). The specific requirements will be set out in forthcoming regulations, along with information about transition arrangements; however at present the requirement for SEA remains as set out in existing legislation. The announcement of the General Election to be held in July 2024 has introduced further uncertainty. Any changes to the legal framework for carrying out SA/SEA will be addressed as appropriate as the Local Plan is prepared. The potential change to EORs has been considered as far as possible during the preparation of this report, for example the baseline information has been presented in terms of quantifiable indicators where possible.

**1.12** The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both using a single appraisal process (as advocated in the national Planning Practice Guidance [\[See reference 4\]](#)), whereby users can comply with the requirements of the SEA Regulations through a single integrated SA process – this is the process that is being undertaken in Luton Borough. From here on, the term ‘SA’ should therefore be taken to mean ‘SA incorporating the requirements of the SEA Regulations’.

**1.13** The SA process comprises a number of stages, with Scoping being Stage A as shown below:

- Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope.
- Stage B: Developing and refining options and assessing effects.
- Stage C: Preparing the Sustainability Appraisal Report.
- Stage D: Consulting on the Local Plan and the SA Report.
- Stage E: Monitoring the significant effects of implementing the Local Plan.

## Habitats Regulations Assessment

**1.14** The requirement to undertake Habitats Regulations Assessment (HRA) of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in July 2007, updated in 2010 and again in 2012 and 2017 [See reference 5]. The Regulations translate Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive) and 79/409/EEC (Birds Directive) into UK law and remain a legal requirement despite the UK exiting the European Union.

**1.15** The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European site and to ascertain whether it would adversely affect the integrity of that site, either alone or in combination with other plans or projects.

**1.16** The HRA of the Luton Local Plan will be undertaken separately but the findings should be taken into account in the SA where relevant (for example to inform judgements about the likely effects of potential development locations on biodiversity).

## Health Impact Assessment

**1.17** Although not a statutory requirement, Health Impact Assessment (HIA) aims to ensure that health-related issues are integrated into the plan-making process. Sustainability objectives that address health issues will be included as part of the SA process as health is one of the topics required by the SEA Regulations to be addressed in the assessment. In addition, the Council will carry out a separate HIA for the new Local Plan.

## Equalities Impact Assessment

**1.18** The requirement to undertake formal Equalities Impact Assessment (EqIA) of development plans was introduced in the Equality Act 2010 but was abolished in 2012. Despite this, authorities are still required to have regard to the provisions of the Equality Act, namely the Public Sector Duty which requires public authorities to have due regard for equalities considerations when exercising their functions.

**1.19** In fulfilling this duty, many authorities still find it useful to produce a written record of equality issues having been specifically considered. Therefore, the Council will be producing an EqIA addressing how the Local Plan is likely to be compatible or incompatible with the requirements of the Equalities Act 2010.

## Approach to Scoping

**1.20** There are five tasks involved at the Scoping stage of SA:

- Stage A1: Setting out the policy context for the SA of the Luton Local Plan (i.e. key Government policies and strategies that influence what the Local Plan and the SA need to consider).
- Stage A2: Setting out the baseline for the SA of the Local Plan (i.e. the current and likely future environmental, social and economic conditions in Luton Borough).
- Stage A3: Drawing on A1 and A2, identify the particular sustainability problems and/or opportunities ('issues') that the Local Plan and the SA should address.
- Stage A4: Drawing on A1, A2 and A3, develop a framework of SA objectives and assessment criteria to appraise the constituent parts of the Local Plan in isolation and in combination.
- Stage A5: Consultation on the scope of the SA.



**1.21** This Scoping Report fulfils the requirements set out above with a view to establishing the likely significant effects of constituent parts of the Local Plan both in isolation and in combination. In accordance with national Planning Practice Guidance (PPG), published on-line by the Government, the Scoping Report should be proportionate and relevant to the Local Plan, focussing on what is needed to identify and assess the likely significant effects.

## Meeting the Requirements of the SEA Regulations

**1.22** The relevant sections of the Scoping Report that are considered to meet the SEA Regulations requirements are signposted below (the remainder will be met during subsequent stages of the SA of the Luton Local Plan). This information will be included in the full SA Report at each stage of plan making to show how the requirements of the SEA Regulations have been met through the SA process.

**1.23** The SEA Regulations [\[See reference 6\]](#) require the responsible authority to prepare, or secure the preparation of, an 'environmental report', which in this case will comprise the SA report. The report shall identify, describe, and evaluate the likely significant effects on the environment of the following (requirements in green shaded text below, where each requirement is met is provided in the bullets below):

Implementing the plan or programme; and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme. (Regulation 12(1) and (2) and Schedule 2)

- The full SA Report that will be produced to accompany consultation on the Local Plan will constitute the 'environmental report' and will be produced at a later stage in the SA process but will include the relevant parts of the Scoping Report as noted below.

An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.

- Covered in Chapter 1, Chapter 2 and Appendix A.

The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.

- Covered in Chapter 3.

The environmental characteristics of areas likely to be significantly affected.

- Covered in Chapter 3.

Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directive 79/409/EEC on the conservation of wild birds and the Habitats Directive.

- Covered in Chapters 3 and 4.

The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.

- Covered in Chapter 2 and Appendix A.

The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive effects, and secondary, cumulative and synergistic effects, on issues such as: (a) biodiversity; (b) population; (c) human health; (d) fauna; (e) flora; (f) soil; (g) water; (h) air; (i) climatic factors; (j) material assets; (k) cultural heritage, including architectural and archaeological heritage; (l) landscape; and (m) the interrelationship between the issues referred to in sub-paragraphs (a) to (l).

- Requirement will be met at a later stage in the SA process.

The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.

- Requirement will be met at a later stage in the SA process.

An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.

- Requirement will be met at a later stage in the SA process.

A description of the measures envisaged concerning monitoring in accordance with regulation 17.

- Requirement will be met at a later stage in the SA process.

A non-technical summary of the information provided under paragraphs 1 to 9.

- Requirement will be met at a later stage in the SA process.

The report shall include such of the information referred to in Schedule 2 to these Regulations as may reasonably be required, taking account of:

- Current knowledge and methods of assessment;
- The contents and level of detail in the plan or programme;
- The stage of the plan or programme in the decision-making process; and
- The extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment. (Regulation 12 (3))

- This Scoping Report and the Environmental Report will adhere to this requirement.

In terms of consultation, the SEA Regulations require that:

- When deciding on the scope and level of detail of the information that must be included in the environmental report, the responsible authority shall consult the consultation bodies. (Regulation 12(5))
- This Scoping Report is being published for consultation with the three statutory bodies (the Environment Agency, Historic England, and Natural England).

Every draft plan or programme for which an environmental report has been prepared in accordance with regulation 12 and its accompanying report

(“the relevant documents”) shall be made available for the purposes of consultation in accordance with the following provisions of this regulation.

As soon as reasonably practical after the preparation of the relevant documents, the responsible authority shall:

- Send a copy of those documents to each consultation body;
- Take such steps as it considers appropriate to bring the preparation of the relevant documents to the attention of the persons who, in the authority’s opinion, are affected or likely to be affected by, or have an interest in the decisions involved in the assessment and adoption of the plan or programme concerned, required under the Environmental assessment of Plans and Programmes Directive (“the public consultees”);
- Inform the public consultees of:
  - (a) the address of the website at which the relevant documents may be viewed and downloaded free of charge;
  - (b) the fact that a copy of the relevant documents may be obtained by email from the responsible authority;
  - (c) the fact that a copy of the relevant documents may be obtained by post from the responsible authority, provided that it is reasonably practicable for the authority to provide a copy by post;
  - (d) the address, email address and telephone number for the purpose of requesting a copy of the relevant documents either by email or by post;
  - (e) whether a charge will be made for copies of the relevant documents provided by post and the amount of any charge; and
  - (f) the telephone number which can be used to contact the responsible authority for enquiries in relation to the relevant documents

The period referred to in paragraph (2) (d) must be of such length as will ensure that the consultation bodies and the public consultees are given an

effective opportunity to express their opinion on the relevant documents.  
(Regulation 13 (1), (2), and (3))

- Public consultation on the Local Plan and accompanying SA Reports will take place as the Local Plan develops. The intended programme and key stages for plan preparation are set out in the Local Development Scheme.

Where a responsible authority, other than the Secretary of State, is of the opinion that a plan or programme for which it is the responsible authority is likely to have significant effects on the environment of another Member State, it shall, as soon as reasonably practicable after forming that opinion:

- Notify the Secretary of State of its opinion and of the reasons for it; and
- Supply the Secretary of State with a copy of the plan or programme concerned, and of the accompanying environmental report. (Regulation 14 (1))

- Unlikely to be relevant to the New Local Plan, as there will be no effects beyond the UK.

**1.24** In terms of taking the SA Report and the results of the consultations into account in decision-making, the SEA Regulations require (relevant extracts of Regulation 16):

As soon as reasonably practicable after the adoption of a plan or programme for which an environmental assessment has been carried out under these Regulations, the responsible authority shall:

- publish the plan or programme, as adopted, its accompanying environmental report and a statement containing the particulars specified in paragraph (4) (“the relevant adoption documents”) on a public website at which the documents may be viewed and downloaded free of charge;

- provide a copy of the relevant adoption documents by email to any person who requests a copy, as soon as reasonably practicable after receipt of that person's request;
  - provide one copy of the relevant adoption documents by post to any person who requests a copy, as soon as reasonably practicable after receipt of that person's request, unless it is not reasonably practicable to provide a copy by post for reasons connected to the effects of coronavirus, including restrictions on movement;
  - make available a telephone number for the public to make enquiries in relation to the relevant adoption documents;
- Requirement will be met at a later stage in the SA process.

As soon as reasonably practicable after the adoption of a plan or programme the responsible authority shall inform (i) the consultation bodies; (ii) the persons who, in relation to the plan or programme, were public consultees for the purposes of regulation 13; and (iii) where the responsible authority is not the Secretary of state, the Secretary of State, that the plan or programme has been adopted, and a statement containing the following particulars:

- How environmental considerations have been integrated into the plan or programme;
- How the environmental report has been taken into account;
- How opinions expressed in response to: (i) the invitation in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;
- How the results of any consultations entered into under regulation 14(4) have been taken into account;
- The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and

- The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

- Requirement will be met at a later stage in the SA process.

**1.25** The SEA Regulations also require that the responsible authority shall monitor the significant effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action (Regulation 17(1)). This requirement will be met after adoption of the Local Plan.

## Structure of the Scoping Report

**1.26** This chapter describes the background to the preparation of the Luton Local Plan and the requirement to undertake SA. The remainder of this Scoping Report is structured into the following sections:

- Chapter 2 describes the other plans, policies and programmes of relevance to the SA of the Luton Local Plan.
- Chapter 3 presents the baseline information which will inform the assessment of the policies and sites in the Local Plan.
- Chapter 4 identifies the key environmental, social and economic issues in Luton Borough of relevance to the Local Plan and considers the likely evolution of those issues without its implementation.
- Chapter 5 presents the SA framework that will be used for the appraisal of the Local Plan and the proposed method for carrying out the SA.
- Chapter 6 describes the next steps to be undertaken in the SA of the Local Plan.
- Appendix A sets out the international, national and sub-national plans, policies and programmes which are of most relevance to the Local Plan.



## Chapter 2

# Relevant Plans and Programmes

**2.1** Schedule 2 of the SEA Regulations requires:

- a) “an outline of the contents and main objectives of the Plan and its relationship with other relevant plans or programmes” and
- b) “the environmental protection objectives established at International, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation”

**2.2** In order to establish a clear scope for the SA it is necessary to review and develop an understanding of the environmental, social and economic objectives contained within international and national policies, plans and strategies that are of relevance to the Luton Local Plan. Given the SEA Regulations requirements above, it is also necessary to consider the relationship between the Luton Local Plan and other relevant plans, policies and programmes.

**2.3** This chapter summarises the relationship of the Luton Local Plan to the relevant international and national policies, plans and programmes which should be taken into consideration during preparation of the plan and its SA, as well as those plans and programmes which are of relevance at a County/sub-regional level. The objectives of these plans and programmes have been taken into account when drafting the SA framework in Chapter 5. An outline of the content and main objectives of the Local Plan will be described in subsequent SA reports, as this emerges through the plan-making process.

## The Implications of Brexit

**2.4** As of the end of January 2020 the UK has left the EU. Principally, the UK's environmental law is derived from EU law or was directly effective EU law. As a result of Brexit, the European Union (Withdrawal) Act 2018 converts existing EU law which applied directly in the UK's legal system (such as EU Regulations and EU Decisions) into UK law and preserves laws made in the UK to implement EU obligations (e.g. the laws which implement EU Directive). This body of law is known as retained EU law and could be subject to future, post-Brexit amendments.

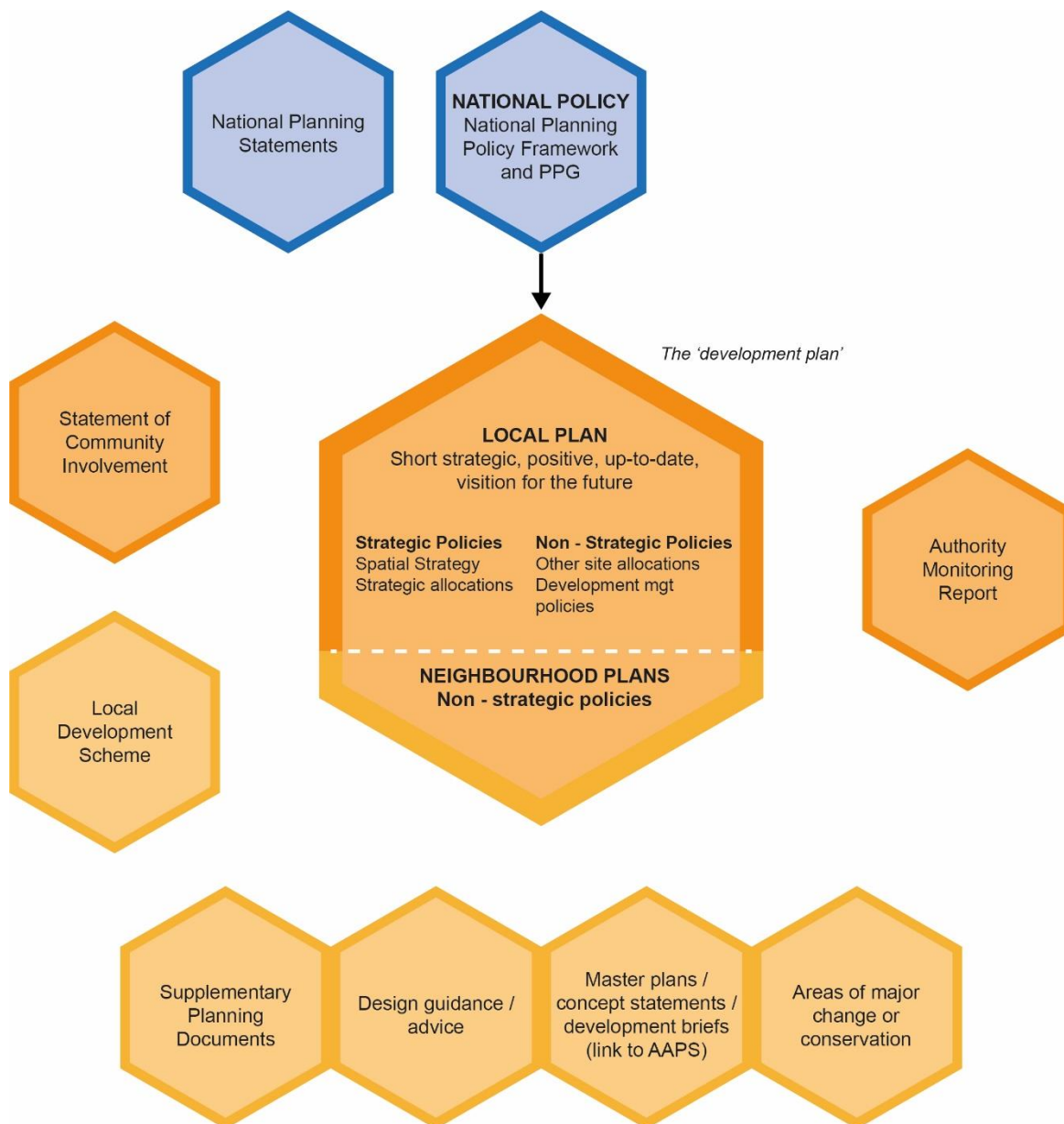
**2.5** As set out in the Explanatory Memorandum accompanying the Brexit amendments [See reference 7], the purpose of the Brexit amendments to the SEA Regulations is to ensure that the law functions correctly after the UK has left the EU. No substantive changes are made by this instrument to the way the SEA regime operates.

**2.6** Relevant international plans and policy (including those at the EU level) are transposed into national plans, policy and legislation and these have been considered in this chapter and in Appendix A.

## Relationship with Other Relevant Plans or Programmes

**2.7** The Luton Local Plan is not prepared in isolation and must be in conformity with a range of international and national plans and programmes as show in Figure 2.1 below. In addition, the Luton Local Plan comprises any 'made' Neighbourhood Plans within the Borough (there are currently none in Luton) and is supported by other documents such as the Statement of Community Involvement, Local Development Scheme, Authority Monitoring Report and Supplementary Planning Documents, also shown in Figure 2.1.

**Figure 2.1: Local Plan Relationship with other relevant plans and programmes**



## International

**2.8** At the international level, there is a wide range of plans and programmes which act to inform and shape national level legislation. Planning policy in England at a national and local level (i.e. the NPPF and Local Plan) should be aware of and in conformity with the relevant legislation. The main sustainability objectives of international plans and programmes which are of most relevance for the Local Plan and the SA are provided in Appendix A.

## National

**2.9** There is an extensive range of national policies, plans and programmes that are relevant to the Local Plan and the SA process. A pragmatic and proportionate approach has been taken with regards to the identification of key national policies, plans and programmes, focusing on those that are of most relevance. A summary of the main objectives of the National Planning Policy Framework and Planning Practice Guidance of relevance to the Local Plan and the SA is provided below. In addition, the main sustainability objectives of other national plans and programmes which are of most relevance to the Local Plan and SA are provided in Appendix A.

## The National Planning Policy Framework and Planning Practice Guidance

**2.10** The National Planning Policy Framework (NPPF) [\[See reference 8\]](#) is the overarching planning framework which provides national planning policy and principles for the planning system in England. The NPPF was originally published in March 2012 and has since been updated and revised several times. The most recent update to the NPPF contains some changes to the five year housing land supply together with an added emphasis on housing for older people. Authorities are now required to seek opportunities to support small sites

to come forward for community-led development for housing, and self-build and custom-build housing. There is also now an emphasis on beautiful buildings and the use of local design codes setting out when the density of development is considered appropriate or not. There is no longer a requirement to review Green Belt boundaries, strengthening their protection.

**2.11** The three overarching objectives of the planning system are set out in paragraph 8 of the NPPF, which should be pursued in mutually supportive ways so that net gains are achieved across each of the different objectives:

- “an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and
- an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”

**2.12** The New Local Plan must be consistent with the requirements of the NPPF, which states:

“Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings”.

**2.13** A local planning authority is also required to have regard to national policies and advice contained in guidance issued by the Secretary of State when preparing a Local Plan [\[See reference 9\]](#).

**2.14** Paragraph 20 of the NPPF states the need for strategic policies in plan making, which set out the overall strategy for the pattern, scale and design quality of places, making sufficient provision for:

- “a) housing (including affordable housing), employment, retail, leisure and other commercial development;
- b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- c) community facilities (such as health, education and cultural infrastructure); and
- d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.”

**2.15** The National Planning Practice Guidance (PPG) [\[See reference 10\]](#) provides guidance for how the Government’s planning policies for England are expected to be applied. Sitting alongside the NPPF, it provides an online resource that is updated on a regular basis for the benefit of planning practitioners.

**2.16** The overarching nature of the NPPF means that its implications for the SA relate to multiple topics which this report seeks to address. Considering the importance of the NPPF to the English planning system, the relevance of the Framework and its implications for the plan making process and the SA is provided in more detail below. Sustainability topics are separated into environmental, social and economic below, but consideration of issues often cuts across topics. The summary provided below is not absolutely comprehensive and the NPPF is intended to be read and applied as a whole during plan making.

## Environmental and Social Considerations

**2.17** Climate change adaption and mitigation, energy efficiency and waste minimisation measures for new development including through the promotion of renewable energy schemes are also supported through the NPPF. One of the core planning principles is to “support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure”. Furthermore, local planning authorities should adopt a proactive approach to mitigate and adapt to climate change, taking full account of flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.

**2.18** The SA can consider the contribution the alternatives make in terms of contribution to climate change mitigation as well as climate change adaptation.

**2.19** In relation to health and wellbeing, healthy, inclusive and safe places which promote social integration, are safe and accessible, and enable and support healthy lifestyles are supported through the Framework. The Building for a Healthy Life design toolkit [\[See reference 11\]](#) can be used by local authorities to assist in the creation of places that are better for people and nature.

**2.20** One of the core planning principles is to “take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community”. It is identified in the document that “a network of high quality open spaces and opportunities for sport and recreation is important for the health and well-being of communities”. Furthermore, the retention and enhancement of local services and community facilities in villages, such as local shops, meeting places, sports, cultural venues and places of worship is supported. Importantly, Local Plans should also “contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible”. Additionally, larger scale developments such as new settlements or

significant extensions to existing villages and towns are required by the NPPF to be guided by policies set within a vision that looks at least 30 years ahead [\[See reference 12\]](#). The need for policies to be reflective of this longer time period is to take account of the likely timescale for delivery.

**2.21** The delivery of new housing is considered to support local communities by meeting housing needs and addressing shortages. The new Luton Local Plan can have a significant influence on addressing inequalities including those relating to health and will need to consider the appropriate siting of new development, particularly large development sites that are likely to include new service and facility provisions. The Local Plan can ensure that new development is located in areas which can improve accessibility for existing as well as new residents and ensure that future development does not exacerbate existing inequalities. The SA process can support the identification and refinement of options that can contribute to reducing inequalities and support the development of policy approaches that cumulatively improve the wellbeing of local communities.

**2.22** The NPPF sets out the approach Local Plans should have in relation to biodiversity and states that Plans should “identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation”. Plans should also promote conservation, restoration and enhancement of priority habitats and species, ecological networks and measurable net gains for biodiversity. A strategic approach to maintaining and enhancing networks of habitats and green infrastructure is to be supported through planning policies.

**2.23** The Luton Local Plan should seek to maximise any opportunities arising for local economies, communities and health as well as biodiversity. This should be inclusive of approaches which are supportive of enhancing the connectivity of green infrastructure and promoting the achievement of biodiversity net gain. The SA process should support the identification and maximisation of potential



benefits through the consideration of alternatives and assessment of both negative and positive significant effects.

**2.24** In relation to landscape, the NPPF sets the planning principles of recognising the intrinsic beauty and character of the countryside as well as protecting and enhancing valued landscapes. Reference is included with regards to this purpose at National Parks, The Broads and Areas of Outstanding Natural Beauty.

**2.25** The Local Plan should be supportive of an approach to development which would protect the landscape character of Luton Borough and its surrounds. Where appropriate it should also seek to protect the identity of the built up areas of Luton. The SA should identify those alternatives which contribute positively to landscape and townscape character.

**2.26** The NPPF states that in relation to the historic environment plans should “set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats”. Where appropriate, plans should seek to sustain and enhance the significance of heritage assets and local character and distinctiveness, while viable uses of assets should be considered. Plans should take into account the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring. They should also consider the contribution the historic environment can make to the character of a place.

**2.27** Although Local Plans can no longer require levels of the Code for Sustainable Homes, they can promote the Home Quality Mark to support residents in understanding the quality and performance of new build homes and can also set targets for developers to provide for a given percentage of energy used by a new development to come from on-site renewable or low carbon technologies. Revisions were made to the Building Regulations 2022 [\[See reference 13\]](#), setting minimum energy efficiency standards which are increasing the performance values of properties. From 15<sup>th</sup> June 2022, all new build homes are required to produce at least 31% less carbon emissions. Local Plan policies can further support the development of renewable energy

technologies where appropriate, in line with climate change mitigation strategies and targets. The UK Green Building Council has produced a resource pack which is designed to help local authorities improve the sustainability of new homes. The New Homes Policy Playbook [See reference 14] sets out minimum requirements for sustainability in new homes that local authorities should introduce, as well as proposed stretching requirements should local authorities wish to go further. For non-residential uses BREEAM assessments can be used by local authorities to ensure buildings meet sustainability objectives.

**2.28** The NPPF states that new and existing development should be prevented from contributing to, being put at an unacceptable risk from, or being adversely affected by, pollutions including water pollution and air quality. Inappropriate development in areas at risk of flooding should be avoided. Plans should take a proactive approach to mitigating and adapting to climate change, taking into account implications for water supply. Furthermore, strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision infrastructure for water supply and wastewater.

**2.29** The new Luton Local Plan presents an opportunity to consider incorporating targets for water efficiency and the level of water consumption and grey water recycling in any new development. The Local Plan also can ensure that development is sited away from areas of high flood probability and that appropriate water drainage is in place in line with flood risk strategies. The SA process should seek to identify and address potential negative effects on the water environment, including implications relating to wastewater.

**2.30** The NPPF states that the planning system should protect and enhance soils in a manner commensurate with their statutory status or quality, while also encouraging the reuse of previously developed land.

**2.31** The new Local Plan can seek to ensure the appropriate protection of soil quality, including best and most versatile agricultural land. Further to this the Local Plan should ensure that new development does not conflict with current mineral operations (there are none within the Borough) as well as long-term mineral resource plans. The SA process should inform the development of the

new Local Plan by helping to identify alternatives which would avoid areas of highest soil quality and best and most versatile agricultural land (in so far as this is relevant to Luton Borough), as well as those which would promote the use of brownfield land.

**2.32** The new Local Plan can offer enhanced protection for designated and non-designated heritage assets and their settings, including any potential archaeological finds in line with heritage protection and enhancement plans. The SA has a role to play by identifying which alternatives could offer opportunities to secure the protection and enhancement of assets as well as those which might have significant impacts in terms of their appropriate use and setting.

## Economic Considerations

**2.33** The Framework sets out that in terms of economic growth the role of the planning system is to contribute towards building a “strong, responsive and competitive economy” by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation. There is also a requirement for the planning system to identify and coordinate the provision of infrastructure. Furthermore, planning policies should address the specific locational requirements of different sectors.

**2.34** Local planning authorities should incorporate planning policies which “support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation”. Local Plans are required to “set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration”.

**2.35** The new Local Plan should seek to maximise the potential benefits of nearby strategic growth, whilst at the same time ensuring the vitality and viability of smaller localised economies. Ensuring that services and facilities

within the Borough's district and neighbourhood centres are maintained and enhanced is also important and will also provide support for local communities. The SA process can support the development of the new Local Plan to ensure that its policies are considerate of impacts on the economy in Luton Borough. The process can also be used to demonstrate that impacts on the viability of Luton town centre and other local centres have been considered.

**2.36** The NPPF encourages local planning authorities to consider transport issues from the earliest stages of plan making so that: opportunities to promote sustainable transport are identified and pursued; the environmental impacts of traffic and transport infrastructure can be identified and assessed; and opportunities from existing or proposed transport infrastructure and changing transport technology and usage are realised. The framework also states that the planning system should actively manage growth patterns in support of these objectives.

**2.37** Growth will inevitably increase traffic on the roads which also has implications for air quality, and the new Local Plan and SA process can seek to minimise effects of this nature through appropriately siting new development, identifying where mitigation may be needed and requiring the necessary transport provisions and contributions from new development. The Local Plan, as supported by the SA, should seek to identify opportunities to maximise the potential for alternative modes of transport to the car and reduce the need to travel, therefore reducing emissions, through the consideration of alternatives and assessment of significant effects. This includes potential opportunities that may arise as a result of the delivery of new infrastructure.

## Other National Policies, Plans and Programmes

**2.38** Numerous other policies, plans and programmes (PPPs) at a national level are of relevance to the preparation of the Luton Local Plan and the SA. Unlike the NPPF, most of the documents are focussed on a specific topic area which

the SA will consider. There will be some overlap between SA topics covered by these plans and programmes where those documents contain more overarching objectives. However, the plans and programmes considered of most relevance to the SA have been grouped by the topics they most directly seek to address, and the sections below each topic heading summarise the implications of the national PPPs for the Local Plan and the SA.

# Climate Change Adaption and Mitigation, Energy Efficiency and Waste Minimisation

**2.39** The relevant national PPPs under this topic are:

- Carbon Budget Delivery Plan (2023)
- Powering up Britain (2023)
- The Environment Improvement Plan (2023)
- British Energy Security Strategy (2022)
- UK Climate Change Risk Assessment (2022)
- The Environment Act (2021)
- The Net Zero Strategy: Build Back Greener (2021)
- The Industrial Decarbonisation Strategy (2021)
- The Heat and Buildings Strategy (2021)
- The UK Hydrogen Strategy (2021)
- Energy Performance of Buildings Regulations (2021)
- National Infrastructure Strategy: Fairer, faster greener (2020)
- The Energy White Paper: Powering our net zero future (2020)
- Decarbonising Transport: Setting the Challenge (2020)
- Sixth Carbon Budget (Climate Change Committee, 2020)

- Flood and Coastal Erosion Risk Management: Policy Statement (2020)
- The National Flood and Coastal Erosion Risk Management Strategy for England (2020)
- The Waste (Circular Economy) (Amendment) Regulations (2020)
- Net Zero – The UK’s contribution to stopping global warming (2019)
- The Flood and Water Management Act 2010 and The Flood and Water Regulations (2019)
- Climate Change Act (2008) and Climate Change Act 2009 (2050 Target Amendment) Order (2019)
- The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate (2018)
- Our Waste, Our Resources: A strategy for England (2018)
- The Clean Growth Strategy (2017)
- National Planning Policy for Waste (NPPW) (2014)
- Waste Management Plan for England (2013)
- The Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK (2012)
- The Promotion of the Use of Energy from Renewable Sources Regulations (2011)
- The UK Low Carbon Transition Plan: National Strategy for Climate and Energy (2009)
- The UK Renewable Energy Strategy (2009)
- Planning and Energy Act (2008)

## Implications for the Local Plan and SA

**2.40** The Local Plan should consider setting out policies to achieve climate change and adaptation while also encouraging development which would help to minimise carbon emissions.

**2.41** The Local Plan should help to ensure that new development is energy efficient and promotes the use of sustainable construction methods and materials, as well as reduce their carbon emissions. In addition, the Local Plan should seek to allocate development in areas where sustainable transport patterns can be best achieved and encourage development to make use of more sustainable sources of energy, potentially through the delivery of renewable energy development. The Local Plan should also ensure that risk from all sources of flooding as a result of climate change is managed effectively and should ensure that development is resilient to future flooding. This could include the Local Plan setting out approaches to encourage the appropriate use of SuDS to minimise flood risk. The Local Plan should also consider the handling of waste in line with the waste hierarchy.

**2.42** The SA is able to respond to this through the inclusion of SA objectives relating to the mitigation of climate change and adaptation to climate change, sustainable construction, flooding and sustainable transport.

## Health and Well-being

**2.43** The relevant national PPPs under this topic are:

- Green Infrastructure Framework (2023)
- White Paper Levelling Up the United Kingdom (2022)
- A fairer private rented sector White Paper (2022)
- National Design Guide (2021)
- The Environment Act (2021)

- The State of the Environment: Health, People and the Environment (2021)
- Build Back Better: Our Plan for Health and Social Care (2021)
- COVID-19 Mental Health and Wellbeing Recovery Action Plan (2021)
- Using the planning system to promote healthy weight environments (2020) Addendum (2021)
- The Charter for Social Housing Residents: Social Housing White Paper (2020)
- Public Health England, PHE Strategy (2020-25)
- Homes England Strategic Plan (2018 to 2023)
- The Housing White Paper 2017: Fixing our broken housing market
- Planning Policy for Traveller Sites (2015)
- Technical Housing Standards – Nationally Described Space Standard (2015)
- Select Committee on Public Service and Demographic Change Report Ready for Ageing? (2013)
- Laying the foundations: housing strategy for England (2011)
- Fair Society, Healthy Lives (2010)
- Healthy Lives, Healthy People: Our strategy for public health in England (2010)
- Environmental Noise Regulations (2006)

## Implications for the Local Plan and SA

**2.44** The Local Plan needs to consider the requirements for infrastructure as this has the potential to have a significant impact on the environment, and it should be prepared to ensure that the population has access to sustainable low carbon infrastructure and services and facilities and that there is sufficient



capacity within them to serve the increased population. This should include healthcare, education and open space.

**2.45** Local Plans offer the opportunity to maximise the well-being benefits of well designed local green spaces. The Local Plan should help to ensure that the provision of open space and green infrastructure is of sufficient quantity and quality to meet the needs of the Plan area, encourage healthy and active lifestyles, creates fair, safe and inclusive communities, and improves the sustainable transport network including active travel networks within the Plan area.

**2.46** The provision of an appropriate level of housing over the plan period will help address issues of disparity in terms of access to decent housing in the plan area. The provision of new housing should be considerate of local needs with regards to housing size, tenure and type, including the needs of Gypsy, Traveller and Travelling Showpeople.

**2.47** The SA is able to respond to this through the inclusion of SA objectives relating to health and wellbeing, social inclusion, and sustainable transport.

## Environment (biodiversity/geodiversity, landscape and soils)

**2.48** The relevant national PPPs under this topic are:

- The Environment Improvement Plan (2023)
- Working with Nature (2022)
- Establishing the Best Available Techniques for the UK (UK BAT) (2022)
- The Environment Act (2021)
- The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations (2019)

- Environmental Damage (Prevention and Remediation) Regulations (2015)
- Biodiversity offsetting in England Green Paper (2013)
- Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011)
- Defra right of way circular (01/09) (2011)
- Countryside and Rights of Way Act (2010)
- Safeguarding our Soils – A Strategy for England (2009)
- England Biodiversity Strategy Climate Change Adaptation Principles (2008)
- Natural Environment and Rural Communities Act (2006)
- Wildlife and Countryside Act (1981) (as amended)
- National Parks and Access to the Countryside Act (1949)

## Implications for the Local Plan and SA

**2.49** The Local Plan should be prepared to limit the potential for adverse impacts on biodiversity and geodiversity as well as important landscapes (including those that are designated) and higher value soils. The Local Plan should help to ensure that ecological features and biodiversity are managed, protected and enhanced and that opportunities for habitat restoration or creation are encouraged. The Local Plan should also help to ensure that environmental pollution is minimised in order to protect land and soils and ensure the efficient extraction of minerals. The Local Plan should also help to ensure that designated and valued landscapes are protected and enhanced, and that development should be sympathetic to local character and history including the surrounding built environment and landscape setting.

**2.50** The plan should also take into account non-designated landscapes identified as particularly sensitive to development and non-designated habitats

which form part of wider ecological network. The Local Plan also presents opportunities to promote the achievement of net gain in biodiversity.

**2.51** In terms of the location of development, the Local Plan can encourage the re-use of brownfield land and protect more valuable agricultural soils from development, in so far as this is relevant to Luton Borough. The allocation of new sites for development and updated planning policy can also be used to achieve better habitat connectivity through the provision of new green infrastructure and the requirement for biodiversity net gain.

**2.52** The SA is able to respond to this through the inclusion of SA objectives relating to the protection and enhancement of biodiversity, character of landscapes and townscapes, green infrastructure and contaminated land.

## Historic Environment

**2.53** The relevant national PPPs under this topic are:

- Historic England Corporate Plan (2022-23)
- Heritage Statement (2017)
- Sustainability Appraisal and Strategy Environmental Assessment: Historic England Advice Note 8 (2016)
- Government's Statement on the Historic Environment for England (2010)
- Planning (Listed Buildings and Conservation Areas) Act (1990)
- Ancient Monuments and Archaeological Areas Act (1979)
- Historic Buildings and Ancient Monuments Act (1953)

## Implications for the Local Plan and SA

**2.54** The potential impact of new development on the historic environment, including local character as well as designated and non-designated heritage assets and their respective settings, should also inform the preparation of the Local Plan. The Local Plan should set out a positive strategy for conserving, enhancing and enjoying heritage assets and their settings, including wider historic townscapes and landscapes. The Local Plan can help to realise the wider benefits of historic environment enhancements which include contributions to well-being and addressing the climate and biodiversity emergencies. Particular regard may be given to protecting heritage assets which have been identified as being 'at risk' (both at the national and local levels). Local planning authorities should consider setting out approaches in their Local Plans to address these issues and site options should be considered with regard to the potential for related issues.

**2.55** The SA is able to respond to this through the inclusion of SA objectives relating to the historic environment and the character of landscapes and townscapes.

