Kimpton Road Site, Luton
Southside And City Developments

Environmental Impact Assessment Scoping Statement

March 2005

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1.0 INTRODUCTION

1.1 The land which is the subject of this Scoping Statement and of the Environmental Statement to be undertaken comprises the former Vauxhall Motors manufacturing plant on Kimpton Road, Luton.

1.2 The Vauxhall Motors car assembly plant was closed in 2000 as part of a restructuring strategy. The IBC van production lines remain in operation and are located immediately to the east of the subject site.

1.3 The closure of the car assembly plant resulted in an immediate and considerable loss of employment and a downsizing of Luton’s manufacturing sector, with concurrent detrimental impacts upon the local and wider economy. It is worthy of note however that there were no compulsory redundancies necessary as part of the closure programme.

1.4 The loss of the car plant and the resulting large and unused site provides a considerable and significant opportunity for redevelopment. In so doing the site provides an opportunity to redress the loss of employment, enhance the local environment, enable regeneration and contribute to the wider economic and growth aims of Luton, thereby making full use of this valuable land resource.

1.5 It is intended that an application for outline planning permission for the redevelopment of this site be submitted in the summer of 2005. A mixed use scheme is proposed incorporating residential units alongside a range of retail, commercial, leisure and community uses.

The Need for an Environmental Impact Assessment

1.6 Environmental Impact Assessments seek to ensure that the likely impacts of major developments are considered and taken into account in evaluating that proposal. Once the impacts of the proposal are understood, appropriate measures for mitigating against them and optimising the environmental benefit of the scheme can be developed. In this way, the adverse impacts of the proposal are minimised.

1.7 The Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 require that for certain planning applications, an environmental
impact assessment must be undertaken and submitted as part of that application. The Regulations provide guidance as to which types of development will be subject to Environmental Impact Assessment. All Schedule 1 developments fall within the remit of the Regulations. Schedule 2 developments may require assessment if it is considered that they would give rise to significant environmental effects.

1.8 It is considered that this proposal would be categorised as an ‘Urban Development Project’, which if over 0.5ha constitutes a Schedule 2 development.

1.9 Schedule 3 of the Regulations specifies the criteria to be used for assessing whether a Schedule 2 development would have ‘significant environmental effects’. In this instance it is unclear whether the proposal would necessitate an Environmental Impact Assessment. However, it is considered prudent to assume that an ES will be required given the scale of the site and its status as previously developed land.

**Purpose of this Report**

1.10 Regulation 10 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 provides for applicants to request a ‘scoping opinion’ from the local planning authority, by which a written statement of the required content of the ES is approved.

1.11 To this end, this scoping report provides Luton Borough Council with an assessment of the topics which the ES will cover. In so doing, it will establish the scope and direction of the Environmental Impact Assessment.

1.12 The purpose of this report is to summarise the results of the scoping exercise for the benefit of the Council and statutory consultees, in order that a strategy for the content and methodology of the ES can be established, by way of a formal ‘scoping opinion’. The scoping report describes the intended structure and form of the Statement, the consultant team and the range of issues to be considered.

1.13 The main part of the report considers each topic in terms of the issues to be considered, methodology and information sources and likely impacts. It also highlights the potentially
significant effects arising from the development which will be considered in greater detail as part of the Environmental Impact Assessment.

**The Consultant Team**

1.14 This report has been commissioned by Southside and City Developments. The consultant team which will produce the Environmental Statement will comprise the following:

- David Lock Associates – town planners, architects and urban designers;
- Wardell Armstrong LLP – environmental and engineering consultants;
- BWB – transport engineers;
- Waterman Environmental – consulting engineers and scientists;
- Waterman Partnership – civil and structural engineers; and
- Waterman Gore – mechanical and electrical engineering consultants.
2.0 LOCATION OF DEVELOPMENT

2.1 The proposal site is located on the north side of Kimpton Road approximately one mile to the south east of the town centre and is clearly visible from large parts of Luton, dominating the skyline. The site currently comprises a number of significant manufacturing and office buildings, associated open car storage and internal access roads. The application site is 22 hectares in size. Appendix 1 indicates the exact location of the proposal site.

2.2 The land rises to the north and within the site, particularly on the western boundary. Significant man-made changes in levels have been made over time. No noteworthy landscaping exists within the site save for some semi-mature planting along the Kimpton Road frontage and on the scarp slopes below the St Anns residential area.

