THE CENTRAL BEDFORDSHIRE COUNCIL (WOODSIDE LINK HOUGHTON REGIS) DEVELOPMENT CONSENT ORDER

Local Impact Report (draft)

Document produced by Luton Borough Council

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1.0 INTRODUCTION

1.1 This report has been prepared by Luton Borough Council (LBC), as planning authorities for respective parts of the site, in accordance with advice and requirements as set out in the Planning Act 2008, the Localism Act 2011 and Advice Note one: Local Impact Reports (version 2, April 2012, The Planning Inspectorate).

1.2 The Advice Note states that a Local Impact Report is a ‘report in writing giving details of the likely impact of the proposed development on the authority’s area’.

1.3 The Advice Note states that when the Examining Authority decides to accept an application it will ask the relevant local authorities to prepare a Local Impact Report and this should be prioritised whether or not the local authority considers that the development would have a positive, negative or neutral effect on the area. The Report may include any topics that they consider to be relevant to the impact of the development on their area as a means by which their existing body of knowledge and evidence on local issues can be fully and robustly reported to the Examining Authority.

1.4 The Advice Note indicates that topics addressed in the LIR may include:

- Site description and surroundings/location
- Details of the proposal
- Relevant planning history and any issues arising
- Relevant development plan policies, supplementary planning guidance or documents, development briefs or approved master plans and an appraisal of their relationship and relevance to the proposals.
- Relevant development proposals under consideration or granted permission but not commenced or completed
• Local area characteristics such as urban and landscape qualities and nature conservation sites
• Local transport patterns and issues
• Designated sites
• Socio-economic and community matters
• Consideration of the impact of the proposed provisions and requirements within the draft Order in respect of all of the above
• Development consent obligations and their impact on the local authority’s area.

1.5 The LIR may also comment on the development consent obligations and the requirements and also any relevant representations.

1.6 The LIR has been written so as to incorporate the subject areas suggested in the Advice Note (set out above), the subject areas in the Environmental Statement, and the obligations and proposed requirements submitted with the application for DCO.

2.0 SITE DESCRIPTION, SURROUNDINGS AND HISTORY

2.1 The Woodside Link proposal related to a new highway about 3km long linking the Woodside Industrial Estate to the M1 motorway. The highway will run from the junction of the existing Porz Avenue / Park Road North / Wheatfield Road / Poynters Road roundabout in Houghton Regis, travel in a north-easterly and then a northerly direction before splitting and connecting with Sundon Road and the M1 motorway at the proposed new Junction 11a. The highway will be single carriageway until it splits: the two spurs are to be dual carriageway. It is intended to provide more direct access to and from the M1 and allow vehicles to avoid travelling through the centre of Houghton Regis and Dunstable to reach the Woodside area.

2.2 The Woodside Link is related to two other projects: the A5-M1 Link Road, which is a Highways Agency project, and the Houghton Regis North Site 1 development (HRN1), which is an urban extension being promoted by the Houghton Regis Development Consortium (HRDC).

2.3 The A5-M1 Link Road is to be a two-lane dual carriageway running from the A5 near its junction with the A505 to a new junction 11a on the M1 motorway. An interim decision on the applications for the A5-M1 Link Road was issued on 18 October 2012, where the project was given consent subject to the completion of an agreement between the Highways Agency, CBC and HRDC to contribute to its funding (see paragraph 29 of the decision letter). The Woodside Link will physically connect at its northern end to the A5-M1 Link Road at the new junction 11a, so that part of the A5-M1 Link Road will need to be built before or at the same time as the Woodside Link.

2.4 A planning application for a housing-led sustainable urban extension to the north of Houghton Regis (Houghton Regis North Site 1, or HRN1) was made to CBC, as local planning authority, on 21 December 2012 and has been granted outline consent (subject to confirmation that the Secretary of State does not wish to call the application in). HRN1 would mean development for residential and employment uses of the fields through which the Woodside Link would pass.

2.5 LBC has made representations to CBC in respect of this application, which in particular relate to matters under the “Duty to Cooperate” in meeting the housing needs of Luton. Members have also sought reassurance that a link road between Poynters Road and Woodside Link will not be constructed. These matters are therefore separate to the proposal for Woodside Link.