## Water and Air

**2.56** The relevant national PPPs under this topic are:

- Environment Act (2021)
- National Chalk Streams Strategy Chalk Stream Strategy (2021)
- Meeting our future water needs: a national framework for water resources (2020)
- Clean Air Strategy (2019)
- Environmental Noise Regulations (2018)
- Water Supply (Water Quality) Regulations 2018

- Water Environment (Water Framework Directive) (England and Wales) Regulations (2017)
- UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations (2017)
- Drought response: our framework for England (Environment Agency, 2017)
- Managing Water Abstraction (2016)
- Environmental Permitting Regulations (2016)
- Nitrate Pollution Prevention Regulations (2015)
- Water White Paper (2012)
- National Policy Statement for Waste Water (2012)
- Air Quality Standards Regulations (2010)
- Flood and Water Management Act (2010)
- Groundwater (England and Wales) Regulations (2009)
- Flood Risk Regulations (2009)
- Future Water: The Government's Water Strategy for England (2008)
- Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007)
- Urban Waste Water Treatment Regulations (2003)
- Environmental Protection Act (1990)

## Implications for the Local Plan and SA

**2.57** Local planning authorities should consider setting out approaches in their Local Plans to promote the efficient use of water and limit all types of pollution including water and air pollution. They should also seek to limit pressure on the wastewater treatment (WwT) infrastructure and water supply. The allocation of sites for development should take account of areas which are of highest sensitivity in relation to these issues, including Source Protection Zones (SPZs)

and Air Quality Management Areas (AQMAs). To limit the potential for air quality issues to be intensified as development is delivered over the plan period, local planning authorities should consider setting out approaches in their Local Plan to factor in the contribution that specific site options can make to achieving modal shift and limiting the need for residents to travel.

**2.58** The SA is able to respond to this through the inclusion of SA objectives relating to air pollution, water quality and waste management.

## Economic Growth

**2.59** The relevant national PPPs under this topic are:

- The Growth Plan (2022)
- Build Back Better: Our Plan for Growth (2021)
- Agricultural Transition Plan (2021 to 2024)
- Agriculture Act (2020)
- UK Industrial Strategy: Building a Britain fit for the future (2018)
- LEP Network response to the Industrial Strategy Green Paper Consultation (2017)
- National Infrastructure Delivery Plan (2016-2021)

## Implications for the Local Plan and SA

**2.60** The Local Plan should allocate land to support the projected level of economic growth required over the plan period. Local planning authorities should consider setting out approaches in Local Plan policies to promote sustainable economic and employment growth to benefit all members of the community and to reduce disparity in the plan area. This should include support for the infrastructure required for the economy to function successfully. Employment sites should be located to enable local people to be able to access

the new employment opportunities. Local planning authorities should consider setting out approaches in their Local Plan to promote the viability of Town Centres as well as Local Centres.

**2.61** The SA is able to respond to this through the inclusion of SA objectives relating to economic growth and employment.

## Transport

**2.62** The relevant national PPPs under this topic are:

- Cycling and Walking Investment Strategy Report to Parliament (2022)
- Decarbonising Transport: A Better, Greener Britain (2021)
- Decarbonising Transport: Setting the Challenge (2020)
- The Road to Zero (2018)
- Transport Investment Strategy (2017)
- Highways England Sustainable Development Strategy and Action Plan (2017)
- Door to Door: A strategy for improving sustainable transport integration (2013)
- Jet Zero Strategy Delivering net zero aviation by 2050 (2020)
- Airports: The Government's View Summary Document- Moving Britain Ahead (2016)

## Implications for the Local Plan and SA

**2.63** The potential for reducing the need to travel, limiting congestion and associated benefits for air quality and climate change as well as public health should inform the preparation of the policies for the Local Plan and its site allocations. The Local Plan should also encourage walking and cycling as

alternative modes of transport by providing safe and attractive walking and cycling infrastructure, as well as recognise the multiple benefits they bring in terms of physical and mental health, reducing carbon emissions and reducing air pollution. Furthermore, the selection of site options for development should be informed by issues such as the potential for access to new and existing public transport nodes and active transport routes and specific highways capacity issues. The selection of individual site options should also be informed by their proximity to essential services and facilities which is likely to reduce the need for residents to regularly travel long distances.

**2.64** The SA is able to respond to this through the inclusion of SA objectives relating to the mitigation of climate change, improving air quality, public health and wellbeing, and the provision of sustainable transport.

## Sub National

**2.65** Below the national level there are further plans and programmes which are relevant to the Local Plan and the SA process. These plans and programmes sit mostly at the sub-regional and borough level and details are provided below with further details in Appendix A.

- Levelling up the East of England: 2023-2030
- Luton 2040 A Place to Thrive Economic Strategy
- Transport East, Transport Strategy 2030-2050 (2023)
- Bedfordshire Natural Capital Assessment, Part 1: Mapping, valuation, and opportunities for enhancement across Bedfordshire (June 2021)
- Bedford Borough Council, Local Transport Plan 2011-2021
- Central Bedfordshire Council Transport Strategy April 2011 to March 2026
- Luton Corporate Plan 2023-2028
- Luton 2040 Vision
- Active Luton Strategy 2023-228



## Chapter 2 Relevant Plans and Programmes

- Domestic Abuse Strategy 2023 to 2028
- Fairness strategy: A town built on fairness and social justice (August 2023)
- Housing Strategy 2022 to 2027
- Luton 2020-2040- A Place to Thrive- Inclusive Economy Strategy
- Library Strategy 2020 to 2025
- Luton Energy Strategy 2018 to 2035
- Luton's Population and Wellbeing Strategy 2023 to 2028
- Prosperity through Procurement: a five year strategy 2019 to 2024
- Waste Management Strategy 2018 to 2028
- Reducing Health Inequalities in Luton: A Marmot Town (2022)
- Transport Strategy and Local Transport Policies (April 2021)
- Local Walking and Cycling Infrastructure Plan 2023-2033
- Electric vehicle chargepoint strategy 2022 to 2025
- Bus Service Improvement Plan (2021)
- Air quality annual status report 2023
- Luton Employment and Skills Strategy 2022-2027
- My climate action plan Becoming a carbon neutral borough by 2040 (2021)
- Harnessing Momentum Our strategy for Arts, Culture and Creative Industries in Luton 2017-2027
- Curating Luton (2021) Our Town-wide Heritage Strategy 2021 to 2031
- The Luton Education Strategy for children and young people 2019
- Hertfordshire Local Transport Plan 2018 -2031

## **Implications for the Local Plan**

**2.66** The new Local Plan needs to consider the above sub national plans for the east of England and Luton Borough.

**2.67** The Local Plan should support the aim to transition towards net zero and support adaptation to climate change. The Local Plan should meet the commitments that Luton Borough Council made to reduce its own emissions following the declaration of a climate emergency in 2020.

**2.68** The Local Plan offers the opportunity to maximise the well-being benefits of well-designed open spaces and areas for recreation. The Local Plan should help to ensure that the provision of open space and areas of recreation is of sufficient quantity and quality to meet the needs of the plan area, encouraging healthy and active lifestyles. The Local Plan should also consider opportunities for biodiversity enhancement within open spaces and across Luton Borough.

**2.69** The provision of an appropriate level of housing will help address issues of inequality in relation to housing in the plan area and support economic growth. The provision of new housing should be considerate of local needs, including the needs of Travellers. The new Local Plan should support economic growth within Luton Borough, including supporting the rural economy and infrastructure requirements. This economic growth should align with the aims in the East of England. A Masterplan has been prepared for Luton Town Centre which should be taken into consideration.

**2.70** The Local Plan should encourage the use sustainable forms of transport such as walking and cycling and public transport. The Local Plan should also support the infrastructure requirements to enhance and decarbonise transport within Luton Borough. Transport plans for the East of England and the Hertfordshire and Bedfordshire authorities have been produced and should be taken into consideration.

## Surrounding Development Plans

**2.71** Development in Luton Borough will not be delivered in isolation from those areas around it. Given the interconnection between Luton Borough and the surrounding areas there is potential for cross-boundary and in-combination effects where development is proposed through development plans in neighbouring authorities. This is of particular importance with Luton Borough being part of the Bedfordshire Housing Market Area and Functional Economic Area. As such, a summary of the plans for the following local authority areas which surround Luton Borough is also provided in Appendix A:

- Central Bedfordshire
- North Hertfordshire
- Dacorum
- St. Albans

**2.72** As the SA progresses, consideration will be given to the extent to which the content of these other plans could lead to in-combination effects with the Luton Local Plan, for example as a result of any large-scale new development being proposed in close proximity across the borough boundaries.

## Chapter 3

# Baseline Information

**3.1** Baseline information provides the basis for predicting and monitoring the likely sustainability effects of a plan and helps to identify key sustainability issues and means of dealing with them.

**3.2** Schedule 2 of the SEA Regulations requires information to be provided on:

- (2) the relevant aspects of the current state of the environment;
- (3) the environmental characteristics of areas likely to be significantly affected;
- (4) any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 2009/147/EC [the 'Birds Directive'] and 92/43/EEC [the 'Habitats Directive'].

**3.3** This section presents the relevant baseline information for Luton Borough. Data referred to have been chosen primarily for regularity and consistency of collection, to enable trends in the baseline situation to be established, and also to enable subsequent monitoring of potential sustainability effects.

# Climate Change Adaptation and Mitigation

## Climate Change

**3.4** Climate change presents a global risk, with a range of different social, economic and environmental impacts that are likely to be felt within Luton Borough across numerous receptors. A key challenge in protecting the environment will be to tackle the causes and consequences of climate change. The consequences include predictions of warmer, drier summers and wetter winters with more severe weather events all year as well resulting in higher sea levels and increased river flooding. A strong reaction is required from planning to ensure appropriate action can be taken to help species and habitats adapt and to enable the agricultural sector to continue to deliver diverse, affordable and good quality produce.

**3.5** There has been a general trend towards warmer average temperatures in recent years with the most recent decade (2012–2021) being on average 0.2°C warmer than the 1991–2020 average and 1.0°C warmer than 1961–1990. All the top ten warmest years for the UK in the series from 1884 have occurred this century [\[See reference 15\]](#).

**3.6** As a mostly urban borough, Luton is particularly likely to experience the Urban Heat Island Effect. The nearest UK climate station to Luton, Rothamsted, found its annual yearly average temperature from 1991-2020 to be 14.1°C which was slightly below the regional average (14.36 °C) over the same period of time but slightly higher than the UK average (12.79 °C) [\[See reference 16\]](#). Luton is within the top 30 local authorities in terms of number of priority neighbourhoods for adaptation, containing 45 priority neighbourhoods for adaptation [\[See reference 17\]](#).

**3.7** Heavy rainfall and flooding events have been demonstrated to have increased potential to occur in the UK as the climate has generally become wetter. For example, for the most recent decade (2012–2021) UK summers have been on average 6% wetter than 1991–2020 and 15% wetter than 1961–1990 whilst winters have been 10%/26% wetter [\[See reference 18\]](#).

**3.8** With 2022 recorded as the warmest year on record, July and August experienced especially dry months and drought conditions were declared across parts of England and Wales. In total, the rainfall for 2022 was 1,051 mm – this is 90% of the 1991 – 2020 decade average [\[See reference 19\]](#). The UK encountered more sun across 2022 than the average year. England experienced the sunniest January in 2023 [\[See reference 20\]](#).

**3.9** The IPCC AR6 Synthesis Report (2023) highlights that greenhouse gas (GHG) emissions are predicted to continue into 2030 making it likely that global warming will exceed 1.5°C, which in turn means that GHG emissions will become harder to maintain below 2°C. As a result of this, increased global warming will occur and elicit climate hazards such as increased incidences of heatwaves, droughts, increased global monsoon precipitation, tropical storms, very wet and very dry weather. Our natural land and ocean carbon sinks will become less effective, sea levels will rise, become more acidic and experience deoxygenation amongst other climate events [\[See reference 21\]](#). The Paris Agreement is a legally binding international treaty involving 196 Parties. The overarching goal of this agreement is to limit global warming increasing to 1.5°C by the end of the century. Achieving this goal still requires a lot of action but since 2016 when the agreement was established, low – carbon solutions and new markets for climate resilience have been sparked.

**3.10** The Tyndall Centre has undertaken work to calculate the ‘fair’ contribution of local authorities towards the Paris Climate Change Agreement. Based on the analysis undertaken the following recommendations have been made for Luton Borough [\[See reference 22\]](#):

- Stay within a maximum cumulative carbon dioxide emissions budget of 4.4 million tonnes (MtCO<sub>2</sub>) for the period of 2020 to 2100. At 2017 CO<sub>2</sub>

emission levels, Luton would use this entire budget within 7 years from 2020.

- Initiate an immediate programme of CO<sub>2</sub> mitigation to deliver cuts in emissions averaging a minimum of -13.1% per year to deliver a Paris aligned carbon budget. These annual reductions in emissions require national and local action, and could be part of a wider collaboration with other local authorities.
- Reach zero or near zero carbon no later than 2042. This report provides an indicative CO<sub>2</sub> reduction pathway that stays within the recommended maximum carbon budget of 4.4 MtCO<sub>2</sub>. At 2042 5% of the budget remains. This represents very low levels of residual CO<sub>2</sub> emissions by this time, or the Authority may opt to forgo these residual emissions and cut emissions to zero at this point. Earlier years for reaching zero CO<sub>2</sub> emissions are also within the recommended budget, provided that interim budgets with lower cumulative CO<sub>2</sub> emissions are also adopted.

**3.11** Luton Borough Council declared a Climate Emergency in 2020. To tackle the climate emergency, Luton Borough Council pledged to ensure that Luton is a carbon neutral town by 2040. In 2021, Luton Borough Council adopted a “My Climate Action Plan” which describes the actions the council will take to reduce carbon emissions. It also includes actions relating to Luton’s governance, procurement and investment to improve the consideration given to the carbon impact of the decisions made [\[See reference 23\]](#).

## Carbon Dioxide Emissions

**3.12** The Government regularly publishes Local Authority and regional carbon dioxide emissions national statistics. Emissions for Luton Borough between 2005-2020 have fallen from 6.0t per capita to 2.8t per capita [\[See reference 24\]](#). Per capita emissions in the plan area within the scope of influence of the local authority fell almost every year between 2005 and 2020, except from 2009-2010 and 2011-2012 where the per capita emissions rose. This is shown in Table 3.1. It should be noted the figures in Table 3.1 do not account for Land Use, Land Use Change and Forestry (LULUCF) figures in Luton Borough. In

2020, LULUCF accounted for -1.70Kt carbon dioxide emissions in Luton Borough.

**Table 3.1: Carbon dioxide emissions estimates in Luton Borough 2005-2020**

Year	Total Emissions (kt)	Per Capita Emissions (t)
2005	1,109.1	6.0
2006	1,109.5	5.9
2007	1,067.0	5.6
2008	1,043.3	5.4
2009	936.9	4.8
2010	997.1	5.0
2011	896.3	4.4
2012	941.0	4.6
2013	905.1	4.4
2014	809.0	3.8
2015	784.8	3.7
2016	750.6	3.5
2017	718.9	3.3
2018	700.2	3.3
2019	658.9	3.1
2020	593.6	2.8

**3.13** In Luton Borough the main contributor of emissions was from domestic and transport. However, between 2005 and 2020, the levels of emissions from



domestic and transport have dropped significantly for Luton Borough, by 42% and 29.2% respectively. This is shown in Table 3.2.

**Table 3.2: Changes in carbon dioxide emissions by sector for Luton Borough between 2005 and 2020**

Source of emissions	2005	2020
Industry	165.7	75.8
Commercial	185.0	55.3
Public Sector	73.5	28.9
Domestic	417.3	243.4
Transport	268.3	191.3
Grand Total	1,109.8	594.7

**3.14** Figure 3.2 shows the per capita CO<sub>2</sub> emissions of Luton Borough compared to neighbouring authorities. It is clear there are nearby boroughs which have higher levels of emissions (Buckinghamshire, Central Bedfordshire and Milton Keynes) and lower levels of emissions (Watford, Stevenage and Three Rivers).

## Overall Energy Consumption

**3.15** The Department for Business, Energy and Industrial Strategy produced the following consumption figures for Luton Borough in 2020. These figures are presented as Ktoe (kilotonnes of oil equivalent):

- All fuels – A total of 250 Ktoe across domestic, transport and industrial and commercial use.
- Coal – A total of 0.3 Ktoe predominantly through industrial and commercial use.

- Manufactured fuels – A total of 0.4 Ktoe through domestic and industrial and commercial use.
- Petroleum – A total of 70.6 Ktoe predominantly from road transport.
- Gas – A total of 119.9 Ktoe predominantly through domestic use.
- Electricity – A total of 54.7 Ktoe through domestic and industrial and commercial use.
- Bioenergy and wastes – A total of 4.1 Ktoe predominantly through industrial and commercial use.

**3.16** Table 3.3 below highlights the energy consumption for Luton between 2005 to 2020 by type. With the exception of energy from biomass and wastes, the consumption of coal, petroleum, manufactured fuels, gas and electricity fell between 2005 and 2020 [\[See reference 25\]](#).

**Table 3.3: Energy Consumption in Luton Borough by Type**

Energy Type	Energy Consumption in Ktoe (2005)	Energy Consumption in Ktoe (2020)
Coal	0.4	0.3
Manufactured Fuels	0.5	0.4
Petroleum	87.2	70.6
Gas	163.3	119.9
Electricity	71.3	54.7
Bioenergy and Wastes	0.7	4.1
Total	323.4	250

## Renewable Energy

**3.17** Renewable energy is recognised as an important contributor to reducing reliance on fossil fuels and adapting to climate change. Within the East of England, there was a total of 145, 281 sites that were capable of generating renewable energy across wind, solar, wave, hydro and biomass renewable sources in 2022. This represents 12% of all the sites within the UK that generate renewable energy. In 2022, the East of England generated a total of 17,010.9 GWh (Gigawatt hours) of renewable energy. This is a 447.3% increase in renewable energy generation since 2011. In 2022, a total of 2,151 photovoltaic panels and 2 onshore wind turbines were installed in Luton. This is an increase on 2014 when 1,007 photovoltaic panels and no onshore wind turbines were installed [\[See reference 26\]](#).

**3.18** Luton's Vision for a Net Zero Town by 2040 highlights the importance of renewable energy in homes through increasing the amount of renewable electricity through roof solar photovoltaics (PV). The vision highlights actions for non-residential buildings as a key part of the roadmap to becoming net zero by 2040 through improving energy efficiency and increasing on site renewable electricity generation, increasing the amount of renewable electricity through rooftop solar PV and improving efficiencies in manufacturing systems [\[See reference 27\]](#).

**3.19** Luton Borough Council has outlined its current activities, actions and programmes to reduce its harmful emissions. The following information has been summarised: [\[See reference 28\]](#).

- **Transport:** Local Cycling and Walking Infrastructure Plans (LCWIP), Electric Vehicle Chargepoint strategy, Staff travel plans for local businesses, Investment in liquid to gas biofuel for council fleet and Deliver bus priority measures on key routes (guided busway Luton to Dunstable).
- **Homes:** £34m investment programme into insulating council properties, including hard to treat, Solar Together programme in conjunction with Central Bedfordshire and Bedford Borough Council, trials of ground source heat pumps in new builds, currently 82% of council homes are EPC rating

C or above and 15 communal sites have access to heat pumps as secondary heat source.

- **Businesses and Public Sector Buildings:** Public Sector Decarbonisation grant - £7.7m award, Whole lighting solutions with IoT controls - joint funding from LBC and Salix, achieves 85% plus lighting energy reduction from buildings, Procurement – frontline services based at Kingsway Depot continue to source 90% of equipment locally, new heating and control system at Central Depot, biomass and gas instead of oil and 100 local businesses given Carbon Awareness training.
- **Biodiversity and Resilience:** Luton Tree and Management strategy, increased green spaces, trialling new robotic mowers with lower emissions, Green Flag status achieved and maintained for six district and neighbourhood parks, SuDS in Schools, Resilient and adaptive communities and Project Groundwater.
- **Education and Awareness Training:** Climate Change guide, Climate Change e-learning module for LBC staff, Carbon Literacy training, NZIP Energetic Lifestyles project and COP26 school packs.

**3.20** Luton Borough Council alongside Bedford and Central Bedfordshire Councils launched the Solar Together initiative through iChoosr, which aims to make solar panels more affordable. Battery storage can also be obtained under the scheme, which stores any unused energy generated by solar panels for future consumption. Not only can the scheme enable residents obtain solar panels and battery storage at a lower price but can help lower energy bills and support the town's ambition to become net zero by 2040 [\[See reference 29\]](#).

## Population, Health and Well-being

### Population

**3.21** Luton's population in 2021 was 225,300 which is an 11% increase since 2011, above the national average which was 6% over the same time period. By

2023, the population had increased further to 231,000. Luton's population increase is higher than the increase for the East of England (8.3 per cent). Regionally the largest population increase was in Bedford (16.6%) and the lowest in North Norfolk (1.5%). Luton has a population density of 52 people per hectare which is greater than some London boroughs. [\[See reference 30\]](#).

**3.22** The population of Luton comprises approximately 112,900 men and 112,400 women. Luton's population is younger than average, with a higher proportion of younger people than nationally and a lower proportion of older people. The under 15 age group account for 21.9 per cent of the Luton population compared with 17.4 per cent nationally. The 15 to 64 age group account for 66.3 per cent of the Luton, a similar proportion to the national figure (64.2 per cent). The majority of this percentage is made up by people aged 30-45. The 65 and over age group represents 11.8 per cent of the Luton population compared with 18.4 per cent nationally. The 0 to 14 year age group grew by 12 per cent, the 15 to 64 age group grew by 11 per cent and those aged 65 and over grew by 11 per cent between 2011 and 2021. The age group of 55 to 59 year olds and 90 and above both had growth of over 30 per cent between 2011 and 2021 with the number of 25 to 29 year olds falling by 12 per cent [\[See reference 31\]](#).

**3.23** The number of households in Luton grew from 74,300 to 78,900 between 2011 and 2021, a growth rate of 6.2 per cent. The total population growth in Luton was 10.9 per cent which indicates that household overcrowding in Luton is increasing. Neighbouring authorities Bedford and Central Bedfordshire had population growth of 17.7 per cent and 15.7 per cent with household growth of 17.4 per cent and 15.7 per cent respectively.

**3.24** According to the 2021 Census, the largest ethnic group in Luton is White: English, Welsh, Scottish, Northern Irish or British. But, this has reduced by around 10% since 2011. In 2021, 37.0% of Luton residents identified their ethnic group within the "Asian, Asian British or Asian Welsh" category, up from 30.0% in 2011. The 7.0 percentage-point change was the largest increase among high-level ethnic groups in this area. Table 3.4 below shows the breakdown of Luton's population by ethnic group [\[See reference 32\]](#).

**Table 3.4: Luton Population by ethnic group (2021)**

Ethnic group	% of population
Asian, Asian British or Asian Welsh	37
Black, Black British, Black Welsh, Caribbean or African	10.1
Mixed or Multiple ethnic groups	4.3
White	45.2
Other ethnic groups	3.5

**3.25** In Luton, the percentage of households including a couple with dependent children rose from 21.9% in 2011 to 23.0% in 2021. During the same period, the regional percentage fell from 21.0% to 20.2%. The percentage of households including a couple without children in Luton fell from 13.4% to 11.7%, while the percentage of households including a couple with only non-dependent children increased from 6.1% to 6.6%.

**3.26** The population in Luton Borough is spread across 20 wards. Ward changes in 2023 resulted in the creation of a new ward, increasing the total number of wards from 19 to 20. South and Dallow are the wards with the highest population both in the 17,000s. Table 3.5 below presents the population change between 2011 and 2021 by ward in Luton Borough, prior to the creation of a new ward in 2023. The table shows that the majority of the wards have experienced a population increase. Stopsley was the only ward to experience a population decrease but this was minimal. South was the ward which experienced the highest population increase with an additional 3,676 people moving into the ward between 2011 and 2021 [\[See reference 33\]](#).

**Table 3.5: Estimated populations by ward in Luton Borough for 2011 and 2021** [See reference 34]

Ward	Population in 2011	Population in 2021	Population Change
Barnfield	7,736	8,196	0.58%
Biscot	16,118	16,624	0.31%
Bramingham	7,207	7,268	0.08%
Challney	13,470	15,460	1.4%
Crawley	7,070	8,437	1.8%
Dallow	16,393	17,990	0.94%
Farley	11,996	13,610	1.3%
High Town	9,046	11,018	2%
Icknield	7,629	8,097	0.60%
Leagrave	11,998	13,892	1.5%
Lewsey	12,519	13,707	0.91%
Limbury	7,904	8,540	0.78%
Northwell	8,153	8,639	0.58%
Round Green	11,623	12,698	0.89%
Saints	14,382	16,501	1.4%
South	13,987	17,663	2.4%
Stopsley	7,021	7,006	-0.020%
Sundon Park	7,949	8,450	0.61%
Wigmore	11,000	11,465	0.42%

## Housing

**3.27** In 2022, it was estimated by the Office for National Statistics that full-time employees could typically expect to spend around 8.3 times their workplace-based annual earnings on purchasing a home in England. This is a decrease compared with 2021, when it was 9.1 times their workplace-based annual earnings. Average house prices nationally increased by 14% in 2021, while average earnings fell by nearly 1%. This has led to housing becoming less affordable [\[See reference 35\]](#). The Housing affordability ratio is defined as housing affordability estimates calculated by dividing house prices by annual earnings to create a ratio. It can be used to compare affordability over time and between areas. A larger number reflects a less affordable area [\[See reference 36\]](#).

**3.28** At the local level, housing affordability improved in 235 out of 331 (71%) local authorities in 2021. Average house prices increased in 64% of local authority districts in England and Wales, while average earnings increased in 71% of local authorities in 2021. In Luton, the housing affordability ratio was 8.1 in 2021, and like other local authorities, has steadily increased in recent years. This figure has increased by 42% since 2011 from 5.7 to 8.1 in 2021 [\[See reference 37\]](#).

**3.29** The average house price for a property in Luton Borough as of April 2024 was £270,071 which is lower than the regional (£375,067) and England average (£298,299) [\[See reference 38\]](#).

**3.30** The percentage of households in the social rented sector increased in Luton, but fell across England. In Luton, the percentage of households in the social rented sector rose from 15.8% in 2011 to 16.4% in 2021, while across England it fell from 17.7% to 17.1%. During the same period, the regional percentage fell from 15.7% to 15.5%. Private renting in Luton increased from 22.6% to 29.0%, while the rate of home ownership decreased from 60.2% to 53.9%. [\[See reference 39\]](#).



**3.31** The 2019 Strategic Housing Land Availability Assessment for Luton provides evidence on the potential supply of both housing across Luton Borough. It identifies an estimated capacity of 16,657 dwellings [See reference 40]. A new SHLAA will be produced as part of the evidence base for the new Local Plan.

**3.32** During the period 2018/19-2021/22, 2,284 dwellings (net) were delivered against a cumulative annual target of 1,700 (425 units per year) – an over delivery of 584 units. 544 homes (net) were completed during the same period on strategic housing sites, and 238 dwellings on allocated housing sites. Between 2011/12 and 2021/22, across the town as a whole, 6,002 homes (net) were completed, an over delivery of 1,327 dwellings against the cumulative annual target.[See reference 41]. Housing completions compared with the Luton Local Plan housing requirement is shown in Table 3.6 below. Table 3.7 contains Affordable housing completions on eligible sites 2018/19-2021/22.

**3.33** When looking at Table 3.6 and Table 3.7 it is important to note that new housing provision does not reflect the identified housing need stated in the Local Plan [See reference 42]:

- 42.3% were one bed properties – with the identified need at 1% of delivery.
- 31.4% were two or three bedroom flats – with the identified need at -1% of delivery.
- 11.5% were 3 bedroom houses – with the identified need being 70% of delivery.
- 9.2% were houses with 4 or more bedrooms, against an identified need of 17%.
- 5.6% were two bedroom houses, against an identified need of 13%.

**Table 3.6: Housing completions compared with the Luton Local Plan housing requirement**

Year	Cumulative annualised plan target	Net gain in homes
2011-12	425	490
2012-13	850	351
2013-14	1,275	147
2014-15	1,700	415
2015-16	2,125	624
2016-17	2,550	798
2017-18	2,975	873
2018-19	3,400	627
2019-20	3,825	791
2020-21	4,250	474
2021-22	4,675	412

**Table 3.7: Affordable housing completions on eligible sites 2018/19-2021/22**

Unit provision on eligible sites	Total units provided	Total affordable units provided	% of total units provided
Total units provided on eligible sites	825	494	59.8%
Of which Units provided through 100% AH developments	471	471	57.1%

Unit provision on eligible sites	Total units provided	Total affordable units provided	% of total units provided
Of which Units provided in other developments	92	23	2.8%
Of which, units provided in unviable developments	0	Units that could have been provided: 43	% of total that could have been provided: 5.2%

## Gypsies, Travellers and Travelling Showpeople

**3.34** During the 2021 Census, 0.7% of the people of Luton Borough described themselves as White: Gypsy or Irish Traveller [\[See reference 43\]](#).

**3.35** Policy LLP20 of the adopted Local plan show existing Gypsy and Traveller sites to be at safeguarded sites at 14 and 72 Wigmore Lane. Gypsy and Traveller and travelling showpeople pitches and plots will be permitted or allocated in accordance with current government policy to meet the needs identified in the Gypsies and Travellers Accommodation Assessments updated as necessary.

**3.36** A Gypsy and Travellers Accommodation Assessment (GTAA) was completed in 2015 to establish the need for Gypsy, Traveller and travelling showpeople accommodation in the Borough. [\[See reference 44\]](#). The study identified a potential need for 19 Gypsy and Traveller permanent pitches over the plan period but, allowing for existing supply, needs were already met over the first five years, whereas there was a need for an additional 14 pitches over the remaining 15 years of the plan. Need for a transit site of 10 pitches was also identified. The study has not identified a need for additional travelling showperson provision. Following a detailed assessment of the travelling activities of residents living on the public site at St Thomas's Road and the Stopsley Mobile Home Park it was found that none of the residents met the new definition of a Traveller as set out in the revised PPTS. Therefore, the need for

additional accommodation for Gypsies and Travellers in Luton as required by PPTS for the period to 2031 was for no additional pitches [\[See reference 45\]](#). A new GTAA will be carried out for the new Local Plan taking into account the Government’s reversion to the definition of Gypsies and Travellers used in the Planning Policy for Travellers Sites to that adopted in 2012.

## Health

**3.37** Health is a cross-cutting topic and as such many topic areas explored in this Scoping report influence health either directly or indirectly. In the 2021 Census, 43.1% of the population of Luton Borough identified themselves as being in very good health and 6.2% in bad health or very bad health. Approximately 16.6% of people in Luton Borough are disabled under the Equality Act where their day to day activities are limited a lot [\[See reference 46\]](#).

**3.38** Health statistics for Luton Borough are shown in Table 3.9 below [\[See reference 47\]](#):

**Table 3.9: Health in Luton**

**Domain:** Infants and children's health

Indicator	Luton	England
Under 18 conception rate per 1,000 females (2021)	16.3%	17.8%
Infant Mortality Rate (2019-21)	5.45%	3.93%
Year 6: Prevalence of obesity (2021-22)	25.9%	20.2%

**Domain:** Adults' health and lifestyle

Indicator	Luton	England
Adults smoking (2021)	16%	14.4%
Physically active adults (2021-22)	58.7%	66.3%
Obese adults (2021-22)	60.6%	62%

**Domain:** Diseases and poor health

Indicator	Luton	England
Under 75 mortality rate from all causes (2021)	389.5	330.5
Under 75 mortality rate from all cardiovascular diseases (2021)	91.9	71.7
Under 75 mortality rate from cancer (2021)	149.4	132.3
Admission episodes for alcohol-related conditions (2021-22)	772.5	663.7

## Life Expectancy

**3.39** The average life expectancy at birth in 2019 for Luton residents was 78.1 years for males and 82.5 years for females. This is lower than the regional average of 80.3 years for males and 83.7 years for females and the England average of 79.6 years for males and 83.2 years for females. Life expectancy is 9.7 years lower for men and 4.1 years lower for women in the most deprived areas of Luton than in the least deprived areas.[\[See reference 48\]](#).

## Obesity and Physical Activity Levels

**3.40** Being overweight or obese carries numerous health risks, including increased likelihood of type 2 diabetes, cancer, heart and liver disease, stroke and related mental health conditions. It is estimated this health issue places a

cost of at least £5.1 billion on the NHS and tens of billions on the wider UK society every year.

**3.41** In Luton, 25.9% of year 6 children are obese compared to the national average of 20.2%. However, 60.6% of adults are obese which is below the national average of 62% [\[See reference 49\]](#).

**3.42** In 2021, Sport England conducted a survey that focussed on understanding Luton's engagement in sport. The survey required respondents to identify if they were 'active' (150 minutes of physical activity per week), 'fairly active' (between 30 – 149 minutes of physical activity) or 'inactive' (30 minutes or less of physical activity) [\[See reference 50\]](#). The results are shown in Table 3.10 below.

**Table 3.10: Sport England Physical Activity Levels Survey (2021/22)**

Area	Active	Fairly Active	Inactive
Luton	55.6%	11.0%	33.4%
Bedfordshire	61.2%	11.7%	27.1%
East of England	63.1%	11.6%	25.3%
England	63.1%	11.6%	25.3%

**3.43** In 2021/22, 55.6% of adults in Luton Borough were physically active. This is below the national average of 63.1%. A total of 33.4% of adults stated that they were physically inactive in Luton which is higher than the national average of 25.3% [\[See reference 51\]](#).

## Perception of Well-being

**3.44** Residents of Luton reported having slightly lower levels of life satisfaction (7.30 out of 10.00) than the average for UK (7.45) in the 2022/23 period. Average figures recorded relating to ‘feeling the things done in life are worthwhile’ were lower than the UK (8.16 and 7.95, respectively) whilst ‘happiness’ in Luton Borough was marginally higher than the UK (7.64 and 7.39, respectively). Levels of high anxiety recorded at 2.64 for Luton Borough in this period. This was a decrease of 0.11 from the previous period (2020/201) [\[See reference 52\]](#).

## Open Space

**3.45** Parks and open spaces are important to the community they serve. They benefit local communities and provide meeting and social spaces, health and wellbeing, the local economy, community and safety, climate cooling and increasing the appearance and profitability of the area. Open spaces provide opportunities for outdoor exercise and offer the opportunity to help increase levels of health and reduce obesity. They also help to maintain good mental health and reduce stress by encouraging relaxations through interaction with the natural environment.

**3.46** The current open space provision in Luton shows a total of 56 sites are designated as open space [\[See reference 53\]](#). There are six district parks, and 28 neighbourhood parks. However, nearly half of Luton’s neighbourhoods have poor access to Green Space. A report by Friends of the Earth found the following [\[See reference 54\]](#):

- 19% of neighbourhoods in Luton are in the bottom category, with very small gardens, no green space within a five-minute walk, and limited access to spaces further afield.
- 29% of neighbourhoods have limited access due to homes having very small gardens, while public spaces are less accessible either because of



the limited number of them or because they are more than five minutes' walk for most residents.

- 29% of neighbourhoods have moderate access to green spaces, with small gardens and either some public green space within five minutes' walk, or good access further afield.
- 24% of neighbourhoods have good provision, with either large gardens and access to small public spaces within five minutes' walk, or smaller gardens but large public spaces within the same distance.
- 0% of neighbourhoods have the best access, with large gardens and significant public spaces less than five minutes' walk away.

**3.47** Luton contains two parks that Historic England has included on its 'Register of Parks and Gardens of Special Historic Interest in England'. They are Wardown Park to the north of the central area, and Putteridge Bury on the north east edge of the town, which lies mostly within Hertfordshire. Such parks are considered by Historic England to make a significant contribution to the richness of the local scene in terms of green space and nature conservation.

**3.48** Luton Borough Council was successful in its bid to The Big Lottery Fund and was awarded £500,000 to support a variety of Play projects. The Big Lottery Portfolio consists of the following projects: **[See reference 55]**

- **Ashcroft Recreational Park:** This project aims to improve play facilities in Ashcroft Park located in the East of Luton, an area of deficiency as identified in the Luton Play Strategy.
- **B1 Café:** The b.1 cafe project is a new project which provides after school play facilities for hard to reach young people between the ages of 11 and 16.
- **Free to play:** The Free to Play project provides an inclusive play project for children and young people with disabilities, their siblings and young carers.
- **Mayne Avenue Open Space:** The project will part fund provision of children and young people's play facilities in Mayne Avenue Open Space, an area deficient in quality play provision.

## Deprivation

**3.49** The Index of Multiple Deprivation (IMD) uses Lower Layer Super Output Areas (LSOA) to measure deprivation at local authority and county level. The seven distinct domains of deprivation (Income; Employment; Health Deprivation and Disability; Education and Skills Training; Crime; Barriers to Housing and Services; and Living Environment) which when weighted and combined from the IMD 2019 have been mapped for the borough (see Figure 3.3).

**3.50** Luton is currently ranked the 70th most deprived out of 317 local authorities, while in 2015 Luton was ranked the 59th most deprived area from 326 local authorities. Therefore, Luton is relatively less deprived than in 2015. The proportion of areas in Luton in the top 10% most deprived parts of the country has fallen, with Luton now having four output areas in the top 10% most deprived compared to nine previously. These are in Northwell, South and two in Farley. Luton's highest deprivation rankings are in the Barriers to Housing and Services (25th), income deprivation affecting older people (43rd) and crime (58th) indicators, with the highest (least deprived) ranking in the Living Environment (120<sup>th</sup>) [\[See reference 56\]](#)

## Crime and Safety

**3.51** The absence of a safe and secure place in which to live can have an extremely negative impact on physical and emotional health and wellbeing.

