



Local Plan 2035
Planning for the future

**DEVELOPMENT STRATEGY AND SITE
SELECTION METHODOLOGY**

APRIL 2017



Your Borough: Planning for the future

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1 Introduction and background

- 1.1 The purpose of this paper is to consider a development strategy for the purposes of public consultation ahead of drafting the Local Plan 2035. The development strategy defines the roles that the urban area of Bedford / Kempston, the villages and other settlements will fulfil in creating a sustainable borough. This includes the role of a potential new settlement or settlements.
- 1.2 The strategy that has guided development for the past ten years or so was set at a regional level by the East of England Plan, 2008 and the Milton Keynes South Midlands Sub-Regional Strategy, 2005. These established the level of development required, split between a 'Growth Area' (Bedford, Kempston and the northern Marston Vale) and the rest of the borough. The Council's Core Strategy and Rural Issues Plan, 2008 provided a greater level of detail to this broad strategy. It defined the extent of the Growth Area, identified key service centres which would be the focus for development outside of the urban area, and set out the circumstances where development would be allowed in the rest of the borough – the 'Rural Policy Area'.
- 1.3 The Localism Act 2011 led to the revocation of regional level plans and the Council is now responsible for considering local needs and setting its own targets for growth and development. This gives the opportunity to take greater account of local needs, opportunities and aspirations for development and positive change. Through the local plan's development strategy, the borough will be able to become more self-reliant and have more control over the way it meets local needs. Existing strengths can be built on, weaknesses addressed and distinctive roles for different places supported.

2 Previous consultations

- 2.1 In thinking about a new development strategy for the Local Plan 2035 the Council has previously undertaken two public consultations.

Issues and Options paper consultation 2014

- 2.2 In 2014 the Council invited comments on the main issues facing the borough that need to be taken into account in a new local plan. This 2014 Issues and Options consultation specifically looked at both the amount of growth that was needed and how it should be distributed. At that time the end-date of the plan was assumed to be 2032.
- 2.3 Using the information that was available at the time produced by the Council's consultants¹, the 2014 Issues and Options paper estimated a starting point for the amount of housing growth that the local plan would need to provide. This was in the form of five options either side of a mid-point range estimate. Taking account of the number of new dwellings already planned or completed, these options for the number of dwellings to be allocated in the local plan for the period 2012 – 2032 varied from 940 to 3,860. In addition, employment growth would be required in balance with the housing growth. The 2014 Issues and Options paper assumed that employment sites already planned would meet much of this need but land for at least 3,000 new jobs would be required. In the case of both housing and employment it was recognised that further work was needed before the figures could be finalised.
- 2.4 In relation to the distribution of this growth, the 2014 Issues and Options paper considered five options. The consultation paper also made clear that a combination of these five or some other option may be appropriate and that the final strategy would also depend on suitable sites being made available for development by landowners.

¹ Bedford Borough Demographic Forecasts 2012-2032, Edge Analytics

Table 1: Summary of 2014 options for the distribution of growth

Option	Summary
Option 1 – Continue the current approach	<ul style="list-style-type: none"> • Growth area remains as currently defined and continues to accommodate majority of growth. • Limited development in the remaining rural area, mostly village infilling. • Development in open countryside restricted in line with government policy.
Option 2 – Expanded growth area	<ul style="list-style-type: none"> • Existing growth area would expand through urban extensions and development adjoining the existing growth area. • Limited development in the remaining rural area, mostly village infilling. • Development in open countryside restricted in line with government policy.
Option 3 – Expanded growth area plus some rural growth	<ul style="list-style-type: none"> • Growth area as option 2. • More growth allowed in the larger villages than in smaller settlements. • Development in open countryside restricted in line with government policy.
Option 4 – Existing growth area plus new rural growth points	<ul style="list-style-type: none"> • Growth area similar to option 1 but with less growth than option 1. • Some growth also to be focussed on a limited number of new rural growth points. • Development in the rest of the borough limited to infilling in existing villages. • Development in open countryside restricted in line with government policy.
Option 5 – Spread development around existing settlements	<ul style="list-style-type: none"> • Abandon concentration of development in the growth area. • Allocate development to settlements according to their size (about two thirds to the urban area and one third to rural villages). • Development in open countryside restricted in line with government policy.

2.5 In line with the Planning and Compulsory Purchase Act 2004 and to meet the requirements of the EU Strategic Environmental Assessment Directive, the Council undertook a sustainability appraisal of the 2014 Issues and Options paper. The results of the sustainability appraisal were published alongside the paper to help the public in responding to the consultation.

- 2.6 In relation to the amount of growth, the sustainability appraisal found that higher growth levels were likely to involve a greater use of natural resources and greater greenfield land-take than lower growth levels. In addition, they were more likely to increase pressures on wildlife, habitats and landscapes. However, higher growth levels would have significantly greater potential to support the delivery of new homes, infrastructure, services and facilities and help support strong local economic growth.
- 2.7 In relation to the options for distributing growth, the sustainability appraisal found that options that concentrated growth (options 1 and 2) were more likely to increase accessibility to services and facilities, whilst reducing the need to travel and encourage sustainable modes of travel. They were also less likely to increase pressures on wildlife, habitats and landscapes. They would preserve the existing rural character of existing villages beyond the growth area. However they restricted choice for developers, investors and home buyers, whilst further increasing development pressure in locations that had already absorbed substantial growth.
- 2.8 Conversely, those options that additionally directed development to the rural areas (options 3 and 5) were more likely to increase the need to travel and risked placing housing in locations which may reduce its ability to help sustain existing services and could involve extensive new infrastructure. However, these options would make a greater contribution to reducing inequalities between the urban and rural parts of the borough than options 1 and 2.
- 2.9 The creation of a limited number of new villages or settlements (option 4) involved the greatest risk for affecting sensitive landscapes. In addition, this option was likely to involve the greatest level of greenfield land-take and require significant infrastructure provision in new settlements.
- 2.10 As a result of the 2014 Issues and Options consultation, the Council received 111 comments in relation to the strategy for distributing growth. The largest proportion of respondents (42%) preferred option 5. The number of respondents preferring individual other options was much lower, and was slightly higher for options 1 and 3 (16% for each option) than for options 2 and 4 (13% for each option).

Further Issues and Options paper consultation 2015

- 2.11 Subsequent to the Issues and Options consultation in 2014 the Office of National Statistics published the 2012 sub-national population projections and the 2012-based household forecasts. The Council's consultants were therefore able to update the initial demographic work. As a result it was possible to calculate a revised figure for the number of dwellings and jobs that should be included in the local plan to meet the borough's housing and employment needs². The end-date of the plan was still assumed to be 2032.
- 2.12 The assessed level of housing need to 2032 was now 17,367 dwellings. Taking account of the number of new dwellings already planned or completed since 2012 (the start of the plan period), the local plan now needed to find sites for at least 4,521 dwellings. In addition, employment growth would be required in balance with the housing growth. As a gross figure 15,500 additional jobs were needed between 2012 and 2032, although once existing commitments were taken into account, the additional land required to provide those jobs was not expected to be significant. Nevertheless, the total amount of growth was greater than originally anticipated in the 2014 Issues and Options paper consultation.
- 2.13 A draft Development Strategy and Site Selection Methodology technical paper was published to support the 2015 consultation. This included an analysis that took account of the 344 sites that were potentially available for development, ie the sites that had been submitted for consideration through the 2014 call for sites process by landowners and other interested parties. The analysis undertook an integrated assessment of the five development strategy options, taking account of the information gathered since the 2014 Issues and Options paper consultation. This analysis considered sustainability appraisal criteria and deliverability criteria (including existing commitments, site size and type, viability, flexibility, and infrastructure opportunities or constraints). The results of this exercise emphasised that no one option was without its drawbacks and each had some advantages. However, it was apparent that none of the options was deliverable because of the distribution of available sites. As a result there was a need to evolve a new sixth option which took advantage of the best aspects of options one to five, whilst trying to avoid the difficulties of delivery that had been identified. The sixth option could also take account of the higher level of growth that was now required.

