

Site Assessment Technical Document

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Executive Summary

This document presents the initial conclusions of the site assessment process for sites proposed for residential development through the Council's Calls for Sites. Importantly **it does not represent a full assessment of sites, and does not draw conclusions on the suitability, availability and achievability of sites in the way in which a Strategic Housing Land Availability Assessment would. Rather it identifies those sites which are considered worthy of further assessment, and those which are not.**

In total the Council received 847 sites for consideration across two separate Calls for Sites. Of these sites, 43 were proposed for employment and seven for Gypsy and Traveller sites, with the remainder assessed for residential development. Of these sites a number have been discounted from the process as a result of preliminary site assessment work and will not be considered further for residential development as part of the Local Plan. There are 198 sites which will be subject to further assessment to identify whether they are suitable, available and achievable in line with national guidance.

Once the Council has completed the further work on the sites it believes warrant further analysis, a full Strategic Housing Land Availability Assessment will be produced. This will be published for consultation alongside the pre-submission version of the Plan in 2018.

At this stage, no allocations have been proposed as part of the Local Plan. This document therefore provides a preliminary summary of the technical site assessment process. The allocation of sites will be supported and informed by the whole evidence base for the Local Plan, including this site assessment paper.

Important information

This Site Assessment Technical Document presents the results of the assessment work undertaken so far in preparation for the Local Plan. It is a high level assessment and does not guarantee or support the development of any site. There is still further work to be done before the Council is able to produce a Strategic Housing Land Availability Assessment, which will identify which sites are Suitable, Available and Achievable, and will then be used to select sites for allocation in the Local Plan.

The initial assessment of sites as presented in this document has been undertaken due to the large number of sites received. Preliminary assessment ensures that sites that have clear technical constraints are excluded from assessment at an early stage.

Technical Site Assessment work also provides a useful detailed cross-check for the higher level studies e.g. the Growth Option Studies and has therefore supported the identification of growth locations in the Draft Plan.

All technical terminology is defined in the glossary in Appendix A.

1) Introduction

1.1 What is the Site Assessment Technical Document?

- 1.1.1 This Site Assessment Technical Document presents the preliminary results of the assessment work undertaken on the sites received through the 'Call for Sites' in both 2014/15 and 2016.
- 1.1.2 The document outlines the site assessment process undertaken to date. It provides a list of all the sites which have been considered for housing development. It then identifies which of these sites warrant further assessment following technical assessment and conversely which sites will not be considered further as part of the Local Plan.
- 1.1.3 This document has been written with the intention of being accessible to a wide audience. A glossary of terms is provided at the end of the document, but due to the technical nature of the document use of some planning terminology has been necessary.

1.2 Relationship to the Local Plan

- 1.2.1 The National Planning Policy Framework (NPPF) requires Local Planning Authorities to have a clear understanding of housing needs in their area. To do this, one of the documents that Local Authorities must produce as part of the Local Plan is called a Strategic Housing Land Availability Assessment (SHLAA).
- 1.2.2 The SHLAA is an important step in the preparation of a Local Plan. It assesses the availability, suitability and achievability of land in the authority's area to meet the housing need identified over the plan period.
- 1.2.3 The terms 'suitable', 'available' and 'achievable' are defined in Planning Practice Guidance written by national government. This is provided in Appendix B.
- 1.2.4 Information on the number of houses the Council must plan for is available in the Initial Strategic Housing Market Assessment for Luton and Central Bedfordshire (SHMA). This calculates how many houses will need to be provided in Central Bedfordshire over the period of time covered by the Local Plan, which in this case is 2015-2035.
- 1.2.5 There is no requirement to produce a SHLAA to support the version of the Local Plan produced for this Regulation 18 Consultation, but the Council considered that it would be helpful to provide a summary of the technical site assessment process so far at this stage.
- 1.2.6 Therefore this Site Assessment Technical Document presents only the results of the assessment undertaken to date and is not intended as a detailed assessment of the suitability, availability and achievability of each site.

1.3 Baseline Assessment of Sites

- 1.3.1 When reviewing sites, officers have taken into account what already exists on the ground, and what is committed in terms of planning permission or allocations from previous Local Plans. Allocations from previous Local Plans can be viewed by looking at the Policy Maps on the website.

- 1.3.2 In assessing each site officers have not taken into account other sites submitted nearby; this means that no assessment of the cumulative impact of multiple submissions in one area has yet been undertaken. This is because each site has been considered in isolation on its own merits. Decisions about the cumulative impact of multiple sites on an area will be made later in the plan process when deciding upon which sites should be allocated. These decisions will be supported by evidence including the Sustainability Appraisal.

2) Methodology

2.1 Call for sites

- 2.1.1 The sites which have been assessed have been sourced from two separate Calls for Sites. The first Call for Sites was undertaken between December 2014 and February 2015. It was intended to support the production of an Allocations Local Plan for small and medium scale allocations to supplement the Development Strategy which sought to allocate sites of a strategic scale. Therefore this Call for Sites asked specifically for sites which could accommodate 15-500 houses.
- 2.1.2 In November 2015 the Council formally withdrew the Development Strategy and embarked on a new Local Plan for Central Bedfordshire. The new Local Plan was launched in February 2016, and the first step of this process was a Call for Sites asking for residential sites of 10+ dwellings alongside sites for employment and Gypsy and Traveller uses. Since it had only been a year since the previous Call for Sites, it was agreed that all submissions from the previous Call for Sites would be carried forward; however some chose to resubmit their sites to provide more information.