3.0 RELEVANT DEVELOPMENT PLAN POLICIES

3.1 The majority of the site lies within the area of Central Bedfordshire Council, with only a small area at the Southern end of the scheme being within Luton.

3.2 As a separate LIR will be prepared by CBC, issues relating to the Policy context within CBC will not be covered in this LIR, this will just relate to the policies and how they relate to LBC.

3.3 The East of England Regional Spatial Strategy (RSS) was abolished by an order that came into force on 3rd January 2013. The National Planning Policy Framework and the saved policies of the South Bedfordshire Local Plan and the Luton Local Plan therefore are relevant to this proposal.

3.4 In the regional and sub-regional context, there are no documents of any significance since the abolition of the East of England Regional Spatial Strategy and the associated Milton Keynes / South Midlands (MK/SM) sub-regional strategy. Given that the geographic area covered by the South East Midlands Local Economic Partnership (SEMLEP) is similar to that of the MK/SM sub-region, one recent sub-regional document of relevance is the MK/SM interurban transport strategy published in 2009.

3.5 A new Strategic Economic Plan (SEP) is currently being prepared by SEMLEP in line with the document “Growth Deals: Initial Guidance for Local Enterprise Partnerships” published by the Government in July 2013. Whilst that SEP has not yet been published, its development will be informed by an Infrastructure Investment strategy published by SEMLEP in October 2013.

(a) Luton Local Plan 2001 - 2011

3.6 In line with paragraph 216 of the NPPF weight should be given to emerging documents although currently the replacement plan has not progressed to a stage that could be taken into consideration in respect of this proposal.
3.7 Luton Borough Council has commenced a review of its Local Plan and is currently at the stage of evidence gathering and a draft plan will be issued for consultation in Spring 2014.

3.8 Therefore in respect of the Development Plan Policies for Luton, the Luton Local Plan 2001 to 2011 applies and saved policies as a result of the Localism Bill are referred to below;

T8 – Walking and Cycling. This seeks to protect existing pedestrian and cycle routes and seek to provide improvements to pedestrian and cycle networks.

ENV4 – Access to the Countryside which seeks to provide improvements to the footpath and bridleway network.

ENV5 – Protection and enhancement of nature conservation, which considers the impact on sites known to have nature conservation, biodiversity or geological interest.

ENV9 – Design principles. This sets out criteria relating to the impact on an area and the need for proposals to respect landforms and natural features and other buildings, views and landmarks.

T12 - Road Proposals. Although this scheme is not specifically referred to in this policy the preamble to the policy refers to the northern by-pass for Luton and Dunstable, which this proposal links to.

3.9 There are no relevant SPGs, SPDs or Development Briefs within Luton Borough affecting this site.

(b) National Planning Policy Framework –

3.10 Not being part of the development plan this LIR is not required to detail the relevance of the National Planning Policy Framework. However, in summary, the following paragraphs are considered to be relevant: 21, 30, 31, 32, 41, 79, 80, 90, 109, 112, 113, 118, 120, 121, 122, 123, 125, 128, 129, 131 and 134.

3.11 A Statement of Common Ground has been submitted and in response to the ExA questions, further detail on compliance with the NPPF has been prepared.

3.12 Local Transport Plans

3.13 In terms of local transport programmes and policies, the scheme should take account of relevant Policies in both Central Bedfordshire and Luton’s third Local Transport Plans (LTP3) submitted to Government in April 2011. In this context it should be noted that Luton’s LTP3 supports the principle of the Woodside Link connecting to the new M1 Junction 11a.

3.14 It is considered that proposed Woodside Link is in accordance with the adopted development plans in force for area covered by the proposal.

4.0 GEOLOGY AND SOILS

4.1 The ES refers to the assessment of geology and soils which has been undertaken, which considers the composition of the soil and local designations.

4.2 The assessment considers the agricultural land classification and the potential for land contamination arising from operations in the locality. The assessment has concluded that there are unlikely to be significant contaminants and that there is no risk to human health, other than an area around Houghton Brook.

4.3 Following a Phase 1 and Phase II Contaminated Land Report which supported a Stage 3 assessment, areas around Chalton Cross Farm and the nearby builders’ yard have been identified as having potential for contaminated ground.