² Objectively Assessed Need for Bedford, ORS; Bedford Economy and Employment Study, GVA

- 2.14 This new sixth option considered the relative sustainability of alternative locations for growth in terms of the availability of employment, services and other community facilities. The urban area of Bedford / Kempston was recognised as the most sustainable location in the borough as it contains the greatest range of employment opportunities together with services, leisure, social and community facilities. Their concentration reduces the need to travel and, where travel is necessary, increases the likelihood of this being by walking or cycling. It also increases the viability of public transport. Beyond the urban area, taking account of technical work on the settlement hierarchy, four levels of settlement were identified. Group 1 villages are those that contain a good range of services and are well connected to larger town centres by regular public transport. Six Group 1 villages were identified – Bromham, Clapham, Great Barford, Sharnbrook, Wilstead and Wootton. Group 2 and 3 villages have fewer facilities. Group 4 settlements have few or no facilities and, furthermore are made up of more loose knit development and therefore do not have a defined settlement policy area. Using this information would suggest that the first choice for allocating growth should be sustainable locations in and around the urban area. Remaining growth should be distributed between the Group 1, Group 2 and Group 3 villages to reflect their relative sustainability: most in the Group 1 villages and least in the Group 3 villages.
- 2.15 In addition to the sustainability of location, the new sixth option aimed to avoid prejudicing the delivery of existing committed sites (i.e. those with planning permission or allocated in previous plans). Much of the supply of committed residential development comes from large and complex sites which take a long time to build-out. This is particularly important for the villages within the existing growth area which have significant development sites already. Additional supply in such areas is unlikely to be easily deliverable. Furthermore, it was recognised that it would be beneficial to allow the newly created and expanded communities to mature before introducing further change. This would suggest that growth in Wootton, Shortstown, Wixams and Stewartby should be limited until after current commitments have been completed. For employment development there are benefits from being located near to primary route corridors because of the attractiveness of good transport links, particularly locations that benefit from new and improving east – west links as well as north – south links.
- 2.16 The option recognised that some villages have experienced the loss of vital services such as shops and pubs in recent years. Changing the current strategy of restraint in the rural policy area could increase the population and change the age profile of rural villages. An increase in activity and spending power would support existing vulnerable village services and facilities, and possibly lead to new provision. Furthermore, larger developments would be likely to bring with them a range of types and sizes of housing, which would provide more choice for existing residents wanting to stay within a village but down-size; a comment made by many people in response to the 2014 consultation.

2.17 Furthermore, the option recognised the constraints of infrastructure. Existing infrastructure may not be capable of expansion e.g. difficulty in expanding an existing school building because of lack of space. In these cases it may be necessary to either prevent new development totally or limit it to a scale that expanded facilities can provide for. Restricting the amount of development to reflect the limits of existing or expanded infrastructure could mean that the borough fails to plan adequately for its needs. Another alternative therefore is to allocate development sites sufficient in scale to accommodate new schools (or other community infrastructure). There is very little capacity in the borough's existing lower/primary schools and any chosen development strategy needs to plan for the additional provision necessary. An initial analysis of the current school situation and current planned dwelling commitments enabled dwelling capacity ranges to be developed with existing limitations and opportunities in mind. Based on recent analysis³, in Bedford borough, each additional 500 dwellings will generate the need for an additional form of school entry (i.e. 30 pupils in each year) and 1,000 dwellings will generate the need for two forms of school entry.

2.18 Having taken account of all these factors, together with the updated level of objectively assessed needs, the revised development strategy produced for public consultation was as follows.

Table 2: Spatial roles of locations and amount of development

Location	Role	Implications	Amount of development
Bedford / Kempston urban area <ul style="list-style-type: none"> • Within urban area • Extensions to urban area 	To provide the focus for regeneration within the urban area and growth in housing, employment, retail	The first choice location for sites for new housing, employment, retail and leisure development with preference being given to sites within the existing urban area of Bedford / Kempston. In particular the Kingsway area (Kings Quarter) provides an opportunity for significant regeneration. Main location for strategic facilities and for infrastructure investment, including improved transport choice.	Around 1,500 dwellings

³ Education Implications for Local Plan 2035 (April 2017), Bedford Borough Council.

<p>Group 1 Villages – Key Service Centres</p> <ul style="list-style-type: none"> • Bromham, Clapham, Great Barford, Sharnbrook, Wilstead, Wootton • + Eastcotts (Cotton End / Shortstown) and Wixams (following further committed growth) 	<p>To provide a focus for further growth, primarily in housing and to provide a strong service role for the local community and surrounding area.</p>	<p>The scale of development at individual villages will be related to development opportunities, the current and potential capacity of infrastructure and services, and the character of the village.</p> <p>Improved infrastructure and transport links where appropriate.</p> <p>Development in Wootton will be later in the plan period post 2025.</p>	<table border="0"> <tr><td>Bromham</td><td>400-500</td></tr> <tr><td>Clapham</td><td>800-900</td></tr> <tr><td>Eastcotts</td><td>200-300</td></tr> <tr><td>Gt Barford</td><td>400-500</td></tr> <tr><td>Sharnbrook</td><td>75-100</td></tr> <tr><td>Wilstead</td><td>75-100</td></tr> <tr><td>Wixams</td><td>0</td></tr> <tr><td>Wootton</td><td>250-350</td></tr> <tr><td>Total</td><td>2,200-2,750</td></tr> </table>	Bromham	400-500	Clapham	800-900	Eastcotts	200-300	Gt Barford	400-500	Sharnbrook	75-100	Wilstead	75-100	Wixams	0	Wootton	250-350	Total	2,200-2,750
Bromham	400-500																				
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Total	2,200-2,750																				
<p>Group 2 Villages – Rural Service Centres</p> <ul style="list-style-type: none"> • Carlton, Harrod, Oakley, Riseley, Roxton, Stewartby, Turvey, Willington, Wyboston 	<p>To provide growth opportunities and a more localised convenience and service role to meet day to day needs of residents and businesses in the rural areas.</p>	<p>The scale of development at individual villages and its contribution to meeting the borough’s development requirement will be related to development opportunities, the current and potential capacity of infrastructure and services, and the character of the village.</p>	<p>50-150 (average 100) per village</p> <p>Total 450 – 1,350 (mid-point 900)</p>																		
<p>Group 3 Villages – remaining villages with a defined SPA*</p> <ul style="list-style-type: none"> • Bletsoe, Cardington, Colmworth, Cople, Felmersham, Little Staughton, Milton Ernest, Odell, Pavenham, 	<p>Limited development.</p>	<p>The scale of development in individual villages and its contribution to meeting the borough’s development requirement will be related to development opportunities. It will be dependent upon the form, character and setting of the village and its proximity to larger villages and their services.</p>	<p>10-20 (average 15) per village</p> <p>Total 220 – 440 (mid-point 330)</p>																		