2.2 Collation of sites

- 2.2.1 Sites received during the 2014/15 Call for Sites were all given a reference code starting with ALP followed by a three digit number (e.g. ALP001). Sites from the 2016 Call used the prefix NLP (e.g. NLP001).
- 2.2.2 Since sites have been sourced from two different Call for Sites exercises, it has been necessary to undertake a review of all submissions and filter out duplicates where sites have been re-submitted, and take forward only the latest submission. As those submitting sites were not informed of their reference numbers in 2014/15, officers used GIS to find sites which appeared to be duplicates and then checked using the following criteria:
- Matching landowner details on both submissions;
 - Both sites had been submitted by the same person (or company if an agent was used);
 - The area of the sites, as measured on GIS, did not differ by 0.25ha or more (this was to allow for a margin of error in plotting).
- 2.2.3 Following the collation of the sites from both Call for Sites, there were a total of 847 individual sites submitted, though three proposed uses which were not asked for in the Call. Of the remaining 844 sites there were 43 submissions which specifically stated that they only wished to be considered for employment purposes and seven sites submitted that proposed development for Gypsy, Traveller and Travelling Show People pitches. These will be considered in detail separately in the employment studies and any future Gypsy and Traveller (G&T) site identification work after Regulation 18 Consultation. The remaining 794 sites were submitted for residential

development, these have been assessed and their results are presented in this document.

2.3 Publication of sites

- 2.3.1 In May 2016 the Council published all sites submitted on its website. A map was produced for each Parish highlighting the submitted sites, sites were labelled with their reference code and major constraints such as the AONB were also shown. This was accompanied by a schedule which provided more details on site sizes and proposed uses. Once this information was published on the website, the Council emailed all of those who had made submissions and asked them to check the maps and schedules were correct.
- 2.3.2 This process allowed the Council to check for errors and addressed any uncertainty around the two separate Calls for Sites processes. Some additional sites were identified through this process.

3) Site Assessment Criteria

- 3.1.1 The Council has produced separate Site Assessment Criteria for Housing, Employment and G&T sites. Details on the Employment and G&T Criteria are available in the Employment and G&T studies. The Employment Land Review (including site assessment) is also subject to consultation during this Regulation 18 consultation. There has not however been any work on G&T sites published as part of this consultation, the assessment of G&T sites will be undertaken later this year to enable G&T site allocations to be consulted on as part of the Regulation 19 consultation which is scheduled for Spring 2018.
- 3.1.2 Over the same period as the 2016 Call for Sites (February 2016 - April 2016), the Council consulted on its draft Housing Site Assessment Criteria. A number of changes were made to the criteria as a result of this consultation and therefore the criteria was put out to consultation again between 30th June and 29th July 2016, this time alongside the Employment and G&T Site Assessment Criteria. Further changes were also made following this consultation. The final Site Assessment Criteria is provided in Appendix C.
- 3.1.3 The assessment criteria has been structured so that the information collated meets the national planning guidance on the preparation of SHLAAs. This is in preparation for when the finalised site assessments are used to inform the SHLAA that will be published alongside the Pre-Submission version of the plan (Regulation 19). The table in Appendix D summarises the results of assessment for each site.

3.2 Scoring system

- 3.2.1 The majority of questions on the Site Assessment Criteria use a RAG (Red, Amber or Green) rating system. These are defined below:
- **Red:** Something which either cannot be mitigated or that will require significant mitigation;
 - **Amber:** Something which would likely require mitigation;
 - **Green:** Mitigation unlikely to be required.
- 3.2.2 The staged assessment of sites used the following approach:
- **Stage one** of the Site Assessment Criteria is an exclusionary stage. This means that sites are discounted if they do not meet a set of basic criteria. This approach was adopted due to the large number of sites received. It allowed officers to screen out the most unsuitable sites and reduce the number of sites that needed to be considered in detail at stage two.
 - For sites progressing past stage one, **stage two** provided a detailed assessment which included input from internal experts within the Council (for example Ecologists, Heritage specialists etc.). At the end of this stage, planning balance was used to decide whether there were too many constraints overall for the site to progress to stage three.

- **Stage three** reviews the viability of the site, and considers if and when it would be developed.

3.3 Changes to site boundaries

- 3.3.1 In some cases officers assessing sites found that whilst the site as a whole might be subject to constraints, it may be appropriate to take a portion of the site forward which is not affected by the identified constraints. For example, whilst development of the full submitted site might cause coalescence, a smaller portion of the site could be appropriate for development.
- 3.3.2 For those sites where officers have identified that the whole site may not be appropriate, but a portion however may be, boundaries will need to be re-drawn. Sites where the boundary will need to be re-drawn can be identified in the table of assessment results where it says '*a portion of the site will be considered further as part of the Local Plan*'. Comments in the 'Justification' column explain why officers feel that only a portion of the site would be appropriate. However, as revised site boundaries will need to be drawn by working with site promoters no revised boundaries are provided as part of this document. Further engagement will take place with internal experts when identifying which portions of these sites might be appropriate to take forward.

3.4 Assessment of strategic sites

- 3.4.1 Sites that are 200 hectares or more in size (approximately 3,600+ homes) have been identified as 'strategic' for the purposes of this assessment only. These sites require a more detailed assessment as due to their size they can have a more significant impact and also have a much greater potential for mitigation.
- 3.4.2 The same assessment criteria have been used for these strategic sites; however the exclusionary method has not been applied. Therefore whilst a site might not meet the requirements of stage one, there is still a wealth of information available to officers should it be required. This approach has been taken as it is considered that the sizes of these sites and their potential ability to stand alone makes it important for officers to have a thorough understanding of the issues beyond those raised in the exclusionary criteria.

4) Site Assessment: Stage One

4.1 Purpose of Stage One

4.1.1 Stage one excludes sites which:

- do not meet capacity requirements;
- have substantial conflict with national designations;
- are subject to a high flood risk; or
- already identify that critical infrastructure requirements cannot be met.

4.1.2 Sites which are not available for allocation are also filtered out, particularly those:

- which already have planning permission;
- where the landowner does not want to develop the site; or
- with significant barriers in terms of legal or ownership issues.

4.2 Exclusion of sites

4.2.1 Sites which are excluded at stage one do not progress through the assessment any further. Though as noted previously the full assessment criteria has been completed for all strategic sites even where they are excluded at stage one (see section 3.4). Regardless of its size, any site which cannot pass stage one is not considered to be appropriate for allocation as it is considered that reasonable mitigation is not possible.