4.4 It is normal practice that if during the course of construction contamination not previously identified is discovered, appropriate action will be taken in order to minimise the impact of any contamination in consultation with the relevant Council’s Environmental Health Department. LBC support the recommendations and note the inclusion of a Requirement within the DCO to observe for any contamination during the course of works and mitigate where necessary.

4.5 The only concern that this Council would raise is that if, during the course of works, asbestos is found on any of site, this should be dealt with appropriately. If it is not contained and able to become airborne, there is a potential (albeit very slight) that is may affect LBC residents

5.0 ROAD DRAINAGE AND THE WATER ENVIRONMENT

5.1 The ES relates to a number of background sources of information that have been used in considering the drainage and this informs the specification for the proposed drainage mitigation.
5.2 It should be noted that the Water Cycle Strategies for Luton and South Bedfordshire and the Luton Borough Council and South Bedfordshire Council Level 1 Strategic Flood Rise Assessment (SFRA) are included in these documents. For the record, these documents are currently subject to review although they have not been replaced.

5.3 In the final conclusion, it is stated that the scheme is predicted to have neutral effects in terms of flood risk.

5.4 The submission does not include details of levels to enable this Council to make a full assessment of the potential for flooding. It is noted that local residents have raised concerns and therefore it would seem appropriate that an additional requirement be imposed to allow the local planning authorities to review the methods of surface water drainage and storage, in particular around Gelding Close. This information should include details of levels.

5.5 Requirement 15 relates to surface water drainage, in the sense of contamination of the watercourse during construction, but does not appear look at the long term approach to the potential for flooding that may arise from the proposal. It is respectfully requested that the inclusion of these further details would be helpful to both LBC and the nearby residents.

6.0 MATERIALS

6.1 The materials section of the ES considers the reuse and disposal of materials associated with the development. It is noted that a site waste management plan will be produced which will indicate levels of waste to be generated and transported from the site.

6.2 Where materials are to be transported from the site, as well as considering use of local sites, details of routing of vehicles should also be included to discourage HGV’s from using the rural highways, where possible.

6.3 Where contaminated materials are to be removed from the site, these should be transported in a manner that reduces the impact on local residents in terms of dust and emissions.

6.4 It is noted that the ES considers that the greater impacts on waste and materials will be associated with HRN1 and other associated developments, but nevertheless the cumulative impact is a consideration and needs to be adequately addressed by all related proposals.

7.0 CULTURAL HISTORY

7.1 Archaeological heritage assets have been assessed in consultation with the County Archaeologist and buildings and landscape of significance on and near the site have been identified. It is noted that the majority of these assets lie within the Central Bedfordshire boundaries.

7.2 It is however noted that some of the properties in High Street North Leagrave are listed as being located in Dunstable, when they in fact lie within the boundaries of Luton.

7.3 Impacts on archaeology heritage assets are noted in this section of the ES, and are generally accepted. As the County Archaeologist serving both authorise, is based within Central Bedfordshire Council, it is assumed that liaison will continue.

7.4 It is noted that Requirements 16 and 17 addresses the protection of cultural and historic impacts and further information will be submitted for consultation in respect of these requirements.

8. NATURE CONSERVATION

8.1 The ES recognises the various Statutory Sites within 5km of the scheme as well as the non-statutory designated sites within 2km of the scheme. It acknowledges the Local Biodiversity Action Plan and refers to the legally protected and notable species.

8.2 It is noted that there is some nature conservation interest along the line of the route, including the presence of water voles, badgers and bats. It is noted that the habitat survey does not include a survey of invertebrates.

8.3 As part of the consultation it is noted that English Nature has submitted detailed comments on the legislative background and main findings of the ecological surveys. LBC support the comments that have been made by English Nature in seeking additional surveys prior to the commencement of works on site.

8.4 The Phase 1 habitat survey, bat survey and badger surveys referred to as the study area, appear to have been based on an earlier road layout and therefore differ from that in the current scheme. This point was raised in the Planning Inspectorates SS1 Advice following issue of acceptance decision dated 12 June 2013. I have not seen any additional survey work submitted since this letter, but I note that Requirement 5 includes reference to repeat surveys being carried out, which this Council would support.