**3.52** Between March 2023 to February 2024 there were 28,777 total crime offences in Luton with an overall crime rate of 126.8 per 1,000 population. This is higher than the average across the South East (121.1) and lower than the average across England (131.3). The highest rate of crime over this period was violent crime and sexual offences accounting for a rate of 42.6, followed by anti-social behaviour (19.8) and burglary (14.5). The overall crime rate in Luton has increased from 125.4 per 1,000 people between Sep-2018 to Aug-2019 to 126.8 per 1,000 people between Mar-2023 to Feb-2024 [\[See reference 57\]](#)

## Economy

**3.53** Nationally, employment rates continued to increase during 2023. However, Luton's employment rate was below the national figure. The percentage of people in Luton who are in employment was 70.5%, which is below the averages for the East of England (77.5%) and Great Britain as a whole (75.8%). There were increases in the number of people claiming unemployment related benefits in Luton (and nationally) from 5% in October 2022 to 6% in April 2024. As of April 2024, 8,805 people between the ages of 16 and 65 were on universal credit in Luton Borough. This equates to 6% of people aged 16-65. The number of claimants is significantly above the regional and national figures at 3.1% and 3.8% respectively [\[See reference 58\]](#).

**3.54** In 2022, the total output (Gross Value Added, GVA) in Luton Borough reached £6,649 million. The trend in GVA has been steadily increasing over the years for Luton, with one decrease from 2019-2020 [\[See reference 59\]](#).

**3.55** The Gross Weekly Pay in 2023 in Luton Borough for full time workers was £658.9 per week for full time workers which is lower than the regional average (£673.5) and the national average (£682.6). This equates to £34,263 a year in Luton Borough compared with £35,022 and £35,495.2 regionally and nationally [\[See reference 60\]](#).

**3.56** In the period from January 2023 to December 2023, 74.6% of people in Luton were economically active. Across the East England region this figure was higher at 80.6% within the same period. About 5.1% (5,700) people were unemployed in Luton, which is higher than both the regional (3.6%) and national averages (3.7%) [\[See reference 61\]](#). Luton's workforce is distributed across a wide range of sectors, with only 41.6% of the working population employed as a manager, director, senior role, professional occupation or associate professional occupation compared to the East of England (53.5%) and Great Britain (52.9%) averages [\[See reference 62\]](#). According to the Census 2021, approximately 41.9% of the population of Luton have a Level 4 qualification and above (degree (BA, BSc), higher degree (MA, PhD, PGCE), NVQ level 4 to 5, HNC, HND, RSA Higher Diploma, BTEC Higher level, professional

qualifications). This is below than the regional figure for East of England at 42.8% and the national figure for England at 47.3% [See reference 63]. Official Labour Market Statistics data presented in Table 3.12 below show that a higher percentage of people are employed in Administrative and support service activities than the national and regional averages. In Luton, 32.4% of people work in Administrative and support service activities compared to the regional average of 11% and the national average of 9%. Similarly, 8.3% of people work in Transportation and Storage which is also higher than the regional average (5.6%) and national average (5%). However, there is a lower number of people employed in Wholesale and Retail Trade; Repair Of Motor Vehicles And Motorcycles, which has the highest percentage of employees for the region and nation [See reference 64].

**Table 3.12: Employee jobs in Luton Borough in relation to regional and national averages (2022)**

Employee Jobs by Industry	Luton Borough (%)	East England (%)	Great Britain (%)
Mining and Quarrying	0	0	0.2
Manufacturing	5.6	7.4	7.6
Electricity, gas, steam and air conditioning	0.0	0.2	0.4
Water supply; sewerage, waste management and remediation activities	0.2	0.8	0.7
Construction	3.7	6.7	4.9
Wholesale and retail trade; repair of motor vehicles and motorcycles	10.2	15.5	14
Transportation and storage	8.3	5.6	5
Accommodation and food service activities	5.6	7.9	8

Employee Jobs by Industry	Luton Borough (%)	East England (%)	Great Britain (%)
Information and communication	1.9	3.6	4.6
Financial and insurance activities	0.5	2.4	3.3
Real estate activities	2.1	1.9	1.9
Professional, scientific and technical, activities	5.6	8	9.1
Administrative and support service activities	32.4	11	9
Public administration and defence; compulsory social security	3.2	3.5	4.7
Education	7.4	8.7	8.6
Human health and social work activities	10.2	12.4	13.5
Arts, entertainment and recreation	1.4	2.2	2.4
Other service activities	1.2	1.7	2.0

**3.57** In 2021 there were 7,860 businesses in Luton. The majority of these (91.5% or 7,195) were micro businesses which have fewer than 10 staff. There were 535 (6.8%) small businesses, 95 (1.2%) medium and 35 (0.4%) large businesses in Luton Borough. Combined small and medium sized (not micro) make up 130 (8%) businesses. In the year leading up to 2023, the number of businesses in Luton fell by 320 [\[See reference 65\]](#).

**3.58** Luton Airport plays an important role in the Luton economy. Further growth at the airport will also bring more visitors to the areas around the airport, supporting the tourism economy and generating increased GDP and more jobs (13% of jobs in Luton currently are in the tourism sector). By 2043, inbound tourist activity via the airport could be supporting around £150 million in GDP each year across the Three Counties area and around 2,030 jobs in the tourism

sector [\[See reference 66\]](#). Luton town centre encompasses the Town Centre Shopping Area, The Mall. The shopping centre spans one million square foot, has more than 120 retailers and food outlets. The Mall attracts 18 million visitors per year, with gross annual sales of around £200 million [\[See reference 67\]](#)

**3.59** Luton is well served by a range of convenience food shops and services including banks, estate agents, hairdressers, cafes, restaurants, pubs and takeaways. The centre's mix of units is broadly similar to the national average. Luton Borough's vacancy rate of 18% in 2014 was higher than the national average of 12%, however this figure is likely to have changed since the COVID-19 pandemic and the changes in shopping habits [\[See reference 68\]](#).

## Transport

**3.60** There are two 'Gateways' from Luton onto Highways England's Strategic Road Network (SRN). Firstly, the A1081/A505 connects the south and east of Luton including the town centre and airport to M1 Junction 10a and Dunstable Road and Hatters Way link the town centre to M1 Junction 11. Secondly, The A6 north of Luton and the A505 in east Luton and towards Hitchin also form part of the Major Road Network (MRN).

**3.61** There are three rail stations in Luton: Luton, Legrave and Luton Airport Parkway. Luton Station has service operated by East Midlands Railway and Thameslink, providing services throughout the East of England, down to London and further south onto London and Brighton. At Legrave Station there are four trains per hour to both Bedford and Brighton, with the latter travelling via Luton Airport, St Albans, London (just 35 minutes away), Gatwick Airport and Burgess Hill. Additional services leave the station for Kent and Three Bridges. Luton Airport Parkway railway station is well connected from London and the south. Travel from Central London to London Luton Airport in just 32 minutes with the Luton Airport Express.

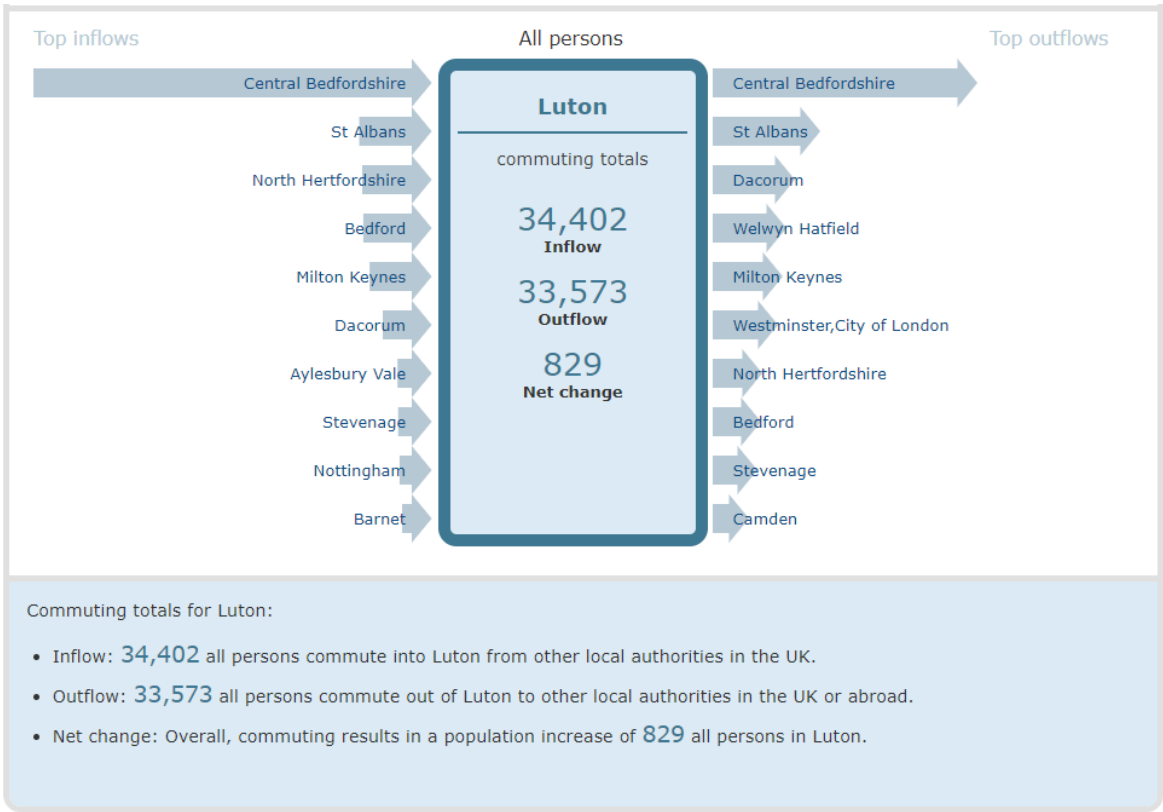
**3.62** London Luton Airport (LTN) is the UK's fifth busiest airport. It's a major base for low-cost airlines and is located 56km (35 miles) north-west of central

London. Airlines from the airport fly to and from more than 30 countries across Europe, the Middle East and North Africa. Car ownership in Luton is relatively low (75%) compared to other local authorities in England and Wales. This is below neighbouring authorities Central Bedfordshire (86.7%) and North Hertfordshire (84.5%) [\[See reference 69\]](#).

**3.63** 21.5% of people aged 16 years and over in employment in Luton work mainly at or from home. However, at the time of Census 2021, UK government guidance and lockdown restrictions resulted in unprecedented changes to travel behaviour and patterns [\[See reference 70\]](#). Additionally, there was an equally high inflow of people commuting into Luton (34,402 people) as commuting out (33,573 people). The vast majority of in and outflows of Luton Borough were to Central Bedfordshire and St Albans, most people travel to work by car or van, followed by bus, mini bus or coach and train [\[See reference 71\]](#). Commuting trends from the 2011 Census are demonstrated in Figure 3.1 below [\[See reference 72\]](#). Luton has high levels of in and out commuting for work, particularly given its relationship with neighbouring authorities.



Figure 3.1: Flows of commuters in and out of Luton Borough (total)



**3.64** The Luton Transport Strategy and Local Transport Policies [\[See reference 73\]](#) outlines a transport vision “To make Luton carbon neutral and improve the quality of life and wellbeing whilst realising sustainable growth opportunities, connect residents and the business community with opportunities to live, work, learn and have fun by providing an integrated, safe, accessible and more sustainable transport system to enable active travel and reduce unnecessary car use, thereby improving air quality, enhancing the natural, built and historic environment and improving health and quality of life for all”. The transport links within Luton Borough are shown in Figure 3.4 and services and facilities in Luton Borough are shown in Figure 3.5.

## Land and Water Resources

### Geology and Minerals

**3.65** Luton is situated in the gap carved through the chalk hills by the River Lea, and the influence of the chalk geology is significant, providing the setting for the town. Luton lies within the northern end of the Chilterns National Landscape (formally referred to as an Area of Outstanding Natural Beauty or AONB) [\[See reference 74\]](#).

**3.66** The Minerals and Waste Local Plan: Strategic Sites and Policies found no sites in the borough are identified for mineral extraction [\[See reference 75\]](#). However, the area has a history of chalk and clay extraction. Further planning permissions for chalk extraction within or close to the Chilterns National Landscape will not normally be granted [\[See reference 76\]](#)

### Water

**3.67** Luton Borough is located within the Thames River Basin District. The management and operational catchment within the Basin is the Lee Upper. There are two water bodies in this operational catchment: Lee (from Luton Hoo Lakes to Hertford and Lee from Luton to Luton Hoo Lakes). This can be seen in Figure 3.6 which shows the watercourses in Luton Borough.

**3.68** The River Lea runs through Luton in the suburb of Leagrave, at this location the source of the river is located. The river also passes through Luton Hoo into Hertfordshire and Essex before flowing into London where the river meets the Thames [\[See reference 77\]](#).

**3.69** Source Protection Zones (SPZs) are defined around large and public potable groundwater abstraction sites and they provide additional protection to safeguard drinking water quality by constraining the proximity of an activity that

can impact the quality of drinking water. There are three Inner Protection Zones in Luton, two in the central part of the Borough and one in the south west of the Borough [\[See reference 78\]](#).

**3.70** Water quality has improved in Luton since 1990 and the majority of watercourses in the Borough meet at least the moderate status. Key threats to water quality in the Thames basins include physical modifications to the basin, pollution from waste water and pollution from towns, cities and transport [\[See reference 79\]](#), other impacts include bacteriological contaminations from animal faeces, and inappropriately stored and applied livestock slurry being washed off the land and pesticides from farming, forestry, golf courses and parks. These contaminants pose a particular threat to bathing waters, shellfish waters and drinking water.

**3.71** The River Lea has been categorised as having Poor Ecological Potential and Fails to Achieve Good Chemical Status [\[See reference 80\]](#). The Luton Lea Catchment Management Plan has themes and objectives to improve the River Lea to benefit the local communities, environment, and economy. There are many things a restored river could bring – educational opportunities, better health and improved wildlife. Themes and objectives include community engagement and participation, promoting appropriate and sympathetic land management, improving water quality and water quantity [\[See reference 81\]](#).

**3.72** Water supply for the majority of the Luton area is provided by Affinity Water. A small area in the north of Luton's boundary falls within Anglian Water's Ruthamford South Resource Zone. Wastewater treatment is provided by Thames Water and Anglian Water.

**3.73** Affinity Water's Revised Draft Water Resources Management Plan (WRMP) 2024 [\[See reference 82\]](#) sets out the key challenges the area faces and the strategy for ensuring a safe, resilient water supply. The Draft WRMP identifies population and housing growth, water leakage, 10% globally rare chalk stream which needs protecting as some of the key challenges for the region's future water supply. The Draft WRMP aims to:

- Deliver a secure and wholesome supply of water

- environmental and social benefit
- increase the resilience of water systems
- deliver at a cost that is acceptable to customers.

**3.74** Thames Water published its Draft Water Resources Management Plan 2024 [See reference 83]. The Draft Water Resources Management Plan identifies the main challenges as a growing population, a changing climate and an environmental need. The plan aims to:

- Reduce the amount of water taken from rivers and underground sources to protect the environment
- Invest into over 31,000KM of pipes to stop water leakage
- Install more smart meters, which give essential information about where water goes, helping tackle leakage and helping customers reduce how much water they use.
- Providing free water efficient devices and tailored advice.
- Boost water supply with innovative new schemes

**3.75** Anglian water published its Revised Draft WRMP24 in August 2023 [See reference 84]. The plan identifies main challenges of license capping, reducing the amount of water taken from sensitive environments, enhanced resilience to drought and adapting to climate change. The intended outcomes of the plan include:

- Supply meets demand
- Positive impact on communities
- Resilient businesses
- Investing for tomorrow
- Flourishing environment
- A smaller footprint
- Fair charges, fair returns

**3.76** Ruthamford South is a Water Resource Zone within Anglian Water WRMP24 water resource zones. The area is vulnerable to baseline growth and growth associated with OxfordCambridge Arc, Climate Change and extreme drought. In addition, there is potential for sustainability reductions in the Cam and Ely Ouse to significantly increase baseline scenario deficits in Environmental Destination scenarios. Across the region, there are three strongly interlinked programmes to combat strategic risk and issues: water metering program, leakage reduction and water efficiency measures [\[See reference 85\]](#).

### Flood Risk

**3.77** While most of Luton Borough falls within Flood Zone 1, there is some land within Flood Zone 3 which means there is a high probability of flooding from rivers and the sea. The main areas of flood risk are associated with the River Lea watercourse. There are also some areas of Flood Zone 2 [\[See reference 86\]](#). This is shown in Figure 3.7.

**3.78** Luton experiences regular flooding events, the main sources of which are weather events, increased pressure on sewerage network, poor maintenance, development and planning issues and fluvial flood risk. Large parts of Luton have experienced severe flooding events. In May 2007, the wettest day on record for Luton caused major travel disruptions by via surface water flooding of several main roads. Combined surface water and Main River flooding in Wardown Park caused cancellation of the Luton Carnival that cost the Council more than £300,000 and the loss of approximately 100,000 additional visitors to the area for the event [\[See reference 87\]](#). In September 2023, Roads across Luton ‘badly flooded’ after heavy downpours which led to the fire service receiving 33 weather related calls in 14 hours [\[See reference 88\]](#).

**3.79** There are a number of flood alleviation schemes throughout the borough. Remaining Green Belt areas should be protected from future development in order that Luton continues to be provided with some flood water storage capacity. Opportunities to identify sites where developer contributions could be used to fund future flood risk management schemes. The Council should look at

opportunities to make space for water to accommodate climate change [\[See reference 89\]](#).

**3.80** The Luton Level 1 Strategic Flood Risk Assessment [\[See reference 90\]](#) was produced in 2013 and is due to be updated. The assessment found the following:

- In many areas current flooding is exacerbated by unattenuated discharges of surface water to fluvial systems and/or the poor conveyance of hydraulic structures. With the prospect of climate change it is considered that these causes of flood risk will worsen unless management practices are changed and/or mitigation measures are implemented.

**3.81** The Central Bedfordshire Level 1 Strategic Flood Risk Assessment was produced in 2017 [\[See reference 91\]](#). The plan found the following:

- As a result of Luton Borough's SWMP, areas in Central Bedfordshire (Houghton Regis) have been identified as Critical Drainage Areas which may affect Luton downstream. Opportunities for upstream storage in these areas could be investigated as part of crossboundary partnership working.
- In the Upper Lee Catchment, there is a new flood storage area at Houghton Regis to reduce the level of risk in Luton - this scheme incorporates a new £8.5 million flood storage area to benefit 600 residential and commercial properties. The flood storage area can hold back 140,000m<sup>3</sup> of water, equivalent to 56 Olympic sized swimming pools, at times of heavy rain and it will then allow it to drain slowly and under control into the Houghton Brook – cutting the risk of flooding to people and property along the Houghton Brook and River Lea in Luton.

**3.82** The climate in Luton is expected to change, presenting a series of risks for the Borough. Climate change is estimated to result in milder wetter winters and increased summer rainfall intensity. This combination will increase the pressure on existing sewer systems effectively reducing their design standard, leading to more frequent flooding [\[See reference 92\]](#).

## Air Quality

**3.83** Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children, the elderly, and those with existing heart and lung conditions. There is also often a strong correlation with equalities issues because areas with poor air quality are also often less affluent areas. Air pollution is the largest environmental risk to public health in the UK. Poor air quality is associated with approximately 28,000 and 36,000 deaths a year. It is estimated that nationally the total cost for the NHS and social care system will be £1.6 billion between 2017 and 2025 for air pollutants (fine particulate matter and nitrogen dioxide) **[See reference 93]**.

**3.84** The Luton 2023 Air Quality Annual Status Report **[See reference 94]** found road traffic is the main source of pollution in the borough with both the town and the motorway providing significant traffic volumes. Other sources include London Luton Airport and local industry, which is distributed in pockets around the borough. At present the main pollutant of concern is nitrogen dioxide (NO<sub>2</sub>). There is a list of measures to improve air quality in Luton:

- The Luton DART which connects London Luton Airport with national rail services in under four minutes, this new airport transfer by fully automated and electrically powered shuttle aims to increase rail modal share by making travelling to the airport by public transport more convenient.
- The launch of LBC's "Engines off" anti-idling campaign following a decision by Councillors in March 2022 to educate, engage and as a last resort fine drivers in an effort to reduce engine idling.
- The launch of Cycling UK's "Making cycling e-asier – National e-cycle scheme" pilot in Luton & Dunstable. The scheme offers free skills and confidence sessions and e-cycle loans to encourage people to consider e-cycles as an active travel option for everyday journeys.



- Council's new Electric vehicle chargepoint strategy 2022 to 2025. This strategy provides a policy framework from which EV chargepoint solutions will be brought forward over a three year period

**3.85** There is an obligation on all local authorities under Part IV of the 1995 Environment Act to review regularly and assess air quality in their areas and to determine whether or not national air quality objectives are likely to be achieved. Where exceedances are considered likely, the local authority must declare an Air Quality Management Area (AQMA) and prepare an Air Quality Action Plan (AQAP) setting out the measures it intends to put in place in pursuit of required air quality improvements.

**3.86** There are currently three Air Quality Management Areas (AQMA) within Luton Borough:

- **Luton AQMA1**- 24 dwellings in the vicinity of the M1 motorway, declared on 3<sup>rd</sup> November 2011 as a result of Nitrogen dioxide NO<sub>2</sub>.
- **Luton AQMA2**- An area encompassing 431 premises in the vicinity of the M1 motorway either side of Junction 11, declared on 31<sup>st</sup> March 2005 as a result of Nitrogen dioxide NO<sub>2</sub>.
- **Luton AQMA3**- From Dunstable Road by Kenilworth Road through to Stuart Street and Chapel Viaduct by Latimer Road, including Castle Street to Holly Street and Telford Way, declared on 1<sup>st</sup> April 2016 as a result of Nitrogen dioxide NO<sub>2</sub>.

**3.87** The distribution of annual mean NO<sub>2</sub> concentrations were marginally up compared to 2021. The 2022 results mark a continuation of the reduced pollutant levels observed in Luton since the COVID-19 induced lows of 2020. As a result of no exceedance of the annual mean NO<sub>2</sub> objective being recorded within AQMA 1 & 2 for the last five years, pending the completion of a period (6 - 12 months) of enhanced passive monitoring to include previously unmonitored locations, the council propose to revoke both AQMAs. In accordance with the recommendations of the Luton Town Centre Air Quality Management Area Review, the council propose to extend the area along Castle Street Southward to the Stockwood Crescent / Castle Street / Cowper Street / London Road

junction to ensure that all relevant hotspots are captured within the amended AQMA [\[See reference 95\]](#).

## Soils

**3.88** The Agricultural Land Classification (ALC) system [\[See reference 96\]](#) provides a framework for classifying land according to the extent to which its physical or chemical characteristics impose long-term limitations to agricultural use. The principal factors influencing agricultural production are soil wetness, drought and erosion. These factors, together with interactions between them, form the basis for classifying land use into one of five grades, where 1 describes land as excellent (land of high agricultural quality and potential) and 5 describes land as very poor (land of low agricultural quality and potential). Land falling outside these scores is deemed to be 'primarily in non-agricultural use', or 'predominantly in urban use'. Grade 3 can be further separated into grades 3a and 3b, although this requires further local surveys and therefore such data is only available for small areas. Grades 1, 2 and 3a are considered to be the best and most versatile agricultural land.

**3.89** The majority of land in Luton is urban. However, land surrounding the built-up area is predominantly Grade 3 Agricultural Land [\[See reference 97\]](#). This is shown in Figure 3.8.

**3.90** The Council has a duty to prepare, maintain and publish a Brownfield Land Register. This Register is a list of previously developed sites that are under construction for residential development, have planning permission for residential development or may be suitable for residential development. As of 2019, there are a total of 106 sites on the Brownfield Register [\[See reference 98\]](#). However, not all of these sites are deliverable and nor have they been granted planning permission. The Council is currently in the process of preparing an updated Brownfield Land Register.

## **Contaminated Land**

**3.91** Under Part IIA of the Environmental Protection Act 1990, Luton Borough Council is responsible for regulating contaminated land. This requires surveying Luton, determining contaminated land, ensuring a solution is found, and identifying who should bear the costs of the solution.

**3.92** In accordance with Section 78R of the Environmental Protection Act 1990, the Council is also required to maintain a public register of contaminated land, which serves as a permanent record of all regulatory action undertaken to ensure remediation of any site that has been classified as contaminated. There are currently no entries on the public register.

**3.93** The definition of contaminated land from Part IIA Environmental Protection Act 1990 (as amended), Section 78A is: ‘any land which appears to the local authority in whose area it is situated to be in such a condition, by reason of substances in, on or under the land, that:

- significant harm is being caused or there is a significant possibility of such harm being caused; or
- significant pollution of controlled waters is being, or is likely to be, caused’

**3.94** Local authorities are required to take a strategic approach in inspecting their area and are required to publish this as a part of a written strategy. A guide for development on potentially contaminated land for Hertfordshire and Bedfordshire was published in 2012. The purpose of this guide is to provide developers, planning agents and other applicants with details of the information required by local authorities for sites that may be affected by land contamination or for when sensitive end uses are introduced to a site **[See reference 99]**.

**3.95** Luton has lots of ‘land affected by contamination’ but very little in the way of sites formally determined as contaminated land under Part 2A of the EPA 1990. A site on Guildford Street was initially referred to the Environment Agency due to pollution of the aquifer, and Luton Borough Council has subsequently

accepted that the site no longer meets the definition of contaminated land set out in s.78A(2) of the Act.

# Waste

**3.96** Waste management is a fundamental part of the services provided by Luton Borough Council. The costs of collecting, recycling and disposing of waste in 2015-16 totalled £13.6m - that's around £170 for each of Luton's households. At the heart of the Council's new strategy is a drive to promote wider social responsibility for managing waste. Everyone in Luton needs to work together - it is up to everyone to play their part and rise to the challenge of meeting the vision which is to quite simply: Waste Less, Recycle More. The Council are committed to doing all they can to increase recycling, reuse and recover value from the waste generated in the town [\[See reference 100\]](#).

**3.97** There are a number of small, locally placed recycling banks across the Luton, this is to dispose of small quantities of waste, such as glass bottles, food tins and in some cases, clothing. There are two Household Waste Recycling Centres (HWRCs) – Tidy Tips in Luton: Eaton Green Road Tidy Tip and Progress Way tidy tip.

**3.98** Between 2020 to 2021, a total of 89,734 tonnes of waste was collected in Luton Borough, of which 80,525 tonnes consisted of household waste. 30% of this household waste was sent to be recycled, composted or re-used resulting in 70% of waste not being recycled. This is significantly lower than the regional average recycling rate of 46.2% for East England and the national recycling rate of 42.3% for England. In relation to non-household waste, only 19% of waste was recycled, composted or re-used [\[See reference 101\]](#). Recycling rates identify that Luton could do better to improve its recycling [\[See reference 102\]](#):

- Dry recycling rate: Luton ranks 8th out of 16 comparable councils.
- Composting rate: Luton ranks 14th out of 16 comparable councils.
- Total recycling rate: Luton ranks 12th out of 16 comparable councils.

**3.99** In 2021 an Anti-Littering Action Plan was adopted with three main focus areas: [\[See reference 103\]](#).

- **Prevention:** Actions include Raise awareness within key partners to the impact of litter and their social responsibility. Use visual examples of the local impact of litter to motivate change. Promote Zero tolerance of littering in a drive to change behaviour. Lobby to have littering added to school curriculum and promote social responsibility amongst the youth. Promote Keep Britain Tidy agenda locally.
- **Intervention:** Work with groups to deliver bespoke campaigns and toolkits. Intervene where necessary to improve the Local Environmental Quality Standard. Target root causes of littering.
- **Collaboration:** Undertake robust enforcement and transparent performance monitoring. Support community schemes to tackle littering and clean ups throughout the year. Deliver effective and consistent messaging on social responsibility to do the right thing with litter.

## Biodiversity

**3.100** There are no European designated nature conservation sites within Luton Borough. The nearest is the Chilterns Beechwoods which is a designated Special Area of Conservation (SAC) located in Bedfordshire and Hertfordshire, Berkshire, Buckinghamshire and Oxfordshire. The area is 1285.86 hectares, the site character is Heath, Scrub, Maquis and Garrigue, Phygrana (4%), Dry grassland, Steppes (8%) and Broad-leaved deciduous woodland (88%) [\[See reference 104\]](#).

**3.101** There are two SSSIs (seen in Table 3.13 below) that fall either wholly or partially within the Borough. There is also an additional SSSI bordering the edge of the Borough: Galley and Warden Hills [\[See reference 105\]](#).

**Table 3.13: Summary of SSSI in Luton**

SSSI Name	Main Habitat	(ha)
Dallow Downs and Winsdon Hill	Calcareous Grassland	41.1702
Cowslip Meadow	Neutral Grassland	6.3563

**3.102 Dallow Downs and Winsdon Hill:** Dallow Downs and Winsdon Hill SSSI supports lowland calcareous grassland with a characteristic downland flora. The species composition varies throughout the site as a result of topography and management history. It is dominated by grasses such as upright brome *Bromopsis erecta*, quaking-grass *Briza media* and fescues *Festuca* spp. A wide range of typical chalk grassland plants are present, the most frequent including rough hawkbit *Leontodon hispidus*, salad burnet *Sanguisorba minor*, common birdsfoot-trefoil *Lotus corniculatus*, glaucous sedge *Carex flacca* and common knapweed *Centaurea nigra*. Dallow Downs and Winsdon Hill SSSI supports the largest Great Britain population of the Nationally Rare<sup>1</sup> great pignut *Bunium bulbocastanum*. Great pignut is an umbelliferous plant of limey soils that has a limited distribution in Great Britain, being mainly confined to the chalk hills between Tring and Cambridge [\[See reference 106\]](#)

**3.103 Cowslip Meadow:** Cowslip Meadow SSSI is of special interest for its species-rich meadow characterised by the nationally rare NVC type MG5 crested dog's-tail *Cynosurus cristatus* – common knapweed *Centaurea nigra* grassland [\[See reference 107\]](#)

**3.104** There are 25 County Wildlife Sites in Luton. The biggest sites are: Galley and Warden Hill, Bradger's Hill, Cowslip Meadow, Fallowfield, Bluebell Wood, Hay Wood, Dallow Downs and Leagrave Common, including Waulud's Bank. There are also 14 District Wildlife Sites, which are designated via the Local Sites Partnership using criteria on the Bedfordshire Recording and Monitoring Centre website.

**3.105** Galley and Warden Hills is Luton's principal site and is owned by Luton Borough Council, even though it lies outside the borough. It is a Site of Special Scientific Interest and on 3 March 1993 became Luton's first nature reserve. It is a nationally important site because of its wide range of chalk grassland communities of wild flowers and butterflies [\[See reference 108\]](#). District and County Wildlife Sites in the Borough are in the process of being reviewed, including for their potential for biodiversity net gain.

**3.106** There are eight priority habitats of national importance present in Luton Borough (Ancient and/or species rich hedgerows, chalk rivers, eutrophic standing waters, lowland calcareous grassland, lowland meadows, lowland wood pasture and parkland, lowland mixed deciduous woodland, wet woodland), as well as 11 Priority Species (Great Crested Newt, Linnet, Reed Bunting, Spotted Flycatcher, Grey Partridge, Bullfinch, Song Thrush, Water Vole, Pipistrelle Bat, Common Fan Foot moth, pale shining brown moth) [\[See reference 109\]](#).

**3.107** Central Bedfordshire Council is responsible for developing the Local Nature Recovery Strategy for Bedfordshire and is working closely with Bedfordshire Local Nature Partnership, Luton Borough Council and Bedford Borough Council along with a range of other partners and stakeholders. The Local Nature Recovery Strategy aims to identify local actions and locations where nature recovery can be delivered. Central Bedfordshire Council is currently at the stage of reviewing public responses on what could be done to help nature [\[See reference 110\]](#).

**3.108** A map showing the designated biodiversity and geodiversity assets is provided in Figure 3.9. It should be noted that the boundaries are from the current 2017 Local Plan and some sites may have changed designation and/or boundaries since the adoption of the Local Plan.



## Historic Environment

**3.109** Luton has a range of unique assets that contribute to the character and distinctiveness of the area. These assets include:

- Conservation Areas
- Historic Parks and Gardens
- Listed buildings
- Scheduled Monuments

**3.110** Some heritage assets, non-designated heritage assets, archaeological sites, historic buildings, parks, formal gardens or battlefields, are considered to be of national importance. Non-designated heritage assets include a list of local heritage assets that do not meet the strict criteria for national designation but are of local importance.

**3.111** Luton's Town-wide Strategy for 2021-2031 [\[See reference 111\]](#) finds there are 116 nationally Listed Buildings in Luton. Only St. Mary's Church is listed as Grade I due to its rich architectural detail evidencing deep and meaningful heritage significance, only because it has been consistently maintained and refurbished. The Town Hall is listed as Grade II because of its' interior and exterior neo-classical and Art Deco architectural features. The 144ft. clock tower, incorporating the town's Coat of Arms and distinctive clock bell, has undergone recent structural repairs coinciding with the launch of the 2021 strategy. Conservation Areas are declared by the Local Authority for those areas which possess 'special interest', the 'character and appearance' of which is desirable to 'preserve and enhance'. They represent a familiar and often cherished local scene thus have greater protection against undesirable changes.

**3.112** Luton has five designated Conservation Areas

- Rothesay Road Conservation Area
- Luton South Conservation Area

- George Street Conservation Area
- High Town Conservation Area
- Plaiters' Lea (Hat District) Conservation Area

**3.113** Four scheduled ancient monuments;

- Dray's Ditches
- Neolithic enclosure known as Waulud's Bank
- Strip lynchets on Stopsley Common
- Two bowl barrows on Galley Hill, 880m north east of the golf course club house

**3.114** Four sites nationally listed as historic parks and garden parks:

- Luton Hoo
- Putteridge Bury
- Wardown Park
- The Improvement Garden

**3.115** Luton Council has adopted a Local List of buildings that are of local architectural or historic interest. The buildings and structures that are on the Local List are non-designated heritage assets and although not statutorily listed, have been identified by the Council as having local interest [\[See reference 112\]](#).

**3.116** The designated heritage assets within Luton Borough can be seen in Figure 3.10.

## Heritage at Risk

**3.117** Historic England has a Heritage at Risk Register [\[See reference 113\]](#) which includes historic buildings, Grade II\* and Grade I listed buildings (Grade II listed buildings are only included for London), sites and Conservation Areas at risk of being lost through neglect, deterioration or decay. The register aims to highlight those places and buildings in greatest need of repair.

**3.118** Three assets in Luton are on the Heritage at Risk Register. Historic England classifies building conditions as ‘very bad’, ‘poor’, ‘fair’ or ‘good’. The condition of buildings or structures on the Heritage at Risk Register typically ranges from ‘very bad’ to ‘poor’, ‘fair’ and (occasionally) ‘good’ reflecting the fact that some buildings or structures capable of use are vulnerable to becoming at risk because they are empty, under-used or face redundancy without a new use to secure their future. Assessing vulnerability in the case of buildings in fair condition necessarily involves judgement and discretion. A few buildings on the Register are in good condition, having been repaired or mothballed, but a new use or owner is still to be secured. Buildings or structures are removed from the Register when they are fully repaired/consolidated, and their future secured through either occupation and use, or through the adoption of appropriate management [\[See reference 114\]](#).

**3.119** The heritage assets on Historic England’s Heritage at Risk Register and their condition are set out below:

- **High Town Road:** Heritage Category – Conservation Area; Condition – Very Bad
- **Plaiters Lea, Town Centre:** Heritage Category – Conservation Area; Condition – Very bad
- **George Street/Town Centre:** Heritage Category – Conservation Area Condition – Poor

## Landscape

**3.120** National Character Area (NCA) profiles created by Natural England are used to define the specific combination of landscape, geodiversity, biodiversity, history, culture and economic activity in the area. NCAs follow natural lines in the landscape instead of administrative boundaries.

**3.121** Luton falls within the Chilterns National Character Area [\[See reference 115\]](#) (see Figure 3.11):

- **Chilterns National Character Area:** Chilterns is one of several NCAs within a Chalk outcrop stretching from East Anglia to Dorset and the South Downs. To the north-east, the Chiltern escarpment lowers into the East Anglian Chalk. In the south-west, the escarpments of the Chilterns and Berkshire and Marlborough Downs face each other across the Goring Gap. From the north-west facing escarpment, the dip slope descends south-east into the London Basin. Here, the Chalk is overlain by younger bedrock. Thames Valley is a distinct area of the Chilterns.

**3.122** There are no National Parks in Luton. However, Luton lies partly in the northern end of the Chilterns National Landscape. The Chilterns is a landscape of remarkable beauty and distinctive character with a unique interaction of geological, ecological and cultural heritage features. The Chilterns was designated as an Area of Outstanding Natural Beauty (AONB) in 1965, with an extension in 1990. It now extends over 833km<sup>2</sup> of mainly privately-owned land and is referred to as a National Landscape. The Chilterns is a home and a workplace for over 80,000 people and some 1.6 million people live within 8km of the National Landscape. In particular, the Chilterns was designated to protect its special qualities which include the steep chalk escarpment with flower-rich downland, woodlands, commons, tranquil valleys, ancient routes, villages with brick and flint houses, chalk streams and a rich historic environment of hillforts and chalk figures [\[See reference 116\]](#).