4.2.2 The Council recognises that sites with constraints should be reconsidered if it is unable to find enough sites to meet its agreed housing target (as required by National Guidance); for example sites which are at a high risk of flooding could be reviewed again to understand the potential for mitigation and likely viability cost implications. However such a high number of sites have been submitted that it is not considered necessary to review such constrained sites in further detail as it's possible to select from the better quality sites to meet housing need in a sustainable way.

4.3 Categories of Assessment

4.3.1 A full copy of the Site Assessment Criteria is available in Appendix C. The methodology of site assessment for stage one of the assessment process is discussed in further detail below by assessment theme.

Provisional Site Capacity

4.3.2 Those who submitted a site were asked to identify how many homes their site could provide. In addition to this the Council applied their own method to estimate how many homes could realistically be provided on each site, to allow all sites to be compared fairly.

4.3.3 In calculating site capacity the Council has made a deduction to the site area based on how much of the site is likely to be required for infrastructure; a

deduction of 40% is made on sites which exceed two hectares, whilst a 20% deduction has been made for sites between 0.4 and two hectares and no deduction has been made for sites below 0.4 hectares in size.

- 4.3.4 A capacity of 30 dwellings per hectare has then been used to estimate how many homes could fit on the remainder of the site. A density of 30 dwellings per hectare reflects the comparatively rural nature of the majority of Central Bedfordshire, however it is recognised that higher densities may be more appropriate in more urban areas, in close proximity to sustainable transport networks, or in the centre of new settlements.
- 4.3.5 This question is only intended to provide an estimate to discount any sites which are unlikely to provide ten or more homes. Site-specific capacities will be determined on a site-by-site basis for the sites which the Council selects for allocation.
- 4.3.6 Whilst national guidance encourages the Council to consider all sites capable of providing five or more homes, it does enable a flexible approach to be taken. The Council has increased the threshold from five homes to ten due to the large number of sites received. This also helps to enable affordable housing provisions, as sites of ten homes or less are not required by national guidance to provide affordable homes. Whilst it is recognised that sites providing only ten units will not have to provide affordable housing, ten units is considered an appropriate number for the purposes of site assessments to enable borderline sites to be included for further consideration. Sites that would provide less than ten homes can still be considered as part of the Neighbourhood Planning process where Neighbourhood Plans are being developed or could come forward as windfall.

Flood Risk

- 4.3.7 The Council's flood risk consultants, JBA Consulting, have used the submitted red-line boundaries to identify how much of each site lies within Flood Zone 2 or 3, or is at risk of surface water flooding (in the 1 in 100 year event). The different Flood Zones are:

Zone 1 - Low Probability	Land having a less than 1 in 1,000 annual probability of river or sea flooding. (Shown as 'clear' on the Flood Map – all land outside Zones 2 and 3)
Zone 2 - Medium Probability	Land having between a 1 in 100 and 1 in 1,000 annual probability of river flooding; or land having between a 1 in 200 and 1 in 1,000 annual probability of sea flooding.
Zone 3a - High Probability	Land having a 1 in 100 or greater annual probability of river flooding; or Land having a 1 in 200 or greater annual probability of sea flooding.
Zone 3b - The Functional Floodplain	This zone comprises land where water has to flow or be stored in times of flood. (Not separately distinguished from Zone 3a on the Flood Map).

- 4.3.8 Some Local Authorities discount sites where any proportion of that site is within Zones 2 or 3. This Council has enabled sites to progress where they are 50% or more outside Flood Zone 2/3 and 50% or more outside of the risk of surface water flooding for the 1 in 100 year event (this was used rather than the 1 in 30 year event to take account climate change predications). This enables a larger proportion of sites to be considered further, which could deliver some housing or employment development, on the areas outside areas at risk of pluvial and fluvial flooding. Any sites which are 50% or more at risk have been discounted.
- 4.3.9 All sites which progress to stage two of the assessment process are subject to more detailed assessment, undertaken with regards to flood risk and the appropriateness of the type of development proposed. The screening outcomes of this second stage will show which sites at lowest flood risk should be considered prior to considering those at greater flood risk, thus adopting a sequential approach to site allocations.
- 4.3.10 Where the site screening process has identified a site to be in either Flood Zone 2 and/or 3, and/or has an ordinary watercourse running through or adjacent to it (to take account of the risk of flooding from watercourses not shown on the Environment Agency's Flood Zone mapping), the flood risk to the sites will be investigated in more detail as part of the Level 2 SFRA, as well as the potential of the site to manage that risk. If land outside of Flood Zones 2 and 3 cannot appropriately accommodate all the necessary development, then the Exception Test will need to be applied.

Nationally Significant Designations

- 4.3.11 A Nationally Significant Designation is something which has been designated under national legislation. The designations considered relevant to this assessment are:
- Site of Special Scientific Interest (SSSI)

- National Nature Reserve
- Scheduled Monument
- Registered Parks and Gardens
- Area of Outstanding Natural Beauty (AONB)

4.3.12 Whilst listed buildings are national designations it was not considered necessary for stage one of the assessment to exclude sites based upon the presence of a listed building since the presence of a listed building in the vicinity of a site does not necessarily preclude development, and impacts can be mitigated. Therefore listed buildings are instead considered at stage two with input from internal historic conservation professionals.

4.3.13 Where more than 50% of a site is covered by a Nationally Significant Designation the site is excluded. Whilst other Local Authorities discount all sites even partially covered by National Designations, this Council has taken a proactive approach and enabled sites to progress where they are up to 50% covered by designations to allow a more detailed assessment to be undertaken at stage two. This recognises the potential for both mitigation and enhancement of these assets.

Relationship to Settlement

4.3.14 All sites have been assessed based on how well they relate to existing settlements, with the exception of sites which are of a sufficient size to stand alone and provide their own infrastructure. For the purposes of this assessment, sites which could provide 1,500 or more homes were considered large enough to be separate from an existing settlement. The threshold of 1,500 homes has been taken from Government Publication *'Locally-led Garden Villages, Towns and Cities'*. It is however acknowledged that village scale new settlements will not be fully self contained and would need to use the services of the nearest larger town.