8.5 In undertaking the additional surveys proposed by English Nature and referred to in Requirement 5 (Landscape and Ecology), LBC would request that this work is carried out along an agreed area, in both within CBC and LBC’s boundaries, in consultation with both Council’s Landscape and Ecology specialists. Where species are identified, Requirement 5 allows for appropriate mitigation to be agreed.

8.6 Mitigation during construction would be ‘enforced’ through the appointment of an Environmental Clerk of Works so that rapid and effective advice is provided to contractors. Such measures include good site practice, contingency plans and specifying new planting of local provenance. The Clerk of Works should liaise with the relevant Landscape
and Ecology specialists from CBC or LBC and also be aware of areas that are sensitive in ecological terms and show a commitment to avoiding the use of heavy earth moving machinery in these areas.

8.7 Regarding ongoing impacts, a full landscaping scheme is proposed to form new habitats with a degree of connectivity and this is covered within the Requirements set out in the DCO.

8.8 The ES proposes no mitigation for badgers as a lack of clear commuting routes makes underpasses difficult to locate. It is argued that there would be no material increased risk of mortality. However, evidence shows that badgers commute across the roads and the proposed monitoring of future impacts should be extended to badgers.

8.9 It is also noted, and agreed, that, the area has significant potential for bats. Where they have been found roosting in the mature trees proposed for felling, further pre-felling inspection should be undertaken to ensure no bats are present.

9. LANDSCAPE

9.1 The design aims to screen Woodside Link and blend it into the landscaping to mitigate impacts but, it is considered that given the levels in this area, screening will not completely disguise the proposed link road.

9.2 It is accepted that growth rates of landscaping can be uncertain; the landscaping should be designed with specimens of a size and species that make a positive impact when planted.

9.3 Given the setting of the road, it is considered important that species used in any scheme are appropriate for the location and comprise of native species which encourage biodiversity.

9.4 The choice of visual receptors is fairly representative in the area and it is accepted that combined with the impacts of HRN1, the landscape will change significantly. However, LBC does not agree that the requirements proposed in the DCO are sufficient with regard to landscape management, and the LBC’s ecologist advises that a landscape management plan should be produced to manage and enhance the area between Wheatfield Road and Sandringham Drive to recognise the nature conservation and landscape value of this area.

10 COMMUNITY AND PRIVATE ASSETS

10.1 The ES proposes measures to reduce the impact of potential community severance which include additional crossing, enhancement of rights of way, undergrounding of overhead lines on part of the route and access to and improvement to public open space.

10.2 Whilst these measures are accepted as benefits, it is considered that they do not fully mitigate the impact and could go further.

10.3 It is noted elsewhere in this LIR that the additional crossing points are not located in the natural desire lines for crossing. It is also noted that the diversions to the public rights of way provide for a longer route, which may not provide the most suitable diversion for walkers.

10.4 It is considered that whilst mitigation is proposed, it may not provide the most direct and beneficial routes.

10.5 The partial undergrounding of the overhead lines is welcomed, but this could be further enhanced by additional undergrounding which would not only be of benefit to the setting of Woodside link, but also to the surrounding landscape.

10.6 The enhancement of the informal open space around Houghton Brook is supported, so long as this does not compromise the setting of the wildlife habitats in the location,

11 AIR QUALITY

11.1 The Environmental Statement considers local and regional effects on air quality. The LIR should specifically consider the local impacts.

11.2 Dust emissions, which would be expected during construction are proposed to be mitigated by a number of measures such as early provision of paved roads, keeping certain activities away from sensitive receptors, cleaning and water suppression. These measures would be contained within a Dust Management Plan, which we would expect to see as part of the CEMP.

11.3 Whilst numbers of HGV movements have not been included within the ES, it is noted that there are likely to be significant HGV movements associated with the removal of unwanted soil. Further discussion with the relevant Council’s Air Quality Specialist (within Environmental Health) is requested to establish routes that minimise the impact on air quality.

11.4 The construction phase of the works is not specified in the ES, although it is noted that works are proposed to commence in 2014 with final completion in 2017. Given the time period measures to control dust, particular over dry periods of the year, are critical.