**3.123** The 2014 Luton Borough Landscape Character Assessment [\[See reference 117\]](#) was prepared for the Borough to support the adopted Local

Plan. Through the study, landscape opportunity areas were identified: Northern Urban Edge, Bramingham Wood, Houghton Brook Corridor, Upper Lea Corridor, Lower Lea Corridor, Stopsley Common, Stockingstone Road greenspace, Dallow Downs and Runley Wood, Wigmore, Southern end of Hart Hill, Area adjacent to Someries Farm, Stockwood Perimeter, Guided Busway Corridor, Eastern Fringe and Vauxhall Way. An updated Landscape Character Assessment will be prepared to support the new Local Plan.

**3.124** The 2015 Green Infrastructure Plan for Luton [\[See reference 118\]](#) identified key elements of the GI network:

- The chalk valley side extending from Warden and Galley Hills southwards into the town;
- The Lea Valley;
- Dallow Downs valley side and Guided Busway corridor;
- Stockwood Park/Luton Hoo;
- Northern urban edge

## Difficulties and Data Limitations

**3.125** The SEA Regulations, Schedule 2(8) require the Environmental Report to include "...a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information".

**3.126** At this stage, given the content and purpose of the SA Scoping Report, it is considered appropriate to note the following data limitations which were identified as the report was prepared:

- Some data is quite aged as it was prepared to support the current Local Plan and will be updated as part of the evidence base for the new Plan, but is not yet available.
- 2021 Census data on transport is not yet available.
- Data was not available on existing services and facilities outside of / close to Luton.
- GIS data was not available for sport and recreation facilities.
- Priority habitats and species data is 18 years old.

**3.127** Where data limitations have been identified, if relevant updates sources become available at a later stage of the SA process, they will be used to update the baseline information informing the appraisal work.





Figure 3.2: Per Capita CO2 Emissions compared to Neighbouring Authorities

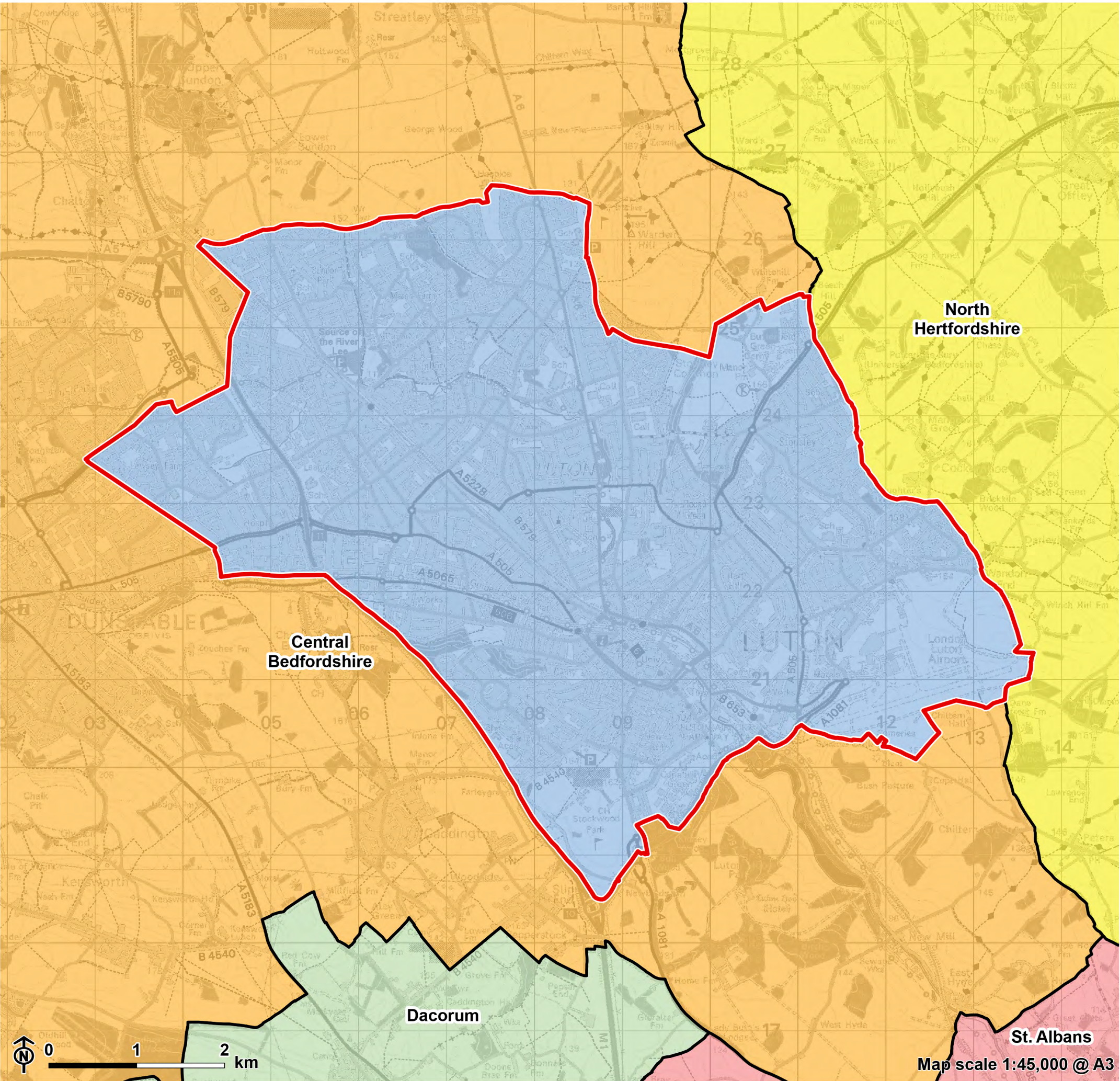
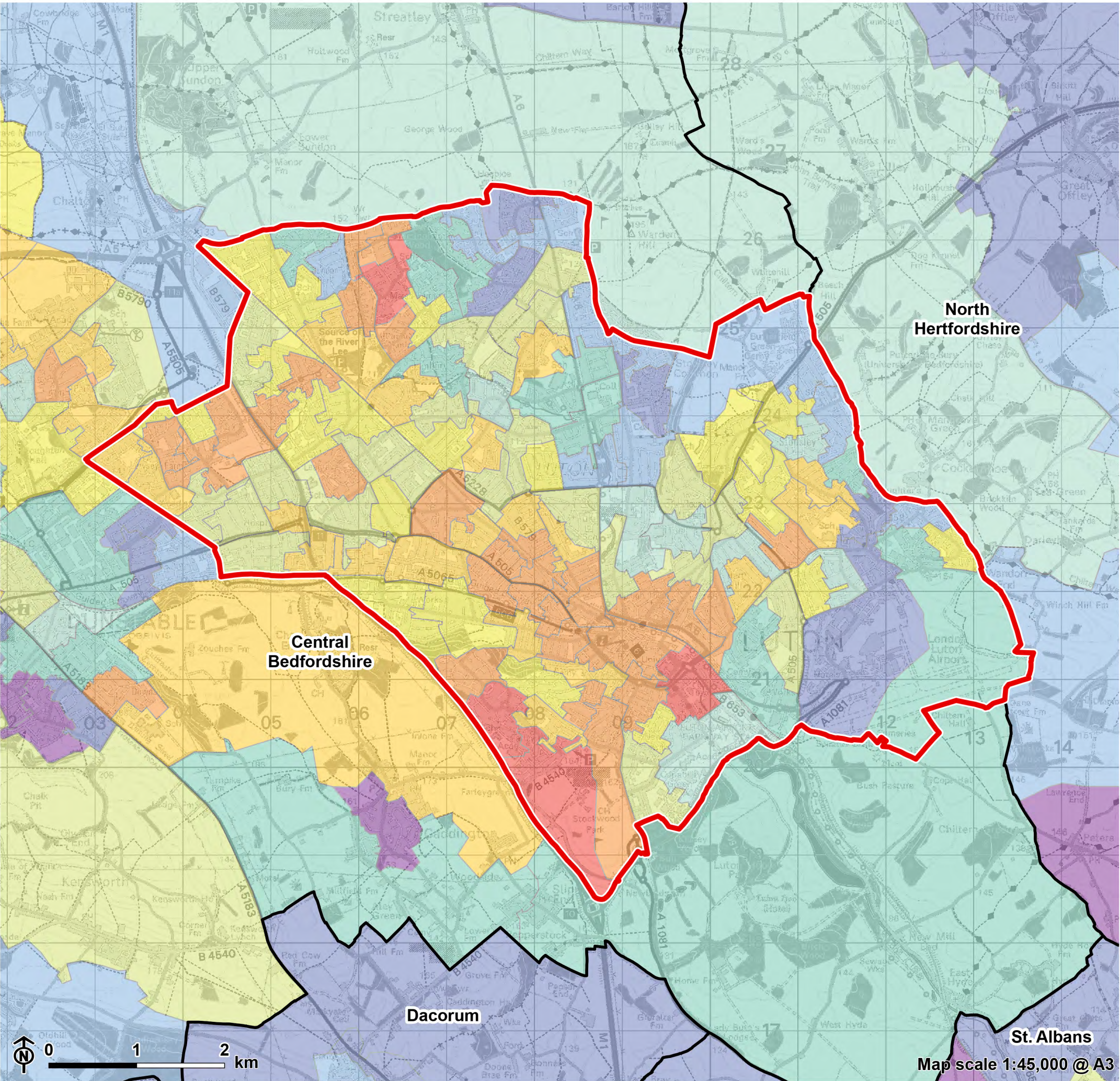




Figure 3.3: Indices of Multiple Deprivation



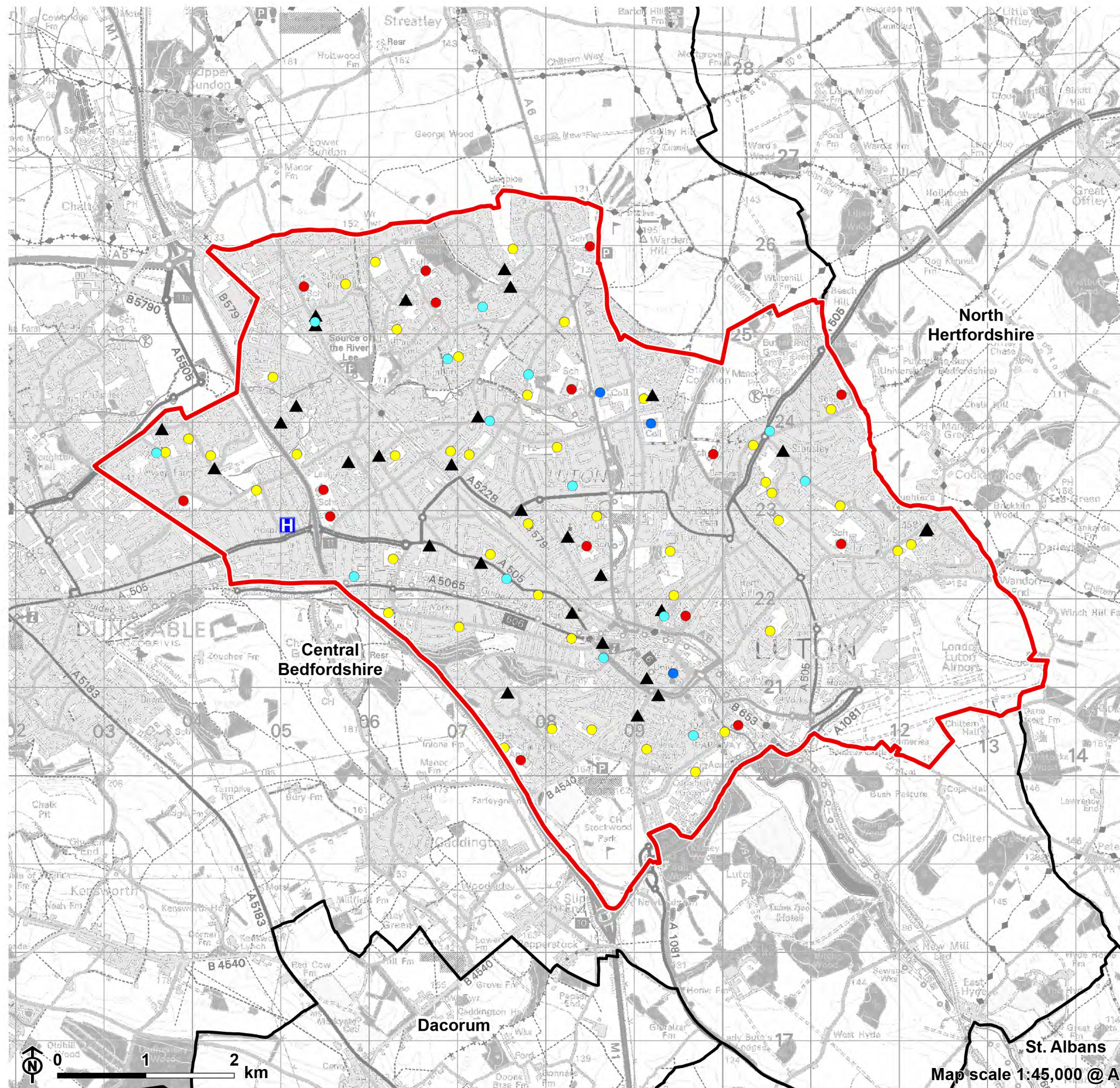


-  Luton Borough boundary
-  Neighbouring local authority
-  Bus stop
-  Railway station
-  National Cycle Network
-  'A' Road
-  Motorway





Figure 3.5: Services and facilities in Luton



- Luton Borough boundary
- Neighbouring local authority
- ▲ GP surgery
- Hospital
- Post office
- Primary School
- Secondary School
- College



Figure 3.6: Watercourse in Luton

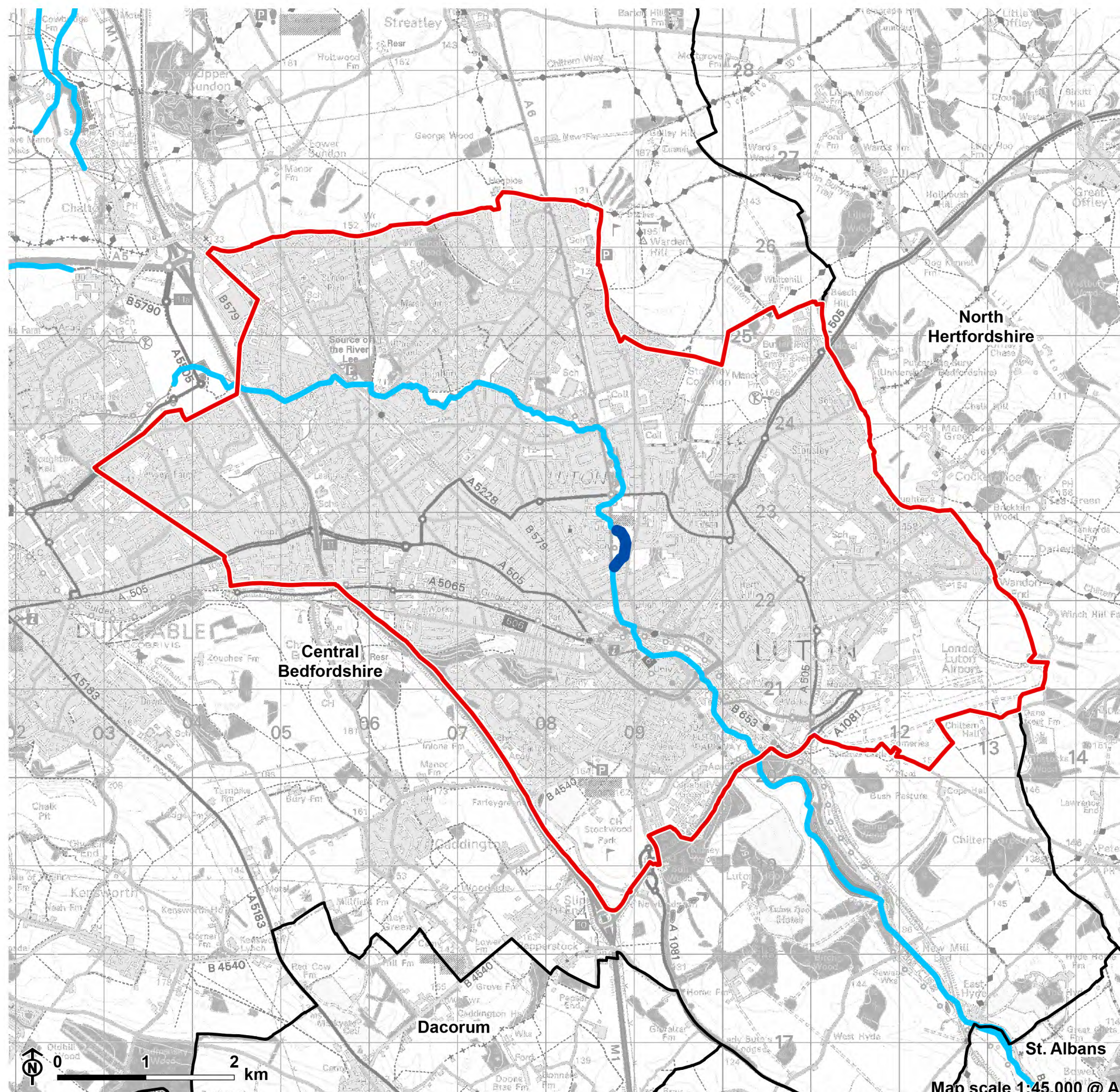
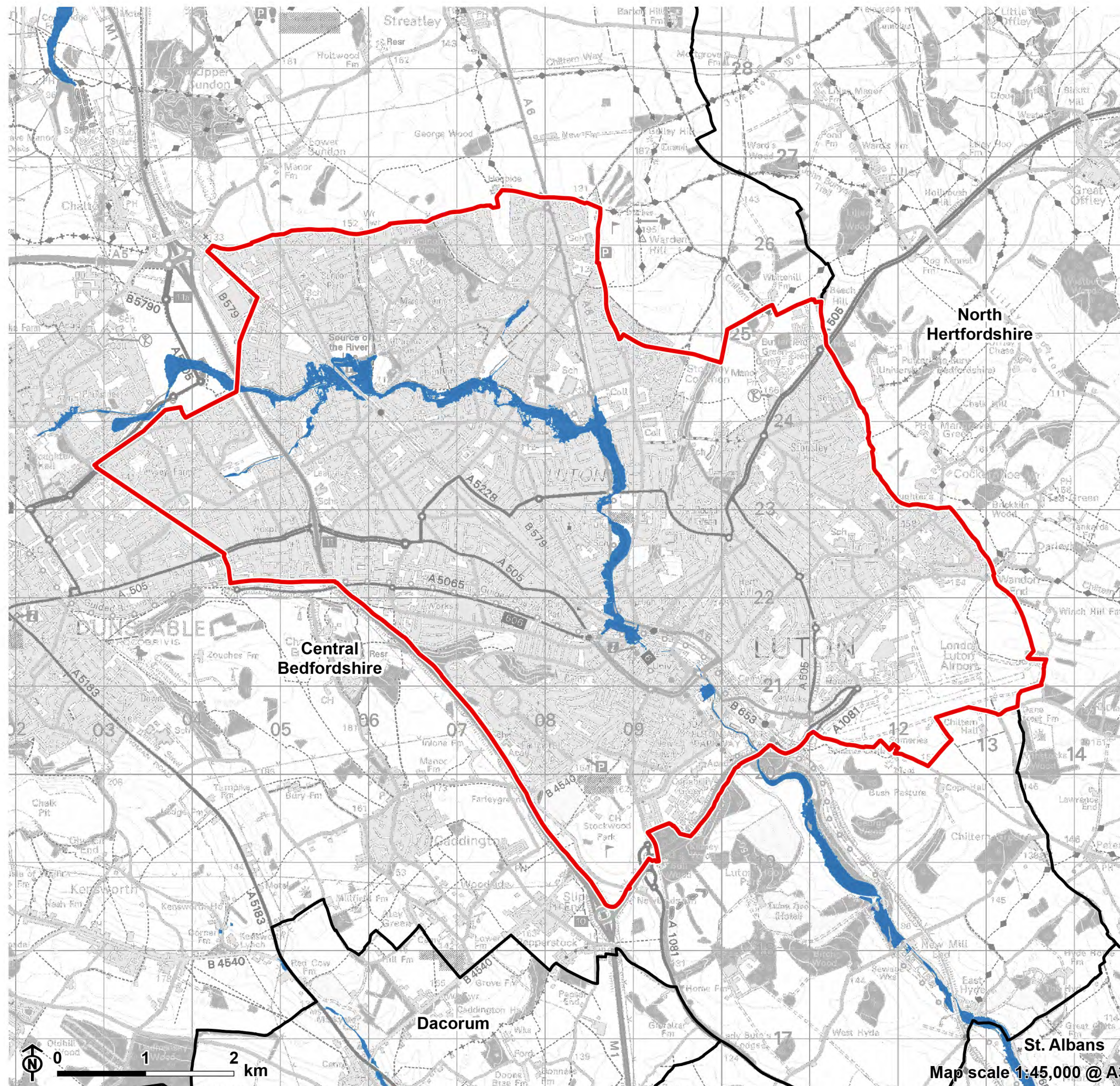




Figure 3.7: Flood Risk

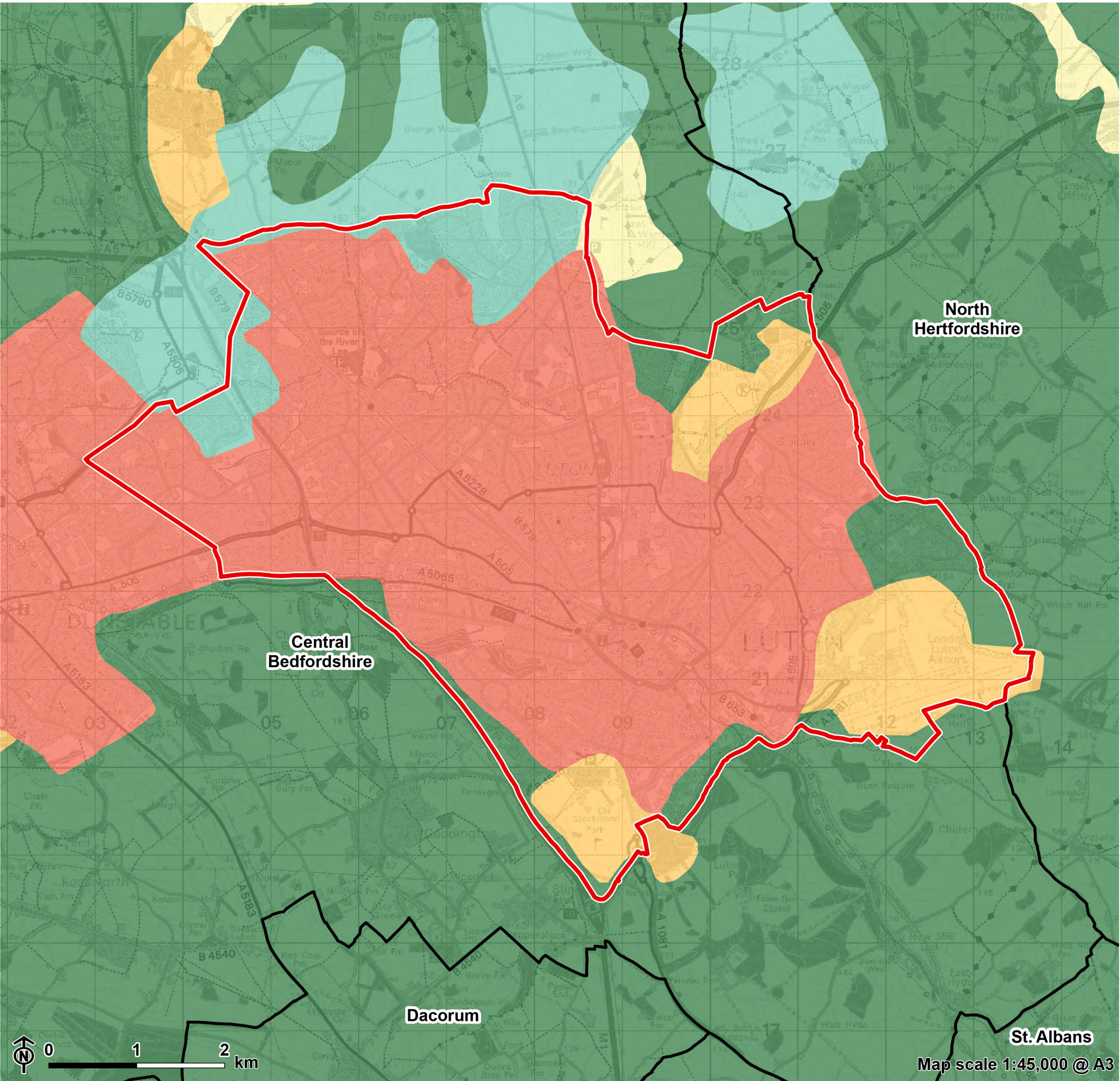


- ▬ Luton Borough boundary
- ▬ Neighbouring local authority
- ▬ Flood zone 2
- ▬ Flood zone 3







Figure 3.8: Agricultural Land Classification









- Luton Borough boundary
- Neighbouring local authority
- Agricultural Land Classification**
  - Grade 2
  - Grade 3
  - Grade 4
  - Non Agricultural
  - Urban






-  Luton Borough boundary
-  Neighbouring local authority
-  Ancient woodland
-  Site of Special Scientific Interest
-  Local Wildlife Site
-  Local Nature Reserve





-  Luton Borough boundary
-  Neighbouring local authority
-  Registered Battlefield
-  Registered Parks and Gardens
-  Scheduled Monument
-  Conservation Area

**Listed Building**

-  Grade I
-  Grade II\*
-  Grade II

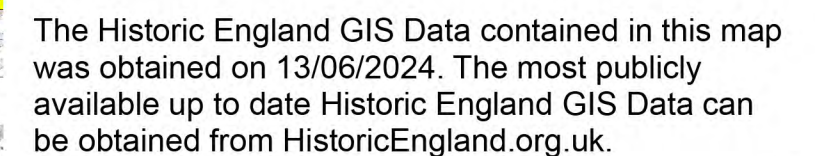
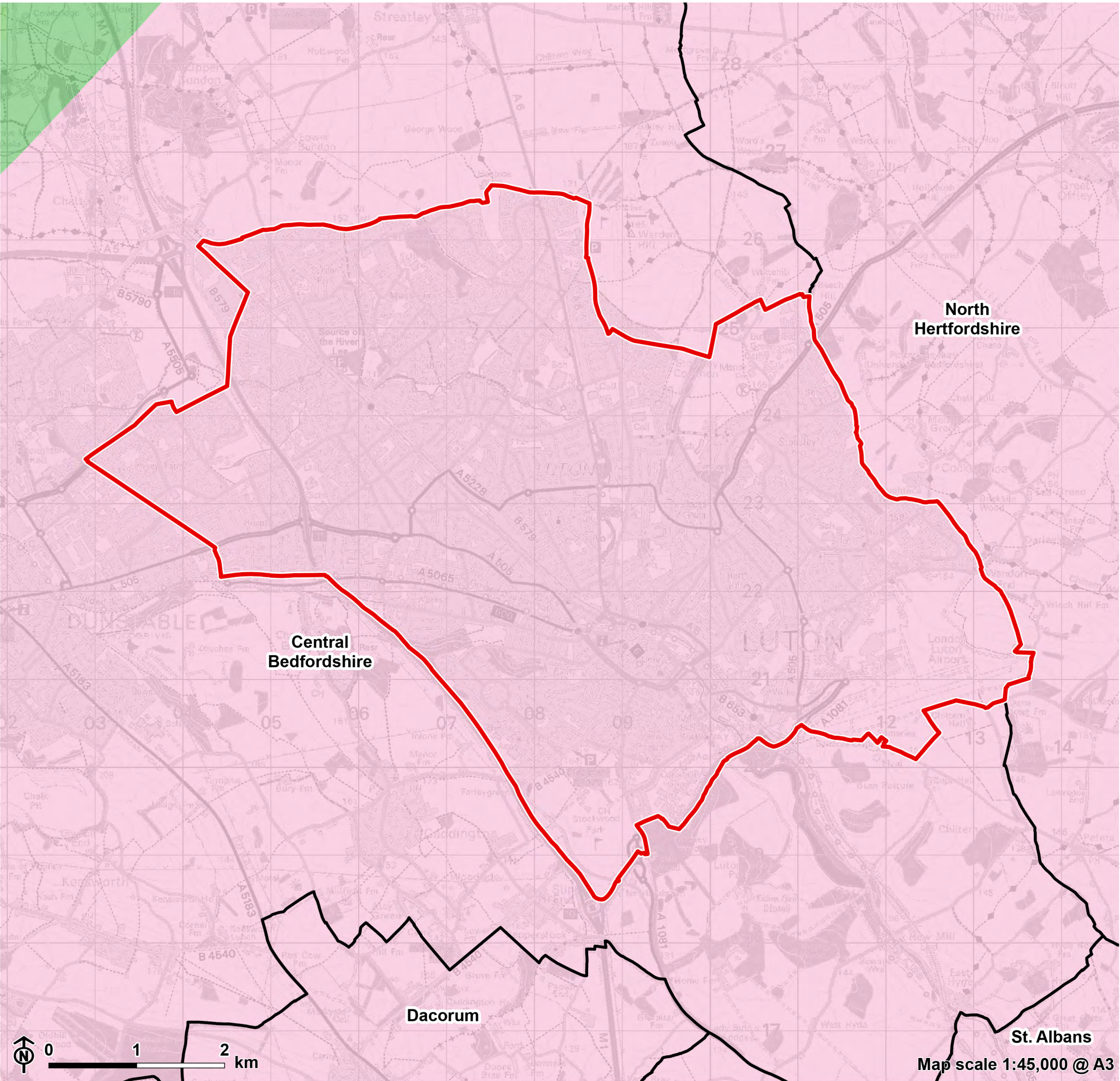




Figure 3.11: National Character Areas





## Chapter 4

# Key Sustainability Issues and Likely Evolution without the Plan

**4.1** Analysis of the baseline information has enabled a number of key sustainability issues facing Luton Borough to be identified. Identification of the key sustainability issues and consideration of how these issues might develop over time if the new Local Plan is not implemented help to meet the requirements of Annex 1 of the SEA Directive to provide information on “the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan; and any existing environmental problems which are relevant to the plan”.

**4.2** Key sustainability issues for Luton were previously identified through the SA Scoping process in 2017 for the adopted Local Plan. These issues have been considered as a starting point but have been fully reviewed and updated during the preparation of this SA Scoping Report for the new Local Plan, in light of the updated policy review and latest baseline information. The current set of key sustainability issues for Luton is presented overleaf.

**4.3** It is also a requirement of the SEA Regulations that consideration is given to the likely evolution of the environment in the plan area (in this case Luton Borough) if the new Local Plan was not to be implemented. This analysis is also presented overleaf in relation to each of the key sustainability issues.

**4.4** The information collated shows that, in general, the current trends in relation to the various social, economic and environmental issues affecting Luton would be more likely to continue without the implementation of the new Local Plan, although the policies in the adopted Luton Local Plan would still go some way towards addressing many of the issues. In most cases, the new Local Plan offers opportunities to directly and strongly affect existing trends in a positive way, through an up-to-date plan which reflects the requirements of the NPPF.

**4.5** Key sustainability issues in Luton (including environmental problems as required by the SEA Regulations) are set out below:

- Hotter, drier summers are expected as a result of ongoing and accelerating climate change, which have the potential for adverse effects on human health and the natural environment. The new Local Plan offers another opportunity to update the Borough's approach to managing the effects of the changing climate and associated weather events, particularly in the design of new buildings, whole developments and green infrastructure. Therefore, without the new Local Plan, this issue is likely to be less well addressed.
- Luton has a young population with a higher number of younger people (under 15) than older people (65+) which can result in increased pressures on certain services and facilities such as nurseries and schools. The new Local Plan offers an opportunity to improve access to and increase availability of such services and facilities. Without the new Local Plan there is likely to be an increasing strain on services and facilities which do not meet local demand.
- Household overcrowding remains an issue due to population growth throughout Luton. Without the new Local Plan, the required housing is less likely to be delivered to meet this population growth.
- Luton has health and well-being issues including low life expectancy, high childhood obesity rates, low physical activity levels and high inactive physical activity levels. The new Local Plan could contribute to tackling issues of health and wellbeing and general health disparities through policies that strongly support uptake of active modes of transport, access to green space, community facilities, improved public realm and other recreation opportunities, in particular in more deprived areas.
- Nearly half of Luton's neighbourhoods have poor access to green space due to very small gardens, no green space within a five-minute walk, and limited access to spaces further afield. The new Local Plan presents an opportunity to help address any existing deficiencies in accessible greenspace and to consider the multi-functionality of the green infrastructure network at a more strategic level to ensure there is

connectivity between the walking and cycling network as well additional greenspace.

- There are relatively high levels of deprivation throughout the Borough. The new Local Plan offers an opportunity to reduce the level of deprivation in areas through appropriately planned growth and regeneration. Therefore, without the new Local Plan, deprivation is less likely to be effectively tackled.
- Crime and safety are a significant concern, with high crime offences and an increased overall crime rate. The new Local Plan will provide opportunities to seek to reduce crime in Luton through policies and objectives to make the borough and the streets safer. Delivering growth and regeneration through the new Local Plan may also contribute to reducing crime and fear of crime.
- Economic performance has been poor across Luton. Luton experiences a low employment rate, a higher number of people claiming unemployment related benefits, a high number of claimants, low gross weekly pay, high rates of unemployment, low Level 4 and above qualifications and a decrease in the number of businesses across Luton in the year leading up to 2023. Trends of poor economic performance are likely to continue without the preparation of a new Local Plan. The new Local Plan offers the opportunity to plan a co-ordinated approach to employment which will lead to increased employment opportunities across the Borough.
- Luton is in Flood Zone 3 and experiences regular flood events. Without the new Local Plan, flood risk will continue to affect the Borough through increased and higher intensity flooding. The new Plan offers an opportunity to plan strategically to locate new development in areas at lower risk from flooding, therefore reducing the number of properties and economic assets at risk from flooding.
- The main air pollutant of concern in Luton, Nitrogen Dioxide, has increased. Without the new Local Plan this trend may continue. The new Plan offers the opportunity to address this issue by promoting sustainable travel and ensuring that the potential air quality impacts of new development are assessed and managed accordingly.

- Luton is mostly urban but does, however, contain pockets of Grade 3 agricultural land which requires protection from development. The new Local Plan provides an opportunity to ensure that this resource is not lost or compromised by future growth by prioritising the development of brownfield land and poorer agricultural land over the best and most versatile grades . Therefore, without the new Local Plan, agricultural land is less likely to be protected.
- Luton has low levels of recycling for both household and non-household waste. The new Local Plan provides an opportunity to adopt up to date policies seeking to minimise waste, increase re-use and recycling. It will also provide an opportunity to deliver adequate space in new developments for waste facilities capable of accommodating recyclable waste.
- Luton has three assets on the Heritage at Risk Register: High Town Road, Plaiters Lea and George Street / Town Centre conservation areas. The new Local Plan provides an opportunity to draw on the most up to date evidence to ensure that new development is sited and designed so as to conserve, enhance and encourage enjoyment of the historic environment as well as improve accessibility and interpretation of it. Therefore, without the new Local Plan, the historic environment is less likely to be protected and enhanced and the condition of assets may worsen.
- Small parts of Luton fall within the Chilterns National Landscape. The new Local Plan offers an opportunity to take into account the most recent landscape-related evidence and to ensure that sensitive landscapes and townscape are protected and enhanced, with development being located and designed to take account of the variation in character and sensitivity across Luton. The new Local Plan also offers the opportunity to take into account the new requirement for local planning authorities to seek to further the purposes of National Landscapes. Without the new Local Plan, this issue is less likely to be addressed as it is more likely that piecemeal and ad-hoc developments would come forward.

## **Chapter 5**

# **Sustainability Framework**

**5.1** The approach being taken to the SA of the Luton Local Plan is based on current good practice and the guidance on SA/SEA set out in the Government's Planning Practice Guidance (PPG).

**5.2** The development of a set of SA objectives (known as the SA framework) is a recognised way in which the likely environmental and sustainability effects of a plan can be described, analysed and compared.

**5.3** The proposed SA framework for the Luton Local Plan is presented below. The previous SA framework for the adopted Luton Local Plan was used as a starting point to inform the preparation of this SA framework although it has been amended and updated to take into account the analysis of international, national and local policy objectives, the baseline information, and the current key sustainability issues identified for Luton.

**5.4** The SA framework comprises a series of SA objectives against which the sustainability of the Local Plan will be appraised. The appraisal of the Local Plan options, policies and site allocations against these SA objectives will be guided in part by the appraisal questions accompanying each objective. The appraisal of site options could be carried out using site-specific assessment criteria that can be developed in relation to each SA objective in order to ensure consistency. The questions included in the framework are not exhaustive, and some may be more relevant to certain elements of the Local Plan than others.