4.3.15 For sites which are not of a size to stand alone, it is important to ensure that they are well related to an existing settlement so that any people living in the homes integrate with the existing settlement and can access facilities and services sustainably. Sites should also provide an extension to the town or village which is complementary to the existing settlement pattern. Some sites may lie in close proximity to a settlement, but still be isolated from a settlement because there is a barrier which separates the site from the settlement, for example a railway line.

4.3.16 This section also discounts sites which cause coalescence. For the purpose of site assessment coalescence means physical or visual coalescence – physical meaning that development of a site would join together two settlements which currently stand separately from each other, visual meaning that development would severely reduce the physical separation of two settlements such that coalescence is more likely in the future. In answering this question, officers have also taken into account committed sites in addition to what is currently on the ground. Prevention of coalescence is particularly important in the Green Belt; this is because one of the five purposes of the Green Belt is to *'prevent neighbouring towns from merging into one another'*.

Therefore sites in the Green Belt have been assessed more rigorously in relation on this question.

- 4.3.17 Where the whole site could cause coalescence, a portion of the site may be considered which would preserve the separation of the settlements. In the case of strategic sites because of the large available land area there is often more potential to reduce the impact of coalescence by using buffers, for example green infrastructure or landscaping to preserve separation. Strategic sites where it would not be possible for such buffers to be provided will be excluded from the site assessment process overall.

Critical Infrastructure

- 4.3.18 In the 2016 Call for Sites, the Council asked those submitting sites to identify what infrastructure would be necessary for the site to come forward and whether they could commit to providing this infrastructure. The site assessment process discounts sites where submissions identify a need for critical infrastructure but state that there is no mechanism for it to be provided as part of the development.
- 4.3.19 This question does not provide an objective assessment of infrastructure requirements or their delivery; it simply uses the information provided on submission forms. Further work on infrastructure will be completed as part of the Viability Study and the Infrastructure Schedule, as well as through ongoing assessment work and communications with site promoters following Regulation 18 consultation.

Availability

- 4.3.20 National planning guidance requires the Council to make an assessment on whether the site is actually available to be developed. This includes an assessment on what the site is currently used for, whether the landowner actually wants to develop the site, and whether there are any legal or ownership issues with the site.
- 4.3.21 Assessment of what the site is currently used for allows Officers to make a judgement as to whether it would be difficult for the site to be developed for housing. It is important to consider whether the land owner actually wants to develop the site because there is no requirement in terms of site ownership for Call for Sites submissions. The submission is also checked for any legal or ownership issues which may delay development of the site, for example any tenancies or complex land ownership arrangements.
- 4.3.22 This section of the assessment discounts any sites which already have planning permission for residential use, as there is no need for these sites to be allocated. Where sites have been approved at committee but the Section 106 is yet to be signed, they have still been removed from the process but would be re-assessed if for any reason full planning permission was not granted.

- 4.3.23 This allows Officers to invest their time in sites which have not already been given permission. Where only part of a site has planning permission and a large part is without permission, the site will not be excluded on the basis of part of it having permission. If a site has been refused planning permission this does not remove it from this process, because the criteria for deciding on allocations for a Local Plan are different to those used when determining a planning application. Therefore it is possible that some sites which have previously been refused planning permission for housing may be considered further as part of this process.
- 4.3.24 Assessments undertaken and information released as part of this consultation are representative of a particular point in time, and therefore information on availability is considered to be correct to the best of the Council's knowledge at the point of publication (July 2017), but is subject to change after this date as the Council continues to determine planning applications and landowner intentions are also subject to change.

Green Belt

Summary of approach

- 4.3.25 The Government attaches great importance to Green Belts and strong national planning policy protects Green Belt land from inappropriate development. The NPPF states that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.
- 4.3.26 National policy does not allow inappropriate development in the Green Belt, however it also requires Local Authorities to take account of '*...the need to promote sustainable patterns of development*' (Para 84) when altering green belt boundaries. The Council is acutely aware of the substantial housing need for both its own administrative area and adjoining authorities. Since around 40% of the authority's area is covered by Green Belt, to promote patterns of sustainable development it was felt necessary to consider sites submitted in the Green Belt through the technical assessment process.
- 4.3.27 As discussed, altering the Green Belt boundary requires exceptional circumstances. The Council believes that the substantial need arising within the Luton Housing Market Area, which almost entirely within the Green Belt, goes some way to establishing these exceptional circumstances. However the Council believes that for exceptional circumstances to be demonstrated, sites in the Green Belt must also be sustainable.

Method

- 4.3.28 The Council's consultants have undertaken a Strategic Green Belt Review to identify any parcels of Green Belt which are making only a '*weak*' or '*relatively weak*' contribution to the wider Green Belt. All sites within these parcels have automatically progressed through Green Belt stage of the site assessment process.

- 4.3.29 In recognition of the importance of Neighbourhood Planning, sites in the Green Belt which are not identified as making a 'weak' or 'relatively weak' contribution, and do not meet the sustainability criteria outlined above may still progress through this stage of the assessment where they have been identified as part of an adopted or draft Neighbourhood Plan which has been subject to Regulation 14 consultation. These sites will have already been subject to a detailed assessment process as part of the Neighbourhood Plan and their inclusion in the Neighbourhood Plan indicates a high level of community support. Sites in Neighbourhood Plans which are submitted in draft form or adopted after this document has been published may still be considered where time allows as part of the plan making process.
- 4.3.30 For all other Green Belt sites, three sustainability criteria have been used to filter out the most sustainable of these sites. Green Belt sites which do not meet all three of the below criteria have been excluded at this stage of the assessment:
- Adjoining settlement has three or more key local services (including convenience shop, lower school, middle school, upper school, village hall, GP surgery, Post Office, or library);
 - Site makes a contribution of 100+ homes in the Luton Housing Market Area; and
 - Site is in, or directly adjacent to, a settlement which has a mainline rail station or direct access to the strategic road network.
- 4.3.31 In looking for the most sustainable Green Belt sites, the Council considers proximity to services an important factor. This reduces the need to travel to access day-to-day services and promotes sustainable travel patterns, as if the site adjoins a settlement with these services then it is highly likely that these services will be accessible without reliance on the private car. The services which have been selected for consideration in these criteria have been informed by the Settlement Audit, and are representative of services which people are likely to need to access regularly.
- 4.3.32 As outlined above there is substantial need arising within the Luton Housing Market Area, most of which is in the Green Belt. To meet housing need sustainably, it is important to meet the need as close as possible to where it arises. To achieve this development would be required within the Green Belt. Therefore for sites which are within the Green Belt, they are only suitable for further consideration if they lie within the Luton HMA, where the need has been identified.
- 4.3.33 The Council believes that sites of 100+ homes offer an opportunity to make a meaningful contribution to the identified housing need, and sites of this size provide the potential to deliver some services for local communities. This approach is supported by paragraph 52 of the NPPF states that *'the supply of new homes can sometimes be best achieved through planning for larger scale development...'*
- 4.3.34 The third criteria a site must fulfil to be considered sustainable in this question is proximity to a settlement with a mainline rail station or direct access to the strategic road network. The Council wishes to promote sustainable travel