2.3 To the north of the site is St Anns, an established residential neighbourhood which includes a range of educational and other community facilities. An existing pedestrian link provides a private pedestrian access to this neighbourhood and its facilities.

2.4 Vehicular access to the site is currently gained via two access points on Kimpton Road. The most easterly access constitutes the main vehicular access to the site and will be retained by IBC Vehicles. The westerly access served the large staff car parks. To the south of Kimpton Road are modern industrial/warehouse premises and a row of local shops and services in both modern and more traditional buildings. These back directly onto the Midland Mainline and Luton Parkway railway station which is some 200 metres from the site as the crow flies. No direct access can currently be obtained to the station from Kimpton Road other than via Windmill Road. A direct shuttle bus service between the station and the airport exists and it is expected that this will continue until a light rail or guided bus link is constructed.
3.0 NATURE OF DEVELOPMENT

The Application Proposals

3.1 The application to be submitted to Luton Borough Council by Southside and City Developments will comprise the following uses:

- residential;
- casino;
- hotel;
- conference facilities;
- B1 office units;
- B1 incubator units;
- bulky goods retail;
- petrol filling station;
- multi-storey car park;
- associated open space; and
- community uses.

3.2 The precise mix and quantum of these uses will be determined prior to commencement of the Environmental Impact Assessment process and will be finalised in the development framework plan to be submitted formally within the planning application.

3.3 This Environmental Statement will consider the impacts of two planning applications:

- **outline planning application** to establish the principle of development, massing and quantum. Formal documentation to include a development framework plan, land use budget, building heights plan, planning and design statement, Environmental Statement and Retail Impact Assessment. Supplementary illustrative material will also be submitted; and

- **full planning application** for phase one infrastructure, including the key access to Kimpton Road, secondary access, main boulevard, primary streets, drainage and development platforms/remediation.
Phasing of Development

3.4 The varied levels on the site necessitate a phased approach to the development, in order that development platforms may be constructed. Despite this requirement, it is anticipated that all phases will be completed by 2012.
4.0 THE ENVIRONMENTAL STATEMENT

General Structure

4.1 As per good practice guidance and in line with the requirements of the EIA Regulations, the Environmental Statement will take the following structure:

- non technical summary;
- the statement; and
- supporting technical appendices.

4.2 The document will comprise the following chapters:

1. Introduction;
2. The Application Site and Development Proposal;
3. Consideration of Alternatives;
4. Planning Policy;
5. Traffic and Transportation;
6. Air Quality;
7. Noise and Vibration;
8. Ground Conditions and Hydrogeology;
9. Drainage and Surface Water Hydrology;
10. Landscape and Visual Impact;
11. Waste Management;
12. Services and Utilities;
13. Socio Economic Issues;
14. Cumulative Impacts;
15. Summary Effects Matrix;
16. Conclusion;
17. Appendices

Ecological Report
Archaeological Report
Introduction
4.3 The introduction will provide a broad overview of the background to the project and the context for the development proposals. The main environmental effects will be identified alongside a brief description of the approach to assessing likely impacts.

The Application Site and Development Proposal
4.4 This section will comprise of the following:

- description of strategic location of the site within Luton and site access;
- description of site context and the nature of the application site;
- description of the outline application proposal;
- summary of the separate full application for primary road infrastructure; and
- account of the construction and proposed phasing of the development.

Consideration of Alternatives
4.5 Part II of Schedule 4 of the Regulations requires that the applicant must outline any alternatives studied. Whilst Circular 2/99 confirms that the developer does not have to undertake a specific study of the alternatives, it is required that if an assessment of alternatives has been made, this should be included within the Environmental Statement.

4.6 An assessment of alternative sites will comprise of a review of the process by which Luton Borough Council arrived at the proposed allocation of the site in the Local Plan.

4.7 The alternative site development options will be described in general terms including potential environmental implications. However a full environmental assessment of the alternatives will not form part of the Environmental Statement.

4.8 An assessment will be made of alternative design options, considered for incorporation within the master plan. These could include alternative uses, layouts and building heights.