<p>Podington, Ravensden Church End, Renhold Salph End, Renhold Green End, Souldrop, Stagsden, Stevington, Swineshead, Thurleigh, Upper Dean, Wilden, Wymington, Yelden.</p>			
<p>Open countryside, including individual dwellings and settlements without a defined SPA* in the countryside</p>	<p>To provide a green setting for the network of villages and support the borough's self- reliance and resilience through food production, biodiversity resources, leisure and tourism. Very limited development to meet locally identified needs.</p>	<p>Development will be carefully managed to safeguard the intrinsic character and beauty of the countryside.</p> <p>Development is likely to be limited to 'rural exceptions' affordable housing schemes and replacement dwellings.</p> <p>Support for agricultural and forestry enterprises and other appropriate rural businesses. Opportunities for diversification including the re-use of buildings and new tourism and recreation activities. Opportunities will be taken to enhance the network of green infrastructure that provides an essential biodiversity and recreational resource.</p>	
			<p>Total 4,370– 6,040 (mid-point 5,205)</p>

*Settlement policy area (SPA)

- 2.19 This aimed to make best use of brownfield sites within the existing urban area, for example through the re-use of existing unused or underused employment land for housing, together with sites on the edge of Bedford which were considered to have a good relationship with existing communities and appropriate accessibility to supporting infrastructure. The next priority was the Group 1 villages, with growth apportioned having regard to the capacity of available sites and access to supporting infrastructure, taking account of school capacity, potential for school expansion and opportunities for the provision of new schools. The amount allocated to each Group 2 and 3 village was expected to vary and the final amount for each village was not calculated. In all cases figures were expressed as a range as individual sites had not yet been fully assessed. This was also why the total amount of development proposed exceeded the assessed level of need for additional dwellings at this stage.
- 2.20 In line with the Planning and Compulsory Purchase Act 2004 and to meet the requirements of the EU Strategic Environmental Assessment Directive, the Council undertook a sustainability appraisal of the revised development strategy as set out in the further Issues and Options paper 2015. The results of the sustainability appraisal were published alongside the paper to help the public in responding to the consultation.
- 2.21 In relation to the amount of growth, a similar conclusion was drawn to that noted in the sustainability appraisal of the 2014 Issues and Option paper. The higher level of growth is likely to require a greater use of natural resources and greater greenfield land-take than lower growth levels. In addition, it is more likely to increase pressures on wildlife, habitats and landscapes. However, the high growth level has significantly greater potential to support the delivery of new homes, infrastructure, services and facilities, and help support strong local economic growth.
- 2.22 In relation to the options for distributing growth, the sustainability appraisal found that, although the new strategy option will prioritise new development within and adjoining the urban area, a lack of suitable sites means that it is likely to require the development of open land adjoining rural villages and therefore could potentially affect habitats, species and natural features. It could also result in more commuting by car and therefore increase emissions from transport. However it could encourage walking and cycling within existing settlements if development includes improved infrastructure. It could also make rural public transport increasingly viable. The option is likely to make a positive contribution to economic growth and job creation, supporting the urban area and town centre, but also strengthening rural economies. It should help to reduce deprivation in

terms of health, income, skills and unemployment in the urban area as well as increasing access to essential services in the rural area. A number of recommendations for mitigation measures to be included in detailed policy were made.

2.23 As part of the public consultation a further invitation was given to landowners and other interested parties to propose additional sites that could be considered for inclusion in the local plan. This specifically referred to the submission of new settlement proposals because the Council was keen to look at longer term growth options. It was recognised that this, together with the views of the public on the draft strategy, would influence the final development strategy of the local plan.

3 Information since the further Issues and Options paper consultation 2015

- 3.1 Public consultation on the revised development strategy, as set out in the further Issues and Option paper and draft Development Strategy and Site Selection Methodology technical paper, resulted in a large number of comments. There was support for the general approach of focusing development in the most sustainable locations, that is, in and around the urban area and Group 1 villages before other settlements. However maintaining the individual identity of settlements was seen as important and coalescence between settlements should be prevented. There was concern that too much development would undermine rural character if concentrated in only a few villages and it may be better for development to be shared between a range of settlements. It was recognised that some development would bring benefits to rural communities and help support village services and facilities although there was concern about the sufficiency of infrastructure. There was general support for the idea that new settlements might help to meet development needs.
- 3.2 In response to the further 'call for sites' the Council received details of about an additional 290 potential development sites (although some of these were duplicates of sites that had been submitted previously). Several of these were for large-scale developments of over 1,000 dwellings and of these, four offered the opportunity for a stand-alone new settlement i.e they could provide (or had the potential to provide) 4,000+ new homes and form a new focus for growth. Further detail of this assessment is given in the technical paper "New Settlements Assessment Framework Methodology and Initial Site Assessment". The option of a new settlement had been previously proposed as part of the Issues and Options paper consultation 2014. However this was not taken forward because the option was not deliverable: no credible potential new rural growth points were available at the time as none had been put forward for consideration. Now that realistic proposals have been submitted for consideration, the merits of a new settlement as part of a development strategy require investigation. The National Planning Policy Framework suggests that the supply of new homes can sometimes be best achieved through planning for larger scale development such as new settlements or extension to existing villages and towns that follow the principles of Garden Cities.
- 3.3 The four sites which potentially could form stand-alone new settlements are: Lee Farm near Sharnbrook, Thurleigh Airfield, Twinwoods near Milton Ernest and Wyboston Garden Village. In summary they range from 4,000 to 6,000 dwellings in size. Each of them includes an element of employment provision and a range of other uses, including primary and secondary schools, open spaces and community facilities. The new settlement proposals are being assessed on the basis of

deliverability (including viability), physical limitations, physical impacts, effect on existing rights of way and adequacy of highways access. No decision has yet been made on which, if any, new settlement proposal should be included in the local plan because of the need for in depth investigation as part of the assessment process. The assessment process is ongoing and a number of issues have come to light which require further investigation. Although some of these issues are serious impediments to delivery, in most cases it is clear that potential solutions could be found. It is therefore a reasonable assumption that a new settlement or settlements could be developed as part of the local plan, subject to significant infrastructure investment, and should be included in the preferred strategy. If subsequent investigations prove that the proposed new settlement option cannot be delivered, then the development strategy would have to be amended before the local plan is submitted to the Secretary of State for examination.