**5.5** All of the topics specifically required by the SEA Regulations (set out in Schedule 2 of the SEA Regulations) are clearly addressed by the headline SA objectives, as listed under each SA objective below.

## **SA Objective 1: Reduce greenhouse gas emissions and develop a managed response to the effects of climate change**

### Appraisal Questions

- Will it reduce greenhouse gas emissions from domestic, commercial and industrial sources?
- Will it plan and implement adaptation measures for the likely effects of climate change?
- Will it include energy efficiency measures?
- Will it reduce energy consumption?
- Will it encourage the development of renewable energy resources?

### Relevant SEA Topics

- Climatic factors

## **SA Objective 2: Protect and enhance biodiversity assets**

### Appraisal Questions

- Will it conserve and enhance both designated and undesignated ecological assets?

- Will it have a detrimental impact on the presence or condition of local biodiversity/geodiversity?
- Will it help to deliver Biodiversity Net Gain?
- Will it maintain and enhance woodland/hedgerow cover and management?
- Will it encourage the development of new biodiversity assets and linkages to existing habitats within/alongside development including the delivery of Local Nature Recovery Strategies?
- Will it provide and manage opportunities for people to come into contact with wildlife whilst encouraging respect for and raising awareness of the sensitivity of biodiversity?

## Relevant SEA Topics

- Biodiversity, flora and fauna

## **SA Objective 3: Maintain and enhance the character and quality of the landscape including the Chilterns National Landscape**

### Appraisal Questions

- Will it safeguard and enhance the character of sensitive landscapes and local distinctiveness and identity?
- Will it help to further the purposes of the Chilterns National Landscape?
- Will it improve the condition of parks and open spaces?

## Relevant SEA Topics

- Landscape

## **SA Objective 4: Conserve, restore and enhance green infrastructure**

### Appraisal Questions

- Will it increase access to existing green space?
- Will it improve existing green spaces?
- Will it provide new green spaces?

## Relevant SEA Topics

- Landscape

## **SA Objective 5: Protect and enhance air quality**

### Appraisal Questions

- Will it improve air quality?
- Will it help to achieve the objectives of the Air Quality Management Areas?
- Will it reduce emissions of key pollutants?
- Will promote more sustainable transport and reduce the need to travel?



- Will it contain measures which will help to reduce congestion?
- Will it facilitate the take up of low / zero emission vehicles?

## Relevant SEA Topics

- Air

## **SA Objective 6: Protect and enhance soils**

### Appraisal Questions

- Will it promote the re-use of previously development land?
- Will it avoid development on higher quality agricultural land?
- Will it ensure contaminated land is remediated where appropriate?

## Relevant SEA Topics

- Soil

## **SA Objective 7: Protect and enhance Water Resources**

### Appraisal Questions

- Will it protect and improve the water quality?
- Will the policy/option support the efficient use of water?

- Will it minimise inappropriate development in Source Protection Zones?
- Will it ensure there is sufficient waste water treatment capacity to accommodate the new development?
- Will it promote development which would avoid water pollution due to contaminated runoff from development?
- Will it ensure that there is sufficient water resource available to support new development?

### Relevant SEA Topics

- Water

## **SA Objective 8: Protect areas that are at risk from flooding and reduce flood risk**

### Appraisal Questions

- Will it limit the amount of development in areas of high flood risk and areas which may increase flood risk elsewhere, taking into account the impacts of climate change?
- Will it promote the use of SuDS and other flood resilient design?

### Relevant SEA Topics

- Water
- Climatic Factors

## **SA Objective 9: Increase resource efficiency and reduce waste generation**

### Appraisal Questions

- Will it reduce the amount of waste produced?
- Will it reduce the amount of waste sent to landfill?
- Will it maximise the recovery, re-use and recycling of waste?
- Will it reduce the amount of litter on open land and highways?
- Will it encourage the prudent use of mineral resources?
- Will it safeguard Luton's material resources for future use?
- Will it lead to reduced consumption of materials and resources?

### Relevant SEA Topics

- Material assets

## **SA Objective 10: Protect and enhance heritage assets and their settings**

### Appraisal Questions

- Will it conserve and enhance designated and non-designated heritage assets, including their setting and their contribution to wider local character and distinctiveness?

- Will it provide opportunities for improvements to the conservation, management and enhancement of Luton's heritage assets, particularly heritage at risk?
- Will it promote access to, as well as enjoyment and understanding of, the local historic environment for Luton's residents and visitors?

## Relevant SEA Topics

- Cultural heritage including architectural and archaeological heritage

## **SA Objective 11: Reduce poverty and inequality and promote social inclusion**

## Appraisal Questions

- Will it integrate new neighbourhoods with existing neighbourhoods?
- Will it promote diversity?
- Will it meet the needs of specific groups including those with protected characteristics and those in more deprived areas?
- Will it promote equality in employment?
- Will it promote religious and racial understanding?

## Relevant SEA Topics

- Population
- Human Health

## **SA Objective 12: Reduce crime and fear of crime**

### Appraisal Questions

- Will it reduce levels of crime, anti-social behaviour and the fear of crime?
- Will it promote principles of good urban design to limit the potential for crime in Luton?

### Relevant SEA Topics

- Population

## **SA Objective 13: Improve public health and encourage healthier lifestyles**

### Appraisal Questions

- Will it improve people's health and reduce ill-health?
- Will it reduce the incidence of premature death?
- Will it help to address levels of obesity?
- Will it reduce incidents of environmental health breaches?

### Relevant SEA Topics

- Human Health

## **SA Objective 14: Provide decent, affordable and safe homes for all**

### Appraisal Questions

- Will it help to meet local housing need, including delivering an appropriate mix of housing and specialist housing?
- Will it improve access to affordable housing?
- Will it make housing available to people in need taking into account requirements of location, size, type and affordability?
- Will it improve the quality of housing stock?
- Will it make the homes more liveable?
- Will it reduce overcrowding?

### Relevant SEA Topics

- Population
- Material assets

## **SA Objective 15: Support the vitality and viability of centres**

### Appraisal Questions

- Will it support the vitality/viability of town and local centres?
- Will it support easy access to a range of high-quality services and facilities?

## Relevant SEA Topics

- Population
- Human Health

## **SA Objective 16: Provide and encourage the use of sustainable transport , improve access and mobility**

### Appraisal Questions

- Will it reduce reliance on private vehicles?
- Will it promote the use of sustainable modes of transport?
- Will it encourage walking and cycling?

## Relevant SEA Topics

- Climatic factors
- Air
- Human health

## SA Objective 17: Promote employment, learning, skills and innovation

### Appraisal Questions

- Will it allow for the delivery of land and infrastructure to meet the economic needs of Luton?
- Will it provide employment opportunities for local people?
- Will it support opportunities for the expansion and diversification of businesses and economy?
- Will it offer employment opportunities to disadvantaged groups?
- Will it contribute to improving educational levels of the population of working age, including by improving access to educational facilities?

### Relevant SEA Topics

- Population
- Material assets

## Use of the SA Framework

**5.6** The SA will be undertaken in close collaboration with the Luton Borough Council officers responsible for drafting the new Local Plan in order to fully integrate the SA process with the production of the plan.

**5.7** Strategic policies and site allocations, including the reasonable alternative options, will be appraised against the SA objectives in the SA framework, with symbols being attributed to each policy or site option to indicate their likely effects on each SA objective. Where a potential positive or negative effect is



uncertain, a question mark will be added to the relevant symbol (e.g. +? or -?) and the symbol will be colour coded in line with the potential positive, negligible or negative effect (e.g. green, yellow, orange, etc.).

**5.8** The likely effects of options need to be determined and their significance assessed, which inevitably requires a series of judgments to be made. The appraisal will attempt to differentiate between the most significant effects and other more minor effects through the use of the symbols. The dividing line in making a decision about the significance of an effect is often quite small. Where either (++) or (--) will be used to distinguish significant effects from more minor effects (+ or -) this will be because the effect of an option or policy on the SA objective in question is considered to be of such magnitude that it will have a noticeable and measurable effect taking into account other factors that may influence the achievement of that objective.

**5.9** The findings of the SA will be presented using colour coded symbols showing the likely effect of each option against each of the SA objectives along with a concise justification for the effect identified. It may be possible to group the appraisal of strategic and development management policies by theme. The key to the SA symbols is shown in Table 5.1 below.

**Table 5.1: SA Framework symbols and colour coding**

Symbol and colour code	Description
++	Significant positive effect likely
++/-	Mixed significant positive and minor negative effects likely
+	Minor positive effect likely
++/--	Mixed significant positive and negative effects likely
+/	Mixed minor positive and negative effects likely
-	Minor negative effect likely

Symbol and colour code	Description
--/+	Mixed significant negative and minor positive effects likely
	Significant negative effect likely
0	Negligible effect likely
?	Uncertain effect

**5.10** In relation to the appraisal of the site options, detailed sets of site assessment criteria have been developed and will be applied during the next stage of the SA. The criteria will relate specifically to each type of site option (i.e. residential, employment, mixed use etc.). The site assessment criteria will set out clear parameters within which certain SA effects would be identified, based on factors such as the distance of site options from features such as biodiversity designations, public transport links and areas of high landscape sensitivity. The criteria, where required, may be updated at future stages on the SA to draw on the most recent evidence sources. The site assessment criteria can be applied through the use of Geographical Information Systems (GIS) data where appropriate.

**5.11** In determining the significance of the effects of the options for potential inclusion in the new Local Plan it will be important to bear in mind the relationship of the Local Plan with the other documents in the planning system such as the NPPF and other national policy approaches, and regulatory requirements, as these may provide additional safeguards or mitigation of potentially significant adverse effects.

## Reasonable Alternatives

**5.12** The SA must appraise not only the preferred options for inclusion in the Local Plan but also ‘reasonable alternatives’ to these options. This implies that alternatives that are not reasonable do not need to be subject to appraisal. Part (b) of Regulation 12(2) notes that reasonable alternatives will take into account

the objectives of the plan, as well as its geographical scope. Therefore, alternatives that do not meet the objectives of national policy, local objectives or are outside the plan area are unlikely to be reasonable.

**5.13** Developing options for a plan is an iterative process, usually involving a number of consultations with the public and stakeholders. Consultation responses and the SA can help to identify where there may be other 'reasonable alternatives' to the options being considered for a plan.

**5.14** The SA findings are not the only factors taken into account when determining a preferred option to take forward in a plan. Indeed, there will often be an equal number of positive or negative effects identified by the SA for each option, such that it is not possible to rank them based on sustainability performance in order to select a preferred option. Factors such as public opinion, deliverability and conformity with national policy will also be taken into account. Future iterations of the SA will describe how the appraisal of options has been taken into consideration when developing the draft Luton Local Plan.

## Chapter 6

### Next Steps

**6.1** In order to meet the requirements of the SEA Regulations, the views of the three statutory consultees (Environment Agency, Historic England and Natural England) are being sought in relation to the scope and level of detail to be included in this SA Scoping Report.

**6.2** Consultees are in particular requested to consider the following:

- Whether the scope of the SA is appropriate as set out considering the role of the Luton Local Plan to help meet and manage Luton's needs.
- Whether there are any additional plans, policies or programmes that are relevant to the SA that should be included.
- Whether the baseline information provided is robust and comprehensive and provides a suitable baseline for the SA of the new Local Plan.
- Whether there are any additional key sustainability issues relevant to the new Local Plan that should be included.
- Whether the SA framework (Chapter 5) is appropriate and includes a suitable set of SA objectives for assessing the effects of the options included within the new Local Plan as well as reasonable alternatives.

**6.3** Responses from consultees will be reviewed and appropriate amendments made to the information contained in the Scoping Report, including the baseline information, policy context and SA framework where necessary.

**6.4** As the Local Plan is drafted, it will be subject to SA using the SA framework presented in Chapter 5. A full SA Report (incorporating the next stages of the SA process) will then be produced and made available to other stakeholders and the general public for wider consultation alongside the emerging Local Plan. This will include any amendments to the Scoping work arising from the consultation with statutory bodies on this report.

LUC

July 2024

## Appendix A

# Review of Plans, Policies and Programmes

## International Plans and Programmes of most relevance for the Local Plan

**A.1** 2022 Convention on Biological Diversity [\[See reference 119\]](#) – COP15 Kunming-Montreal adopted the “Kunming-Montreal Global Biodiversity Framework” (GBF), including four goals and 23 targets for achievement by 2030.

**A.2** The Glasgow Pact (UN Framework Convention on Climate Change, 2021) - Nations adopted the Glasgow Climate Pact [\[See reference 120\]](#). The package of decisions consists of a range of agreed items, including strengthened efforts to build resilience to climate change, to curb greenhouse gas emissions and to provide the necessary finance for both. Nations reaffirmed their duty to fulfil the pledge of providing \$100 billion annually from developed to developing countries. And they collectively agreed to work to reduce the gap between existing emission reduction plans and what is required to reduce emissions. They also agreed to phase down unabated coal power and inefficient subsidies for fossil fuels.

**A.3** United Nations Declaration on Forests and Land Use (COP26 Declaration) (2021) [\[See reference 121\]](#): international commitment to halt and reverse forest loss and land degradation by 2030 while delivering sustainable development and promoting an inclusive rural transformation.

**A.4** The 2030 Agenda for Sustainable Development (2015) [\[See reference 122\]](#), adopted by all United Nations Member States, provides a shared blueprint

## **Appendix A** Review of Plans, Policies and Programmes

for peace and prosperity for people and the planet and includes 17 Sustainable Development Goals (SDGs), designed to achieve a better and more sustainable future for all.

**A.5** The United Nations Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (the 'Aarhus Convention') (1998) [\[See reference 123\]](#) establishes a number of rights of the public (individuals and their associations) with regard to the environment. The Parties to the Convention are required to make the necessary provisions so that public authorities (at national, regional or local level) will contribute to these rights to become effective.

**A.6** The United Nations Declaration on Sustainable Development (Johannesburg Declaration) (2002) [\[See reference 124\]](#) sets a broad framework for international sustainable development, including building a humane, equitable and caring global society aware of the need for human dignity for all, renewable energy and energy efficiency, sustainable consumption and production and resource efficiency.

**A.7** The United Nations Paris Climate Change Agreement (2015) [\[See reference 125\]](#) is an international agreement to keep global temperature rise this century well below 2 degrees Celsius above pre-industrial levels.

**A.8** The International Convention on Wetlands (Ramsar Convention) (1976) [\[See reference 126\]](#) is an international agreement with the aim of conserving and managing the use of wetlands and their resources.

**A.9** The European Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) (1979) [\[See reference 127\]](#) aims to ensure conservation and protection of wild plant and animal species and their natural habitats, to increase cooperation between contracting parties, and to regulate the exploitation of those species (including migratory species).

**A.10** The International Convention on Biological Diversity (1992) [\[See reference 128\]](#) is an international commitment to biodiversity conservation through national strategies and action plans.

**A.11** The European Habitats Directive (1992) [\[See reference 129\]](#), together with the Birds Directive, sets the standard for nature conservation across the EU and enables all 27 Member States to work together within the same strong legislative framework in order to protect the most vulnerable species and habitat types across their entire natural range within the EU. It also established the Natura 2000 network.

**A.12** The European Birds Directive (2009) [\[See reference 130\]](#) requires the maintenance of all species of naturally occurring birds in the wild state in the European territory at a level which corresponds in particular to ecological, scientific and cultural requirements, while taking account of economic and recreational requirements.

**A.13** The United Nations Declaration on Forests (New York Declaration) (2014) [\[See reference 131\]](#) sets out international commitment to cut natural forest loss by 2020 and end loss by 2030.

**A.14** The Valletta Treaty (1992) [\[See reference 132\]](#), formerly the European Convention on the Protection of the Archaeological Heritage (Revisited), aims to protect the European archaeological heritage “as a source of European collective memory and as an instrument for historical and scientific study”.

**A.15** The United Nations (UNESCO) World Heritage Convention (1972) [\[See reference 133\]](#) promotes co-operation among nations to protect heritage around the world that is of such outstanding universal value that its conservation is important for current and future generations.

**A.16** The European Convention for the Protection of the Architectural Heritage of Europe (1985) [\[See reference 134\]](#) defines ‘architectural heritage’ and requires that the signatories maintain an inventory of it and take statutory measures to ensure its protection. Conservation policies are also required to be



integrated into planning systems and other spheres of government influence as per the text of the convention.

**A.17** The European Landscape Convention (2002) [\[See reference 135\]](#) promotes landscape protection, management and planning. The Convention is aimed at the protection, management and planning of all landscapes and raising awareness of the value of a living landscape.

## National Plans and Programmes (beyond the NPPF) of Most Relevance for the Local Plan

### Climate Change Adaptation and Mitigation

**A.18** The Carbon Budget Delivery Plan (2023) [\[See reference 136\]](#) explains how the government intends to meet its legally-binding climate goals, setting out a package of quantified and unquantified proposals and policies, and associated timescales and delivery risks this also includes:

- wider matters in connection with carbon budgets
- the contribution of these proposals and policies to sustainable development
- the impact the package has on sectors of the economy

**A.19** Powering up Britain (2023) [\[See reference 137\]](#) sets out the department's approach to energy security and net zero, and acts as an introduction to Powering Up Britain: Energy Security Plan, and Powering Up Britain: Net Zero Growth Plan.

**A.20** The Environment Improvement Plan 2023 [\[See reference 138\]](#) for England is the first revision of the 25YEP. It builds on the 25YEP vision with a new plan setting out how they will work with landowners, communities and businesses to deliver each of our goals for improving the environment, matched with interim targets to measure progress. Taking these actions will help us restore nature, reduce environmental pollution, and increase the prosperity of our country.

**A.21** UK Climate Change Risk Assessment 2022 [\[See reference 139\]](#) outlines the UK government and devolved administrations' position on the key climate change risks and opportunities that the UK faces today. The risk assessment considers sixty-one UK-wide climate risks and opportunities cutting across multiple sectors of the economy and prioritises the following eight risk areas for action in the next two years:

- risks to the viability and diversity of terrestrial and freshwater habitats and species from multiple hazards
- risks to soil health from increased flooding and drought
- risks to natural carbon stores and sequestration from multiple hazards
- risks to crops, livestock and commercial trees from multiple climate hazards
- risks to supply of food, goods and vital services due to climate-related collapse of supply chains and distribution networks
- risks to people and the economy from climate-related failure of the power system
- risks to human health, wellbeing and productivity from increased exposure to heat in homes and other buildings
- multiple risks to the UK from climate change impacts overseas

**A.22** The British Energy Security Strategy (2022) [\[See reference 140\]](#) sets out how the UK will enhance its energy security, setting out plans for future deployment of wind, new nuclear, solar and hydrogen, and for supporting the production of domestic oil and gas in the nearer term. The strategy builds on the

Prime Minister's 'Ten point plan for a green industrial revolution', and the 'Net zero strategy'. Key aims and commitments include:

- New commitments to supercharge clean energy and accelerate deployment, which could see 95% of Great Britain's electricity set to be low carbon by 2030.
- Supporting over 40,000 more jobs in clean industries, totalling 480,000 jobs by 2030.
- Accelerated expansion of nuclear, wind, solar, hydrogen, oil and gas, including delivering the equivalent to one nuclear reactor a year instead of one a decade.
- Offshore wind – Aim of providing up to 50GW by 2030, of which 5GW is planned to be from floating offshore wind in deeper seas. This is aimed to be underpinned by new planning reforms to cut the approval times for new offshore wind farms from 4 years to 1 year and an overall streamlining which will aims to reduce the time it takes for new projects to reach construction stages while improving the environment.
- Oil and gas – A licensing round for new North Sea oil and gas projects is planned to launch in Autumn, with a new taskforce providing bespoke support to new developments.
- Onshore wind – The Government plans to consult on developing partnerships with a limited number of supportive communities who wish to host new onshore wind infrastructure in return for guaranteed lower energy bills.
- Heat pump manufacturing – The Government aim to run a Heat Pump Investment Accelerator Competition in 2022 worth up to £30 million to make British heat pumps, with hopes to reduce demand for gas.

**A.23** The Environment Act 2021 [\[See reference 141\]](#) sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. The Environment Act will deliver:

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- Long-term targets to improve air quality biodiversity, water, and waste reduction and resource efficiency.
- A target on ambient PM2.5 concentrations.
- A target to halt the decline of nature by 2030.
- Environmental Improvement Plans, including interim targets.
- A cycle of environmental monitoring and reporting.
- Environmental Principles embedded in domestic policy making.
- Office for Environmental Protection to uphold environmental law.

**A.24** The Net Zero Strategy: Build Back Greener (2021) [\[See reference 142\]](#) sets out policies and proposals for decarbonising all sectors of the UK economy to meet net zero targets by 2050. It sets out strategies to keep the UK on track with carbon budgets, outlines the National Determined Contribution (NDC) and sets out the vision for a decarbonised economy in 2050. Its focus includes:

- Policies and proposals for reducing emissions across the economy in key sectors (power, fuel supply and hydrogen, industry, heat and buildings, transport, natural gas and waste).
- Policies and proposals for supporting transition across the economy through innovation, green investment, green jobs, embedding net-zero in government, local climate action, empowering people and businesses, and international leadership and collaboration.

**A.25** The Industrial Decarbonisation Strategy (2021) [\[See reference 143\]](#) aims to support existing industry to decarbonise and encourage the growth of new, low carbon industries to protect and create skilled jobs and businesses in the UK encouraging long-term investment in home-grown decarbonisation technology. The strategy builds in the Prime Minister's 10 Point Plan for a Green Industrial Revolution and sets out the government's vision for building a competitive, greener future for the manufacturing and construction sector and is part of the government's path to net zero by 2050. The strategy aims to reduce emissions by two-thirds in just 15 years and support up to 80,000 jobs over the next thirty years and includes measures to produce 20 terawatt hours of the UK

industry's energy supply from low carbon alternatives by 2030. It also aims to introduce new rules on measuring the energy and carbon performance of the UK's largest commercial and industrial buildings, providing potential savings to businesses of around £2 billion per year in energy costs in 2030 and aiming to reduce annual carbon emissions by over 2 million tonnes - approximately 10% of their current emissions. Other key commitments within the Strategy include:

- The use of carbon pricing to drive changes in industry to focus on emissions in business and investment decisions.
- To establish a policy framework to accelerate the switch from fossil fuels to low carbon alternatives such as hydrogen, electricity, or biomass.
- New product standards, enabling manufacturers to clearly distinguish their products from high carbon competitors.
- To ensure the land planning regime is fit for building low carbon infrastructure.
- Support the skills transition so that the UK workforce benefits from the creation of new green jobs.
- An expectation that at least 3 megatons of CO<sub>2</sub> is captured within industry per year by 2030.
- That by 2050, there will be zero avoidable waste of materials across heavy industries.

**A.26** The Heat and Buildings Strategy (2021) [\[See reference 144\]](#) sets out the government's plan to significantly cut carbon emissions from the UK's 30 million homes and workplaces. This strategy aims to provide a clear direction of travel for the 2020s, set out the strategic decisions that need to be taken this decade, and demonstrate how the UK plans to meet its carbon targets and remain on track for net zero by 2050. Key aims of the strategy include:

- Reduce direct emissions from public sector buildings by 75% against a 2017 baseline by the end of carbon budget 6.
- Significantly reduce energy consumption of commercial, and industrial buildings by 2030.

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- Phase out the installation of new natural gas boilers beyond 2035.
- Significantly grow the supply chain for heat pumps to 2028: from installing around 35,000 hydronic heat pumps a year to a minimum market capacity of 600,000 per year by 2028.
- Reduce the costs of installing a heat pump by at least 25-50% by 2025 and to ensure heat pumps are no more expensive to buy and run than gas boilers by 2030.
- Achieve 30-fold increase in heat pumps manufactured and sold within the UK by the end of the decade.
- Grow the market for heat pumps notably via a £450 million Boiler Upgrade Scheme to support households who want to switch with £5,000 grants.
- Improve heat pump appeal by continuing to invest in research and innovation, with the £60 million Net Zero Innovation Portfolio 'Heat Pump Ready' Programme supporting the development of innovation across the sector.
- Ensure all new buildings in England are ready for Net Zero from 2025. To enable this, new standards will be introduced through legislation to ensure new homes and buildings will be fitted with low-carbon heating and high levels of energy efficiency.
- Establish large-scale trials of hydrogen for heating, including a neighbourhood trial by 2023.
- Ensure as many fuel poor homes in England, as reasonably practicable, achieve a minimum energy efficiency rating of band C by the end of 2030.
- Support social housing, low income and fuel poor households via boosting funding for the Social Housing Decarbonisation Fund and Home Upgrade Grant, which aim to improve the energy performance of low income households' homes, support low carbon heat installations and build the green retrofitting sector to benefit all homeowners.
- Scale up low-carbon heat network deployment and to enable local areas to deploy heat network zoning- Heat Network Transformation Programme of £338 million (over 2022/23 to 2024/25).

**A.27** The UK Hydrogen Strategy (2021) [\[See reference 145\]](#) sets out the approach to developing a substantial low carbon hydrogen sector in the UK and to meet the ambition for 5GW of low carbon hydrogen production capacity by 2030. The Strategy outlines the role of hydrogen in meeting net zero targets, the existing opportunity within the UK, a strategic framework, a roadmap for the economy, and the UK Government's commitments for a hydrogen economy. The Energy Performance of Buildings Regulations (2021).

**A.28** The Energy Performance of Buildings Regulations (2021) [\[See reference 146\]](#) seek to improve the energy efficiency of buildings, reducing their carbon emissions and lessening the impact of climate change. The Regulations require the adoption of a standard methodology for calculating energy performance and minimum requirements for energy performance, reported through Energy Performance Certificates and Display Energy Certificates.

**A.29** The Energy white paper: Powering our net zero future (2020) [\[See reference 147\]](#) builds on the Prime Minister's Ten point plan for a green industrial revolution. The white paper addresses the transformation of the UK's energy system, promoting high-skilled jobs and clean, resilient economic growth during its transition to net-zero emissions by 2050. Key aims of the paper include:

- Supporting green jobs – The government aims to support up to 220,000 jobs in the next 10 years.
- Transforming the energy system – To transform its electricity grid for net-zero, the white paper highlights how this will involve changing the way the country heats its homes, how people travel, doubling the electricity use, and harnessing renewable energy supplies.
- Keeping bills affordable – The government aims to do this by making the energy retail market “truly competitive”. This will include offering people a method of switching to a cheaper energy tariff and testing automatically switching consumers to fairer deals to tackle “loyalty penalties”.
- Generating emission-free electricity by 2050 – The government aims to have “overwhelmingly decarbonised power” in the 2030s in order to generate emission-free electricity by 2050.

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- Establishing UK Emissions Trading Scheme – The government aims to establish a UK Emissions Trading Scheme (UK ETS) from 1 January 2021 to replace the current EU ETS at the end of the Brexit Transition Period.
- Exploring new nuclear financing options – The government is continuing to explore a range of financing options for new nuclear with developers including the Regulated Asset Base (RAB) funding model.
- Further commitments to offshore wind – The white paper lays out plans to scale up its offshore wind fleet to 40 gigawatts (GW) by 2030, including 1GW of floating wind, enough to power every home in the country.
- Carbon capture and storage investments – Including £1bn worth of investments in state-of-the-art CCS in four industrial clusters by 2030. With four low-carbon clusters set up by 2030, and at least one fully net-zero cluster by 2040.
- Kick-starting the hydrogen economy – The government plans to work with industry to aim for 5GW of production by 2030, backed up by a new £240m net-zero Hydrogen Fund for low-carbon hydrogen production.
- Investing in electric vehicle charge points – The government plans to invest £1.3bn to accelerate the rollout of charge points for electric vehicles as well as up to £1bn to support the electrification of cars.
- Supporting the lowest paid with their bills – The government aims to support those with lower incomes through a £6.7bn package of measures that could save families in old inefficient homes up to £400.
- Moving away from fossil fuel boilers – The government aims, by the mid-2030s, for all newly installed heating systems to be low-carbon or to be appliances that it is confident can be converted to a clean fuel supply.
- Supporting North Sea oil and gas transition – The white paper notes the importance of supporting the North Sea oil and gas transition for the people and communities most affected by the move away from fossil fuels. The government aims to achieve this by ensuring that the expertise of the oil and gas sector be drawn on in developing CCS and hydrogen production to provide new green jobs for the future.



**A.30 National Infrastructure Strategy: Fairer, faster greener (2020)** [\[See reference 148\]](#) sets out plans to transform UK infrastructure in order to level up the country, strengthen the Union and achieve net zero emissions by 2050. This will be enabled by clear support for private investment and through a comprehensive set of reforms to the way infrastructure is delivered.

**A.31 The Sixth Carbon Budget report (2020)** [\[See reference 149\]](#) is based on an extensive programme of analysis, consultation and consideration by the Committee and its staff, building on the evidence published last year for our Net Zero advice. Our recommended pathway requires a 78% reduction in UK territorial emissions between 1990 and 2035. In effect, bringing forward the UK's previous 80% target by nearly 15 years.

**A.32 Decarbonising Transport: Setting the Challenge (2020)** [\[See reference 150\]](#) sets out the strategic priorities for the new Transport Decarbonisation Plan (TDP), published in July 2021. It sets out in detail what government, business and society will need to do to deliver the significant emissions reduction needed across all modes of transport, putting us on a pathway to achieving carbon budgets and net zero emissions across every single mode of transport by 2050. This document acknowledges that while there have been recently published strategies to reduce greenhouse gas emissions in individual transport modes, transport as a whole sector needs to go further and more quickly, therefore the TDP takes a coordinated, cross-modal approach to deliver the transport sector's contribution to both carbon budgets and net zero.

**A.33 Flood and Coastal Erosion Risk Management: Policy Statement (2020)** [\[See reference 151\]](#) sets out the government's long-term ambition to create a nation more resilient to future flood and coastal erosion risk, and in doing so, reduce the risk of harm to people, the environment and the economy. The Policy Statement sets out five policy areas which will drive this ambition. These are:

- Upgrading and expanding our national flood defences and infrastructure;
- Managing the flow of water more effectively;

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- Harnessing the power of nature to reduce flood and coastal erosion risk and achieve multiple benefits;
- Better preparing our communities; and
- Enabling more resilient places through a catchment-based approach.

**A.34 Net Zero – The UK’s contribution to stopping global warming** (Climate Change Committee, 2019) [\[See reference 152\]](#) responds to a request from the Governments of the UK, Wales and Scotland, asking the Committee to reassess the UK’s long-term emissions targets. Our new emissions scenarios draw on ten new research projects, three expert advisory groups, and reviews of the work of the IPCC and others. The report’s key findings are that:

- The Committee on Climate Change recommends a new emissions target for the UK: net-zero greenhouse gases by 2050.
- In Scotland, we recommend a net-zero date of 2045, reflecting Scotland’s greater relative capacity to remove emissions than the UK as a whole.
- In Wales, we recommend a 95% reduction in greenhouse gases by 2050.

**A.35 The Promotion of the Use of Energy from Renewables Sources Regulations 2011** [\[See reference 153\]](#) required the government to ensure that renewable energy comprised 15% of the UK’s total energy mix by 2020. The Renewable Energy Directive has now been superseded by Directive (EU) 2018/2001 (RED II). Although the UK has now been released from the renewable energy targets under RED II following Brexit, the UK-EU Trade and Cooperation Agreement includes a commitment to promote energy efficiency and the use of energy from renewable sources and reaffirmation of the EU’s 2030 “targets” and the UK’s 2030 “ambitions” for renewable energy and energy efficiency.

**A.36 The National Flood and Coastal Erosion Risk Management Strategy for England 2011** [\[See reference 154\]](#) sets out the national framework for managing the risk of flooding and coastal erosion. It sets out the roles for risk management authorities and communities to help them understand their responsibilities. The strategic aims and objectives of the Strategy are to:

- Manage the risk to people and their property;
- Facilitate decision-making and action at the appropriate level – individual, community or Local Authority, river catchment, coastal cell or national; and
- Achieve environmental, social and economic benefits, consistent with the principles of sustainable development.

**A.37** The Flood and Water Management Act 2010 [See reference 155] and The Flood and Water Regulations 2019 [See reference 156] sets out measures to ensure that risk from all sources of flooding is managed more effectively. This includes incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; rolling back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

**A.38** The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate [See reference 157] sets out visions for the following sectors:

- People and the Built Environment – “to promote the development of a healthy, equitable and resilient population, well placed to reduce the harmful health impacts of climate change...buildings and places (including built heritage) and the people who live and work in them are resilient and organisations in the built environment sector have an increased capacity to address the risks and make the most of the opportunities of a changing climate.”
- Infrastructure – “an infrastructure network that is resilient to today’s natural hazards and prepared for the future changing climate.”
- Natural Environment – “the natural environment, with diverse and healthy ecosystems, is resilient to climate change, able to accommodate change and valued for the adaptation services it provides.”
- Business and Industry – “UK businesses are resilient to extreme weather and prepared for future risks and opportunities from climate change.”

- Local Government – “Local Government plays a central role in leading and supporting local places to become more resilient to a range of future risks and to be prepared for the opportunities from a changing climate.”

**A.39** Our Waste, Our Resources: A strategy for England (2018) [See reference 158] aims to increase resource productivity and eliminate avoidable waste by 2050. The Strategy sets out key targets which include: a 50% recycling rate for household waste by 2020, a 75% recycling rate for packaging by 2030, 65% recycling rate for municipal solid waste by 2035 and municipal waste to landfill 10% or less by 2035.

**A.40** The Clean Growth Strategy (2017) [See reference 159] sets out the approach of the government to secure growth of the national income while cutting greenhouse gas emissions. The key policies and proposals of the Strategy sit below a number of overarching principles: acceleration of clean growth including through recommendations for private and public investment to meet carbon budgets; providing support to improve business and industry energy efficiency; improving energy efficiency in the housing stock including through low carbon heating; accelerating the shift to low carbon transport; delivering clean, smart, flexible power; enhancing the benefits and value of our natural resources; leading in the public sector to meet emissions targets; and ensure Government leadership to drive clean growth.

**A.41** The National Planning Policy for Waste (NPPW) (2014) [See reference 160] identifies key planning objectives, requiring planning Authorities to:

- Help deliver sustainable development through driving waste management up the waste hierarchy;
- Ensure waste management is considered alongside other spatial planning concerns;
- Provide a framework in which communities take more responsibility for their own waste;
- Help secure the recovery or disposal of waste without endangering human health and without harming the environment; and

- Ensure the design and layout of new development supports sustainable waste management.

**A.42** The Waste Management Plan for England (2013) [\[See reference 161\]](#) sets out the measures for England to work towards a zero waste economy.

**A.43** The Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK 2012 [\[See reference 162\]](#) aims to realise the wider energy efficiency potential that is available in the UK economy by maximising the potential of existing dwellings by implementing 21st century energy management initiatives on 19th century homes.

**A.44** The UK Low Carbon Transition Plan: National Strategy for Climate and Energy (2009) [\[See reference 163\]](#) sets out a five-point plan to tackle climate change. The points are as follows: protecting the public from immediate risk, preparing for the future, limiting the severity of future climate change through a new international climate agreement, building a low carbon UK and supporting individuals, communities and businesses to play their part.

**A.45** The UK Renewable Energy Strategy (2009) [\[See reference 164\]](#) sets out the ways in which we will tackle climate change by reducing our CO<sub>2</sub> emissions through the generation of a renewable electricity, heat and transport technologies.

**A.46** The Climate Change Act 2008 [\[See reference 165\]](#) sets targets for UK greenhouse gas emission reductions of at least 100% by 2050, against a 1990 baseline (this was previously 80% but was updated to a net zero target in June 2019).

**A.47** The Planning and Energy Act (2008) [\[See reference 166\]](#) enables local planning authorities to set requirements for carbon reduction and renewable energy provision. It should be noted that while the Housing Standards Review proposed to repeal some of these provisions, at the time of writing there have been no amendments to the Planning and Energy Act.

**A.48** The Waste (Circular Economy) (Amendment) Regulations [See reference 167] seek to prevent waste generation and to monitor and assess the implementation of measures included in waste prevention programmes. They set out requirements to justify not separating waste streams close to source for re-use, recycling or other recovery operations, prohibit incineration and landfilling of waste unless such treatment process represent the best environmental outcome in accordance with the waste hierarchy. The Regulations set out when waste management plans and in waste prevention programmes are required. The Regulations focus on the circular economy as a means for businesses to maximise the value of waste and waste treatment.

## Health and Well-being

**A.49** The Green Infrastructure Framework (2023) [See reference 168] by Natural England will help increase the amount of green cover to 40% in urban residential areas. The Green Infrastructure Framework provides a structure to analyse where greenspace in urban environments is needed most. It aims to support equitable access to greenspace across the country, with an overarching target for everyone being able to reach good quality greenspace in their local area. From parks to green roofs, and increased tree cover, the Green Infrastructure Framework will make a significant contribution to nature recovery by embedding nature into new developments. Increasing the extent and connectivity of nature-rich habitats will also help increase wildlife populations, build resilience to the impacts of climate change, and ensure our cities are habitable for the future

**A.50** The White Paper Levelling Up the United Kingdom (2022) [See reference 169] sets out how the UK Government will spread opportunity more equally across the UK. It comprises 12 UK-wide missions to achieve by 2030. Missions which relate to population, health and wellbeing state that by 2030:

- The gap in Healthy Life Expectancy (HLE) between local areas where it is highest and lowest will have narrowed, and by 2035 HLE will rise by five years.