patterns and sites adjoining settlements with mainline rail access offer realistic sustainable travel opportunities for residents in this area. This criteria has however been expanded to include sites which adjoin settlements with access to the Strategic Road Network as it is recognised that Central Bedfordshire has high rates of car ownership, and proximity to the strategic road network is likely to reduce travel time for those who do continue to rely upon the private car as a regular form of transport.

5) Site Assessment: Stage Two

5.1 Purpose of Stage Two

- 5.1.1 Stage two of the Site Assessment Criteria has been developed to provide a comprehensive review of the constraints and opportunities on sites which have passed stage one. Stage two assesses the site in line with national and emerging local policy directions and sources comments from internal experts.

5.2 Exclusion of sites

- 5.2.1 As stage two provides a great deal of detailed information on such diverse subject areas, it was not considered appropriate to restrict the assessment of sites at this stage through use of an exclusionary or quantitative approach. Therefore it was considered most helpful to ensure that any sites which entered stage two progressed through the entire stage of assessment to allow officers to make a judgement at the end of the stage using 'planning balance'. This enabled officers to make a fair assessment of sites overall using the wealth of information gathered at stage two to ensure that a fair judgement was made on sites and did not prejudice the allocations process by assigning numerical scores to each of the sites.

5.3 Categories of Assessment

- 5.3.1 As noted previously, no site has been excluded at stage two based on assessment of one factor alone, rather the stage is reviewed as a whole. The key themes assessed at Stage two are discussed in detail below:

Previously Developed Land

- 5.3.2 It is important to consider whether a site comprises Previously Developed Land because National Planning Guidance encourages the reuse of Previously Developed Land in preference to development of Greenfield sites.
- 5.3.3 Previously Development Land is defined in the NPPF as:

'Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.'

Community

- 5.3.4 This section provides information on any previous consultation that has been undertaken in relation to the site, reviews the status of Neighbourhood Planning in the area, and makes an assessment of the impact which development of the site could have on the sustainability of the settlement in terms of services. Services considered include retail provision, employment and public houses. This assessment is important to understand the community's aspirations for the area and ensure that settlements remain sustainable.

Cumulative Impact

- 5.3.5 It is important to take into consideration how much pressure from new development a settlement has already seen, and is likely to see in the near future when assessing what impact new development could have. This section takes figures from recent housing completions data and provides a percentage increase for the last decade for each parish. Committed housing permissions are considered separately to understand what level of increase from current numbers is expected
- 5.3.6 As stated previously, the site assessment process considers sites on their individual merits, so no assessment will be made at this stage on the number of other sites submitted in the area. The cumulative impact of new allocations will be considered when selecting sites for allocation. Further consideration will also be given to the merits of combining separately submitted sites to deliver sustainable development and infrastructure at this later stage.

Physical Constraints

- 5.3.7 Any features which currently exist on site or near to the site that could affect developability are seen as physical constraints. Examples of these include: pylons, gas works, sewage treatment works, uneven topography, or wind turbines. Some of these constraints may be mitigated against, however there are likely to be costs involved with this which could affect the site's overall viability.

Character of the settlement

- 5.3.8 The NPPF requires Local Authorities to plan a positive strategy for the conservation and enjoyment of the historic environment. It also states that proposals that preserve elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.
- 5.3.9 Central Bedfordshire is a diverse area with a number of unusual and distinctive settlement characteristics and patterns. The Council wishes to preserve these where possible. This question makes an assessment on whether development of a site would have an adverse impact on the natural or historic forms of the settlement.

Agricultural Land Quality

- 5.3.10 The NPPF protects the best and most versatile agricultural land, suggesting that Local Authorities seek to use areas of poorer quality land in preference to that of higher quality. Agricultural land of grade 1, 2 or 3a is considered to be the best and most versatile. The most recent data available from Natural England does not differentiate between Grades 3a and 3b, and therefore this distinction could not be made in assessments.
- 5.3.11 The land grades as defined by Natural England are summarised below:
- **Grade 1** – Land with no or very minor limitations to agricultural use. A range of agricultural and horticultural crops can be grown; yields are high and less variable than on lower quality land.
 - **Grade 2** – Land with minor limitations which affect the choice of crop yield, cultivations or harvesting. A wide range of agricultural and horticultural crops can usually be grown but on some land there may be some reduced flexibility due to difficulties with the production of more demanding crops.
 - **Grade 3** – Land with moderate limitations which affect the choice of crops, timing and type of cultivation, harvesting of the level of yield. Where more demanding crops are grown yields are generally lower and more variable than Grades 1 and 2.
 - **Grade 4** – Land with severe limitations which significantly restrict the range of crops and/or level of yields.