Technical Chapters / Assessment Methodology
4.9 The Government guidance ‘Preparation of Environmental Statements For Planning Projects that require Environmental Assessment: A Good Practice Guide’ (1995) provides a suggested methodology for the production of Environmental Statements. This Environmental Statement will follow this guidance and include a Methodology detailing
how the document has been prepared and the techniques used to assess the significance of the effects of the proposal.

4.10 A number of surveys have already been undertaken of the site, the results of which will form the basis for an assessment of baseline conditions. Further desk based and on-site surveys will be undertaken to supplement the existing information and make a full assessment of the current site condition.

4.11 Evaluation of the effects of the proposed development on the existing baseline conditions will make use of established techniques, (such as that outlined in the DoT Design Manual for Roads and Bridges) and guidelines (such as those issued by the Institute for Environmental Management and Assessment (IEMA)). The assessments will record the following characteristic of each effect:

**Spatial:** limited to site, affecting environs or spreading over a wider area?

**Temporal:** short (less than 5 years), medium (5-10 years) or long term (10 years plus).
- permanent or temporary (e.g. during construction phase);
- continuous or intermittent;
- increasing or decreasing in intensity.

**Nature:** reversible or irreversible.
- certain or possible;
- direct or indirect.

**Significance:** adverse or beneficial.
- for each – severe (adverse only), major, moderate, minor or insignificant.

4.12 These assessments will take into account the range of measures to mitigate any adverse effects and outline the potential improvements in environmental quality arising from the development. These strategies will be outlined by the individual specialist consultants within the team and co-ordinated by David Lock Associates. Any recommendations made by any parties following this Scoping Report will be considered carefully as part of this process.
5.0 PLANNING POLICY

Lead Consultant

5.1 The lead consultant addressing planning policy issues will be David Lock Associates.

Preliminary Scoping

5.2 Contemporary planning policy, directed from national guidance, encourages the re-use of previously developed land built at high development densities to maximise the potential of land. The principle of this proposal accords with this general approach in that it proposes the redevelopment of a brownfield site.

5.3 Luton Borough Council are encouraging redevelopment of the site to compensate for the loss of jobs resulting from the closure of part of the Vauxhall site. A site specific policy has been developed in negotiation with Luton Borough Council allocating the site for mixed use redevelopment.

Issues to be Considered

5.4 The following issues will be addressed in the planning policy chapter:
- general adherence of the scheme with national, regional and sub regional planning policy; and
- assessment of the scheme in relation to site specific requirements and LBC policy.

Approach

5.5 The scheme will be assessed against the criteria outlined in all tiers of planning policy, in particular within relevant Planning Policy Guidance notes, Planning Policy Statements and emerging national guidance. This will include PPS1 (Delivering Sustainable Development), PPS23 (Planning and Pollution Control), PPG3 (Housing), PPG6 (Retail), PPG10 (Waste Management), PPG13 (Transport), PPG24 (Planning and Noise).

5.6 Consideration will be given to the content and direction of the emerging Regional Spatial Strategy for the East of England, the Milton Keynes and South Midlands Sub Regional Spatial Strategy and the Bedfordshire and Luton Structure Plan in relation to the development proposals. Finally, an assessment will be made of the scheme’s compliance with both the adopted Luton Local Plan site specific policy which allocates the site for employment uses and the emerging Local Plan and the agreed revised wording of the policy, allocating the site for mixed use redevelopment.
6.0 TRAFFIC AND TRANSPORTATION

Lead Consultant

6.1 The lead consultant on matters relating to transportation and traffic will be BWB (Consulting) Ltd.

Preliminary Scoping

6.2 The proposed development would comprise a range of land uses, each having particular transport implications. Given the scale of the proposals, the additional generated traffic will materially affect the operation of the local highway network and could also affect the operation of the strategic highway network. Preliminary discussions with both Luton Borough Council and the Highways Agency have resulted in the agreement of a general methodology for the assessment.

6.3 Assessments will need to be undertaken for the weekday morning and evening peak hours, with the Saturday peak period also examined. The baseline traffic situation for the weekday assessments will utilise existing traffic information derived from the assessment of the East Luton Corridor highway improvement scheme. The Saturday assessment will be based on suitable traffic surveys at key junctions in the area.