11.5 LBC consider that monitoring of air quality and noise is required both before, during the construction of, and operation of the Scheme. LBC Environmental Protection specialists would want to be consulted on all issues that relate to the location of such monitoring sites.
11.6 The ES refers the clearance of buildings at Chalcross Farm. This Council would consider that during the course of works, if asbestos is found on any of site, this should be dealt with appropriately. If it is not contained and able to become airborne, there is a potential (albeit very slight) that is may affect LBC residents.

11.7 During the operational phase of the proposed link road, it is noted that the modelled changes in air quality is slightly beneficial with regards to NO$_2$ and PM$_{10}$ in respect of the Dunstable AQMA. However, away from the major junctions at Woodside and the M1, away from where vehicles currently pass, air quality is currently good; the air quality is likely to decrease. The effective monitoring of levels and mitigation is important, in order to protect the health local residents, in particular vulnerable members of the community.

12 NOISE AND VIBRATION

12.1 It is noted that the ES states that no piling works will be required during the construction of the Woodside Link. The sole source of noise impact would be from traffic using the new highway and during construction. Predictions of future impacts rely on modelling traffic levels and whilst the methodology of the transport model is accepted, the prediction in respect of HGV movements along the proposed road is considered to be lower that would be expected, given the developments that the road would serve.

12.2 In the absence of details regarding the level of HGV movements expected, it is therefore difficult to establish the environmental impact on neighbouring properties in terms of air quality, noise and vibration.

12.3 The residents living adjacent to the proposed line of the Woodside Link, currently benefit from open land and therefore relatively quiet environment. Both during construction and once operational, residents are likely to be affected by traffic noise. Noise from HGVs has a particular low frequency in characteristic. This is frequency of noise is particularly difficult to attenuate.

12.4 Given the height of the vehicles and the levels of the surrounding land, Details of the proposed noise barriers have not been supplied, but it is considered that they may not necessarily be as effective as suggested. LBC consider that monitoring of air quality and noise is required both before, during the construction of, and operation of the Scheme.

12.5 Reference is made to operational hours, during construction within Requirement 13. These hours exceed the normally acceptable hours of work conditions. It is therefore suggested in paragraph 15.12, that the hours are not extended.

12.6 A night time noise assessment is included in the ES and this is shown to exceed the World Health Organisations guidance on night noise. Given that Woodside Link will serve a route from the M1 J11a to an industrial area (and HRN1 also proposes an employment site to close to the J11a), there is the potential for night time operations involving HGVs, which has the potential to be a long term impact.

12.7 Paragraph 13.2.16 refers to the former Luton Local Plan policy ENV15, which was not saved as its role duplicated that of PPG24. That has now been superseded by the NPPF which advised that Planning Policies and decisions should seek to “mitigate and reduce to a minimum other adverse impacts: on health and quality of life arising from noise from new development, including through the use of conditions”. LBC Environmental Protection specialists would want to be consulted on all issues that relate to the location of such monitoring sites and noise attenuation measures.

12.8 It is noted within the DCO, that requirements for the routing of traffic are included. These requirements and ongoing monitoring are important as part of the mitigation of the impact.

12.9 Further discussion with the relevant Council’s Noise Specialist (within Environmental Health) is requested to establish routes that minimise the impact on noise impact.

13 EFFECTS ON ALL TRAVELLERS

13.1 Chapter 14 of the ES refers to the linkage of the proposed highway, with other highways and public rights of way in the locality. It is noted that there are no bridleways affected by this proposal/

13.2 The administrative boundary between Luton and Central Bedfordshire runs down the centre of Poynters Road; the homes on the east side of Poynters road are therefore in Luton. LBC welcomes the proposals for an HGV ban on Poynters Road, together with the introduction of speed control measures. In regard to the HGVs that would require access to the Woodside industrial estate and other adjacent employment sites in east Dunstable, in accordance with Policy 5 of Luton’s LTP3, LBC wishes to see positive signing of HGV movements at M1 Junction 11a. LBC considers that the proactive signing of HGVs should be included in the DCO as it relates to the design of the scheme.

13.3 LBC recognises that the reduction in traffic levels on some roads particularly in the west of Luton, as a result of the introduction of the Scheme in conjunction with the A5-M1 Link, could contribute to reduced likelihood of road traffic collisions in these areas. LBCs main concerns relate to safety of pedestrian and cycle movements. In particular LBC is concerned about the safety implications of diverting the cycle crossing of the Woodside link to a point approximately 100 metres east of the existing Poynters Road junction, away from the natural desire line for cyclists and pedestrians wishing to cross the Woodside Link at the north end of Poynters Road.