- 3.4 The inclusion of a new settlement or settlements in the preferred development strategy would go some way towards helping meet the higher level of growth needed. However, the ability of the Council to meet its five year land supply requirements must also be considered. If the Council cannot show at any given point in time that five years' worth of completions can be achieved then it is likely that planning permissions would be granted on appeal by the Planning Inspectorate to boost the supply of new housing. Such housing developments would be additional to those in the local plan strategy. Therefore a local plan strategy relying only on a new settlement for the additional capacity needed to achieve objectively assessed need would not be effective at delivering development across the plan period. This is because experience shows that a new settlement is unlikely to have started on site until eight or more years after plan adoption and it would not be completed within the plan period. As a result, along with a strategy that includes a new settlement or settlements, there would be a need for a number of allocated development sites that will show completions in the earlier years after adoption to ensure that a five year land supply is maintained throughout the plan period.
- 3.5 One implication of the response to the further 'call for sites' is that more time is required to assess the additional sites and particularly the new settlement proposals for which a more complex assessment process is required. Furthermore it was decided that, if there is a possibility that new settlements are to be included in the plan, there should be a period of targeted public consultation on the proposals and the effect of new settlements on the development strategy before the local plan is drafted. Also since the 2015 consultation, updated national population data have been published (the 2014 based sub-national population projections). These have implications for the number of dwellings that must be allocated in the local plan and mean that the calculation of the borough's housing need now must be updated. At the same time it was decided to amend the plan period from 2012-2032 to 2015-2035 in order to ensure that the local plan covers the full 15-year time horizon

from adoption expected by the National Planning Policy Framework. Using this revised plan period, the assessed level of housing need to 2035 is now 19,000 dwellings⁴. However, taking account of the number of new dwellings already planned or completed since 2015 (the start of the plan period), the local plan needs to find sites for at least 8,103 dwellings. This amount of growth is greater than originally anticipated in the previous Issues and Options paper consultations as discussed in paragraphs 2.11 and 2.12 above. The updated objective assessment of need does not however increase the requirement for employment land because the amount of land already committed is sufficient to absorb any additional jobs generated.

3.6 As part of the Issues and Options paper consultation 2015, a large number of comments were received on the technical work undertaken to establish a settlement hierarchy. The settlement hierarchy examines the degree of accessibility to transport, services and community facilities of individual settlements in the borough and is one of the factors used to help decide where development should be located. The main issues raised in response to the consultation were:

- The range of sustainability criteria considered is too narrow and should take account of other things such as population, employment and peak time return bus journeys.
- The weighting given to some facilities/services is inappropriate.
- The split between the different groups is in the wrong place and therefore some settlements are in the wrong group.
- Some groups with settlement policy areas are in Group 3 even though their scores are lower than some settlements in Group 4 (those without settlement policy areas).

3.7 Following further work, a number of refinements have been made to the methodology and this has resulted in some changes to the position of settlements in the hierarchy. Details of these changes are given in the revised Rural Settlement Hierarchy technical paper.

⁴ Bedford Strategic Housing Market Assessment Update 2016

4 Moving towards a preferred development strategy

- 4.1 In moving towards a preferred development strategy for the local plan a number of new factors now need to be taken into account as discussed above. These include:
- Feedback as a result of public consultation.
 - Additional sites submitted for consideration (including the four new settlement proposals).
 - The revised timescale for the local plan and resultant revised objectively assessed need for growth.
 - The rural settlement hierarchy as refined.
- 4.2 The previous section outlined the four new settlement proposals that are now being evaluated and could form part of the preferred development strategy. As a result of the long lead-in time that must be allowed before a new settlement (or settlements) delivers development, it has to be assumed that the contribution to meeting assessed need within the plan period would be limited to 2,200 dwellings, the remainder being delivered beyond the plan period.
- 4.3 In addition to the new settlement proposals, of particular note when considering the available sites is a large brownfield opportunity at Stewartby which represents a substantial opportunity. Re-using previously developed sites is encouraged by the National Planning Policy Framework and is an effective way of dealing with unsightly or polluted land. The former Stewartby brickworks site has been unused since it closed in 2008. It is a brownfield site of about 52 hectares and has good transport links as it lies either side of the Bedford to Bletchley railway line and is close to the A421. Ideas for its future use have included employment as well as housing development. However the site also represents an important reminder of the heritage of the Marston Vale brickmaking industry. The surviving chimneys and kilns are protected from unauthorised demolition because of their historical importance, however they are likely to deteriorate unless a way can be found of securing their future. The Government encourages the effective use of land by re-using previously developed (brownfield) land and is expected to introduce targets to secure the redevelopment of brownfield sites. Development of the site would require remediation works and infrastructure improvements. Together, these significant costs have delayed its redevelopment in the past. The site could provide a strategic development opportunity of up to about 1,000 dwellings provided that the heritage issues can be resolved. The previous draft development strategy did not take account of such 'one off' opportunities, however the principle of using brownfield sites before greenfield sites was supported by respondents to the Issues and Options paper

consultations in both 2014 and 2015 and is also generally acknowledged to be a more sustainable use of land. This therefore is a consideration that should be taken into account in the new development strategy.

- 4.4 The development strategy must decide the balance of development between a new settlement, the brownfield opportunity at Stewartby, sites within and adjoining the urban area, the Group 1 villages and the lower order settlements. This balance could be reached in a number of different ways and still achieve the required level of development need.
- 4.5 In generating potential options for consideration it is important to focus on sites that are suitable, available and deliverable. The Council has undertaken an initial assessment of the sites submitted for consideration using the site selection methodology (set out in Table 8 of section 6 below). Note that this does not include the new settlement proposals which have a separate assessment methodology. This initial assessment has enabled the Council to exclude a number of sites that are not likely to be suitable, available or deliverable.
- 4.6 Another consideration is whether the sites are able to deliver necessary infrastructure and services, such as schools, community facilities, roads and drainage. In relation to primary schools, unless the development is of a type that does not create a need for school places, we need to ensure that sufficient spaces are available in existing schools. In some locations, for example within parts of the rural area, the availability of school places does not represent a constraint to limited additional growth because existing schools have sufficient space or are capable of expansion. However, in other locations, in order to support growth, a new school or school extension may be needed. Proposed new primary schools could provide one form of entry (one class in every year group) but ideally would be a minimum of two forms of entry to facilitate delivery of a broad curriculum and efficient use of resources. Extensions to existing schools where possible should provide an additional whole form of entry. Based on recent analysis⁵, in Bedford borough each additional 500 dwellings will generate the need for an additional form of school entry (i.e. 30 pupils in each year) and 1,000 dwellings will generate the need for two forms of school entry. Community Infrastructure Levy contributions generated on this scale of development would generally speaking be sufficient to cover the cost of school building. This calculation takes account of the fact that 30% of housing allocated on larger sites may not contribute to the Community Infrastructure Levy (for example, affordable housing / starter homes) and some funding is directed to parish councils. The implication of this is that sites capable of providing around 500 or 1,000 homes would support delivery of new and expanded schools and minimise funding gaps. Where there is no school capacity

⁵ Education Implications for Local Plan 2035 (April 2017), Bedford Borough Council.

available sites must offer the provision of a school at an early stage of the development. In all cases the Council will require sites for new primary schools to be a minimum of two hectares in size, which will provide sufficient space to enable one form entry schools to expand to meet future needs.

- 4.7 Other information to take into account in generating potential options includes the amount of development already committed in an area. For example, the situation at Wixams, Wootton and Shortstown suggests that these villages should have no additional development at this time. In the case of Wixams there is still a significant amount of development to build out and space at planned schools is committed to serve new populations. Wootton has expanded significantly in recent years and development is soon to commence on another large site south of Fields Road. Similarly in Shortstown significant existing commitments remain to be built out.
- 4.8 When considering potential sites within and adjoining the urban area, the sustainability appraisal process has already showed that there are advantages of prioritising development in the urban area. It is here that land is used most efficiently, accessibility to employment, services and facilities is maximised, and hence the need to travel is minimised. These sustainability benefits mean that preference should be given to allocating deliverable sites within the urban area wherever possible. Extensions to the urban area can also be suitable locations if they have good accessibility and are well related to existing services and facilities within the urban area and necessary supporting infrastructure can be provided. However it will also be important to consider landscape impact and the distinctiveness of nearby villages. The Council's initial assessment of sites within and adjoining the urban area indicates that about 1,988 dwellings could be provided here.
- 4.9 In generating growth options, the larger villages that are shown to have greater access to transport, services and community facilities as identified in the Rural Settlement Hierarchy Scoring Methodology paper, are the most appropriate locations for rural growth. They are identified as Group 1 villages or Key Service Centres. It is therefore reasonable that they should take a substantial proportion of the remaining required growth, with less in the lower order villages. The need to ensure the availability of school places supports Group 1 village allocations of either 500 or 1,000 dwellings in order to facilitate the provision of a new school, or an additional form of entry to an existing school, (unless there is spare capacity in the existing school).
- 4.10 The contribution of sites from each Group 1 village is shown in Table 3 below, presented as a lower and higher growth option (based on one and two form primary school alternatives). Note that the figure for Sharnbrook is higher than for the other

villages as there is spare capacity in the existing primary school to support 100 dwellings. In principle the alternative of allocating only 100 dwellings here could also represent a further growth option.