Issues to be Considered

6.4 The following matters will be considered as part of the EIA process:

- the likely impact of the proposal upon the local highway network, based upon the net increase in traffic over and above that generated by the previous use of the site (Vauxhall Motors plant);
- the possible need for highway improvements or financial contributions towards strategic transport schemes;
- the creation of a travel demand strategy to encourage non-car modes of travel and deter traffic from sensitive areas;
- the scope to minimise car use and encourage pedestrian and cyclist priority;
- the proposed road hierarchy within the site and the circulation of traffic within the development; and
- the impact of construction traffic.
Approach

6.5 The assessment will be based on a comparison between the operation of the local highway network under baseline and future ‘with development’ conditions. Increases in existing traffic volumes will be predicted using approved methods and will account for the traffic generated by various committed developments that are planned for the area.

6.6 Development traffic flows will be based on appropriate trip generation rates for each land use and will distinguish between those trips already in the area and those new to the locality. This traffic will be distributed and assigned to the local highway network in accordance with approved methods, with local and strategic traffic identified.

6.7 Junction modelling will be undertaken for all those junctions experiencing a material increase in traffic during the various assessment periods. The models will be constructed using approved software and will assess existing and proposed junction configurations, as appropriate.

6.8 The assessment process will be undertaken in conjunction with the Highways Agency and Borough Council to ensure that all parameters and outputs are rigorous and acceptable. Methods of encouraging a modal shift and increasing the use of public transport, walking and cycling will also be considered as part of this process.
7.0 AIR QUALITY

Lead Consultant

7.1 The lead consultant addressing air quality will be Waterman Environmental.

Preliminary Scoping

7.2 The Environment Act 1995 requires local authorities to declare Air Quality Management Areas (AQMAs) in those locations where people will be exposed to ambient air that is not expected to meet the National air quality objectives that have been set. Luton Borough Council declared an AQMA in relation to NO₂ at 24 dwellings adjacent to the M1, however, the site is not in close proximity to this AQMA.

7.3 Significant changes to traffic on the local road network may have the potential to affect local air quality. Additionally, dust emissions generated during demolition and construction activities may also affect local air quality and cause nuisance effects if deposited onto surfaces such as cars and windows. Other potential sources of air pollution include Luton Airport.

7.4 The development has the potential for increased traffic generation associated with the proposed uses, which is likely to extend over a relatively large geographical area. As such, there is the potential for air pollutant levels to be increased as a result of the proposals, both during construction and following completion of the development.

Issues to be Considered

7.5 The following issues will be considered as part of the Environmental Statement:

- assessment of air quality for the site and surrounding locality;
- effects on local air quality and sensitive receptors of dust emissions during demolition and construction activities;
- effects on local air quality, particularly NO₂ and PM₁₀ levels, due to emissions from vehicles associated with the construction works and also once the development is completed and fully operational; and
- effects of the changes to local air quality on future residents and users of the site.

Approach

7.6 The assessment of air quality would involve Liaison with Luton Borough Council regarding the various assumptions and scenarios to be modelled and for the identification of any available monitoring data.
7.7 Potentially sensitive receptor locations will be identified, including both existing and proposed, that could be affected by changes in air quality that result from the demolition/construction and operation of the development.

7.8 A review of baseline conditions will be undertaken with particular regard to the Luton Borough Council’s air quality review documents and monitoring data, if appropriate.

7.9 An assessment of the significance of emissions of construction plant will be made and proposals for controlling dust and other emissions during the demolition and construction activities formulated, with reference to the Building Research Establishment (BRE) guidance ‘Controlling Particles, Vapour and Noise Pollution from Construction Sites’.

7.10 Detailed dispersion modelling, for example ADMS-Roads or Caline model, will be used to assess the effect of traffic generated by the development on local air quality, particularly NO$_2$ and PM$_{10}$.

7.11 Finally, an assessment of the significance of impacts from traffic associated with the completed development will be made, alongside the identification of any necessary mitigation measures.
8.0  NOISE AND VIBRATION

**Lead Consultant**

8.1 The lead consultant addressing noise and vibration issues will be Waterman Environmental.

**Preliminary Scoping**

8.2 The proposal site is located in close proximity to a number of uses which generate high levels of both noise and vibration. The press shop of the Vauxhall manufacturing plant abuts the site, with the expanding London Luton airport located immediately to the southeast.

8.3 As such, consideration of noise and vibration issues forms an extremely important element of this Environmental Statement in order to ensure that the proposals do not impact upon the existing baseline condition and can be effectively incorporated into the local environment.