13.4 The scheme envisages the provision of four Toucan crossings on the E-W section of the link. Also, the reduction in traffic volumes on other parts of the network as a result of the new road will have a beneficial impact on those communities. However, LBC remains concerned about the lack of crossing facilities in the immediate vicinity of the junction between the new link road, Poynters Road, Porz Avenue and Park Road North. The provision of the Toucan
crossing 100 metres to the east of the new junction will not be on the natural desire line for a number of existing movements.

13.5 The land currently is served by a good network for public footpaths and this scheme has the potential to improve the public right of way network. It is noted that FP8 is proposed to be stopped up and a replacement provided that provides a longer route but one which could provide an attractive riverside walk. However, given the biodiversity that Houghton Brook provides, consideration should be given to the implications for wildlife habitats around the brook as well as the linking of the footpath with others in the locality.

13.6 The relevance of landscape and experience impacts on drivers is acknowledged, especially where concentration on the main dual carriageway needs to be maintained with frequent signed junctions. Impacts on users of single carriageway roads are noted.

13.7 In terms of health impact, the ES refers to the environmental influences on driver stress, which of course will also extend to driving behaviour of other road users. It is noted that it is perceived that a reduction in congestion will reduce driver stress. This is noted and supported; however, the additional of appropriate crossing points will also encourage pedestrians and cyclists to have a safer passage across the proposed highway.

14 ASSESSMENT OF CUMULATIVE EFFECTS

14.1 The introduction to the ES refers to the background to the scheme and in particular refers to the HRN1 development. At the time of preparing the ES, HRN1 had not been determined, but it is understood that this now benefits from outline consent (albeit is subject to the Secretary of State not calling in the application). Further to this a submission of a screening opinion for the second phase (HRN2) has now been considered.

14.2 Chapter 15 of the ES refers to HRN1 in more detail, but it does not consider that the impact of HRN1 would be significant in the context of the Woodside proposal.

14.3 Other schemes at are referred to are the A5-M1 link road and Luton North development. In the case of the A5-M1 link, the ES considers that this could be taken as part of the baseline landscape, whilst the Luton North development is subject to separate assessment.

14.4 Whilst the A5-M1 link road has been agreed, work has not commenced, therefore its true impact has not yet been established and any mitigation proposed has not been monitored for effectiveness. It should therefore be reviewed for any potential changes, since the granting of the Order by the Secretary of State and any changes referred to and fully considered within the ES for this proposal.

14.5 In the case of Luton North, whilst there are no details on this proposal, the site has been identified as an allocation in CBC’s emerging development strategy and there is the potential for additional traffic to use Woodside as a link to and from the A5 and A6. As this development is predominantly residential, there is the potential for a significant number of vehicles to be using this route, either to the employment areas of HRN1 or through to employment areas within Dunstable.

14.6 Whilst it is accepted that this development is not a commitment until it has been publicly examined through the local plan process, it should nevertheless be given some weight in terms of this proposal.

14.7 The Council would consider that all of these schemes play a significant part in the need and justification for the Woodside Link and therefore should be fully considered.

14.8 There are implications for traffic, drainage, air quality and noise associated with these developments and the health impact of the cumulating of these proposals.

14.9 Paragraph 15.4.3 of the ES refers to the need to take account of impacts of the other proposals, as the various scheme design progresses. This Council considers that greater consideration of the cumulative impact of all of these schemes should be taken into account as part of this proposal, being key to the implementation of these other proposals.

15 DEVELOPMENT CONSENT ORDER

15.1 This section considers the Requirements, as set out in Schedule 2 to the draft Order, to offset and mitigate impacts arising from the proposal.

15.2 Paragraph 3 provides for setting out stages of the authorised development.

15.3 Paragraph 4 provides that work shall take place in accordance with the approved details. Particular details of landscaping may be approved and where necessary substituted in accordance with the ES.

15.4 Paragraph 5 effectively requires, before any work commences, a landscape and ecology management plan shall be submitted with a set of measures for implementation. As mentioned above, in addition to the surveys outlined in the submitted document, a survey of invertebrates should also be included.