Facilities and Services

- 5.3.12 The purpose of these questions is to acknowledge what facilities and services currently exist in nearby and adjoining settlements. This information provides an initial understanding of what services and facilities a new development could benefit from. This question considers seven separate forms of facilities and services:
- Lower School and/or Primary School
 - Middle School
 - Secondary and/or Upper School
 - GP's surgery or Medical Centre
 - Retail Provision
 - Distance to the nearest Bus Stop from the Site
 - Distance to the nearest Train Station from the Site.
- 5.3.13 It is important to note that this question assesses whether the services exist, and does not undertake an assessment of capacity. School capacity is considered separately later in stage two, and capacity of GP's surgeries and Medical Centres is considered instead in the Settlement Capacity Study which is one of the studies which will be used when selecting sites for allocation.
- 5.3.14 In order to accurately calculate the distance between a site and the nearest bus or train station TRACC Visography Software, a transport accessibility tool, calculates walking times to existing bus and rail public transport links. The thresholds used represent national standards, with the distance people are prepared to walk for a train being greater than that for a bus. To calculate distance, the centre point of each site is used. This question also takes into

account where the site being assessed has proposed new bus or rail routes as part of its submission.

Access

- 5.3.15 All sites must be able to provide safe access for vehicles and pedestrians. Where access is poor or there are barriers that potentially constrain access, this can affect the deliverability of the site. This question assesses whether or not a site can be accessed from a currently existing road network, this being: A roads, B roads and other minor roads. It is also important that legal issues are considered when reviewing access arrangements, for example if the access to the site crosses another person's land then it is vital the landowner has their permission.
- 5.3.16 In the case of some site submissions, it has been difficult to ascertain whether the site has appropriate access arrangements. Therefore the assessments made on access are representative of the information known at the time of assessment, and access will be further considered for sites when making decisions about allocation.

Education

- 5.3.17 The Council's Education Officers have been consulted in order to provide detailed information on the capacity of each individual school at all tiers of education. Information has also been provided on any planned educational projects which would increase capacity. Where sites represent a large scale development, some submissions have indicated a commitment to providing new educational services. Whilst all sites will make educational contributions, in the case of some smaller sites this may not be enough to address a wider capacity issue where a new school may be required for example because there is no physical capacity for a school to expand on an existing site.

Potable and Waste Water

- 5.3.18 The Water Cycle Strategy feeds into this question; this identifies what the capacity is for potable and waste water by parish.
- 5.3.19 This question identifies whether there is currently capacity to supply potable water and remove waste water to sites, or whether new infrastructure will be required to support future growth. Potable water can be defined as drinking water available for consumption, in comparison to waste water which is not consumable due to its poor quality.
- 5.3.20 New developments require the supply of clean water, safe disposal of waste water and protection from flooding. It is possible that allocating homes in some locations may result in the capacity of existing infrastructure, such as waste water treatment works, being exceeded. This could lead to services failing, environmental impacts and any upgrade costs being passed on to residential and business customers.

- 5.3.21 Water utilities companies have a statutory duty to supply water to, and remove waste water from, new development sites and a lack of available capacity does not prevent future development. If capacity is not currently available either existing infrastructure will need to be upgraded or new infrastructure will need to be provided. The infrastructure upgrades required will depend on the amount and location of growth falling within each water catchment area.
- 5.3.22 The Council is preparing a Water Cycle Study to assess the demands that proposed growth will place on existing water services and establish its ability to cope. The Stage 1 Water Cycle Study (April 2017) identifies the current capacity of existing water infrastructure. A Stage 2 study will be prepared alongside the further assessment and shortlisting of sites, to test the cumulative impact of development on infrastructure and identify the nature and timing of any upgrades required. This allows water resource and capacity issues to be resolved at the earliest possible stage in the planning process, allowing water companies to plan for and implement new infrastructure in a timely manner to meet the needs of new homes and businesses.
- 5.3.23 At this stage in the site assessment process, sites have not been tested against this criteria. Shortlisted sites will be assessed through Stage 2 of the Water Cycle Study and the conclusions will feed into the assessment process at this time.

Drainage and Water

- 5.3.24 At stage two, further work has been carried out by the Council's flood consultants, JBA Planning. This question of the assessment uses some of this work to categorise sites as Red, Amber or Green depending on how much further assessment would likely to be required in terms of flood risk. The classifications for Red, Amber and Green are provided below:
- **Red: Level two assessment required** – sites where fluvial flood risk (Flood Zones 2/3) is less than 50%;
 - **Amber: Ordinary Watercourse Present, further assessment required to confirm flood risk** – Sites are 100% with Flood Zone 1 but ordinary watercourses have been identified and therefore further assessment is required as part of a level 2 assessment;
 - **Green: Site is at limited risk of surface water flooding, assessment is unlikely to be required** - Surface water flood risk in the 100 year event (including 30 year) is less than 50% and the site is fully within Flood Zone 1.

Public Protection

- 5.3.25 The Council's Public Protection officers have been consulted to consider whether any environmental impacts may impact on the viability and/or deliverability of the site.
- 5.3.26 The desk top exercise has looked at land contamination, noise, odour and light and considers whether the proposal presents a risk to the amenity of future or existing land users in terms of Public Health.

- 5.3.27 It may be that any impacts identified need to be quantified through the completion of appropriate technical reports to support any forthcoming application and/or subsequent assessments as part of the site allocation process.
- 5.3.28 When the environmental impacts are quantified, it may be that such risks are too great and the proposal is therefore not deemed suitable or cannot deliver the full potential as envisaged.

Landscape Character

- 5.3.29 The landscape character of Central Bedfordshire is varied and distinctive ranging from exposed escarpments, wooded ridges, open vales and intimate river valleys. Different landscapes have different sensitivities in terms of visual and landscape character and differing capacities to accommodate development.
- 5.3.30 This question incorporates comments from the Council's Landscape Officers. It addresses potential issues new development would bring with regard to visual change, potential impacts of change on landscape character and if development can be mitigated effectively whilst in keeping with landscape and planting character. Assessment also considers the ability of landscapes around settlements to integrate development without impacting on character of the setting and wider countryside and views.
- 5.3.31 Potential impacts on designated landscapes are also considered; some sites may either be within or form part of the setting to the Area of Outstanding Natural Beauty (AONB) or Nature Improvement Areas (NIA), or Registered Parks and Gardens or other historic landscape settings.
- 5.3.32 Officers have identified where development could be integrated with appropriate landscape mitigation along with opportunities to enhance landscape character, settlement edges and green corridors and where landscaping issues previously mentioned can be mitigated against and improved upon.