**Issues to be Considered**

8.4 The effects to be considered during the assessment process include:
- the noise effects of the construction phase on the surrounding locality;
- the suitability of the scheme in relation to adjacent uses, in particular the Vauxhall plant and the airport; and
- the need for appropriate noise and vibration mitigation measures.

**Approach**

8.5 Baseline studies of existing noise and vibration levels will be undertaken in consultation with the EHO. It is anticipated that the baseline noise survey would consist up to six long-term positions (at least 72 hours) and up to 8 weekday sample positions. These surveys would be undertaken to evaluate the impacts of road, railway and industrial noise on the site. A review of available information regarding the likely noise implications of aircraft would also be undertaken.

8.6 The assessment of effects will be undertaken in accordance with published guidance and planning policy requirements, including PPG24, British Standard 8233 and the World Health Organisation (WHO) Guidelines. A range of mitigation measures will be proposed to minimise noise and vibration impacts, particularly on existing and future residential...
populations, although results from the baseline noise survey would feed into the design process.
9.0 GROUND CONDITIONS AND HYDROGEOLOGY

Lead Consultant

9.1 The lead consultant addressing ground condition issues will be Wardell Armstrong LLP.

Preliminary Scoping

9.2 Extensive surveying work has been undertaken regarding the ground conditions of the site and the potential risk of contamination, including a full site investigation. Ongoing water monitoring has been undertaken since November 2004, the results of which will inform the base line assessment and allow an accurate evaluation of the impact of the proposal on future hydrogeological patterns. This will form the basis of the evaluation of baseline ground conditions at the site.

Issues to be Considered

9.3 The issues to be considered in this chapter of the Environmental Statement comprise the following:

- existing geology of the site and surrounding area;
- hydrogeology, in particular the underlying aquifer, groundwater and hydrogeological patterns;
- geotechnics of the site relating to previous uses and geotechnical requirements of the proposed development;
- potential sources and paths of contamination; and
- appropriate contamination and geotechnical remediation strategies.

Approach

9.4 An assessment of the site investigation survey undertaken in January 2005 will be undertaken to establish the exact nature of ground conditions within the proposal area. This will include analysis of key data to establish base line conditions and an evaluation of the likely impacts of the development.

9.5 A historical overview of previous site investigation work will be undertaken to make an assessment of the sensitivity of the site and complete a source target pathway analysis.

9.6 The ground condition investigations will inform the design of a remediation strategy and suitable geotechnical solution to minimise the impact of the development.
10.0 DRAINAGE AND SURFACE WATER HYDROLOGY

Lead Consultant

10.1 The lead consultant addressing hydrology and drainage will be Waterman Environmental.

Preliminary Scoping

10.2 The application site, due to its elevated nature, does not fall within the Environment Agency specified areas at risk of flooding.

Issues to be Considered

10.3 The following issues will be considered as part of the Environmental Statement:
   - the development of a strategy for surface water drainage;
   - the likely effects on the hydrology of the surrounding environs, in particular the impacts on patterns of infiltration, water quality and local abstraction;
   - the likely impacts on local water courses; and
   - the management and treatment of foul and waste water.

Approach

10.4 The assessment of hydrology and drainage would include a desk based investigation of existing conditions and review of ongoing water monitoring to inform the formulation of a drainage strategy. This strategy would be developed in accordance with the latest best practice guidance in incorporating sustainable urban drainage systems including the recently published PPS25.

10.5 The strategy for means of foul water disposal will be produced following regular liaison and agreement with the Environment Agency and Luton Borough Council.

10.6 A method of surface water attenuation will be established describing the method of discharge into existing watercourses and predicted runoff patterns. Measures to prevent flood risk on site will not be necessary but consideration of impact of the development on downstream watercourses will be included.
11.0 LANDSCAPE AND VISUAL IMPACT

**Lead Consultant**

11.1 The lead consultant for the landscape and visual assessment will be Waterman Environmental.

**Preliminary Scoping**

11.2 Preliminary analysis of the landscape and potential visual issues has revealed that the site is not within any particular landscape policy designations and as such is not protected.

11.3 However, the elevated position of the site and its visibility from large parts of Luton, increases the importance of issues of visual impact. The existing Vauxhall plant is highly visible from a number of approaches into and within Luton and currently has a detrimental aesthetic impact. In particular, the site is visible from Luton Hoo and Capability Green which are designated as Areas of Great Landscape Value (AGLV).