15.5 Paragraph 6 relates to the monitoring for contaminated materials and remediation strategy should contamination be identified.
15.6 Paragraph 7 relates to the submission of a Construction Environmental Management Plan, which includes the monitoring of air quality and the routing of construction traffic. This management plan is important to minimise the impact on neighbouring residents. This Requirement should be extended to include a Site Waste Management Plan, to ensure that provision is made for any spoil to be removed from the site.

15.7 Paragraph 8 refers to details of the proposed acoustic barriers which are to be erected/constructed and mitigation measures to protect residents from disturbance from noise and vibration.

15.8 Paragraph 9 relates to access by construction traffic and routing for construction vehicles.

15.9 Paragraph 10 relates to building and construction materials in respect of surfacing of footpaths and highways. Where the proposed road is in close proximity to residential properties, this Council would encourage the use of low noise surfacing materials.

15.10 Paragraph 11 relates to building and construction materials in respect of highway structures to reduce the visual impact on the area.

15.11 Paragraph 12 relates to street lighting. Where there is no conflict with other guidelines, lighting should be designed in a manner appropriate to the setting. In particular, where there is a potential for wildlife habitats, lighting levels should be kept to a minimum.

15.12 Paragraph 13 relates to hours of working. Generally the following hours of operation are attached to planning consents in the form of conditions; Monday to Friday 0730 to 1800hrs, Saturday 0800 to 1300hrs and no working on Sundays or Bank Holidays. The proposed hours an extension to those hours, which generally may be necessary for a road construction project in an unpopulated area.

15.13 Whilst it may be difficult to require different working hours on individual sections of the route, in this case it may be appropriate to consider this through a Construction Code of Practice.

15.14 It is noted that no Sunday working is planned in respect of this scheme. For the avoidance of doubt, this Council would suggest that Sundays should be included as referral to "no working shall take place" along with Bank Holidays unless previously agreed with the Local Planning Authority.

15.15 Paragraph 14 relates to measures to minimise dust and mud arising from the development. This will be addressed by the SWMP and the CEMP.

15.16 Paragraph 15 relates to safeguarding of watercourses and drainage however this currently relates to the contamination rather than flood risk. Following concerns raised by local residents' further consideration should be given to the impact of flood risk arising from the scheme.

15.17 Paragraphs 16 and 17 relate to relates to the cultural heritage and archaeology. Comments in respect of this element will be addressed by the County Archaeologist, who is based at Central Bedfordshire Council.

15.19 Paragraph 18 relates to the submission of a detailed landscaping scheme and the maintenance thereof. Given the open nature of the route, LBC would seek to ensure that native species, particularly ones with biodiversity value, are chosen for the scheme.

15.20 In addition to the above, this Council would respectfully request that the Examining Officer includes provision to allow the submission of details of surface and foul water drainage, by stage. Those details should include a levels survey and an up-to-date Flood Risk Assessment and implementation of any necessary measures. The Environment Agency and Thames Water Utilities should be brought into the appraisal process.

16. SUMMARY

16.1 The guidance on Local Impact Reports recommends that a view is given by the local planning authority of the relative weighting between the social, economic and environmental issues associated with the proposal and the impact of the scheme on them. This includes a link road to provide employment, local services and associated development.

16.2 Whilst the proposal itself would not create employment, other than during the course of construction, the wider implications of the scheme in allowing additional highway capacity to accommodate development would result in a positive impact to employment and housing needs in Central Bedfordshire and Luton under the Duty to Co-operate.

16.3 In terms of social impact, the benefits of greater employment opportunities that development served by the proposed Woodside Link can only be seen as a positive contribution.

16.4 In terms of environmental impact, whilst there will be some loss of public open space and impact on the landscape and the potential of increased noise levels and impact on air quality. Monitoring and mitigation of the impacts will be carried out to offset some of these impacts. However, concerns are still expressed regarding the effectiveness of noise barriers where the proposed road has the potential to carry significant numbers of HGV's.

16.5 Concerns are also expressed in respect of the potential for flood risk arising from the proposal, based on local information submitted by residents.
16.6 In balance, it is considered that the social and economic benefits outweigh the negative environmental impacts and the scheme should therefore be supported, subject to the mitigation measures proposed and suggested by Luton Borough Council.