Table 3: Group 1 villages potential growth

Group 1 village	Lower growth option	Higher growth option
Bromham	500	1000
Clapham	500	1000
Great Barford	500	1000
Sharnbrook	600	1100
Shortstown	0	0
Wilstead	500	1000
Wixams	0	0
Wootton	0	0
Total	2600	5100

- 4.11 In the Group 2 villages or Rural Service Centres, two alternative approaches can be considered when generating options. The lower growth option of 25- 50 dwellings takes account of the space currently available in existing primary schools, and proposes a modest level of growth based on the scale of the contribution those Group 2 villages with some school capacity could make to the overall dwelling numbers. This means that allocations should aim to provide about 50 additional homes and at least 25 each, provided that there is sufficient school capacity (unless development is of a type that does not generate a need for school places). This flexible target recognises that the Group 2 villages have different needs and opportunities for growth, and reflects the space available in existing primary schools. For the higher growth option, the need to ensure the availability of school places means that allocations need to be 500 dwellings in order to support the provision of a new school.
- 4.12 The contribution of sites from each Group 2 village is shown in Table 4 below. In the lower growth option, no allocation is proposed in villages where there is no capacity in primary schools to support further development (Stewartby and Willington). For the higher growth option, no allocation is proposed in villages where there are insufficient suitable development sites

available that could generate sufficient dwellings to support a new school (Harrold, Milton Ernest, Roxton and Stewartby). In addition, Stewartby is already receiving growth from the long-standing commitment of the Broadmead Road site which is currently under construction. Furthermore, the brownfield site opportunity of the brickworks site will result in growth towards the end of the period covered by the local plan.

Table 4: Group 2 villages potential growth

Group 2 Village	Lower growth option	Higher growth option
Carlton	25-50	500
Harrold	25-50	0
Milton Ernest	25-50	0
Oakley	25-50	500
Roxton	25-50	0
Stewartby	0	0
Turvey	25-50	500
Willington	0	500
Total	(mid point) 225	2000

4.13 The Council's preferred strategy is not to allocate growth in lower-order settlements (Group 3 and Group 4) through the local plan. This does not mean that no development can occur here, Parish Councils have powers to prepare their own Neighbourhood Plans and this means that they can allocate sites for development to provide opportunities for small-scale growth. Where Parish Councils choose not to prepare a Neighbourhood Plan that allocates sites for development, it is intended that the local plan will include a policy that allows small amounts of development if supported by the local community.

4.14 Table 5 below summarises the potential sources of growth that need to be balanced in the development strategy to achieve the required level of growth of at least 8,103 dwellings noted in paragraph 3.5 above.

Table 5: Growth option sources

Source	Potential growth – lower growth option	Potential growth – higher growth option
New settlement	2200	2200
Stewartby brickworks site	1000	1000
Within and adjoining urban area	1988	1988
Group 1 villages	2600	5100
Group 2 villages	225	2000
Total	8013	12288

- 4.15 Although the lower growth option is slightly below the required level of growth, this small difference could be made up once a more detailed assessment of individual site capacity is completed. Nevertheless, it is clear that the figure of 8,103 dwellings is likely to be achievable. However, there are various combinations that can meet the dwelling requirement. A large range of alternative option scenarios could be generated, for example: scenarios that include or don't include new settlements, scenarios that include or don't include the redevelopment of the Stewartby brickworks, and scenarios which involve lower or higher levels of growth in other locations. To ensure that all realistic scenarios are considered, more option scenarios than just those that exactly meet the level of growth required have been generated. This includes all scenarios that are able to deliver growth within 10% of the level of growth required (7,293 – 8,913 dwellings). Building in this flexibility takes account of any uncertainty in relation to the eventual capacity of individual sites. The potential option scenarios that have been generated are shown in Table 6 below.
- 4.16 When comparing the option scenarios it is clear that if a new settlement is not included, the only way to achieve the dwelling requirement is if the higher growth option is selected in the Group 1 or Group 2 villages. This is also the case if the Stewartby brickworks site is not included. However, if both a new settlement and the Stewartby brickworks site are included (in addition to development within and adjoining the urban area) then the lower growth option for the Group 1 villages is sufficient to achieve the dwelling requirement. Growth in the Group 2 villages is not essential to achieve the required number although it provides some flexibility and is likely to be beneficial in providing a wider choice of sites and therefore increasing the rate of delivery early in the plan period.

4.17 In order to inform the decision of which option scenario should form the basis of the local plan strategy the process of sustainability appraisal can be employed. This technique compares the effects of alternative options on a series of sustainability objectives. Sustainability appraisal is a requirement of the Planning and Compulsory Purchase Act 2004 and the EU Strategic Environmental Assessment Directive. The sustainability appraisal that accompanies this technical paper is set out in a separate document: the Second Addendum to Issues and Options Sustainability Appraisal, 2017. Table 6 below shows that there are twelve alternative scenarios that are realistically capable of meeting the level of growth required to meet assessed needs. These have been tested in the sustainability appraisal to identify their effects on sustainability objectives.

Table 6: Potential option scenarios

Option scenario	New settlement	Stewartby brickworks site	Within and adjoining urban area	Group 1 villages	Group 2 villages	Total dwellings	Option tested
1	2200	1000	1988	low growth 2600	low growth 225	8013	yes
2	2200	1000	1988	low growth 2600	high growth 2000	9788	no
3	2200	1000	1988	high growth 5100	low growth 225	10513	no
4	2200	1000	1988	high growth 5100	high growth 2000	12288	no
5	0	1000	1988	high growth 5100	low growth 225	8313	yes
6	0	1000	1988	high growth 5100	high growth 2000	10088	no
7	0	1000	1988	low growth 2600	low growth 225	5813	no
8	0	1000	1988	low growth 2600	high growth 2000	7588	yes
9	2200	0	1988	high growth 5100	low growth 225	9513	no
10	2200	0	1988	high growth 5100	high growth 2000	11288	no
11	2200	0	1988	low growth 2600	low growth 225	7013	no
12	2200	0	1988	low growth 2600	high growth 2000	8788	yes
13	2200	1000	0	high growth 5100	low growth 225	8525	yes
14	2200	1000	0	high growth 5100	high growth 2000	10300	no
15	2200	1000	0	low growth 2600	low growth 225	6025	no
16	2200	1000	0	low growth 2600	high growth 2000	7800	yes
17	2200	1000	1988	0	low growth 225	5413	no