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- Well-being will have improved in every area of the UK, with the gap between top performing and other areas closing.
- Homicide, serious violence, and neighbourhood crime will have fallen, focused on the worst-affected areas.
- Pride in place, such as people's satisfaction with their town centre and engagement in local culture and community, will have risen in every area of the UK, with the gap between the top performing and other areas closing.
- The number of primary school children achieving the expected standard in reading, writing and maths will have significantly increased. In England, this will mean 90% of children will achieve the expected standard, and the percentage of children meeting the expected standard in the worst performing areas will have increased by over a third.
- Renters will have a secure path to ownership with the number of first-time buyers increasing in all areas; and the Government's ambition is for the number of non-decent rented homes to have fallen by 50%, with the biggest improvements in the lowest performing areas.

**A.51** A fairer private rented sector White Paper (2022) [\[See reference 170\]](#) aims to build upon the vision of the Levelling Up White Paper and reform the Private Rented Sector and improve housing quality. It outlines that everyone deserves a secure and decent home and outlines measures to improve the experience of renters in the Private Rented Sector.

**A.52** The State of the Environment: Health, People and the Environment (2021) [\[See reference 171\]](#) focuses on the relationship between human health and people's access to and connection with a clean, high quality natural environment. It presents information on England's environment, and people's exposure to environmental pollutants, flooding and climate change in relation to human health. It highlights environmental inequalities that contribute to differences in health outcomes for people in England.

**A.53** The National Design Guide (2021) [\[See reference 172\]](#) sets out the Government's priorities for well-designed places in the form of ten



characteristics: context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources and lifespan.

**A.54** Build Back Better: Our Plan for Health and Social Care (2021) [\[See reference 173\]](#) sets out the government's new plan for health and social care. It provides an overview of how this plan will tackle the elective backlog in the NHS and put the NHS on a sustainable footing. It sets out details of the plan for adult social care in England, including a cap on social care costs and how financial assistance will work for those without substantial assets. It covers wider support that the government will provide for the social care system, and how the government will improve the integration of health and social care. It explains the government's plan to introduce a new Health and Social Care Levy.

**A.55** The COVID-19 Mental Health and Wellbeing Recovery Action Plan (2021) [\[See reference 174\]](#) sets out the Government's plan to prevent, mitigate and respond to the mental health impacts of the pandemic during 2021 and 2022. Its main objectives are to support the general population to take action and look after their own mental wellbeing; to take action to address factors which play a crucial role in shaping mental health and wellbeing outcomes; and, to support services to meet the need for specialist support.

**A.56** The Charter for Social Housing Residents: Social Housing White Paper (2020) [\[See reference 175\]](#) sets out the Government's actions to ensure residents in social housing are safe, listened to, live in good quality homes and have access to redress when things go wrong.

**A.57** Using the planning system to promote healthy weight environments (2020), Addendum (2021) [\[See reference 176\]](#) provides a framework and starting point for local authorities to clearly set out in local planning guidance how best to achieve healthy weight environments based on local evidence and needs, by focusing on environments that enable healthier eating and help promote more physical activity as the default. The Addendum provides updates on the implications for planning for a healthier food environment, specifically on



the hot food takeaways retail uses, and sets out recommended actions in light of changes to the Use Class Order (UCO) in England from 1 September 2020.

**A.58** The Public Health England, PHE Strategy 2020-25 (2019) [\[See reference 177\]](#) identifies PHE's priorities upon which to focus over this five-year period to protect people and help people to live longer in good health.

**A.59** The Homes England Strategic Plan 2018 to 2023 [\[See reference 178\]](#) sets out a vision to ensure more homes are built in areas of greatest need, to improve affordability, and make a more resilient and diverse housing market.

**A.60** The Housing White Paper 2017 (Fixing our broken housing market) [\[See reference 179\]](#) sets out ways to address the shortfall in affordable homes and boost housing supply. The White Paper focuses on the following:

- Planning for the right homes in the right places – Higher densities in appropriate areas, protecting the Green Belt while making more land available for housing by maximising the contribution from brownfield and surplus public land, regenerating estates, releasing more small and medium-sized sites, allowing rural communities to grow and making it easier to build new settlements.
- Building homes faster – Improved speed of planning cases, ensuring infrastructure is provided and supporting developers to build out more quickly.
- Diversifying the Market – Backing small and medium-sized house builders, custom-build, institutional investors, new contractors, housing associations.
- Helping people now – supporting home ownership and providing affordable housing for all types of people, including the most vulnerable.

**A.61** The Planning Policy for Traveller Sites 2015 [\[See reference 180\]](#) sets out the Government's planning policy for traveller sites, replacing the older version published in March 2012. The Government's overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and

nomadic way of life of travellers while respecting the interests of the settled community.

**A.62** The Technical Housing Standards – Nationally Described Space Standard (2015) [\[See reference 181\]](#) sets out the Government’s new nationally described space standard. The standard deals with internal space within new dwellings and sets out requirements for the Gross Internal (floor) Area of new dwellings at a defined level of occupancy, as well as floor areas and dimensions for key parts of the home.

**A.63** The Select Committee on Public Service and Demographic Change Report Ready for Ageing? (2013) [\[See reference 182\]](#) warns that society is underprepared for the ageing population. The report states “longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises”. The report highlights the under provision of specialist housing for older people and the need to plan for the housing needs of the older population as well as younger people.

**A.64** Fair Society, Healthy Lives (2011) [\[See reference 183\]](#) investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is “overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities”.

**A.65** Laying the foundations: A housing strategy for England [\[See reference 184\]](#) aims to provide support to deliver new homes and improve social mobility.

**A.66** Healthy Lives, Healthy People: Our strategy for public health in England 2010 [\[See reference 185\]](#) sets out how the Government’s approach to public health challenges will:

- Protect the population from health threats – led by central Government, with a strong system to the frontline;

- Empower local leadership and encourage wide responsibility across society to improve everyone's health and wellbeing and tackle the wider factors that influence it;
- Focus on key outcomes, doing what works to deliver them, with transparency of outcomes to enable accountability through a proposed new public health outcomes framework;
- Reflect the Government's core values of freedom, fairness and responsibility by strengthening self-esteem, confidence and personal responsibility; positively promoting healthy behaviours and lifestyles; and adapting the environment to make healthy choices easier; and
- Balance the freedoms of individuals and organisations with the need to avoid harm to others, use a 'ladder' of interventions to determine the least intrusive approach necessary to achieve the desired effect and aim to make voluntary approaches work before resorting to regulation.

**A.67** The Environmental Noise Regulations 2006 [See reference 186] apply to environmental noise, mainly from transport. The regulations require regular noise mapping and action planning for road, rail and aviation noise and noise in large urban areas. They also require Noise Action Plans based on the maps for road and rail noise and noise in large urban areas. The Action Plans identify Important Areas (areas exposed to the highest levels of noise) and suggest ways the relevant authorities can reduce these. Major airports and those which affect large urban areas are also required to produce and publish their own Noise Action Plans separately. The Regulations do not apply to noise from domestic activities such as noise created by neighbours; at workplaces; inside means of transport; or military activities in military areas.

## Environment (biodiversity/geodiversity, landscape and soils)

**A.68** The Environment Improvement Plan 2023 [See reference 187] for England is the first revision of the 25YEP. It builds on the 25YEP vision with a new plan setting out how we will work with landowners, communities and

businesses to deliver each of our goals for improving the environment, matched with interim targets to measure progress. Taking these actions will help us restore nature, reduce environmental pollution, and increase the prosperity of our country. To achieve its vision, the 25YEP set out 10 goals. We have used those 10 goals set out in the 25YEP as the basis for this document: setting out the progress made against all 10, the specific targets and commitments made in relation to each goal, and our plan to continue to deliver these targets and the overarching goals. The environmental goals are:

- Goal 1: Thriving plants and wildlife
- Goal 2: Clean air
- Goal 3: Clean and plentiful water
- Goal 4: Managing exposure to chemicals and pesticides
- Goal 5: Maximise our resources, minimise our waste
- Goal 6: Using resources from nature sustainably
- Goal 7: Mitigating and adapting to climate change
- Goal 8: Reduced risk of harm from environmental hazards
- Goal 9: Enhancing biosecurity
- Goal 10: Enhanced beauty, heritage, and engagement with the natural environment

**A.69** Working with nature (2022) [\[See reference 188\]](#) discusses the importance of nature in providing ecosystem services and presents recent and historical trends in biodiversity. It outlines some of the main pressures affecting England's habitats, wildlife and ecosystems: land use; climate change; pollution; invasive non-native species; and hydrological change.

**A.70** Establishing the Best Available Techniques for the UK (UK BAT) (2022) [\[See reference 189\]](#) sets out a new framework that aims to improve industrial emissions and protect the environment through the introduction of a UK BAT regime. It aims to set up a new structure of governance with a new independent body in the form of Standards Council and the Regulators Group, consisting of

government officials and expert regulators from all UK nations. It aims to also establish a new UK Air Quality Governance Group to oversee the work of the Standards Council and the delivery of the requirements under this new framework. It is anticipated that the BATC for the first four industry sectors will be published in the second half of 2023.

**A.71** The Environment Act 2021 [\[See reference 190\]](#) sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. Biodiversity elements in the Act include:

- Strengthened biodiversity duty. Both onsite and offsite enhancements must be maintained for at least 30 years after completion of a development.
- Biodiversity net gain to ensure developments deliver at least 10% increase in biodiversity
- Local Nature Recovery Strategies to support a Nature Recovery Network.
- Duty upon Local Authorities to consult on street tree felling.
- Strengthen woodland protection enforcement measures.
- Conservation Covenants.
- Protected Site Strategies and Species Conservation Strategies to support the design and delivery of strategic approaches to deliver better outcomes for nature.
- Prohibit larger UK businesses from using commodities associated with wide-scale deforestation.
- Requires regulated businesses to establish a system of due diligence for each regulated commodity used in their supply chain, requires regulated businesses to report on their due diligence, introduces a due diligence enforcement system.

**A.72** The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 [\[See reference 191\]](#) protect biodiversity through the conservation of natural habitats and species of wild fauna and flora, including

birds. The Regulations lay down rules for the protection, management and exploitation of such habitats and species, including how adverse effects on such habitats and species should be avoided, minimised and reported.

**A.73 Environmental Damage (Prevention and Remediation) Regulations 2015** [\[See reference 192\]](#) are wide-ranging government regulations that can potentially apply to many businesses. The regulations oblige those who create environmental damage, whether by water pollution, adversely affecting protected species or sites of special scientific interest (SSSIs), or by land pollution that causes risks to human health, to not only cease the damage, but also to implement a wide variety of remedial measures to restore affected areas.

**A.74 Biodiversity offsetting in England Green Paper (2013)** [\[See reference 193\]](#). Biodiversity offsets are conservation activities designed to compensate for residual losses. The Green Paper sets out a framework for offsetting.

**A.75 Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011)** [\[See reference 194\]](#) guides conservation efforts in England up to 2020 by requiring a national halt to biodiversity loss, supporting healthy ecosystems and establishing ecological networks.

**A.76 Defra Right of Way Circular (1/09) (2011)** [\[See reference 195\]](#) gives advice to local authorities on recording, managing and maintaining, protecting and changing public rights of way.

**A.77 The Countryside and Rights of Way Act 2010** [\[See reference 196\]](#) is an Act of Parliament to make new provision for public access to the countryside.

**A.78 Safeguarding our Soils – A Strategy for England (2009)** [\[See reference 197\]](#) sets out how England's soils will be managed sustainably. It highlights those areas which Defra will prioritise and focus attention on tackling degradation threats, including better protection for agricultural soils; protecting and enhancing stores of soil carbon; building the resilience of soils to a

changing climate; preventing soil pollution; effective soil protection during construction and dealing with contaminated land.

**A.79** England Biodiversity Strategy Climate Change Adaptation Principles (2008) [\[See reference 198\]](#) sets out principles to guide adaptation to climate change. The principles are take: practical action now, maintain and increase ecological resilience, accommodate change, integrate action across all sectors and develop knowledge and plan strategically. The precautionary principle underpin all of these. Natural Environment and Rural Communities Act 2006.

**A.80** The Natural Environment and Rural Communities Act 2006 [\[See reference 199\]](#) places a duty on public bodies to conserve biodiversity.

**A.81** Wildlife and Countryside Act 1981 (as amended) [\[See reference 200\]](#) was enacted primarily to implement the Birds Directive and Bern Convention in Great Britain. The Act received royal assent on 30 October 1981 and was brought into force in incremental steps. It is supplemented by the Wildlife and Countryside (Service of Notices) Act 1985, which relates to notices served under the 1981 Act. The act contains four parts and 17 schedules, which cover:

- Part 1: Wildlife (includes protection of birds, animals and plants; and measures to prevent the establishment of non-native species which may be detrimental to native wildlife).
- Part 2: Nature conservation, the countryside and National Parks (including the designation of protected areas).
- Part 3: Public rights of way.
- Part 4: Miscellaneous provisions of the act.

**A.82** The National Parks and Access to the Countryside Act 1949 [\[See reference 201\]](#) is an Act of Parliament to make provision for National Parks and the establishment of a National Parks Commission; to confer on the Nature Conservancy and local authorities' powers for the establishment and maintenance of nature reserves; to make further provision for the recording,

creation, maintenance and improvement of public paths and for securing access to open country.

# Historic Environment

**A.83** Historic England, Corporate Plan 2022-23 [\[See reference 202\]](#) contains the action plan which sets out how the aims of the corporate plan will be delivered. The plan includes priorities to demonstrate how Historic England will continue to work towards delivering the heritage sector's priorities for the historic environment.

**A.84** The Heritage Statement 2017 [\[See reference 203\]](#) sets out how the Government will support the heritage sector and help it to protect and care for our heritage and historic environment, in order to maximise the economic and social impact of heritage and to ensure that everyone can enjoy and benefit from it.

**A.85** Sustainability Appraisal and Strategic Environmental Assessment, Historic England Advice Note 8 (2016) [\[See reference 204\]](#) sets out requirements for the consideration and appraisal of effects on the historic environment as part of the Sustainability Appraisal/Strategic Environmental Assessment process.

**A.86** The Government's Statement on the Historic Environment for England 2010 [\[See reference 205\]](#) sets out the Government's vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life. Includes reference to promoting the role of the historic environment within the Government's response to climate change and the wider sustainable development agenda.

**A.87** The Planning (Listed Buildings and Conservation Areas) Act 1990 [\[See reference 206\]](#) is an Act of Parliament that changed the laws for granting of



planning permission for building works, with a particular focus on listed buildings and conservation areas.

**A.88** The Ancient Monuments and Archaeological Areas Act 1979 [\[See reference 207\]](#) is a law passed by the UK government to protect the archaeological heritage of England and Wales and Scotland. Under this Act, the Secretary of State has a duty to compile and maintain a schedule of ancient monuments of national importance, in order to help preserve them. It also creates criminal offences for unauthorised works to, or damage of, these monuments.

**A.89** The Historic Buildings and Ancient Monuments Act 1953 [\[See reference 208\]](#) is an Act of Parliament that makes provision for the compilation of a register of gardens and other land (parks and gardens, and battlefields).

## Water and Air

**A.90** Managing Water Abstraction (2021) [\[See reference 209\]](#) is the overarching document for managing water resources in England and Wales and links together the abstraction licensing strategies.

**A.91** The Environment Act 2021 [\[See reference 210\]](#) sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. It also establishes the Office for Environmental Protection which will act as an impartial and objective body for the protection and improvement of the environment. The Act sets out legislation which covers:

- Resource efficiency, producer responsibility, and the management, enforcement and regulation of waste;
- Local air quality management frameworks and the recall of motor vehicles etc; and
- Plans and proposals for water resources, drainage and sewerage management, storm overflows, water quality and land drainage.

**A.92** National Chalk Streams Strategy (2021) [See reference 211] was built around the “trinity of ecological health”: water quantity, water quality and habitat quality and included 30+ recommendations to Defra, the Environment Agency, Natural England, the water companies, NGOs and stakeholders.

**A.93** Meeting our future water needs: a national framework for water resources (2020) [See reference 212] set the strategic direction for long term regional water resources planning. The framework is built on a shared vision to:

- leave the environment in a better state than we found it
- improve the nation’s resilience to drought and minimise interruptions to all water users

**A.94** The national framework [See reference 213] marks a step change in water resources planning. The 5 regional water resources groups will produce a set of co-ordinated, cross-sector plans. These plans will:

- address the scale of challenges we face by identifying the options needed in their region to manage demand and increase supply
- realise opportunities from water resources planning by working collaboratively

**A.95** The Clean Air Strategy 2019 [See reference 214] sets out the comprehensive action that is required from across all parts of Government and society to meet these goals. This will be underpinned by new England-wide powers to control major sources of air pollution, in line with the risk they pose to public health and the environment, plus new local powers to take action in areas with an air pollution problem. These will support the creation of Clean Air Zones to lower emissions from all sources of air pollution, backed up with clear enforcement mechanisms. The UK has set stringent targets to cut emissions by 2020 and 2030.

**A.96** The Environment Agency's Approach for Groundwater Protection (2018) [See reference 215] contains position statements which provide information about the Environment Agency’s approach to managing and protecting

groundwater. They detail how the Environment Agency delivers government policy for groundwater and adopts a risk-based approach where legislation allows. Many of the approaches set out in the position statements are not statutory but may be included in, or referenced by, statutory guidance and legislation.

**A.97** The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 [\[See reference 216\]](#) protect inland surface waters, transitional waters, coastal waters and groundwater, and outlines the associated river basin management process. These Regulations establish the need to prevent deterioration of waterbodies and to protect, enhance and restore waterbodies with the aim of achieving good ecological and chemical status.

**A.98** The UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations 2017 [\[See reference 217\]](#) sets out the Government's ambition and actions for delivering a better environment and cleaner air, including £1 billion investment in ultra-low emission vehicles, a £290 million National Productivity Investment Fund, a £11 million Air Quality Grant Fund and £255 million Implementation Fund to help Local Authorities to prepare Air Quality Action Plans and improve air quality, an £89 million Green Bus Fund, £1.2 billion Cycling and Walking Investment Strategy and £100 million to help improve air quality on the National road network.

**A.99** Drought response: our framework for England (2017) [\[See reference 218\]](#) tells you how drought affects England and how the Environment Agency works with government, water companies and others to manage the effects on people, business and the environment. It aims to ensure consistency in the way we co-ordinate drought management across England. It sets out:

- how drought affects different parts of England
- who is involved in managing drought and how we work together
- how we and others take action to manage drought
- how we monitor and measure the impacts of drought to advise senior management and government on the prospects and possible action

- how we report on drought and communicate with others

**A.100** The Nitrate Pollution Prevention Regulations 2016 [\[See reference 219\]](#) provides for the designation of land as nitrate vulnerable zones and imposes annual limits on the amount of nitrogen from organic manure that may be applied or spread in a holding in a nitrate vulnerable zone. The Regulations also specify the amount of nitrogen to be spread on a crop and how, where and when to spread nitrogen fertiliser, and how it should be stored. It also establishes closed periods during which the spreading of nitrogen fertiliser is prohibited.

**A.101** The Water Supply (Water Quality) Regulations 2016 [\[See reference 220\]](#) focus on the quality of water for drinking, washing, cooking and food preparation, and for food production. Their purpose is to protect human health from the adverse effects of any contamination of water intended for human consumption by ensuring it is wholesome and clean.

**A.102** The Environmental Permitting Regulations 2016 [\[See reference 221\]](#) streamline the legislative system for industrial and waste installations into a single permitting structure for those activities which have the potential to cause harm to human health or the environment. They set out how to prevent or, where that is not practicable, to reduce emissions into air, water and land and to prevent the generation of waste, in order to achieve a high level of protection of the environment and human health.

**A.103** The Air Quality Standards Regulations 2016 [\[See reference 222\]](#) set out limits on concentrations of outdoor air pollutants that impact public health, most notably particulate matter (PM10 and PM2.5) and nitrogen dioxide (NO<sub>2</sub>). It also sets out the procedure and requirements for the designation of Air Quality Management Areas (AQMAs).

**A.104** The Water White Paper (2012) [\[See reference 223\]](#) sets out the Government's vision for the water sector including proposals on protecting water resources and reforming the water supply industry. It states outlines the measures that will be taken to tackle issues such as poorly performing

ecosystem, and the combined impacts of climate change and population growth on stressed water resources.

**A.105** The National Policy Statement for Waste Water (2012) [\[See reference 224\]](#) sets out Government policy for the provision of major waste water infrastructure. The policy set out in this NPS is, for the most part, intended to make existing policy and practice in consenting nationally significant waste water infrastructure clearer and more transparent.

**A.106** The Flood and Water Management Act 2010 [\[See reference 225\]](#) and The Flood and Water Regulations (2019) [\[See reference 226\]](#) sets out measures to ensure that risk from all sources of flooding is managed more effectively. This includes incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; rolling back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

**A.107** Groundwater (England and Wales) Regulations 2009 [\[See reference 227\]](#) implement in England and Wales Community legislation on pollution of groundwater. They provide rules for the granting by the Environment Agency of a permit under these Regulations, consent under section 91(8) of the Water Resources Act 1991 and (with exceptions) an environmental permit under the Environmental Permitting (England and Wales) Regulations. In addition, the Regulations create an offence of discharge of a hazardous substance or non-hazardous pollutant without a permit, provide for powers of enforcement of the Environment Agency and prescribe penalties for offences committed under these Regulations.

**A.108** Flood Risk Regulations 2009 [\[See reference 228\]](#) regulations were enacted in December 2009. They outline a set of tasks, which the county council is required to follow between now and approximately 2015. The regulations also implement the 2007 EU Floods Directive. In accordance with the regulations the council has a series of new responsibilities, these are:

## Appendix A Review of Plans, Policies and Programmes

- The preparation of a Preliminary Flood Risk Assessment (PFRA) Report, including the identification of flood risk areas
- The preparation of Flood Hazard Maps and Flood Risk Maps
- The preparation of Flood Risk Management Plans
- Cooperating with the Environment Agency and other Lead Local Flood Authorities.

### A.109 Future Water: The Government's Water Strategy for England (2008)

**[See reference 229]** sets out how the Government wants the water sector to look by 2030, providing an outline of steps which need to be taken to get there. These steps include improving the supply of water; agreeing on important new infrastructure such as reservoirs; proposals to time limit abstraction licences; and reducing leakage. The document also states that pollution to rivers will be tackled, whilst discharge from sewers will be reduced.

**A.110** The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007) **[See reference 230]** sets out a way forward for work and planning on air quality issues by setting out the air quality standards and objectives to be achieved. It introduces a new policy framework for tackling fine particles and identifies potential new national policy measures which modelling indicates could give further health benefits and move closer towards meeting the Strategy's objectives. The objectives of the Strategy are to:

- Further improve air quality in the UK from today and long term; and
- Provide benefits to health quality of life and the environment.

**A.111** The Environmental Noise Regulations 2006 **[See reference 231]** apply to environmental noise, mainly from transport. The regulations require regular noise mapping and action planning for road, rail and aviation noise and noise in large urban areas. They also require Noise Action Plans based on the maps for road and rail noise and noise in large urban areas. The Action Plans identify Important Areas (areas exposed to the highest levels of noise) and suggest ways the relevant authorities can reduce these. Major airports and those which affect large urban areas are also required to produce and publish their own

Noise Action Plans separately. The Regulations do not apply to noise from domestic activities such as noise created by neighbours; at workplaces; inside means of transport; or military activities in military areas.

**A.112** The Urban Waste Water Treatment Regulations (2003) [\[See reference 232\]](#) protect the environment from the adverse effects of urban waste water discharges and certain industrial sectors, notably domestic and industrial waste water. The regulations require the collection of waste water and specifies how different types of waste water should be treated, disposed and reused.

**A.113** The Environmental Protection Act 1990 [\[See reference 233\]](#) makes provision for the improved control of pollution to the air, water and land by regulating the management of waste and the control of emissions. Seeks to ensure that decisions pertaining to the environment are made in an integrated manner, in collaboration with appropriate authorities, non-governmental organisations and other persons.

## Economic Growth

**A.114** The Growth Plan 2022 [\[See reference 234\]](#) makes growth the government's central economic mission, setting a target of reaching a 2.5% trend rate. Sustainable growth will lead to higher wages, greater opportunities and provide sustainable funding for public services. The Chancellor of the Exchequer's "growth plan" contained a raft of significant tax measures, with major changes being announced for both individuals and businesses.

**A.115** Build Back Better: Our Plan for Growth (2021) [\[See reference 235\]](#) sets out a plan to 'build back better' tackling long-term problems to deliver growth that delivers high-quality jobs across the UK while supporting the transition to net zero. This will build on three core pillars of growth: infrastructure, skills and innovation.

**A.116** The Agricultural Transition Plan 2021 to 2024 [\[See reference 236\]](#) aims to drive competitiveness, increase productivity, reduce carbon emissions, and



generate fairer returns across the agricultural industry. The Transition Plan introduces several new schemes to improve the environment, animal health and welfare, and farm resilience and productivity (e.g., grants will be available for sustainable farming practices, creating habitats for nature recovery and making landscape-scale changes such as establishing new woodland and other ecosystem services).

**A.117** The Agriculture Act 2020 [See reference 237] sets out how farmers and land managers in England will be rewarded in the future with public money for “public goods” – such as better air and water quality, thriving wildlife, soil health, or measures to reduce flooding and tackle the effects of climate change, under the Environmental Land Management Scheme. The Act will help farmers to stay competitive, increase productivity, invest in new technology and seek a fairer return from the marketplace. Agricultural Transition Plan 2021 to 2024.

**A.118** UK Industrial Strategy: Building a Britain fit for the future (2018) [See reference 238] lays down a vision and foundations for a transformed economy. Areas including artificial intelligence and big data; clean growth; the future of mobility; and meeting the needs of an ageing society are identified as the four ‘Grand Challenges’ of the future.

**A.119** The National Infrastructure Delivery Plan 2016-2021 [See reference 239] brings together the Government’s plans for economic infrastructure over this five year period with those to support delivery of housing and social infrastructure.

**A.120** The LEP Network Response to the Industrial Strategy Green Paper Consultation (2017) [See reference 240] seeks to ensure that all relevant local action and investment is used in a way that maximises the impact it has across the Government’s strategy. Consultation responses set out how the 38 Local Enterprise Partnerships will work with Government using existing and additional resources to develop and implement a long-term Industrial Strategy.

## Transport

**A.121** The Cycling and Walking Investment Strategy Report to Parliament (2022) [\[See reference 241\]](#) sets out the objectives and financial resources for cycling and walking infrastructure. It states the Government's long-term ambition is to make walking and cycling the natural choices for shorter journeys. It aims to double cycling by 2025, increase walking activity, increase the percentage of children that usually walk to school and reduce the number of cyclists killed or seriously injured on England's roads.

**A.122** Decarbonising Transport: A Better, Greener Britain (2021) (Decarbonising Transport Plan (DTP)) [\[See reference 242\]](#) sets out the Government's commitments and the actions needed to decarbonise the entire transport system in the UK. It follows on from the Decarbonising Transport: Setting the Challenge report published in 2020. The DTP commits the UK to phasing out the sale of new diesel and petrol heavy goods vehicles by 2040, subject to consultation, in addition to phasing out the sale of polluting cars and vans by 2035. The DTP also sets out how the government will improve public transport and increase support for active travel, as well as creating a net zero rail network by 2050, ensuring net zero domestic aviation emissions by 2040, and a transition to green shipping.

**A.123** Decarbonising Transport: Setting the Challenge (2020) [\[See reference 243\]](#) sets out the strategic priorities for the new Transport Decarbonisation Plan (TDP), published in July 2021. It sets out in detail what government, business and society will need to do to deliver the significant emissions reduction needed across all modes of transport, putting us on a pathway to achieving carbon budgets and net zero emissions across every single mode of transport by 2050. This document acknowledges that while there have been recently published strategies to reduce greenhouse gas emissions in individual transport modes, transport as a whole sector needs to go further and more quickly, therefore the TDP takes a coordinated, cross-modal approach to deliver the transport sector's contribution to both carbon budgets and net zero.

**A.124** The Road to Zero (2018) [\[See reference 244\]](#) sets out new measures towards cleaner road transport, aiming to put the UK at the forefront of the design and manufacturing of zero emission vehicles. It explains how cleaner air, a better environment, zero emission vehicles and a strong, clean economy will be achieved. One of the main aims of the document is for all new cars and vans to be effectively zero emission by 2040.

**A.125** The Transport Investment Strategy 2017 [\[See reference 245\]](#) sets out four objectives that the strategy aims to achieve:

- Create a more reliable, less congested, and better connected transport network that works for the users who rely on it;
- Build a stronger, more balanced economy by enhancing productivity and responding to local growth priorities;
- Enhance our global competitiveness by making Britain a more attractive place to trade and invest; and
- Support the creation of new housing.

**A.126** The Highways England Sustainable Development Strategy and Action Plan (2017) [\[See reference 246\]](#) is designed to communicate the company's approach and priorities for sustainable development to its key stakeholders. Highways England aims to ensure its action in the future will further reduce the impact of its activities seeking a long-term and sustainable benefit to the environment and the communities it serves. The action plan describes how Highways England will progress the aspirations of their Sustainable Development and Environment Strategies. It describes actions that will enable the company to deliver sustainable development and to help protect and improve the environment.

**A.127** Door to Door: A strategy for improving sustainable transport integration (2013) [\[See reference 247\]](#) focuses on four core areas which need to be addressed so that people can be confident in choosing greener modes of transport. There are as follows:

- Accurate, accessible and reliable information about different transport options;
- Convenient and affordable tickets;
- Regular and straightforward connections at all stages of the journey and between different modes of transport; and
- Safe and comfortable transport facilities.

**A.128** The strategy also includes details on how the Government is using behavioural change methods to reduce or remove barriers to the use of sustainable transport and working closely with stakeholders to deliver a better-connected transport system.

**A.129** Jet Zero Strategy Delivering net zero aviation by 2050 (2020) [**See reference 248**] aims to reduce in-sector emissions from aviation by around 50% by 2050. The strategy is underpinned by three principles:

**A.130 International leadership:** Leading coordinated global efforts to tackle international aviation emissions, including through ongoing work in the International Civil Aviation Organization.

**A.131 Delivered in partnership:** Working with all parts of the sector and different partners to develop, test, implement and invest in the solutions needed.

**A.132 Maximising opportunities:** Using the opportunity of the Jet Zero transition to boost the economy, create new jobs, develop new industries, and become a more energy secure nation.

**A.133** Airports: The Government's View Summary Document- Moving Britain Ahead (2016) [**See reference 249**] supports the construction of a new runway at Heathrow airport to provide strategic and economic benefits to the UK, offering the best deal for passengers and increasing the number of UK airports connected to Heathrow.

## Sub-national Plans and Programmes of most relevance to the Local Plan

### **A.134** Levelling up the East of England: 2023-2030 [\[See reference 250\]](#)

focuses on the East of England's progress towards achieving the Government's twelve levelling up missions. Key findings from the report include the East of England:

- has increased in population size by over 8%, almost 500,000 people, between 2011 and 2021, making it the fastest growing English region
- has the highest percentage of working age people in work than any region in the UK – 79%
- has attainment in reading, writing and maths at Key Stage 2 below UK average – just 64%. Average is 65% and the Government's levelling up target is 90%
- has the highest level of owner occupation than any region in the UK – 67% – but homes are more than 9 times median incomes so are less affordable than the English average. Meanwhile 1 in 4 private rented homes are “non-decent” and currently 99,604 people are on councils' waiting lists for social housing and 14,856 are homeless including those in temporary accommodation
- has (just) above average healthy life expectancy – 65 years for both women and men – but there is a variation of up to 9 years between people living in different places: for women the biggest “gap” is between Peterborough at 59 years and Cambridgeshire at 68 years; the gap for men is also 9 years: between Central Bedfordshire at 68 years and Luton at 59 years.

### **A.135** Luton 2040: A Place to Thrive Economic Strategy [\[See reference 251\]](#)

will help to secure a strong recovery following the COVID-19 pandemic, as well as reforming our economy to ensure that everyone in Luton can benefit from economic growth and opportunities in future. Plans include sustaining Economic Growth, local wealth building, skills for the future, a real living wage town,

growing the airport, a thriving town centre and transforming lives through arts, culture and heritage.

**A.136** Transport East, Transport Strategy 2030-2050 [\[See reference 252\]](#) sets out ambitions and priority areas for improved connections and new infrastructure. It aligns with established national, regional and local plans, and will help everyone work together to make life in the East better.

**A.137** Bedfordshire Natural Capital Assessment, Part 1: Mapping, valuation, and opportunities for enhancement across Bedfordshire (June 2021) [\[See reference 253\]](#) describes a project to produce a detailed natural capital (habitat) basemap for the whole of Bedfordshire, to model and map the physical and economic benefits (ecosystem services) that flow from the natural capital, and to identify opportunities to enhance accessible natural greenspace, biodiversity and a range of ecosystem services. It was commissioned by the three local authorities of Bedfordshire: Luton Borough Council, Bedford Borough Council and Central Bedfordshire Council, through the Bedfordshire Local Nature Partnership. This report is the first of four, and presents results for the whole of Bedfordshire, as well as providing background and methodological details.

**A.138** Bedford Borough Council, Local Transport Plan, 2011-2021 [\[See reference 254\]](#) sets out a plan to tackle Bedford Borough's transport problems. The vision is to create a transport system in which walking, cycling and public transport are the natural choices of travel for the majority of journeys because they are affordable, healthy, convenient and safe alternatives to the private car.

**A.139** Central Bedfordshire Council Transport Strategy April 2011 to March 2026 [\[See reference 255\]](#) set out our transport priorities for 15 years (from 2011-2026). Since 2011 there have been several changes that have affected transport priorities for Central Bedfordshire. The vision focuses on being globally connected, delivering sustainable growth to ensure a green, prosperous and ambitious place for the benefit of all by creating an integrated transport system that is safe, sustainable and accessible.

**A.140** Luton Corporate Plan 2023-2028 [\[See reference 256\]](#) is the council's principal plan for the next five years, setting out how they will play their part in delivering on the town's ambitious vision for Luton 2040. The vision is for Luton to be a healthy, fair and sustainable town where everyone can thrive and no-one has to live in poverty. The Council believe that this vision has the potential to truly transform Luton for the better and most of Luton's residents now feel optimistic about the future of our town.

**A.141** Luton 2040 Vision [\[See reference 257\]](#) is for Luton to be a healthy, fair and sustainable town, where everyone can thrive and no-one has to live in poverty. Priorities include:

- Building an inclusive economy that delivers investment to support the growth of businesses, jobs and incomes.
- Improving population wellbeing and tackling health inequalities to enable everyone to have a good quality of life and reach their full potential.
- Becoming a child friendly town, where our children grow up happy, healthy and secure, with a voice that matters and the opportunities they need to thrive.
- Tackling the climate emergency and becoming a net zero town with sustainable growth and a healthier environment.
- Supporting a strong and empowered community, built on fairness, local pride and a powerful voice for all our residents.

**A.142** Active Luton Strategy 2023 to 2028 [\[See reference 258\]](#) looks at creating opportunities for communities to thrive. The strategy is a five-year vision to support people achieve their potential. Priorities include:

- Supporting children in Luton communities to get the best start in life
- Supporting the wellbeing of the Luton community
- Developing skills and lifelong learning
- Developing further as a great place to work
- Strengthening financial viability and sustainability



- Conducting business in an environmentally sustainable manner

**A.143** Domestic Abuse Strategy 2020 to 2023 [\[See reference 259\]](#) aims to raise awareness of the impact, prevalence and causes of domestic abuse in all its forms, to improve outcomes for those affected by it and help them to break the cycle of domestic abuse and go on to live a life free from its effects. There are four priorities as part of the plan:

- prevention and early help
- partnership
- provision and improvement
- protection

**A.144** Fairness strategy: A town built on fairness and social justice (August 2023) [\[See reference 260\]](#) is about Supporting a strong community, committed to fairness and local pride, with a powerful voice for all residents. The starting point for the strategy is

- Comply with equality and human rights laws and duties
- Recognise that we don't all have the same access to our legal rights
- A sense of belonging
- Shared Vision
- If resources are invested strategically we'll see:
  - increased social inclusion
  - active citizenship
  - system change for equity

**A.145** Housing Strategy 2022 to 2027 [\[See reference 261\]](#) states by 2027 Luton BC should aim to ensure:

- good and improving housing services for residents, and tenants of all social landlords in the town

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- an active and increasing role for our residents and tenants
- at least 425 new homes and 85 new affordable homes each year
- council led activity in the local private rental market making more homes available at lower cost
- more of the homes we most need, especially family homes
- significant reductions in the use of temporary accommodation, to under 500 households
- no rough sleeping in Luton
- improved conditions in the private rented sector through extension of licensing
- reduction of fuel poverty through additional energy efficiency measures to homes of all tenures
- full compliance with emerging building safety and fire safety requirements

**A.146** Luton 2020-2040- A Place To Thrive- Inclusive Economy Strategy [\[See reference 262\]](#) will help Luton to secure a strong recovery following the COVID-19 pandemic, as well as reforming the economy to ensure that everyone in Luton can benefit from economic growth and opportunities in future. The Inclusive Economy Board will work with everyone in the town to grow economy sustainably, by developing growth in key sectors, creating more well-paid jobs and enhancing the skills of residents to meet the needs of employers. Strategies include:

- Sustaining economic growth
- Local wealth building
- Skills for the future
- A real living wage town
- Growing the airport
- A thriving town centre
- Transforming lives through arts, culture and heritage

**A.147** Library Strategy 2020 to 2025 [\[See reference 263\]](#) sets out Luton's aspiration and vision for a library service that is sustainable and relevant to the residents of Luton. Whilst the council recognises that Libraries are an invaluable community service providing access to learning, information and culture for all, the landscape for libraries has changed dramatically in the last ten years. Libraries have a key role to play in enabling Luton Borough Council to deliver on its vision for Luton in 2040: a vibrant town built on fairness, where people live good lives and achieve their aspirations, everyone will be able to achieve their potential and inequality will be reduced, a town where no one lives in poverty. The vision for the library service will inspire people to read, learn and access trusted sources of information, enabling individuals to improve their economic and social wellbeing. This will be achieved through the provision of easily accessible physical and online information, welcoming community spaces, access to health and wellbeing services, and supporting skill development to utilise this information for all. Luton's library service is therefore fundamental in breaking the link between information poverty and income poverty, and in reducing social isolation towards achieving the Luton 2040 vision.