11.4 The site itself contains a number of very steep level changes creating discrete development platforms, a number of which are isolated in nature. The steep banks delineating these areas have been colonised by pioneering scrubs and grasses.

11.5 At present, the site is not of high quality in visual or landscape terms, incorporating mostly factory buildings and hard standing. The redevelopment of the site provides a valuable opportunity to significantly improve the landscape.

**Issues to be Considered**

11.6 The effects to be considered during the assessment of landscape and visual impact include the following:

- the physical effect of the construction phase, including loss of or change to elements of the landscape;
- the visual impact and change in landscape character as a result of the development;
- the effect of increased recreational use of the site;
- impact of built environment; and
- appropriate landscape management and maintenance strategies.
Approach

11.7 The assessment of landscape and visual impact of the development will be undertaken in accordance with relevant guidance such as that set out in:


11.8 An extensive baseline assessment of the site and its environs will be undertaken to assess how it fits into the existing landscape. A Visual Envelope will be prepared to establish the areas from which the existing site is visible, key views and receptor sites from which the visual effect will be assessed. This will be assessed through the use of computer software and verified by eye in the field.

11.9 The visual assessment would not only consider from where the proposal would be visible but also the context and composition of the views and the existing skyline. A Zone of Visual Influence (ZVI) of the development proposals will then be prepared to demonstrate changes, if any, on the key views of the development.

11.10 The analysis of visual effects will include those during the construction phase, on completion of the development and 20 years after the date of completion and would be supported by visually verified images.

11.11 Effects will be determined on local views (within 2km), medium views (2-5km) and long distance views (over 5km), taking into account the sensitivity of the location, the magnitude of the effect and the number of receptors affected.
12.0 WASTE MANAGEMENT

**Lead Consultant**

12.1 The lead consultant addressing issues of waste management will be Waterman Environmental.

**Preliminary Scoping**

12.2 A review of the existing waste outputs and the Bedfordshire and Luton Waste Strategy (2001) and the Bedfordshire and Luton Joint Minerals and Waste Local Plan (Adopted 2005) will be undertaken to establish a baseline position regarding waste outputs and disposal.

**Issues to be Considered**

12.3 The following issues will be considered in the waste management chapter of the Environmental Statement:

- identification of existing and proposed waste streams associated with demolition/construction and the operational development;
- the need for a waste management strategy relating to construction and operational phases of the proposed development;
- potential strategies for minimising waste generated and maximising the recycling of waste.

**Approach**

12.4 A desk top review of existing policy at a national, regional and local level will be undertaken to demonstrate that the proposal conforms with existing guidance and identify potential waste streams. An assessment of the likely waste generation of the development will be undertaken.

12.5 A waste management strategy will be developed in accordance with the Local Authority and the necessary statutory bodies to establish methods of storage, collection and handling of the numerous types of waste generated by the development.

12.6 This strategy will include measures to reduce the amount of waste the development generates and provision of facilities for recycling of waste.
13.0 SERVICES AND UTILITIES

Lead Consultant
13.1 The lead consultant addressing issues of services and utilities will be Waterman Gore.

Preliminary Scoping
13.2 A review of statutory undertakers’ existing records will be undertaken to establish a baseline condition regarding provision of gas, water, electricity and telecommunications networks.

13.3 It is considered likely that the existing utility networks serving the Vauxhall Motors plant will have a large capacity which could be transferred to the proposed development.

Issues to be Considered
13.4 The following issues will be addressed in the chapter regarding services and utilities:
   - capacity of existing services;
   - networks of existing utilities and services;
   - possible energy/water saving techniques;
   - the need to modify existing systems to sustain the proposed development; and
   - the possibility of incorporating CHP within the scheme.

Approach
13.5 Assessment of the existing services and utilities strategy for the Luton area will be undertaken to ascertain the current state of the infrastructure. This will be used in conjunction with information gathered from liaison with relevant statutory undertakers to establish a baseline capacity.

13.6 An assessment of potential effects generated by the proposals will be made in accordance with published standards and guidance.

13.7 Techniques for water and energy conservation and sustainable energy generation will be evaluated and incorporated into the proposal where appropriate to do so.
14.0 SOCIO-ECONOMIC ISSUES

Lead Consultant
14.1 The lead consultant who will address the socio economic issues will be David Lock Associates.