Option scenario	New settlement	Stewartby brickworks site	Within and adjoining urban area	Group 1 villages	Group 2 villages	Total dwellings	Option tested
18	2200	1000	1988	0	high growth 2000	7188	no
19	0	0	1988	high growth 5100	low growth 225	7313	yes
20	0	0	1988	high growth 5100	high growth 2000	9088	no
21	0	0	1988	low growth 2600	low growth 225	4813	no
22	0	0	1988	low growth 2600	high growth 2000	6588	no
23	2200	0	0	high growth 5100	low growth 225	7525	yes
24	2200	0	0	high growth 5100	high growth 2000	9300	no
25	2200	0	0	low growth 2600	low growth 225	5025	no
26	2200	0	0	low growth 2600	high growth 2000	6800	no
27	0	1000	0	high growth 5100	low growth 225	6325	no
28	0	1000	0	high growth 5100	high growth 2000	8100	yes
29	0	1000	0	low growth 2600	low growth 225	3825	no
30	0	1000	0	low growth 2600	high growth 2000	5600	no
31	2200	0	1988	hybrid 3500	low growth 225	7913	yes
32	2200	0	1988	hybrid 3500	high growth 2000	9688	no
33	0	0	1988	hybrid 3500	high growth 2000	7488	yes
34	0	0	1988	hybrid 3500	low growth 225	5713	no
35	2200	0	0	hybrid 3500	high growth 2000	7700	yes
36	2200	0	0	hybrid 3500	low growth 225	5925	no

4.18 In relation to the alternative strategy option scenarios, the sustainability appraisal shows that distinct differences between options can be identified. Options which do not include growth in and around the urban area (options 13, 16, 23 and 35) perform least well, although option 28 is an exception to this rule: even though it does not include growth in and around the urban area, this is balanced by the effect of not including new settlements. Those options which do not include new settlements whilst including growth in and around the urban area (options 5, 8, 19 and 33) perform well, as does option 1 which includes growth in all locations. For several sustainability objectives the effect of all options is uncertain because it largely depends on the detailed location or design of development.

- 4.19 The sustainability appraisal also tested the revised figure for objectively assessed need in the strategy. The result of this not surprisingly is the same as that previously noted for both the sustainability appraisal of the 2014 Issues and Option paper and the 2015 sustainability appraisal first addendum. However, the higher level of growth can be expected to intensify the magnitude of likely effects.
- 4.20 In deciding the Council's preferred strategy for the local plan, options which perform best in sustainability testing do not necessarily have to be chosen, as there may be good reasons for choosing an alternative strategy. However, if an option that does not perform as well as others is chosen, the plan should mitigate the adverse effects that have been identified. The sustainability testing of potential option scenarios has shown that options that do not include new settlements perform well, as does the option which includes growth in all locations. There is little to choose between these options, however the Council has decided that the preferred strategy should include a new settlement (or settlements). This is because new settlements provide long-term certainty over the location of growth that extends beyond the plan period. They give the opportunity to build-in new infrastructure and create a new community without the difficulties of extending existing built-up areas. They also mean that less development has to take place in other locations. For these reasons the Council has decided that option 1, which includes development in each of the locations shown in the option scenarios, should be the preferred strategy. Choosing option 1 means that the lower growth option for Group 1 and Group 2 villages can be selected which would reduce the impacts of development on those villages whilst still meeting assessed needs. Including some growth in Group 2 villages also means that existing services and facilities can be supported.

5 Preferred development strategy for the local plan

5.1 For the local plan's preferred development strategy the roles of settlements are as set out in Table 7 below. Infrastructure investment and the distribution of new homes, jobs and other types of development will contribute to creating a well-connected network of settlements that together meet the needs of residents in the borough. The focus will be on:

- The creation of a new settlement or settlements that will provide a new focus for strategic growth.
- Regeneration of the large brownfield site opportunity at the former Stewartby brickworks site (subject to resolving concerns about the impact on historic buildings and structures, and the effect this might have on the viability of development).
- Regeneration in the urban area of Bedford and Kempston, together with sustainable urban extensions, with growth in housing, employment, retail and other facilities. This will include regeneration projects to create a vibrant and modern town centre while preserving the established character.
- Development in villages at a scale that takes account of existing commitments and infrastructure capacity / potential infrastructure capacity. Growth in the larger (Group 1) villages at the lower growth option level will provide primarily new homes but also services for the local community. Growth in the next size (Group 2) villages will be more limited to help support local services. Some development may also be appropriate in Group 3 and 4 settlements if needed and supported by the community.
- Maintaining a living, working countryside and improving the rural area's self-reliance by supporting opportunities to diversify the rural economy while conserving and enhancing the natural environment.

5.2 Taking account of the roles of settlements as set out in Table 7 below, together with the capacity of schools and other relevant factors as discussed above, it has been possible to derive a potential distribution of growth as a basis for public consultation. In terms of housing development, the amount of growth to be allocated is 8,103 dwellings. It is assumed that one or more new settlement will be developed out of the four that have been put forward and which are still subject to assessment. The new settlement(s) will provide about 2,200 dwellings within the plan period. It is furthermore assumed in the preferred strategy that the brownfield opportunity site at the former Stewartby brickworks will contribute 1,000 dwellings within the plan period. That leaves a requirement for a further 4,900 dwellings to be allocated to meet the assessed need for housing development. Much of this will need to be delivered in the earlier parts of the plan period in order to ensure that a five year supply of deliverable housing land is maintained.

- 5.3 In order to meet this figure, the preferred development strategy looks first for appropriate development capacity in the urban area as the sustainability appraisal has shown that this is the most sustainable location for development. It has the greatest range of employment opportunities together with services, leisure, social, cultural and community facilities. The best use will be made of any brownfield sites, for example through the re-use of existing unused or underused employment land for housing. Sites on the edge of Bedford will also be selected which will deliver high quality extensions to the urban area which are well connected to existing communities within the urban area and provide necessary supporting infrastructure. With this in mind, the Council's initial assessment estimates that sites in and around the urban area could deliver around 1,988 dwellings. The next priority is the Group 1 villages. Growth is apportioned having regard to the capacity of available sites and access to supporting infrastructure, including taking account of school capacity, potential for school expansion and opportunities for the provision of new schools to meet the lower growth option. For Group 2 villages a lower amount of development is proposed. The Council's initial assessment estimates that sites in and around Group 1 and 2 villages together could supply around 2,825 dwellings.
- 5.4 In relation to employment land and as noted previously, once existing commitments through planning permissions and existing as yet undeveloped plan allocations are taken into account, there is no clear need at present to allocate additional land specifically for business, industry or warehousing uses. As a result, the preferred strategy is not to allocate any additional land for such employment but to include a policy in the local plan setting out how the Council will deal with any proposals to develop new free-standing employment sites. This is likely to support developments that provide a genuinely new form and / or quality of employment development rather than duplicate existing undeveloped sites. New employment development should be located near to main roads, preferably re-using existing employment sites, and be in locations with good access by public transport, bicycle and on foot. In accordance with national government guidance, the preferred location for office development is the town centre. No additional employment development is specified in the table below. However it is recognised that any new settlement proposal would be likely to include an element of land for employment uses as part of a sustainable master plan.