**A.148** Luton Energy Strategy 2018 to 2035 [\[See reference 264\]](#) will focus actions on the alleviation of fuel poverty and the maximisation of incomes into the local economy. To achieve this the council will demonstrate clear leadership and will make appropriate use of innovation in the approach. The commitment is long term and will be sustained throughout the life of this Strategy. This is important as it will provide an important element of Luton's support to meeting national goals to move to a low carbon economy.

**A.149** Luton's Population and Wellbeing Strategy 2023 to 2028 [\[See reference 265\]](#) will focus on

- Improving population wellbeing and tackling health inequalities to enable everyone to have a good quality of life and reach their full potential,
- Becoming a child friendly town, where our children grow up happy, healthy and secure, with a voice that matters and the opportunities they need to thrive,
- Supporting a strong and empowered community built on fairness, local pride and a powerful voice for all residents.

**A.150** Prosperity through Procurement: a five-year strategy 2019 to 2024 [\[See reference 266\]](#) builds on the previous version (Luton Council Corporate Procurement Strategy 2015 to 2019) and provides increased focus on how effective procurement activities can enable wider community and organisational outcomes. The strategy is carried out on three main themes:

- the real living wage
- local recruitment, skills and developing staff
- potential employees and community health and wellbeing

**A.151** Waste Management Strategy 2018 to 2028 [\[See reference 267\]](#) will be focused on less waste and more recycling. Key targets include:

- to recycle 50% of the possible recyclable material currently in their residual bin
- to capture or divert more than half of the green waste currently placed in their residual waste bin
- to reduce contamination of recycling streams
- to improve the quality of the recycling captured

**A.152** Reducing Health Inequalities in Luton: A Marmot Town (2022) [\[See reference 268\]](#) has eight principles:

1. Give every child the best start in life
2. Enable all children, young people and adults to maximise their capabilities and have control over their lives
3. Create fair employment and good work for all
4. Ensure a healthy standard of living for all
5. Create and develop healthy and sustainable places and communities



6. Strengthen the role and impact of ill-health prevention
7. Tackle discrimination, racism and their outcomes
8. Pursue environmental sustainability and health equity together

**A.153** Transport Strategy and Local Transport Policies (April 2021) [\[See reference 269\]](#) sets out Luton's strategic priorities and policies to achieve more sustainable access to goods and services in the town over the next 20 years by encouraging and enabling more walking, cycling and the use of public transport.

**A.154** Local Walking and Cycling Infrastructure Plan 2023-2033 [\[See reference 270\]](#) identifies how the LCWIP will help achieve Local Transport plan 4 2022-2040 objectives:

- The plan identifies the key active travel infrastructure necessary to reduce car dependency.
- The plan recognises that active travel provides affordable, accessible, door-to-door journeys.
- The plan supports a place-based approach to active travel, which provides opportunities to improve green infrastructure and enhance biodiversity.
- The plan proposes cycling and walking routes to key employment centres, transport hubs, schools, colleges and universities.

**A.155** Electric vehicle chargepoint strategy 2022 to 2025 [\[See reference 271\]](#) aims to support the roll-out of public EV chargepoints that enables the transition to a zeroemission road transport system for journeys that can't otherwise be made by sustainable transport. There are five objectives:

- Increase the number of public EV chargepoints across the council estate to meet the charging needs of residents, businesses and visitors.
- Ensure residents without off-street parking have access to a range of convenient, accessible and reliable EV chargepoints, on-street and through charging hubs.

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- Support the transition of the council fleet, public transport and private hire/taxi vehicles to zero carbon fuels.
- Promote EV chargepoints solutions that improve the user experience of public charging in Luton.
- Ensure chargepoints are fairly priced and inclusively designed.

**A.156** Bus Service Improvement Plan (2021) [See reference 272] sets targets for passenger growth, increases in customer satisfaction, improvements to punctuality and reliability, faster journey times.

**A.157** Air quality annual status report 2023 [See reference 273] found Road traffic is the main source of pollution in the borough, with both the town and the motorway providing significant traffic volumes. Other sources include London Luton Airport and local industry, which is distributed in pockets around the borough. As of 2023, 39 industrial processes permitted by Luton Borough Council were operational within the borough. At present the main pollutant of concern is nitrogen dioxide (NO<sub>2</sub>).

**A.158** Luton Employment and Skills Strategy 2022-2027 [See reference 274] has identified four key strategic priorities:

- Skills Driving Economic Recovery and Growth
- Developing a Pipeline of Talented and Resilient People
- Tackling Long-Term Inequality and Economic Inactivity
- Creating an Adaptable, Upskilled Workforce

**A.159** My climate action plan Becoming a carbon neutral borough by 2040 (2021) [See reference 275] describes the actions Luton will take to consolidate and accelerate what they are already doing, identify and analyse gaps and to initiate a borough wide debate on the scale and pace of change that is required. Luton made significant progress in reducing carbon emissions in the recent years by:

- reducing energy use

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- improving the energy efficiency of our corporate buildings and social housing stock
- investing in renewable technologies
- promoting sustainable transport in the borough and beyond

**A.160** Harnessing Momentum: Our strategy for Arts, Culture and Creative Industries in Luton 2017-2027 [\[See reference 276\]](#) has a vision of a town transformed by vibrant arts, culture and creativity that brightens the lives and life chances of everyone in Luton. The mission is to enable a diverse cultural offer that empowers people to dream and aspire, supports communities to grow strong and sustainable and develops a vibrant, inclusive creative economy that supports everyone in Luton to thrive.

**A.161** Curating Luton (2021) Our Town-wide Heritage Strategy 2021 to 2031 [\[See reference 277\]](#) sets a clear direction for how Luton will deliver ambitious plans collectively, with partners and residents, putting heritage at the heart of their recovery. Heritage will anchor place-shaping as the council reimagine the town centre and transform communities, neighbourhoods and greenspaces.

**A.162** The Luton Education Strategy for children and young people 2019 [\[See reference 278\]](#) identified four factors that impact on the evolution of local education provision:

- The perceived quality of LA education services and access to alternatives.
- The strength of connections among schools, the LA and other local partners
- Past performance of the system
- Leadership of (system) change

**A.163** Hertfordshire's Local Transport Plan 2018 – 2031 [\[See reference 279\]](#) sets out how transport can help deliver a positive future vision of Hertfordshire. As well as providing for safe and efficient travel, transport has a major input into

wider policies such as economic growth, meeting housing needs, improving public health and reducing environmental damage.

# Surrounding Development Plans

**A.164** Central Bedfordshire adopted its Local Plan on 22<sup>nd</sup> July 2021, covering the period of 2015 through to 2035. The Local Plan plans for:

- around 39,350 new homes
- a range of different homes
- 30% of homes to be lower cost options, such as affordable rent and shared ownership
- at least 24,000 new jobs, through new and expanded employment sites

**A.165** The review of the adopted Local Plan was completed and on the 23 November 2023 the Council approved a high level timetable to prepare a new Local Plan. The emerging Local Plan is at the informal/non-statutory engagement and evidence review stage. The next stage is the early public and stakeholder engagement issues and options.

**A.166** The North Hertfordshire Local Plan 2011-2031 was adopted on 8 November 2022 and replaces the saved policies of the District Plan Second Review with Alterations. The new Local Plan sets out how and where new homes, jobs and infrastructure will be delivered in the district. The vision for the plan is to “Put people first and deliver sustainable services to enable a brighter future together”. The Plan is based on three main priorities: People First, Sustainability and a Brighter Future Together.

**A.167** The Dacorum Local Plan 1991-2011 was adopted in 2004 and should be read alongside the adopted Core Strategy and Site Allocations DPD.

**A.168** A New Dacorum Local Plan (to 2040) is currently in progress. Consultation on the New Local Plan ran Monday 30 October 2023 and 11



December 2023. The Council is continuing to prepare the Dacorum Local Plan for its next formal stage of consultation in late 2024. A key role of the Local Plan is to establish the amount and location of new development in Dacorum over the next 16 years and to set out the approach to:

- Identifying where and when development should take place,
- Delivering a step change in housing growth,
- Supporting the local economy, employment and retail,
- Adapting to and mitigating a changing climate,
- Promoting high quality design of development,
- Conserving and enhancing the historic and natural environment, and
- Enabling the delivery of infrastructure.

**A.169** St. Albans current adopted Local Plan is The District Local Plan Review 1994 which is one of the oldest in the country and needs to be replaced. The New Local Plan is like a blueprint for future development so that inevitable change can be managed carefully and thoughtfully. The Plan can help tackle Climate Change and improve biodiversity in the borough. The New Local Plan underwent Regulation 18 consultation from July to September 2023 and will begin Regulation 19 Pre-submission consultation from October 2024.

## References

- 1 ONS (2023) Estimate of the population for England and Wales Available at:  
<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/estimatesofthepopulationforenglandandwales>
- 2 The Planning and Compulsory Purchase Act 2004 was amended under the Environmental Assessments and Miscellaneous Planning (EU Exit) Regulations 2018
- 3 The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633), as amended by The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI2018/1232)
- 4 Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (2016, updated 2021) Planning Practice Guidance [online]. Available at:  
<https://www.gov.uk/government/collections/planning-practice-guidance>
- 5 The Conservation of Habitats and Species Regulations 2017 (SI 2017/1012), as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579)
- 6 The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004 No. 1633) as amended by The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232) and The Environmental Assessment of Plans and Programmes (Amendment) Regulations 2020 (SI 2020/1531)
- 7 Explanatory Memorandum to the Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 No. 1232
- 8 Ministry of Housing, Communities and Local Government (2023) National Planning Policy Framework

- 9 HM Government (2004) Planning and Compulsory Purchase Act 2004 (as amended) – Clause 19(2)(A) [online]. Available at:  
<https://www.legislation.gov.uk/ukpga/2004/5/section/19>
- 10 Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (2016, updated 2024) Planning Practice Guidance [online]. Available at:  
<https://www.gov.uk/government/collections/planning-practice-guidance>
- 11 Homes England (2020) Building for a Healthy Life [pdf]. Available at:  
[https://www.udg.org.uk/sites/default/files/publications/files/14JULY20%20BFL%202020%20Brochure\\_3.pdf](https://www.udg.org.uk/sites/default/files/publications/files/14JULY20%20BFL%202020%20Brochure_3.pdf)
- 12 The updated PPG clarifies that this requirement of the NPPF is to be applied “where most of the development arising from larger scale developments proposed in the plan will be delivered well beyond the plan period, and where delivery of those developments extends 30 years or longer from the start of the plan period”. Furthermore, where this requirement applies “the authority will need to ensure that their vision reflects the long-term nature of their strategy for the plan or those larger scale developments. It is not anticipated that such visions would require evidence in addition to that already produced to support the plan”.
- 13 Department for Levelling Up, Housing and Communities (2022) Building Regulations in England: circular 01/2022 [online]. Available at:  
<https://www.gov.uk/government/publications/building-regulations-in-england-circular-012022>
- 14 UK Green Building Council (2021) The New Homes Policy Playbook [pdf]. Available at: <https://ukgbc.s3.eu-west-2.amazonaws.com/wp-content/uploads/2021/01/05144257/New-Homes-Policy-Playbook-January-2021.pdf>
- 15 Met Office (2022) UKCP18 Climate Change [online] Available at:  
<https://www.metoffice.gov.uk/research/approach/collaboration/ukcp/data/index>
- 16 Met Office (2024) UK Climate Averages [online]. Available At:  
<https://www.metoffice.gov.uk/research/climate/maps-and-data/uk-climate-averages/gcpwxz1ey>

- 17 Friends of the Earth Policy (2022) Who suffers most from heatwaves in the UK? [online]. Available At: <https://policy.friendsoftheearth.uk/insight/who-suffers-most-heatwaves-uk>
- 18 International Journal of Climatology (2022) State of the UK Climate 2021 [online] Available at: <https://rmets.onlinelibrary.wiley.com/doi/10.1002/JOC.7787>
- 19 Met Office (2022) 2022 UK Annual Climate Summary [online] Available at: <https://www.metoffice.gov.uk/research/climate/maps-and-data/summaries/index>
- 20 The Met Office (2022) Climate Summaries – 2022 Seasonal [online] Available at: <https://www.metoffice.gov.uk/research/climate/maps-and-data/summaries/index>
- 21 Intergovernmental Panel on Climate Change (2023) AR6 Synthesis Report: Climate Change 2023 [online] Available at: <https://www.ipcc.ch/reports/>
- 22 Tyndall Centre (2024) Settling Climate Commitments for Luton [online] Available at: <https://carbonbudget.manchester.ac.uk/reports/E06000032/>
- 23 Luton Borough Council (2021) My climate action plan: Becoming a carbon neutral borough by 2040 [online] Available at: [https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/Climate change/Climate-change-action-plan.pdf](https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/Climate%20change/Climate-change-action-plan.pdf)
- 24 ONS and Department for Business, Energy & Industrial strategy (2019) 2005 to 2020 UK local and regional CO2 emissions – data tables, available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-national-statistics-2005-to-2020>
- 25 Department for Business, Energy and Industrial Strategy (2022) Subnational Total Final Energy Consumption 2005 – 2020 [online] Available at: <https://www.gov.uk/government/statistics/total-final-energy-consumption-at-regional-and-local-authority-level-2005-to-2020>
- 26 Gov.uk (2022) Regional Renewable Statistics [online] Available at: <https://www.gov.uk/government/statistics/regional-renewable-statistics>



- 27** Luton Borough Council (n.d) Luton 2040 A Net Zero Town [online]  
Available At:  
[https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/Climate change/luton-net-zero-roadmap-report.pdf](https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/Climate%20change/luton-net-zero-roadmap-report.pdf)
- 28** Luton Borough Council (n,d) Where have we got to so far? [online]  
Available at: <https://m.luton.gov.uk/Page/Show/Environment/climate-change/Pages/Where-have-we-got-to-so-far.aspx>
- 29** Luton Borough Council (2022) 09/05/2022 - Registration opens for Solar Together Bedfordshire[online] Available at:  
<https://m.luton.gov.uk/Page/Show/news/Pages/Registration-opens-for-Solar-Together-Bedfordshire.aspx>
- 30** ONS (2021) Luton's Population 2021 Census headline figures [online] Available at:  
[https://www.luton.gov.uk/Community\\_and\\_living/Lists/LutonDocuments/PDF/Luton-Census-2021-summary-report.pdf](https://www.luton.gov.uk/Community_and_living/Lists/LutonDocuments/PDF/Luton-Census-2021-summary-report.pdf)
- 31** Luton Borough Council (2022) Luton's Population 2021 Census headline figures [online]. Available At:  
[https://www.luton.gov.uk/Community\\_and\\_living/Lists/LutonDocuments/PDF/Luton-Census-2021-summary-report.pdf](https://www.luton.gov.uk/Community_and_living/Lists/LutonDocuments/PDF/Luton-Census-2021-summary-report.pdf)
- 32** ONS (2021) How life has changed in Luton: Census 2021 [online]  
Available at:  
<https://www.ons.gov.uk/visualisations/censusareachanges/E06000032/>
- 33** City Population (2024) Luton [online] Available at:  
[https://citypopulation.de/en/uk/eastofengland/wards/E06000032\\_luton/](https://citypopulation.de/en/uk/eastofengland/wards/E06000032_luton/)
- 34** ONS (2021) Census 2021 Luton [online] Available at: <https://explore-local-statistics.beta.ons.gov.uk/areas/E06000032-luton>
- 35** ONS (2021) Housing affordability in England and Wales: 2021 [online]  
Available at:  
<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandandwales/2021#:~:text=In%20England%2C%20average%20house%20prices,overall%20housing%20became%20less%20affordable>

- 36** Housing affordability in England and Wales: 2022 Available at:  
<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandandwales/2022>
- 37** Housing Affordability in England and Wales (2021) [online] Available at:  
<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandandwales/2021>
- 38** UK House Price Index summary: April 2024 [online] Available at:  
<https://www.gov.uk/government/statistics/uk-house-price-index-for-april-2024/uk-house-price-index-summary-april-2024>
- 39** Census (2021) How life has changed in Luton: Census 2021 [online]  
Available at:  
<https://www.ons.gov.uk/visualisations/censusareachanges/E06000032/>
- 40** Luton Borough Council (2019) Strategic Housing Land Availability  
Assessment [online] Available at:  
<https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/SHLAA-2017/shlaa-november-2019.pdf>
- 41** Luton Local Authority Monitoring Report 2018/19 – 2021/2222 [online]  
Available at:  
[https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/LocalPlan/Infrastructure and delivery/DEL 010.pdf](https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/LocalPlan/Infrastructure%20and%20delivery/DEL%20010.pdf)
- 42** Luton Local Authority Monitoring Report 2018/19 – 2021/2222 [online]  
Available at:  
[https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/LocalPlan/Infrastructure and delivery/DEL 010.pdf](https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/LocalPlan/Infrastructure%20and%20delivery/DEL%20010.pdf)
- 43** ONS (2021) Census Maps 2021 [online] Available at:  
<https://www.ons.gov.uk/census/maps/choropleth/identity/ethnic-group/ethnic-group-tb-20b/white-roma?oa=E00066537>
- 44** Luton Gypsy and Traveller Accommodation Assessment (2015) [online]  
Available at:  
<https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/Local%20Plan/Housing/HOU%20006a.pdf>

- 45** Luton Borough Council (2016) Luton Gypsy and Traveller Accommodation Assessment [online]. Available At:  
[https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/LocalPlan/Housing/HOU\\_006b.pdf](https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/LocalPlan/Housing/HOU_006b.pdf)
- 46** Luton Borough Council (2021) Health Census 2021 [online] Available at:  
[https://www.luton.gov.uk/Community\\_and\\_living/Lists/LutonDocuments/PDF/health.pdf](https://www.luton.gov.uk/Community_and_living/Lists/LutonDocuments/PDF/health.pdf)
- 47** Public Health England (2019) Local Authority Health Profile: Luton [online] Available at: <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/E06000032.html?area-name=Luton>
- 48** Public Health England (2019) Local Authority Health Profile: Luton [online] Available at: <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/E06000032.html?area-name=Luton>
- 49** Public Health England (2019) Local Authority Health Profile: Luton [online] Available at: <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/E06000032.html?area-name=Luton>
- 50** Sport England (2023) Active Lives Adult Survey November 2021-22 Report [online] Available at: <https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/2023-04/Active%20Lives%20Adult%20Survey%20November%202021-22%20Report.pdf?VersionId=ln4PN2X02DZ1LF18btqaj5KFHx0Mio9o>
- 51** Office for Health Improvement & Disparities (2021) Physical Activity [online] Available at:  
<https://activelives.sportengland.org/Result?queryId=120024>
- 52** Office for National Statistics (2022) Annual personal well-being estimates [online]. Available at:  
<https://www.ons.gov.uk/peoplepopulationandcommunity/wellbeing/datasets/headlineestimatesofpersonalwellbeing>
- 53** Luton Borough Council (n.d) Parks and open space play sites [online]. Available At:  
[https://www.luton.gov.uk/Leisure\\_and\\_culture/Lists/LutonDocuments/PDF/Parks/Play-area-inspection-sheet-index.pdf](https://www.luton.gov.uk/Leisure_and_culture/Lists/LutonDocuments/PDF/Parks/Play-area-inspection-sheet-index.pdf)

- 54** Friends of the Earth (2020) England's green space gap How to end green space deprivation in England [online]. Available At: [https://policy.friendsoftheearth.uk/sites/default/files/documents/2020-10/Green\\_space\\_gap\\_full\\_report\\_1.pdf](https://policy.friendsoftheearth.uk/sites/default/files/documents/2020-10/Green_space_gap_full_report_1.pdf)
- 55** Luton Borough Council (2024) BIG Lottery Fund [online] Available At: [https://m.luton.gov.uk/Page/Show/Leisure\\_and\\_culture/Parks\\_and\\_recreation/BIG\\_Lottery\\_Funding/Pages/default.aspx](https://m.luton.gov.uk/Page/Show/Leisure_and_culture/Parks_and_recreation/BIG_Lottery_Funding/Pages/default.aspx)
- 56** Luton Borough Council (2019) 2019 Indices of Multiple Deprivation Summary [online]. Available At: <https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/Planning/Observatory/2019-indices-of-multiple-deprivation-in-luton.pdf>
- 57** Luton Borough Council (2024) Luton Insight [online] Available At: <https://lutoncouncil.localinsight.org/#/map>
- 58** NOMIS (2023) Labour Market Profile – Luton [online] Available at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157201/report.aspx?town=luton#tabwab>
- 59** ONS (2020) Regional gross domestic product: local authorities [online] Available at: <https://www.ons.gov.uk/economy/grossdomesticproductgdp/datasets/regionalgrossdomesticproductlocalauthorities>
- 60** NOMIS (2023) Labour Market Profile – Luton [online] Available at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157201/report.aspx?town=luton#tabwab>
- 61** NOMIS (2023) Labour Market Profile – Luton [online] Available at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157201/report.aspx?town=luton#tabwab>
- 62** NOMIS (2023) Labour Market Profile – Luton [online] Available at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157201/report.aspx?town=luton#tabwab>
- 63** ONNOMIS (2023) Labour Market Profile – Luton [online] Available at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157201/report.aspx?town=luton#tabwab>



- 64** NOMIS (2023) Labour Market Profile – Luton [online] Available at:  
<https://www.nomisweb.co.uk/reports/lmp/la/1946157201/report.aspx?town=luton#tabwab>
- 65** NOMIS (2023) Labour Market Profile – Luton [online] Available at:  
<https://www.nomisweb.co.uk/reports/lmp/la/1946157201/report.aspx?town=luton#tabwab>
- 66** Luton Rising (2022) Why Grow? [online]. Available At:  
<https://lutonrising.org.uk/wp-content/uploads/2022/02/Why-Grow.pdf>
- 67** Luton Borough Council (2024) Step forward Luton [online] Available At:  
<https://invest.stepforwardluton.co.uk/investment-opportunities/#:~:text=Attracting%2018%20million%20visitors%20per,122%20retailers%20and%20food%20outlets.>
- 68** Luton Borough Council (2015) Retail Study Update [online] Available at:  
<https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/Local%20Plan/Luton%20town%20centre%20and%20neighbourhood%20centres/CEN%20005.pdf>
- 69** Census (2021) Census Maps [online] Available at:  
<https://www.ons.gov.uk/census/maps/choropleth/housing/number-of-cars-or-vans/number-of-cars-3a/no-cars-or-vans-in-household?lad=E07000099>
- 70** ONS (2021) Travel to work, England and Wales: Census 2021 [online] Available:  
<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/traveltoworkenglandandwales/census2021>
- 71** ONS (2011) Method of travel to work [online] Available at:  
<https://www.nomisweb.co.uk/census/2011/qs701ew>
- 72** NOMIS (2011) Location of usual residence and place of work [online] Available at: <https://www.nomisweb.co.uk/census/2011/wu01uk/chart>
- 73** Luton Borough Council (2021) Transport Strategy and Local Transport Policies [online] Available at:  
[https://www.luton.gov.uk/Transport\\_and\\_streets/Lists/LutonDocuments/PDF/transport-strategy.pdf](https://www.luton.gov.uk/Transport_and_streets/Lists/LutonDocuments/PDF/transport-strategy.pdf)

- 74** Luton Borough Council (2014) Luton Borough Landscape Character Assessment [online] Available at:  
[https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/LocalPlan/Natural and historic environment/ENV 013.pdf](https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/LocalPlan/Natural%20and%20historic%20environment/ENV%20013.pdf)
- 75** Luton Borough Council (2014) Minerals and waste Local Plan: strategic sites and policies (MWLP:SSP) [online] Available at:  
<https://m.luton.gov.uk/Page/Show/Environment/Planning/Regional%20and%20local%20planning/Pages/Minerals%20and%20waste.aspx#:~:text=Minerals%20and%20waste%20Local%20Plan,and%20other%20waste%20management%20activities>.
- 76** Bedford Council (2005) Bedfordshire and Luton Minerals and Waste Local Plan [online]. Available At:  
<https://www.bedford.gov.uk/media/4018/download?inline>
- 77** River Lea Catchment Partnership (2024) Luton Lea Catchment management Plan [online] Available At:  
<https://riverleacatchment.org.uk/index.php/luton-lea-about-us/luton-lea-catchment-description>
- 78** Magic Map (2024) [online] Available at:  
<https://magic.defra.gov.uk/MagicMap.aspx>
- 79** Environment Agency (2015) Part 1: Thames river basin district River basin management plan [online] Available at:  
[https://assets.publishing.service.gov.uk/media/5b2b8449e5274a18f42a8c84/Thames RBD Part 1 river basin management plan.pdf](https://assets.publishing.service.gov.uk/media/5b2b8449e5274a18f42a8c84/Thames_RBD_Part_1_river_basin_management_plan.pdf)
- 80** Luton Borough Council (2015) Luton Water Cycle Strategy [online] Available at:  
<https://www.luton.gov.uk/environment/lists/lutondocuments/pdf/local%20plan/climate%20change/cc%20005.pdf>
- 81** River Lea Catchment Partnership (2024) Themes and Objectives [online] Available At: <https://www.riverleacatchment.org.uk/index.php/luton-lea-cmp/luton-lea-themes-and-objectives>
- 82** Affinity Water (2024) Revised Draft WRMP 2024 [online] Available at:  
<https://ehq-production-europe.s3.eu-west-1.amazonaws.com/25b870b8a477800645b2e1b841bf61225bcba819/origi>

- 
- [nal/1693510345/b0a038665195d7b2a1bfb43584f42704 Revised draft W RMP.pdf?X-Amz-Algorithm=AWS4-HMAC-SHA256&X-Amz-Credential=AKIA4KKNQAKICO37GBEP%2F20240606%2Feu-west-1%2Fs3%2Faws4\\_request&X-Amz-Date=20240606T093012Z&X-Amz-Expires=300&X-Amz-SignedHeaders=host&X-Amz-Signature=a284b37f7f2f4e4c2e92e1a6487601442d084787ef53eba6099a5d2a4080aa02](https://www.thameswater.co.uk/media-library/home/about-us/regulation/water-resources/water-resources-management-plan-overview.pdf)
- 83** Shape your water future Our Water Resources Management Plan 2020 – 2100 [online] Available at: <https://www.thameswater.co.uk/media-library/home/about-us/regulation/water-resources/water-resources-management-plan-overview.pdf>
- 84** Anglian Water (2023) Our Water Resources management Plan 2024 [online]. Available At: <https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp/revised-draft-wrmp24-main-report-v2.pdf>
- 85** Anglian water (2023) Water Resource Zones Summaries [online]. Available At: <https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp/march-2024-update/v2rdwrmp-wrz-summary-rtss-supporting-document.pdf>
- 86** Gov.uk Flood map for planning [online] Available at: <https://flood-map-for-planning.service.gov.uk/flood-zone-results?polygon=%5b%5b510302,220107%5d,%5b512030,220916%5d,%5b512664,221681%5d,%5b512686,222447%5d,%5b512030,223147%5d,%5b511395,223825%5d,%5b510039,224547%5d,%5b509120,225115%5d,%5b508355,225859%5d,%5b508355,226340%5d,%5b506780,226406%5d,%5b505643,226078%5d,%5b503915,225969%5d,%5b503280,225815%5d,%5b502471,225028%5d,%5b504549,224306%5d,%5b505249,22381%5d,%5b506255,221266%5d,%5b506933,220041%5d,%5b508770,218400%5d,%5b510302,220107%5d%5d&center=%5b507578,222403%5d&location=luton%2520borough>
- 87** Luton Borough Council (2011) Preliminary Flood Risk Assessment [online] Available at: [https://www.luton.gov.uk/Transport\\_and\\_streets/Lists/LutonDocuments/PDF/Engineering%20and%20Transportation/Climate%20change/Luton-PFRA-20110608-V1pt0.pdf](https://www.luton.gov.uk/Transport_and_streets/Lists/LutonDocuments/PDF/Engineering%20and%20Transportation/Climate%20change/Luton-PFRA-20110608-V1pt0.pdf)

- 88** Luton Today (2023) Roads across Luton ‘badly flooded’ after heavy downpours [online] Available At: <https://www.lutontoday.co.uk/news/weather/roads-across-luton-badly-flooded-after-heavy-downpours-4343828>
- 89** Luton Borough Council (2013) Level 1 SFRA Update [online] Available At: <https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/luton-level-1-strategic-flood-risk-assessment-update.pdf>
- 90** Luton Borough Council (2013) Level 1 SFRA Update [online] Available At: <https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/luton-level-1-strategic-flood-risk-assessment-update.pdf>
- 91** Central Bedfordshire (2017) Level 1 Strategic Flood Risk Assessment [online] Available at: [https://centralbedfordshire.oc2.uk/docfiles/12/level\\_1\\_sfra.pdf](https://centralbedfordshire.oc2.uk/docfiles/12/level_1_sfra.pdf)
- 92** Luton Borough Council (2013) Level 1 SFRA Update [online] Available At: <https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/luton-level-1-strategic-flood-risk-assessment-update.pdf>
- 93** Office for Health Improvements and Disparities (2022) Air pollution: applying all our health [online] Available at: <https://www.gov.uk/government/publications/air-pollution-applying-all-our-health/air-pollution-applying-all-our-health#:~:text=In%20the%20UK%2C%20air%20pollution,and%2036%2C00%20deaths%20every%20year.>
- 94** Luton Borough (2023) Air Quality Annual Status Report [online] Available at: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020001/TR020001-001872-Luton Borough Council-Response-to-ISH5-AP-2023-Air-Quality-Annual-Status-Report.pdf>
- 95** Luton Borough (2023) Air Quality Annual Status Report [online] Available at: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020001/TR020001-001872-Luton Borough Council-Response-to-ISH5-AP-2023-Air-Quality-Annual-Status-Report.pdf>

- 96** Natural England (2013) Agricultural Land Classification (ALC) system [online] Available at:  
<https://publications.naturalengland.org.uk/category/5954148537204736>
- 97** [Natural](#) England (2019) Agricultural Land Classification [online] Available at: <https://naturalengland-defra.opendata.arcgis.com/datasets/Defra::provisional-agricultural-land-classification-alc-england/explore?filters=eyJBTENfR1JBREUiOiR3JhZGUgMyJdfQ%3D%3D&location=52.640934%2C-1.443386%2C8.27>
- 98** Luton Borough Council (2019) Brownfield Land Register [online] Available at:  
<https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/Local%20Plan/Housing/hou-013.pdf>
- 99** Hertfordshire and Bedfordshire Contaminated Land Forum (2012) Technical Guide for Planning Applicants and Developers Development on Potentially Contaminated land and/or for a sensitive end use [online] Available at:  
<https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/Environmental%20and%20Consumer%20Services/Pollution/Contaminated%20land/Herts%20and%20Beds%20Contaminated%20Land%20Planning%20Guidance.pdf>
- 100** Luton Borough Council (2018) Waste management strategy 2018 to 2028 [online]. Available At:  
<https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/Bins and recycling/Waste-Strategy.pdf>
- 101** Gov.uk (2021) ENV18 – Local authority collected waste: annual results table [online] Available at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1047704/LA\\_and\\_Regional\\_Spreadsheet\\_2021\\_rev.ods](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1047704/LA_and_Regional_Spreadsheet_2021_rev.ods)
- 102** Luton Borough Council (2018) Waste management strategy 2018 to 2028 [online]. Available At:  
<https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/Bins and recycling/Waste-Strategy.pdf>



- 103** Luton Borough Council (2021) Anti-litter strategy 2021 to 2023[online] Available at:  
<https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/anti-litter-strategy.pdf>
- 104** JNCC (n.d) Chilterns Beechwoods [online] Available at:  
<https://sac.jncc.gov.uk/site/UK0012724>
- 105** Natural England (2023) Designated Sites View SSSI Condition Survey [online] Available at:  
<https://designatedsites.naturalengland.org.uk/SiteSearch.aspx>
- 106** Natural England (2020) Dallow Downs and Winsdon Hill SSSI Luton [online] Available At: [https://consult.defra.gov.uk/natural-england/dallow-downs-and-winsdon-hill/supporting\\_documents/Dallow%20Downs%20and%20Winsdon%20Hill%20SSSI%20Notification%20document%2013%20October%202020.pdf](https://consult.defra.gov.uk/natural-england/dallow-downs-and-winsdon-hill/supporting_documents/Dallow%20Downs%20and%20Winsdon%20Hill%20SSSI%20Notification%20document%2013%20October%202020.pdf)
- 107** Natural England (2020) Cowslip Meadow SSSI Luton [online] Available At: [https://consult.defra.gov.uk/natural-england/cowslip-meadow/supporting\\_documents/Cowslip%20Meadow%20SSSI%20Supporting%20Information%2013%20October%202020.pdf](https://consult.defra.gov.uk/natural-england/cowslip-meadow/supporting_documents/Cowslip%20Meadow%20SSSI%20Supporting%20Information%2013%20October%202020.pdf)
- 108** Luton Borough Council (2024) Nature Conservation [online] Available At: [https://m.luton.gov.uk/Page/Show/Environment/Land\\_and\\_premises/Conservation/Pages/Conservation1.aspx](https://m.luton.gov.uk/Page/Show/Environment/Land_and_premises/Conservation/Pages/Conservation1.aspx)
- 109** Beds Life (2006) Rebuilding Biodiversity in Bedfordshire & Luton [online] Available at:  
[https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/LocalPlan/Natural\\_and\\_historic\\_environment/ENV\\_010.pdf](https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/LocalPlan/Natural_and_historic_environment/ENV_010.pdf)
- 110** Central Bedfordshire Council (2024) Local Nature Recovery Strategy [online]. Available At: [https://www.centralbedfordshire.gov.uk/info/50/environmental\\_issues/291/natural\\_environment/2](https://www.centralbedfordshire.gov.uk/info/50/environmental_issues/291/natural_environment/2)
- 111** Curating Luton (2021) Our town-wide Heritage Strategy 2021 to 2031 [online]. Available At:

- [https://www.luton.gov.uk/Leisure\\_and\\_culture/Lists/LutonDocuments/PDF/curating-luton-heritage-strategy.pdf](https://www.luton.gov.uk/Leisure_and_culture/Lists/LutonDocuments/PDF/curating-luton-heritage-strategy.pdf)
- 112** Luton Borough Council (2023) Local list Buildings of local architectural or historic interest [online]. Available At: <https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/Planning/luton-local-list-buildings-of-local-architectural-or-historic-interest.pdf>
- 113** Historic England (2019) Heritage at Risk [pdf]. Available at: <https://historicengland.org.uk/images-books/publications/har-2019-registers/ee-har-register2019/>
- 114** Historic England (no date) Heritage at Risk Register. Available at: <https://historicengland.org.uk/advice/heritage-at-risk/search-register/results/?search=luton&searchType=HAR>
- 115** Natural England (2012-2014) National Character Areas [online]. Available at: <https://nationalcharacterareas.co.uk/chilterns/context-map/>
- 116** Chilterns Conservation Board (2019) Chilterns AONB Management Plan 2019-2024 [online] Available At: <https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/Local%20Plan/Natural%20and%20historic%20environment/ENV%20012.pdf>
- 117** The Greenland Trust (2014) Luton Borough Landscape Character Assessment [online] Available at: <https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/Local%20Plan/Natural%20and%20historic%20environment/ENV%20013.pdf>
- 118** Greenland Trust (015) A Green Infrastructure Plan for Luton [online] Available At: <https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/Local%20Plan/Natural%20and%20historic%20environment/ENV%20006.pdf>
- 119** UK Parliament (2023) COP15: Global biodiversity framework [online] Available at: <https://lordslibrary.parliament.uk/cop15-global-biodiversity-framework/#:~:text=COP15%20ran%20from%207%20to,other%20work%20on%20biodiversity%20preservation>
- 120** United Nations (2021) Glasgow Climate Pact [online] Available at: <https://unfccc.int/documents/310497>