Heritage and Archaeology

- 5.3.33 Central Bedfordshire has a rich and diverse heritage with areas of high archaeological and historical importance. It is important to retain and protect these valuable features or areas that are a part of the heritage of Central Bedfordshire as they help create sense of place, wellbeing and contribute to the area's identity. The Council's Archaeology and Conservation Officers have provided comments on possible impacts from development on the area's heritage.
- 5.3.34 With regard to archaeology, sites may affect protected Scheduled Monuments (SM) or their settings. Sites may also be situated on land that has multi-period archaeological potential. This refers to land that has seen previous historical uses throughout multiple periods of time, for example a site may contain Roman and Anglo-Saxon archaeology. This doesn't necessarily mean

development cannot be placed here; rather mitigation would need to be undertaken prior to the commencement of development. Sometimes it may be necessary for information on areas with archaeological potential to be gathered before any development proposals are submitted as a planning application. This information is needed to help assess the impact the development will have on the archaeological features and what type of mitigation might be needed to allow the development to happen.

- 5.3.35 Possible impacts on heritage assets such as Scheduled Monuments or Listed Buildings are an important consideration where new development may cause harm to the buildings/features themselves or have an impact on the setting or surroundings of these protected features. An assessment must be made to understand if these impacts can be mitigated.
- 5.3.36 The Council's Archaeological Officers have used the information in the Central Bedfordshire Historic Environment Record to inform the comments that they have made. Conservation comments have been supplemented with information from Conservation Area Appraisals for settlements in Central Bedfordshire which have them.

Ecological Assets

- 5.3.37 The biological, geological and ecological assets of an area that a site may affect were assessed by the Council's Ecologist. Sites may be situated adjacent to or near areas of environmental value, constrained by nationally significant designations such as Sites of Special Scientific Interest (SSSI's), or may be within the proximity of sites that are of local importance e.g. Local Nature Reserves (LNRs) and County Wildlife Sites (CWS).
- 5.3.38 Impacts on local sites such as these can sometimes be mitigated by providing environmental enhancements to ensure a net gain in biodiversity on the site can be achieved. This question within the criteria also allows an understanding of the needs of existing species and habitats that may be affected by an allocation and promotes the awareness of protected species that may reside within the area such as bats and amphibians.

Open Space and Green Infrastructure

- 5.3.39 This question addresses how the potential development of the submitted site would affect green infrastructure and open space. Assessment and comment is provided by Green Infrastructure and Leisure Officers within the Council. The question looks at the proposed site's potential impacts (both positive and negative) on Green Infrastructure and Leisure, and the potential for enhancement and mitigation.
- 5.3.40 Open space refers to land that is accessible to the public for leisure and recreation. The Council's Leisure Strategy provides information about identified Leisure sites. Development could result in the loss of open space, or could enhance or create new open spaces within development.

5.3.41 Green infrastructure refers to the network of multifunctional green spaces including habitat and watercourse networks, paths and open spaces. It is important in the delivery of high quality, sustainable development, alongside other conventional forms of infrastructure. Development could damage existing green infrastructure, or prejudice the delivery of planned green infrastructure, or could enhance existing green infrastructure, and include the creation of new green infrastructure to enhance the green infrastructure network. Information on the planned green infrastructure network is set out in County, District and Town and Parish Green Infrastructure Plans.

Minerals and Waste

5.3.42 Central Bedfordshire's geological character includes a variety of different minerals, some of which can be extracted, for example Silica Sand. Desirable minerals that exist within the county are finite in that once extracted, it will take an unfeasible length of time for these resources to rejuvenate. Mineral extraction sites that currently exist within Central Bedfordshire are highlighted within Central Bedfordshire Council's Minerals and Waste Local Plan (2014) which also highlights the importance of preventing the loss of mineral resources from surface developments. Therefore, this question addresses whether sites are within Mineral Safeguarding Areas (MSA) or in close proximity to any mineral extraction sites.

5.3.43 Also, this question identifies any impacts from new development on existing waste sites. This involves; landfill sites, waste transfer sites, biological treatment of waste sites (composting, anaerobic digestion) and thermal treatment of waste sites (incineration) which are also included in the Minerals and Waste Local Plan. Call for Sites submissions that are near to these waste sites may be affected by noise, light or possible air pollution therefore it is important to note the existence of any waste related businesses.

Planning History

5.3.44 This section reviews the planning history of the site. This provides information on any previous uses, any proposed uses and also any issues which the planning process has already identified. Importantly though, just because a site has been refused planning permission in the past this does not mean it is automatically unsuitable for allocation. It is also important to understand whether previous land uses could have potentially polluted the land.

5.3.45 Sites which already have planning permission for the proposed residential use will have already been excluded at stage one.

6) Site Assessment: Stage Three

6.1 Purpose of Stage Three

- 6.1.1 The achievability of the site is assessed in stage three. This considers whether the site is viable and whether there is a reasonable prospect that the site would be delivered within the period covered by the Local Plan.

6.2 Exclusion of sites

- 6.2.1 Sites are excluded in this stage if they have already been shown to have a large number of constraints which would require considerable expense to mitigate against and they are also shown to be unviable. In addition sites are excluded if it is shown that they could not come forward within the Plan Period (2015-2035).
- 6.2.2 This stage requires officers to make a judgement using planning balance. Whilst some sites may not appear to be viable when an assumption is made on level of planning contributions required, it would not be appropriate to exclude them based on this alone until further work has been done, unless the assessment has overwhelmingly shown that there would be a number of other constraints requiring mitigation and therefore affecting viability, for example a major infrastructure requirement.