Table 7: Spatial roles of locations and amount of development

Location	Role	Implications	Amount of housing development
New settlement(s) (precise location to be decided)	To provide a new focus for growth, primarily in housing, but also with employment and associated facilities to serve the new community	A new sustainable stand-alone growth point which will deliver a strategic level of growth, including employment, environmental and community infrastructure.	Between 4,000 and 6,000 dwellings in total however only 2,200 of these will be developed by 2035 2,200
Brownfield site opportunities	To regenerate underused land resources	Stewartby brickworks site	1,000
Bedford / Kempston urban area <ul style="list-style-type: none"> • Within urban area • Extensions to urban area 	To provide the focus for regeneration within the urban area and growth in housing, employment, retail	The first choice location for sites for new housing, employment, retail and leisure development with preference being given to sites within the existing urban area of Bedford / Kempston. In particular the Kingsway area (Kings Quarter) provides an opportunity for significant regeneration. Extensions to the urban area are proposed at Salph End and Gibraltar Corner with smaller extensions elsewhere. Main location for strategic facilities and for infrastructure investment, including improved transport choice.	Within urban area 877 Extensions 1,111 Total 1,988
Group 1 villages – Key Service Centres <ul style="list-style-type: none"> • Bromham, Clapham, Great Barford, 	To provide a focus for further growth, primarily in	Development at individual villages and its contribution to meeting the borough’s requirements will be related to opportunities, the current and potential capacity of infrastructure and services, and the character of the village.	Bromham 500 Clapham 500 Gt Barford 500 Sharnbrook 600

<p>Sharnbrook, Wilstead, Wootton</p> <ul style="list-style-type: none"> + Shortstown and Wixams (following further committed growth) 	<p>housing and to provide a strong service role for the local community and surrounding area.</p>	<p>Development may be allocated in a Neighbourhood Plan.</p> <p>Improved infrastructure and transport links where appropriate.</p>	<table border="0"> <tr> <td>Shortstown</td> <td>0</td> </tr> <tr> <td>Wilstead</td> <td>500</td> </tr> <tr> <td>Wixams</td> <td>0</td> </tr> <tr> <td>Wootton</td> <td>0</td> </tr> <tr> <td>Total</td> <td>2,600</td> </tr> </table>	Shortstown	0	Wilstead	500	Wixams	0	Wootton	0	Total	2,600								
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Wilstead	500																				
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Total	2,600																				
<p>Group 2 villages – Rural Service Centres</p> <ul style="list-style-type: none"> Carlton, Harrold, Milton Ernest, Oakley, Roxton, Stewartby, Turvey, Willington 	<p>To provide growth opportunities and a more localised convenience and service role to meet day to day needs of residents and businesses in the rural areas.</p>	<p>Development at individual villages and its contribution to meeting the borough’s requirements will be related to opportunities, the current and potential capacity of infrastructure and services, and the character of the village.</p> <p>Development may be allocated in a Neighbourhood Plan.</p>	<table border="0"> <tr> <td>Carlton</td> <td>25-50</td> </tr> <tr> <td>Harrold</td> <td>25-50</td> </tr> <tr> <td>Milton Ernest</td> <td>25-50</td> </tr> <tr> <td>Oakley</td> <td>25-50</td> </tr> <tr> <td>Roxton</td> <td>25-50</td> </tr> <tr> <td>Stewartby</td> <td>0</td> </tr> <tr> <td>Turvey</td> <td>25-50</td> </tr> <tr> <td>Willington</td> <td>0</td> </tr> <tr> <td>Total (mid point)</td> <td>225</td> </tr> </table>	Carlton	25-50	Harrold	25-50	Milton Ernest	25-50	Oakley	25-50	Roxton	25-50	Stewartby	0	Turvey	25-50	Willington	0	Total (mid point)	225
Carlton	25-50																				
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Total (mid point)	225																				
<p>Group 3 and Group 4 settlements</p>	<p>Limited development in appropriate locations.</p>	<p>Development in individual settlements with defined settlement policy areas will be dependent upon the form, character and setting of the settlement and its proximity to larger villages and their services (including to settlements outside of the borough where relevant).</p> <p>Settlements without a defined settlement policy area are considered to be part of the countryside.</p> <p>Development may be allocated in a Neighbourhood Plan. If no Neighbourhood Plan is in preparation, planning applications for development will be guided by policy.</p>	<p>No allocation in the local plan however Parish Councils may bring forward sites through Neighbourhood Plans with the support of their local communities. If no Neighbourhood Plan is in preparation, planning applications for development will be guided by policy.</p>																		

Open countryside, including individual dwellings and other settlements without a defined settlement policy area in the countryside	To provide a green setting for the network of villages and support the borough's self-reliance and resilience through food production, biodiversity resources, leisure and tourism. Very limited development to meet locally identified needs.	Development will be carefully managed to safeguard the intrinsic character and beauty of the countryside. Development is likely to be limited to 'rural exceptions' affordable housing schemes and replacement dwellings. Support for agricultural and forestry enterprises and other appropriate rural businesses. Opportunities for diversification including the re-use of buildings and new tourism and recreation activities. Opportunities will be taken to enhance the network of green infrastructure that provides an essential biodiversity and recreational resource.	No allocation in the local plan
			Total 8,013

- 5.5 As previously noted, the Council's preferred strategy is not to allocate growth in lower-order villages (Group 3 and Group 4) through the local plan. This does not mean that no development can occur here, Parish Councils have powers to prepare their own Neighbourhood Plans and this means that they can allocate sites for development to provide opportunities for small-scale growth. Furthermore, the local plan will include a policy that allows small amounts of development if supported by the local community.
- 5.6 A sustainability appraisal has been undertaken of the preferred strategy and is set out in a separate document: the Second Addendum to Issues and Options Sustainability Appraisal, 2017. In summary this shows that the preferred strategy is likely to have both positive and negative effects on sustainability indicators. The likely positive effects include:

- maximising the use of previously developed land
- improved infrastructure
- economic growth, job creation and improved skills
- Bedford town centre becoming more attractive and successful
- providing a range of housing (including affordable and older persons) and helping reduce deprivation
- promoting healthy communities by providing walking and cycling facilities, open space and leisure facilities
- reducing the need to travel by increasing the overall provision of services, facilities and employment across the borough
- making rural public transport and other sustainable modes of travel increasingly viable.

5.7 The sustainability appraisal shows that the likely negative effects include:

- most new development will be on greenfield land
- use of greenfield land could potentially affect habitats, species and natural features
- increased resource consumption (energy, water, land) and waste production
- more commuting by car from rural settlements, which could lead to greater traffic congestion and poorer air quality unless public transport is improved.

5.8 The sustainability appraisal recommends that, to minimise the negative effects of the preferred strategy and increase sustainability benefits, the following mitigation measures should be included in detailed policies in the local plan.

- Ensure that the best use is made of previously developed land so as to minimise the use of greenfield land.
- Avoid development of the best and most versatile agricultural land.
- Ensure that development avoids land at risk of flooding
- Avoid low density development so as to make efficient use of land and encourage higher density in appropriate locations.
- Maximise the energy efficiency of development so as to reduce carbon emissions.
- Minimise the water consumption of development so as to reduce impact on water resources.
- Ensure that development minimises impacts on heritage and nature conservation assets.

- Ensure that development is of high quality design that is sensitive to local character and is appropriately landscaped so as to reduce the impact on the built environment and existing communities.
- Ensure that housing development meets a range of needs.
- Prioritise development on sites with good access to local facilities, public transport links and key infrastructure so as to minimise the need to travel support public transport and discourage car use.
- Improve the provision of dedicated walking and cycling infrastructure with new development so that the use of private cars is minimised.