Preliminary Scoping
14.2 This section will focus in particular on demography, land use and property, the economy, community facilities and recreation opportunities.

14.3 Preliminary surveys will be undertaken to establish broad economic patterns, capacity of existing facilities such as schools and health centres and local housing need within Luton. These will focus upon the impact of the closure of the Vaux Motors Plant on the local economy.

Issues to be Considered
14.4 The following socio economic issues will be considered in this chapter:
- the balance between employment and housing development;
- the provision of affordable housing;
- the likely impact on existing services and facilities within the area; and
- the need for provision of new facilities.

Approach
14.5 A full assessment will be made of the baseline socio economic conditions within Luton, the site itself and the surrounding wards. This will include:
- housing need, patterns of settlement;
- state of the economy, deprivation and employment patterns;
- access and proximity to community, sports and recreation facilities;
- capacity of education and health services.

14.6 Effects will be assessed on a qualitative basis by assessing the demand for additional facilities within the framework of existing services. A strategy will be established for extra provision of facilities, if required.
15.0 ECOLOGY/ARCHAEOLOGY

15.1 Following initial assessments of the Kimpton Road site, it is apparent that the issues of ecology and archaeology are not significant. As such, it is considered that they will not form part of the formal assessment of impacts within the Environmental Statement.

15.2 However, desk based assessments will be undertaken to establish the exact nature of the site’s ecology and archaeology. These will form part of the appendices of the Environmental Statement. A more extensive description of the works to be undertaken is outlined in the appendices of this scoping report.
16.0 CONCLUSION

16.1 This report has outlined the scope of the Environmental Statement for the proposed development at the Kimpton Road site, Luton in accordance with the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999.

16.2 The topics to be covered within the Environmental Statement have been established, in response to consideration of the likely anticipated impacts associated with the development. It is considered that a full and comprehensive Environmental Statement will be prepared which will consider and mitigate against the potential impacts resulting from the proposed development.
APPENDICES

Appendix 1 – Site Location Plan
Appendix 2 – Scope of Ecological Report
Appendix 3 – Scope of Archaeological Report
Appendix 1 - Site Location Plan
Appendix 2 – Scope of Ecological Report

Lead Consultant
The lead consultant addressing ecological issues will be Chris Down.

Preliminary Scoping
The application site is currently predominantly hard surfaced or built over, with less than 2% of the development area in ‘green’ condition.

An initial site survey has disclosed that there is little or no vegetation on the site and few species of flora and fauna, none of which enjoy legal protection. Furthermore, there are no legally protected habitats within the development area.

Issues to be Considered
The following issues will be considered as part of the ecological assessment:
- existing ecological habitats;
- potential impacts of development; and
- need for enhancement/mitigation measures.

Approach
A review of existing data from the Bedfordshire and Luton Biodiversity Recording and Monitoring Centre will be undertaken, followed by liaison with statutory and voluntary third parties and a bat survey.

Based on the above inquiries, an assessment of the site’s wildlife merits will be made according to English Nature approved criteria which considers protected and rare species. A comparison with relevant local County Wildlife Site habitats will be undertaken. These assessments will be performed in the light of relevant legislation and guidance.

If, as expected, no wildlife impediment to redevelopment is disclosed, no mitigation of impacts will be required. However, an assessment will be made of the impact of the construction phase and an identification of opportunities for wildlife gain within the scheme.
Appendix 3 – Scope of Archaeology Report

Lead Consultant
The lead consultant addressing archaeological issues will be Waterman Environmental.

Preliminary Scoping
The historical use of the site for industrial and manufacturing purposes indicates that it is unlikely that any features of archaeological or historic interest have existed or have been retained on site.

Issues to be Considered
The following issues will be considered by the archaeology report:
- location and condition of any existing archaeological features;
- potential impact of the development; and
- the need for mitigation measures.

Approach
A desk based assessment of the site will be undertaken involving the analysis of historic maps, aerial photographs, site topography and geology and use of the Sites and Monuments Record.

Following the desk based analysis a walk over survey of the site will be completed to verify the results of the collected data.

Having established the archaeological status of the site, consideration will be given to the impact of the development and potential mitigation / enhancement measures.