6.3 Categories of Assessment

Viability

- 6.3.1 Consultants have been employed to undertake a high level viability assessment of the Plan which assesses different site typologies based on location and site size. This provides a broad indication of whether development of a site of the suggested size is likely to be viable in this location. Further information on viability is available in the separate Viability Study.
- 6.3.2 The viability work has assumed a £38,000 per dwelling cost of infrastructure/ Section 106 contributions. This is based upon research which has been undertaken looking at previously collected s106 planning obligations associated with planning consents in Central Bedfordshire.
- 6.3.3 This question categorises sites in the following way:
- High Viability –Sites that can achieve the upper benchmark land values and required infrastructure costs
 - Medium Viability –Sites that can achieve the lower benchmark land values and required infrastructure costs
 - Low Viability –Sites that do not achieve the lower benchmark land values and required infrastructure costs

Achievability

6.3.4 This section uses the submitted information to make an assessment on whether there are any market factors which would affect the site coming forward. It also uses the submitted information to identify when the site could come forward, and how long it would take to build the entire site.

7) Results

7.1 Table of Results

- 7.1.1 All sites are listed in Appendix D, where it is identified whether further assessment will be undertaken for each site or whether the site has been excluded from the Local Plan process. Where sites have been excluded, a brief explanation is provided as to why the site will not be considered any further. Where sites are proposed to be progressed, it has been identified whether officers will continue to consider the site in its entirety or propose only taking forward a portion of the site only for further assessment.
- 7.1.2 No maps have been produced as part of this document. For red line boundaries please see the Parish Maps which were published on the Council's website in May 2016 showing all sites submitted (see www.centralbedfordshire.gov.uk/localplan). Site maps with updated red-line boundaries will be produced for the SHLAA document, when the Council has had chance to review the results of this consultation and consider which portions of sites are likely to be appropriate on sites which will be considered further as part of the Local Plan.
- 7.1.3 The columns of the table are identified below with an explanation on the information provided in each column:
- **ID:** This is gives the reference number of the site;
 - **Site Name:** The name of the site;
 - **Parish:** The parish which the site falls in;
 - **Nearest Settlement:** the nearest settlement to the site, this had been added to make it easier to find sites on the parish maps;
 - **Green Belt:** Whether the site is designated Green Belt;
 - **Site Size:** the size of the site in hectares, as measured after plotting the submitted red line boundary on GIS;
 - **Overlapping Submissions:** Notes where other submissions overlap the site;
 - **Outcome:** Identifies whether the Council believe the whole site or part of the site should be considered in further assessment work, or whether it is excluded and therefore will not be considered further in Local Plan process;
 - **Justification:** This column explains why the site has been excluded, or why only a portion is considered appropriate. No information is provided in this column for sites which are going to be considered further in full, though this does not necessarily mean that no significant constraints have been identified.

7.2 Parish Breakdown

- 7.2.1 The table in Appendix E presents a summary of the total number of sites which were excluded at each stage of the assessment process. As shown there are a significant number of sites which are proposed to be considered further as part of the Local Plan process and further assessment of the

suitability, availability and achievability of these sites will provided in the upcoming SHLAA document.

- 7.2.2 It is important to note at this stage that these numbers include re-submissions and some duplicates where some parcels of land have been submitted twice. Therefore it is not appropriate to use these figures to draw judgements on the overall number of sites or land available. All sites will be filtered for the SHLAA to remove any duplicate parcels of land.

8) Next Steps

8.1 Sites which have been excluded

8.1.1 Sites which have not met the requirements of site assessment process will not usually be considered further as part of the Local Plan process unless collectively together with other sites they are capable of coming forward as wider allocations. If it is considered that a site has been unfairly excluded then there is an opportunity to submit formal representations on this technical paper. These must however be made in writing to be considered.

8.2 Site identified for further assessment

8.2.1 The sites which have been identified for further assessment will be considered in further detail during the next stages of the Local Plan. This will be informed by technical evidence alongside a review of the site assessment information and any information that has been subsequently received, for example information on access or viability. Further consultation with internal experts will also take place on any sites which are considered further.

8.2.2 Where a site has been identified for further assessment, this does not mean that potential barriers to development were not identified during the site assessment process. Some sites which have been identified for further assessment may have had issues identified during the site assessment process, but have been progressed to understand the potential for mitigation.

8.3 Production of SHLAA

8.3.1 A full SHLAA will be produced in line with national guidance to accompany the draft Local Plan at the pre-submission consultation stage in Spring 2018. This will further the work presented in this document to produce a list of sites which are **suitable**, **available** and **achievable** in line with national guidance.

8.3.2 Importantly, the SHLAA will not in itself determine whether a site should be allocated for development. The SHLAA will instead provide information on the range of sites which are available to meet need, leaving it to the Local Plan itself to determine which of those sites should come forward as allocations. Therefore inclusion of a site in the SHLAA does not necessarily mean that the site will be selected for allocation the Local Plan.

8.3.3 The Local Plan will identify allocations with reference to the identified Strategy, Vision and Objectives. It will use the information in the SHLAA, alongside a number of other studies and evidence including for example:

- The Sustainability Appraisal;
- The Sequential Approach to Flood Risk;
- The results of public consultation;
- Transport Modelling;
- Technical evidence studies;
- Settlement capacity study;

- A1 study;
- Growth options studies;
- Further consultation with internal experts.

8.4 Site Allocations in the Local Plan

- 8.4.1 The draft Local Plan (Regulation 18) only identifies broad locations for growth. These broad locations are not intended to be representative of sites at this stage, and instead show where the evidence reviewed to date is suggesting that growth should be directed to. These broad locations will be subject to consultation, and then the results of this consultation along with a number of evidence studies will be used to select sites for allocation to meet the Plan target using the list of suitable, available and achievable sites in the SHLAA. Final site allocations will be available to view in the pre-submission version of the Local Plan which is expected to be published in Spring 2018.

Appendices

Appendix A: Glossary

Appendix B: National SHLAA guidance

Appendix C: Site Assessment Criteria

Appendix D: Preliminary assessment results

Appendix E: Summary of assessment by parish