- 121** United Nations (2021) Land Use, Land-Use Change and Forestry (LULUCF) [online] Available at: <https://unfccc.int/topics/land-use/workstreams/land-use--land-use-change-and-forestry-lulucf>
- 122** Department for International Development and Foreign, Commonwealth & Development Office (2017) Agenda 2030: Delivering the Global Goals [online] Available at: <https://www.gov.uk/government/publications/agenda-2030-delivering-the-global-goals>
- 123** UNECE (1998) Convention On Access To Information, Public Participation In Decision-Making And Access To Justice In Environmental Matters [online] Available at: <https://unece.org/fileadmin/DAM/env/pp/documents/cep43e.pdf>
- 124** United Nations (2002) Johannesburg Declaration on Sustainable Development [online] Available at: [https://www.un.org/esa/sustdev/documents/WSSD\\_POI\\_PD/English/POI\\_PD.htm#:~:text=We%20reaffirm%20our%20pledge%20to,illicit%20drug%20problems%3B%20organized%20crime%3B](https://www.un.org/esa/sustdev/documents/WSSD_POI_PD/English/POI_PD.htm#:~:text=We%20reaffirm%20our%20pledge%20to,illicit%20drug%20problems%3B%20organized%20crime%3B)
- 125** UNFCCC (2015) Adoption of the Paris Agreement [online] Available at: <https://unfccc.int/resource/docs/2015/cop21/eng/l09r01.pdf>
- 126** Wetlands International (1976) Ramsar Convention [online] Available at: <https://www.wetlands.org/wetlands/ramsar-convention/>
- 127** The Council of Europe (1979) Convention on the Conservation of European Wildlife and Natural Habitats [online] Available at: <https://coe.int/en/web/bern-convention>
- 128** United Nations (1992) Convention on Biological Diversity [online] Available at: <https://www.cbd.int/doc/legal/cbd-en.pdf>
- 129** European Commission (1992) The Habitats Directive [online] Available at: [https://environment.ec.europa.eu/topics/nature-and-biodiversity/habitats-directive\\_en](https://environment.ec.europa.eu/topics/nature-and-biodiversity/habitats-directive_en)
- 130** European Commission (2009) Directive 2009/147/EC of the European Parliament and of the Council [online] Available at: <https://www.legislation.gov.uk/eudr/2009/147>

- 131** United Nations (2015) New York Declaration on Forests - Halving the loss of natural forest by 2020, striving to end it by 2030 [online] Available at: <https://unfccc.int/news/new-york-declaration-on-forests>
- 132** Council of Europe (2023) Convention for the Protection of the Archaeological Heritage of Europe (revised) (Valletta, 1992) [online] Available at: <https://coe.int/en/web/culture-and-heritage/valletta-convention>
- 133** UNESCO World Heritage Convention (1972) Convention Concerning the Protection of the World Cultural and Natural Heritage [online] Available at: <https://whc.unesco.org/en/conventiontext/>
- 134** Council of Europe (2023) Convention for the Protection of the Architectural Heritage of Europe (Granada, 1985) [online] Available at: <https://www.coe.int/en/web/culture-and-heritage/granada-convention>
- 135** Council of Europe (2000) European Landscape Convention [online] Available at: <https://rm.coe.int/1680080621>
- 136** Department for Energy Security and Net Zero (2023) Carbon Budget Delivery Plan [online] Available at: <https://www.gov.uk/government/publications/carbon-budget-delivery-plan>
- 137** Department for Energy Security and Net Zero (2023) Powering up Britain [online] Available at: <https://www.gov.uk/government/publications/powering-up-britain>
- 138** Department for Environment, Food & Rural Affairs (2023) Environmental Improvement Plan 2023 [online] Available at: <https://www.gov.uk/government/publications/environmental-improvement-plan>
- 139** HM Government (2022) UK Climate Change Risk Assessment 2022 [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1047003/climate-change-risk-assessment-2022.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1047003/climate-change-risk-assessment-2022.pdf)
- 140** Gov.uk (2022) British energy security strategy [online] Available at: <https://www.gov.uk/government/publications/british-energy-security-strategy/british-energy-security-strategy>

- 141** Legislation.gov.uk (2021) Environment Act 2021 [online] Available at:  
<https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>
- 142** Gov.uk (2022) Net Zero Strategy: Build Back Greener [online] Available at:  
<https://www.gov.uk/government/publications/net-zero-strategy>
- 143** Gov.uk (2021) Industrial decarbonisation strategy [online] Available at:  
<https://www.gov.uk/government/publications/industrial-decarbonisation-strategy>
- 144** Gov.uk (2023) Heat and buildings strategy [online] Available at:  
<https://www.gov.uk/government/publications/heat-and-buildings-strategy>
- 145** HM Government (2021) UK Hydrogen Strategy [online] Available at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1011283/UK-Hydrogen-Strategy\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1011283/UK-Hydrogen-Strategy_web.pdf)
- 146** Legislation.gov.uk (2021) The Energy Performance of Buildings (England and Wales) (Amendment) Regulations 2021 [online] Available at:  
<https://www.legislation.gov.uk/ukdsi/2021/9780348220216>
- 147** HM Government (2020) Powering our Net Zero Future [online] Available at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/945899/201216\\_BEIS\\_EWP\\_Command\\_Paper\\_Accessible.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/945899/201216_BEIS_EWP_Command_Paper_Accessible.pdf)
- 148** HM Treasury (2020) National Infrastructure Strategy [online] Available at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/938049/NIS\\_final\\_web\\_single\\_page.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/938049/NIS_final_web_single_page.pdf)
- 149** Climate Change Committee (2020) The Sixth Carbon Budget The UK's path to Net Zero [online] Available at: <https://www.theccc.org.uk/wp-content/uploads/2020/12/The-Sixth-Carbon-Budget-The-UKs-path-to-Net-Zero.pdf>
- 150** Department for Transport (2020) Decarbonising Transport [online] Available at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/932122/decarbonising-transport-setting-the-challenge.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/932122/decarbonising-transport-setting-the-challenge.pdf)



- 151** HM Government (2020) Flood and coastal erosion risk management [online] Available at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/903705/flood-coastal-erosion-policy-statement.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/903705/flood-coastal-erosion-policy-statement.pdf)
- 152** Climate Change Committee (2019) Net Zero – The UK’s contribution to stopping global warming [online] Available at:  
<https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/#:~:text=Key%20findings,the%20UK%20as%20a%20whole>
- 153** Legislation.gov.uk (2011) The Promotion of the Use of Energy from Renewable Sources Regulations 2011 [online] Available at:  
<https://www.legislation.gov.uk/uksi/2011/243/contents/made>
- 154** Environment Agency (2022) National Flood and Coastal Erosion Risk Management Strategy for England [online] Available at:  
<https://www.gov.uk/government/publications/national-flood-and-coastal-erosion-risk-management-strategy-for-england--2>
- 155** Legislation.gov.uk (2010) Flood and Water Management Act 2010 [online] Available at: <https://www.legislation.gov.uk/ukpga/2010/29/contents>
- 156** Legislation.gov.uk (2019) The Floods and Water (Amendment etc.) (EU Exit) Regulations 2019 [online] Available at:  
<https://www.legislation.gov.uk/ukdsi/2019/9780111176283/contents>
- 157** Department for Environment, Food & Rural Affairs (2018) The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting [online] Available at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1171501/national-adaptation-programme-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1171501/national-adaptation-programme-2018.pdf)
- 158** HM Government (2018) Our Waste, Our Resources: a Strategy For England [online] Available at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/765914/resources-waste-strategy-dec-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/765914/resources-waste-strategy-dec-2018.pdf)
- 159** HM Government (2017) The Clean Growth Strategy [online] Available at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/644211/clean-growth-strategy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/644211/clean-growth-strategy.pdf)

- [ds/attachment\\_data/file/700496/clean-growth-strategy-correction-april-2018.pdf](#)
- 160** Department for Communities and Local Government (2014) National Planning Policy for Waste [online] Available at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/364759/141015\\_National\\_Planning\\_Policy\\_for\\_Waste.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf)
- 161** Department for Environment, Food & Rural Affairs (2013) Waste management plan for England 2013 [online] Available at:  
<https://www.gov.uk/government/publications/waste-management-plan-for-england>
- 162** Department of Energy & Climate Change (2012) The Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK [online] Available at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/65602/6927-energy-efficiency-strategy--the-energy-efficiency.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/65602/6927-energy-efficiency-strategy--the-energy-efficiency.pdf)
- 163** HM Government (2008) The UK Low Carbon Transition Plan [online] Available at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/228752/9780108508394.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/228752/9780108508394.pdf)
- 164** Department of Energy & Climate Change (2009) The UK renewable energy strategy [online] Available at:  
<https://www.gov.uk/government/publications/the-uk-renewable-energy-strategy>
- 165** Legislation.gov.uk (2008) Climate Change Act 2008 [online] Available at:  
<https://www.legislation.gov.uk/ukpga/2008/27/contents>
- 166** Legislation.gov.uk (2008) Planning and Energy Act 2008 [online] Available at: <https://www.legislation.gov.uk/ukpga/2008/21/contents>
- 167** Legislation.gov.uk (2020) The Waste (Circular Economy) (Amendment) Regulations 2020 [online] Available at:  
<https://www.legislation.gov.uk/ukxi/2020/904/made>

- 168** Natural England (2023) Introduction to the Green Infrastructure Framework - Principles and Standards for England [online] Available at: <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx>
- 169** Department for Levelling Up, Housing and Communities (2022) Levelling Up the United Kingdom [online] Available at: <https://www.gov.uk/government/publications/levelling-up-the-united-kingdom>
- 170** Department for Levelling Up, Housing and Communities (2022) Levelling Up the United Kingdom [online] Available at: <https://www.gov.uk/government/publications/levelling-up-the-united-kingdom>
- 171** Environment Agency (2023) State of the environment: health, people and the environment [online] Available at: <https://www.gov.uk/government/publications/state-of-the-environment/state-of-the-environment-health-people-and-the-environment>
- 172** Ministry of Housing, Communities & Local Government (2021) National Design Guide [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/962113/National\\_design\\_guide.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/962113/National_design_guide.pdf)
- 173** Gov.uk (2022) Build Back Better: Our Plan for Health and Social Care [online] Available at: <https://www.gov.uk/government/publications/build-back-better-our-plan-for-health-and-social-care/build-back-better-our-plan-for-health-and-social-care>
- 174** HM Government (2021) COVID-19 mental health and wellbeing recovery action plan [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/973936/covid-19-mental-health-and-wellbeing-recovery-action-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/973936/covid-19-mental-health-and-wellbeing-recovery-action-plan.pdf)
- 175** Ministry of Housing, Communities & Local Government (2021) The charter for social housing residents: social housing white paper [online] Available at: <https://www.gov.uk/government/publications/the-charter-for-social-housing-residents-social-housing-white-paper>

- 176** Public Health England (2020) Using the planning system to promote healthy weight environments [online] Available at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/863821/PHE\\_Planning\\_healthy\\_weight\\_environments\\_guidance\\_1.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863821/PHE_Planning_healthy_weight_environments_guidance_1.pdf)
- 177** Public Health England (2019) PHE Strategy 2020-25 [online] Available at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/831562/PHE\\_Strategy\\_2020-25.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/831562/PHE_Strategy_2020-25.pdf)
- 178** Homes England (2022) Homes England strategic plan 2018 to 2023 (text version) [online] Available at:  
<https://www.gov.uk/government/publications/homes-england-strategic-plan-201819-to-202223/homes-england-strategic-plan-2018-to-2023>
- 179** Ministry of Housing, Communities & Local Government (2017) Fixing our broken housing market [online] Available at:  
<https://www.gov.uk/government/publications/fixing-our-broken-housing-market#:~:text=This%20white%20paper%20sets%20out,build%20homes%20faster>
- 180** Department for Communities and Local Government (2015) Planning policy for traveller sites [online] Available at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/457420/Final\\_planning\\_and\\_travellers\\_policy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/457420/Final_planning_and_travellers_policy.pdf)
- 181** Department for Communities and Local Government (2015) Technical housing standards – nationally described space standard [online] Available at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1012976/160519\\_Nationally\\_Described\\_Space\\_Standard.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1012976/160519_Nationally_Described_Space_Standard.pdf)
- 182** UK Parliament (2013) Ready for Ageing? [online] Available at:  
<https://publications.parliament.uk/pa/ld201213/ldselect/ldpublic/140/140.pdf>
- 183** Institute of Health Equity (2010) Fair Society, Healthy Lives [online] Available at: <https://www.instituteofhealthequity.org/resources-reports/fair->

- [society-healthy-lives-the-marmot-review/fair-society-healthy-lives-full-report-pdf.pdf](#)
- 184** Prime Minister's Office, 10 Downing Street (2011) Laying the foundations: a housing strategy for England [online] Available at:  
<https://www.gov.uk/government/news/laying-the-foundations-a-housing-strategy-for-england#:~:text=The%20Prime%20Minister%20and%20Deputy,a%20housing%20strategy%20for%20England'.&text=The%20housing%20strategy%20aims%20to,and%20buyers%20can't%20buy>
- 185** Department of Health and Social Care (2010) Healthy Lives, Healthy People: our strategy for public health in England [online] Available at:  
<https://www.gov.uk/government/publications/healthy-lives-healthy-people-our-strategy-for-public-health-in-england>
- 186** Legislation.gov.uk (2006) The Environmental Noise (England) Regulations 2006 [online] Available at:  
<https://www.legislation.gov.uk/ukxi/2006/2238/contents/made>
- 187** Department for Environment, Food & Rural Affairs (2023) Environmental Improvement Plan 2023 [online] Available at:  
<https://www.gov.uk/government/publications/environmental-improvement-plan>
- 188** Environment Agency (2022) Working with nature [online] Available at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1094162/Working\\_with\\_nature\\_-\\_report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1094162/Working_with_nature_-_report.pdf)
- 189** Department for Environment, Food & Rural Affairs (2022) Establishing the Best Available Techniques for the UK (UK BAT) [online] Available at:  
<https://www.gov.uk/government/publications/establishing-the-best-available-techniques-for-the-uk-uk-bat>
- 190** Legislation.gov.uk (2021) Environment Act 2021 [online] Available at:  
<https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>
- 191** Legislation.gov.uk (2019) The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 [online] Available at:  
<https://www.legislation.gov.uk/ukdsi/2019/9780111176573>



- 192** Legislation.gov.uk (2015) The Environmental Damage (Prevention and Remediation) (England) Regulations 2015 [online] Available at: <https://www.legislation.gov.uk/ukxi/2015/810/made>
- 193** Department for Environment Food & Rural Affairs (2013) Biodiversity offsetting in England [online] Available at: [https://consult.defra.gov.uk/biodiversity/biodiversity\\_offsetting/supporting\\_documents/20130903Biodiversity%20offsetting%20green%20paper.pdf](https://consult.defra.gov.uk/biodiversity/biodiversity_offsetting/supporting_documents/20130903Biodiversity%20offsetting%20green%20paper.pdf)
- 194** Department for Environment, Food & Rural Affairs (2011) Biodiversity 2020: A strategy for England's wildlife and ecosystem services [online] Available at: <https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services>
- 195** Department for Environment, Food & Rural Affairs (2011) Rights of way circular (1/09) [online] Available at: <https://www.gov.uk/government/publications/rights-of-way-circular-1-09>
- 196** Legislation.gov.uk (2000) Countryside and Rights of Way Act 2000 [online] Available at: <https://www.legislation.gov.uk/ukpga/2000/37>
- 197** Department for Environment, Food & Rural Affairs (2009) Safeguarding our Soils [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69261/pb13297-soil-strategy-090910.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69261/pb13297-soil-strategy-090910.pdf)
- 198** Department for Environment, Food & Rural Affairs (2008) England Biodiversity Strategy Climate Change Adaptation Principles [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69270/pb13168-ebs-ccap-081203.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69270/pb13168-ebs-ccap-081203.pdf)
- 199** Legislation.gov.uk (2006) Natural Environment and Rural Communities Act 2006 [online] Available at: <https://www.legislation.gov.uk/ukpga/2006/16/contents>
- 200** Legislation.gov.uk (1981) Wildlife and Countryside Act 1981 [online] Available at: <https://www.legislation.gov.uk/ukpga/1981/69#:~:text=An%20Act%20to%20repeal%20and,restrict%20the%20introduction%20of%20certain>

- 201** Legislation.gov.uk (1949) National Parks and Access to the Countryside Act 1949 [online] Available at:  
<https://www.legislation.gov.uk/ukpga/Geo6/12-13-14/97>
- 202** Historic England (2023) Historic England Corporate Plan 2023-26 [online] Available at: <https://historicengland.org.uk/about/what-we-do/corporate-plan/>
- 203** Department for Digital, Culture Media & Sport (2017) Heritage Statement 2017 [online] Available at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/664657/Heritage\\_Statement\\_2017\\_final\\_-\\_web\\_version\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/664657/Heritage_Statement_2017_final_-_web_version_.pdf)
- 204** Historic England (2016) Sustainability Appraisal and Strategic Environmental Assessment [online] Available at:  
<https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>
- 205** HM Government (2010) The Government's Statement on the Historic Environment for England 2010 [online] Available at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/229834/Acc\\_HeritageVision\\_Part1.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/229834/Acc_HeritageVision_Part1.pdf)
- 206** Legislation.gov.uk (1990) Planning (Listed Buildings and Conservation Areas) Act 1990 [online] Available at:  
<https://www.legislation.gov.uk/ukpga/1990/9/contents>
- 207** Legislation.gov.uk (1979) Ancient Monuments and Archaeological Areas Act 1979 [online] Available at:  
<https://www.legislation.gov.uk/ukpga/1979/46>
- 208** Legislation.gov.uk (1953) Historic Buildings and Ancient Monuments Act 1953 [online] Available at: <https://www.legislation.gov.uk/ukpga/Eliz2/1-2/49/contents>
- 209** Environment Agency (2021) Managing water abstraction [online] Available at: <https://www.gov.uk/government/publications/managing-water-abstraction/managing-water-abstraction>

- 210** Legislation.gov.uk (2021) Environment Act 2021 [online] Available at: <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>
- 211** CIEEM (2021) Chalk Stream Restoration Strategy 2021 & Implementation Plan 2022 [online] Available at: <https://cieem.net/resource/chalk-stream-restoration-strategy-2021-implementation-plan-2022/#:~:text=The%20strategy%20was%20built%20around,water%20companies%2C%20NGOs%20and%20stakeholders>
- 212** Environment Agency (2020) Meeting our future water needs: a national framework for water resources [online] Available at: <https://www.gov.uk/government/publications/meeting-our-future-water-needs-a-national-framework-for-water-resources>
- 213** Environment Agency (2020) Meeting our future water needs: a national framework for water resources [online] Available at: <https://www.gov.uk/government/publications/meeting-our-future-water-needs-a-national-framework-for-water-resources>
- 214** Department for Environment Food & Rural Affairs (2019) Clean Air Strategy 2019 [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/770715/clean-air-strategy-2019.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770715/clean-air-strategy-2019.pdf)
- 215** Environment Agency (2018) The Environment Agency's approach to groundwater protection [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/692989/Environment-Agency-approach-to-groundwater-protection.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/692989/Environment-Agency-approach-to-groundwater-protection.pdf)
- 216** Legislation.gov.uk (2017) The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 [online] Available at: <https://www.legislation.gov.uk/uksi/2017/407/contents/made>
- 217** Department for Environment Food & Rural Affairs and Department for Transport (2017) UK plan for tackling roadside nitrogen dioxide concentrations [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/633269/air-quality-plan-overview.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/633269/air-quality-plan-overview.pdf)

- 218** Environment Agency (2017) Drought response: our framework for England [online] Available at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/625006/LIT\\_10104.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/625006/LIT_10104.pdf)
- 219** Legislation.gov.uk (2016) The Nitrate Pollution Prevention (Amendment) Regulations 2016 [online] Available at:  
<https://www.legislation.gov.uk/ukxi/2016/1190/made>
- 220** Legislation.gov.uk (2016) The Water Supply (Water Quality) Regulations 2016 [online] Available at:  
<https://www.legislation.gov.uk/ukxi/2016/614/contents/made>
- 221** Legislation.gov.uk (2016) The Environmental Permitting (England and Wales) Regulations 2016 [online] Available at:  
<https://www.legislation.gov.uk/ukxi/2016/1154/contents/made>
- 222** Legislation.gov.uk (2016) The Air Quality Standards (Amendment) Regulations 2016 [online] Available at:  
<https://www.legislation.gov.uk/ukxi/2016/1184/contents/made>
- 223** UK Parliament (2012) The Water White Paper [online] Available at:  
<https://publications.parliament.uk/pa/cm201012/cmselect/cmenvfru/writenv/water/wwp31.htm>
- 224** HM Government (2012) National Policy Statement for Waste Water [online] Available at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69505/pb13709-waste-water-nps.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69505/pb13709-waste-water-nps.pdf)
- 225** Legislation.gov.uk (2010) Flood and Water Management Act 2010 [online] Available at: <https://www.legislation.gov.uk/ukpga/2010/29/contents>
- 226** Legislation.gov.uk (2019) The Floods and Water (Amendment etc.) (EU Exit) Regulations 2019 [online] Available at:  
<https://www.legislation.gov.uk/ukdsi/2019/9780111176283/contents>
- 227** Legislation.gov.uk (2009) The Groundwater (England and Wales) Regulations 2009 [online] Available at:  
<https://www.legislation.gov.uk/ukdsi/2009/9780111480816>

- 228** Legislation.gov.uk (2009) The Flood Risk Regulations 2009 [online]  
Available at: <https://www.legislation.gov.uk/ukxi/2009/3042/contents/made>
- 229** HM Government (2008) Future Water [online] Available at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69346/pb13562-future-water-080204.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69346/pb13562-future-water-080204.pdf)
- 230** Department for Environment Food and Rural Affairs (2007) The Air Quality Strategy for England, Scotland, Wales and Northern Ireland [online]  
Available at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69336/pb12654-air-quality-strategy-vol1-070712.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69336/pb12654-air-quality-strategy-vol1-070712.pdf)
- 231** Legislation.gov.uk (2006) The Environmental Noise (Wales) Regulations 2006 [online] Available at: <https://www.legislation.gov.uk/wsi/2006/2629>
- 232** Legislation.gov.uk (2003) The Urban Waste Water Treatment (England and Wales) (Amendment) Regulations 2003 [online] Available at:  
<https://www.legislation.gov.uk/ukxi/2003/1788>
- 233** Legislation.gov.uk (1990) Environmental Protection Act 1990 [online]  
Available at: <https://www.legislation.gov.uk/ukpga/1990/43/section/113>
- 234** HM Treasury (2022) The Growth Plan 2022 [online] Available at:  
<https://www.gov.uk/government/publications/the-growth-plan-2022-documents>
- 235** HM Treasury (2021) Build Back Better: our plan for growth [online]  
Available at: <https://www.gov.uk/government/publications/build-back-better-our-plan-for-growth>
- 236** Department for Environment, Food & Rural Affairs (2020) Agricultural Transition Plan 2021 to 2024 [online] Available at:  
<https://www.gov.uk/government/publications/agricultural-transition-plan-2021-to-2024>
- 237** Legislation.gov.uk (2020) Agriculture Act 2020 [online] Available at:  
<https://www.legislation.gov.uk/ukpga/2020/21>
- 238** HM Government (2018) Industrial Strategy [online] Available at:  
<https://assets.publishing.service.gov.uk/government/uploads/system/uploa>



- [ds/attachment\\_data/file/664563/industrial-strategy-white-paper-web-ready-version.pdf](#)
- 239** Infrastructure and Projects Authority (2016) National Infrastructure Delivery Plan 2016–2021 [online] Available at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/520086/2904569\\_nidp\\_deliveryplan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/520086/2904569_nidp_deliveryplan.pdf)
- 240** LEP Network (2017) The LEP Network Response to the Industrial Strategy Green Paper Consultation [online] Available at:  
<https://www.lepnetwork.net/media/1470/lep-network-industrial-strategy-response-april-2017-final.pdf>
- 241** Department for Transport (2022) Cycling and walking investment strategy report to Parliament 2022 [online] Available at:  
<https://www.gov.uk/government/publications/cycling-and-walking-investment-strategy-report-to-parliament-2022>
- 242** Department for Transport (2021) Decarbonising Transport [online] Available at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1009448/decarbonising-transport-a-better-greener-britain.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1009448/decarbonising-transport-a-better-greener-britain.pdf)
- 243** Department for Transport (2020) Decarbonising Transport [online] Available at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/932122/decarbonising-transport-setting-the-challenge.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/932122/decarbonising-transport-setting-the-challenge.pdf)
- 244** Department for Transport (2018) The Road to Zero [online] Available at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/739460/road-to-zero.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/739460/road-to-zero.pdf)
- 245** Department for Transport (2017) Transport investment strategy [online] Available at: <https://www.gov.uk/government/publications/transport-investment-strategy>
- 246** Highways England (2018) Highways England Sustainable Development Strategy and Action Plan [online] Available at:

- <https://www.gov.uk/government/publications/highways-england-sustainable-development-strategy>
- 247** Department for Transport (2013) Door to Door [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/706255/door-to-door-strategy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/706255/door-to-door-strategy.pdf)
- 248** Department for Transport (2022) Jet Zero Strategy Delivering net zero aviation by 2050 [online]. Available At: <https://assets.publishing.service.gov.uk/media/62e931d48fa8f5033896888a/jet-zero-strategy.pdf>
- 249** Department for Transport (2016) Airports: The Government's View Summary document Moving Britain Ahead [online]. Available At: <https://assets.publishing.service.gov.uk/media/5a80a754e5274a2e8ab5164e/heathrow-airport-expansion-summary-document.pdf>
- 250** East of England (2023) Leveling up the East of England: 2023-2030 [online]. Available At: <https://www.eelga.gov.uk/app/uploads/2022/12/Levelling-up-the-East-of-England-FULL-1.pdf>
- 251** Central Bedfordshire (2023) Economic Insight 2023 [online]. Available At: <https://www.becentralbedfordshire.co.uk/media/20bf5nug/economic-insight-report-final-full-copy.pdf>
- 252** Transport East (2023) Transport Strategy 2023-2050 [online]. Available At: [https://www.transporeast.gov.uk/wp-content/uploads/20230224-TE\\_Strategy-FINAL-1.pdf](https://www.transporeast.gov.uk/wp-content/uploads/20230224-TE_Strategy-FINAL-1.pdf)
- 253** Natural Capital Solutions (2021) Bedfordshire Natural Capital Assessment Part 1: Mapping, valuation, and opportunities for enhancement across Bedfordshire [online]. Available At: <https://bedsrcc.org.uk/wp-content/uploads/2022/01/Bedfordshire-natural-capital-assessment-report-FINAL.pdf>
- 254** Bedford Borough Council (2011) Local Transport Plan [online]. Available At: <https://www.bedford.gov.uk/media/3527/download?inline>
- 255** Central Bedfordshire (2011) The Central Bedfordshire Council Transport Strategy Local Transport Plan 3 [online]. Available At:

- [https://www.centralbedfordshire.gov.uk/info/55/transport\\_roads\\_and\\_parking/596/transport\\_strategy](https://www.centralbedfordshire.gov.uk/info/55/transport_roads_and_parking/596/transport_strategy)
- 256** Luton Council (2023) Luton Council Corporate Plan 2023-2028 [online]. Available At: [https://www.luton.gov.uk/Council\\_government\\_and\\_democracy/Lists/LutonDocuments/PDF/Policy%20and%20Performance/LBC-corporate-plan.PDF](https://www.luton.gov.uk/Council_government_and_democracy/Lists/LutonDocuments/PDF/Policy%20and%20Performance/LBC-corporate-plan.PDF)
- 257** Luton Council (2024) Luton 2040: A place to Thrive [online]. Available At: [https://www.luton.gov.uk/Council\\_government\\_and\\_democracy/Lists/LutonDocuments/PDF/Luton2020-2040/Luton-2040-strategic-vision.pdf](https://www.luton.gov.uk/Council_government_and_democracy/Lists/LutonDocuments/PDF/Luton2020-2040/Luton-2040-strategic-vision.pdf)
- 258** Active Luton (2023) Strategy 2023–2028 [online] Available At: [https://activeluton.co.uk/images/Active\\_Luton\\_Strategy\\_2023-28.pdf](https://activeluton.co.uk/images/Active_Luton_Strategy_2023-28.pdf)
- 259** Luton Council (2021) Luton domestic abuse strategy [online]. Available At: [https://www.luton.gov.uk/Community\\_and\\_living/Lists/LutonDocuments/PDF/Community%20Safety/domestic-abuse-strategy.pdf](https://www.luton.gov.uk/Community_and_living/Lists/LutonDocuments/PDF/Community%20Safety/domestic-abuse-strategy.pdf)
- 260** Luton Council (2023) Fairness strategy A town built on fairness and social justice [online]. Available At: [https://www.luton.gov.uk/Council\\_government\\_and\\_democracy/Lists/LutonDocuments/PDF/fairness-strategy.pdf](https://www.luton.gov.uk/Council_government_and_democracy/Lists/LutonDocuments/PDF/fairness-strategy.pdf)
- 261** Luton council (2022) Luton Housing Strategy 2022 to 2027 [online]. Available At: <https://www.luton.gov.uk/Housing/Lists/LutonDocuments/PDF/Luton-housing-strategy-2022-to-2027.pdf>
- 262** Luton Council (2020) Inclusive Economic Strategy [online]. Available At: [https://www.luton.gov.uk/Council\\_government\\_and\\_democracy/Lists/LutonDocuments/PDF/Luton2020-2040/Inclusive-economy-strategy.pdf](https://www.luton.gov.uk/Council_government_and_democracy/Lists/LutonDocuments/PDF/Luton2020-2040/Inclusive-economy-strategy.pdf)
- 263** Luton Council (2020) Luton Council Library Strategy 2020-2025 [online]. Available At: <https://democracy.luton.gov.uk/cm5public/Document.ashx?czJKcaeAi5tUFL1DTL2UE4zNRBcoShgo=Jucye3yT03WEV%2BZVDs1nPWaOHDnZa4LWpg8B4tFWBigPIpv%2F22kjWA%3D%3D&rUzwRPf%2BZ3zd4E7lkn8Lyw%3D%3D=pwRE6AGJFLDNih225F5QMaQWCtPHwdhUfCZ%2FLUQzgA2uL5jNRG4jdQ%3D%3D&mCTIbCubSfXsDGW9IXnlq%3D%3D=hFfl>

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[UdN3100%3D&kCx1AnS9%2FpWZQ40DXFvdEw%3D%3D=hFfIUdN3100%3D&uJovDxwdjMPoYv%2BAJvYtyA%3D%3D=ctNJFf55vVA%3D&FgPIIEJYlotS%2BYGoBi5olA%3D%3D=NHdURQburHA%3D&d9Qjj0ag1Pd993jsyOJqFvmyB7X0CSQK=ctNJFf55vVA%3D&WGewmoAfeNR9xqBux0r1Q8Za60lavYmz=ctNJFf55vVA%3D&WGewmoAfeNQ16B2MHuCpMRKZMwaG1PaO=ctNJFf55vVA%3D#:~:text=Our%20vision%20is%20to%20create,residents%20to%20reach%20their%20potential.](https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/Energy-strategy.pdf)

- 264** Luton Borough Council (2018) Luton BC Energy Strategy [online]. Available At: <https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/Energy-strategy.pdf>
- 265** Luton Council (2023) Luton's population wellbeing strategy 2023 to 2028 [online]. Available At: [https://m.luton.gov.uk/Page/Show/Health\\_and\\_social\\_care/health/publichealth/Pages/Lutons-population-wellbeing-strategy-2023-28.aspx](https://m.luton.gov.uk/Page/Show/Health_and_social_care/health/publichealth/Pages/Lutons-population-wellbeing-strategy-2023-28.aspx)
- 266** Luton Council (2019) Prosperity through Procurement: A five-year strategy [online]. Available At: [https://www.luton.gov.uk/Council\\_government\\_and\\_democracy/Lists/LutonDocuments/PDF/Corporate%20Finance/Procurement/procurement-strategy.pdf](https://www.luton.gov.uk/Council_government_and_democracy/Lists/LutonDocuments/PDF/Corporate%20Finance/Procurement/procurement-strategy.pdf)
- 267** Luton Council (2018) Waste management strategy 2018 to 2028 [online]. Available At: <https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/Bins%20and%20recycling/Waste-Strategy.pdf>
- 268** Luton Borough Council (2022) Reducing Health Inequalities in Luton: A Marmot Town [online]. Available At: <https://www.instituteofhealthequity.org/resources-reports/reducing-health-inequalities-in-luton-a-marmot-town/full-report.pdf>
- 269** Luton Council (2021) Transport Strategy and Local Transport Policies [online]. Available At: [https://www.luton.gov.uk/Transport\\_and\\_streets/Lists/LutonDocuments/PDF/transport-strategy.pdf](https://www.luton.gov.uk/Transport_and_streets/Lists/LutonDocuments/PDF/transport-strategy.pdf)
- 270** Luton Council (2023) Local Cycling and Walking Infrastructure Plan [online]. Available At:

- [https://www.luton.gov.uk/Transport\\_and\\_streets/Lists/LutonDocuments/PDF/Responsible%20travel/lcwip.pdf](https://www.luton.gov.uk/Transport_and_streets/Lists/LutonDocuments/PDF/Responsible%20travel/lcwip.pdf)
- 271** Luton Council (2023) Electric vehicle chargepoint strategy 2022 to 2025 [online]. Available At: [https://www.luton.gov.uk/Transport\\_and\\_streets/Lists/LutonDocuments/PDF/ev-chargepoint-strategy.pdf](https://www.luton.gov.uk/Transport_and_streets/Lists/LutonDocuments/PDF/ev-chargepoint-strategy.pdf)
- 272** Luton Council (2021) Bus Service Improvement Plan [online]. Available At: [https://www.luton.gov.uk/Transport\\_and\\_streets/Lists/LutonDocuments/PDF/BSIP-Luton.pdf](https://www.luton.gov.uk/Transport_and_streets/Lists/LutonDocuments/PDF/BSIP-Luton.pdf)
- 273** Luton Council (2023) 2023 Air Quality Annual Status Report (ASR) [online]. Available At: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR020001/TR020001-001872-Luton%20Borough%20Council-Response-to-ISH5-AP-2023-Air-Quality-Annual-Status-Report.pdf>
- 274** Luton Council (2022) Luton Employment & Skills Strategy 2022-2027 [online]. Available At: [https://www.luton.gov.uk/Council\\_government\\_and\\_democracy/Lists/LutonDocuments/PDF/luton-employment-and-skills-strategy-2022-2027.pdf](https://www.luton.gov.uk/Council_government_and_democracy/Lists/LutonDocuments/PDF/luton-employment-and-skills-strategy-2022-2027.pdf)
- 275** Luton Council (2021) My climate action plan Becoming a carbon neutral borough by 2040 [online]. Available At: <https://www.luton.gov.uk/Environment/Lists/LutonDocuments/PDF/Climate%20change/Climate-change-action-plan.pdf>
- 276** Luton Council (2021) Harnessing Momentum [online]. Available At: [https://www.luton.gov.uk/Leisure\\_and\\_culture/Lists/LutonDocuments/PDF/Arts%20and%20cultural/harnessing-momentum.pdf](https://www.luton.gov.uk/Leisure_and_culture/Lists/LutonDocuments/PDF/Arts%20and%20cultural/harnessing-momentum.pdf)
- 277** Luton Council (2021) Our town-wide Heritage Strategy 2021 to 2031 [online]. Available At: [https://www.luton.gov.uk/Leisure\\_and\\_culture/Lists/LutonDocuments/PDF/curating-luton-heritage-strategy.pdf](https://www.luton.gov.uk/Leisure_and_culture/Lists/LutonDocuments/PDF/curating-luton-heritage-strategy.pdf)
- 278** Luton Council (2019) The Luton Education Strategy for Children Education Service: Children, Families and Education Directorate and Young People [online]. Available At:



[https://www.luton.gov.uk/Education\\_and\\_learning/Lists/LutonDocuments/PDF/Education-Strategy.pdf](https://www.luton.gov.uk/Education_and_learning/Lists/LutonDocuments/PDF/Education-Strategy.pdf)

- 279** Hertfordshire County council (2018) Hertfordshire's Local Transport Plan 2018 – 2031 [online]. Available At:  
<https://www.hertfordshire.gov.uk/media-library/documents/about-the-council/consultations/ltp4-local-transport-plan-4-complete.pdf>

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## **Bristol**

12th Floor, Colston Tower, Colston Street, Bristol BS1 4XE  
0117 929 1997  
bristol@landuse.co.uk

## **Cardiff**

16A, 15th Floor, Brunel House, 2 Fitzalan Rd, Cardiff CF24 0EB  
0292 032 9006  
cardiff@landuse.co.uk

## **Edinburgh**

Atholl Exchange, 6 Canning Street, Edinburgh EH3 8EG  
0131 202 1616  
edinburgh@landuse.co.uk

## **Glasgow**

37 Otago Street, Glasgow G12 8JJ  
0141 334 9595  
glasgow@landuse.co.uk

## **London**

250 Waterloo Road, London SE1 8RD  
020 7383 5784  
london@landuse.co.uk

## **Manchester**

6th Floor, 55 King Street, Manchester M2 4LQ  
0161 537 5960  
manchester@landuse.co.uk

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