5.9 In the preferred strategy, the initial selection of sites has been made in accordance with the Council's site selection methodology in section 6 below. The final selection of sites will be made following public consultation on the preferred development strategy. It will be included in the local plan to be submitted to the Secretary of State for examination. However, where Parish Councils are preparing Neighbourhood Plans that include development site allocations that reflect the number identified in the local plan strategy, provided that such plans are sufficiently progressed by the time the local plan has to be submitted, then no allocations will need to be made in the local plan for that village. Instead, the allocation of sites will be decided locally by the Parish Council in consultation with the local community.

6 Site selection methodology

- 6.1 As a result of the call for sites in 2014 and again in 2015, a large number of sites were submitted to the Council to be considered for inclusion in the local plan. Details of the number and type of sites have been published on the Council's website. Clearly not all of these sites are needed to meet the Council's assessed need for housing, employment and other development. In order to decide which sites to include in the local plan, a methodology has been set out so that, once the plan is published, all interested parties understand how the site selection will be made.
- 6.2 The site selection process identifies sites which bring forward development in accordance with the development strategy and objectives of the plan. The methodology is designed to balance sustainability and deliverability objectives in a way which ensures that the plan's purpose and the development targets it contains are met. Some of the sites that have been put forward for consideration are free-standing new settlement proposals. As these raise different issues to other sites, a separate selection methodology will be used for them as set out in the technical paper "New Settlements Assessment Framework Methodology".
- 6.3 For residential development proposals the site selection process involves a four stage process to establish which sites best fit the plan's preferred strategy to provide a basis for making a decision about which sites should be allocated. This sits alongside separate work undertaken on the sustainability appraisal of the plan as a whole.
- 6.4 The four key steps in the process are as follows.
- Step 1. Initial appraisal to identify which sites will be taken forward for further assessment. At this stage sites which are not in locations identified in the spatial strategy, do not meet the site size criteria set out in the call for sites form, or which have overriding physical or environmental constraints will be filtered out.
 - Step 2. Assessing the suitability and availability of each potential site.
 - Step 3. Assessing the deliverability of each site, including viability considerations.
 - Step 4. Assessing how each site will contribute to meeting the objectives of the plan and identifying those which perform most strongly against the key criteria including: sustainability (efficient use of resources and accessibility), contribution to

improving housing supply through broadening the range of sites and site types which are available, ability to deliver necessary infrastructure and services (or land to provide these), and constraints.

6.5 An overview of the process and how it operates is set out below. The sites will be assessed using the information submitted through the call for sites process (and any updates submitted), supplemented where necessary by further technical advice from Council officers and other partners.

Table 8: Site selection steps

Step	Key questions	Comments
Step 1 - Initial appraisal to identify which sites will be taken forward for further assessment.	<ul style="list-style-type: none"> • Does the site meet the size criteria set out in the call for sites form? • Does the site have overriding environmental or physical constraints? • Is the site located within or adjacent to the urban area or Group 1 or 2 villages or in close proximity to the settlement boundary? 	<ul style="list-style-type: none"> • Is the site proposed to accommodate fewer than 5 dwellings or provide less than 0.25 ha of land for employment? • Overriding constraints are if the development requires land that is designated as an SSSI or is in flood zone 3. • Is the site located within, adjoining or in close proximity (<0.5 miles by road) to the urban area boundary or the settlement policy area of a Group 1 or 2 village? (Note the local plan will not allocate sites for lower order villages.)
Step 2 - Assessing the suitability and availability of each potential site.	<ul style="list-style-type: none"> • Is the site suitable for development? 	<ul style="list-style-type: none"> • To be suitable a site must relate well to the structure of the settlement and existing facilities, must not seriously harm important open spaces or important views into and out of the settlement, must not have a serious harmful impact on heritage assets, and must not have serious access constraints.

	<ul style="list-style-type: none"> • Does the site have legal or ownership constraints which would prevent it from coming forward? • Is the site controlled by a developer who has expressed an intention to sell? 	
Step 3 - Assessing the deliverability of each site including viability considerations.	<ul style="list-style-type: none"> • Is there a reasonable expectation that the site is viable based on the information submitted at call for sites stage. • At what point in the plan period could the site come forward? 	In addition to the information supplied by site promoters, the Council will undertake an analysis of the viability of development on a plan-wide basis.
Step 4 - Assessing how each site will contribute to meeting the objectives of the plan and identifying those which perform most strongly against the key criteria.	<ul style="list-style-type: none"> • Sustainability (efficient use of resources and accessibility). • Contribution to improving housing supply through broadening the range of sites and site types which are available. • Ability to deliver necessary infrastructure and services. 	<ul style="list-style-type: none"> • A number of factors are examined to assess the sustainability of the site, including: whether the site is previously developed or greenfield (and if greenfield whether the site is on the best and most versatile agricultural land); whether the site is contaminated; whether the site is in a source protection zone for water supplies; its accessibility by foot to the nearest GP, primary school and food store; its accessibility by public transport to the nearest major employer; the extent to which the site is liable to flood. • Where a site generates a need for additional school places, the ability of that site to meet that need where necessary (either through expansion of an existing school if feasible or delivery of a new school) will be taken into consideration. The ability to deliver other

	<ul style="list-style-type: none"> • Constraints 	<p>necessary infrastructure and community benefits will also be taken into account.</p> <ul style="list-style-type: none"> • The assessment of constraints examines the following factors: impact on heritage assets; impact on nature conservation interests; impact on the landscape; the existence of rights of way; access; proximity to minerals or waste sites; any other constraints.
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- 6.6 Sites will be scored depending on how well they perform against each of the key questions. The assessment for each site only progresses to the next step if it successfully passes the previous step. A poor score for a site against one or more criteria at Step 4 does not mean that it is excluded from further consideration, however it is a factor that must be balanced in the assessment of the site. Following the assessment of each site, an overall conclusion and recommendation regarding each site’s potential for selection will be recorded.
- 6.7 In line with the preferred development strategy, locations in and around the urban area will be given priority when it comes to the selection of residential development sites. Following this, sites in and around Group 1 and 2 villages will be selected. In villages where there are a number of sites that have been selected and this exceeds the level for that village that is established in the development strategy, it is recognised that alternative combinations of selected sites are possible. These alternative combinations will be examined further to highlight their relative advantages and disadvantages. Public consultation will help inform the choice of selected sites for inclusion in the local plan to be submitted to the Secretary of State for examination. The draft allocations will be the subject of a stage 2 sustainability appraisal which will form part of the sustainability report required for the local plan.
- 6.8 No adaptation to the methodology has been made to appraise employment development sites put forward through the call for sites as the council does not intend to allocate any additional employment sites. Instead the intention is to include a criteria based policy in the local plan for the appraisal of any employment proposals that come forward (see para 5.4).

6.9 For main town centre uses⁶, the site selection process follows the National Planning Policy Framework (paragraphs 23-27), together with the additional advice set out in National Planning Practice Guidance. In summary, suitable sites to meet identified needs will be considered in identified town centres. If suitable sites are not available, edge of centre sites that are well connected to town centres will be considered. Out of centre sites will not be allocated in the local plan, although the plan will include policies that set out the criteria to be taken into account when considering planning applications for such proposals. For certain main town centre uses particular market, locational and operational requirements may be taken into account if justified. Similarly, other uses may be justified in certain locations, including the rural area and these will be considered on a case by case basis.

⁶ Defined in the National Planning Policy Framework as “retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities)”.