

# **Strategic Employment Site Assessment Technical Document**

July 2017





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# Executive Summary

This document presents the conclusions of the site assessment process for the delivery of stand alone strategic employment development through the Council's Calls for Sites.

In total the Council received 847 sites for consideration across two separate Call for Sites processes, 77 of these were proposed for the delivery of employment either as mixed use proposals or as stand alone employment sites. Of the 77 submitted sites, 30 were below the 10ha threshold which was used to determine if a site could deliver strategic employment and were therefore discounted from the process. 47 sites were therefore subject to a detailed site assessment process undertaken by Peter Brett Associates, to identify whether they are suitable, available and achievable in line with national guidance to deliver strategic scale employment.

Whilst all 47 sites were assessed for the delivery of strategic employment, and some will potentially be taken forward within the next version of the local plan as sustainable mixed-use proposals, the purpose of this technical paper is to identify options for the delivery of stand alone strategic employment sites within Central Bedfordshire.

At this Regulation 18 stage, the draft local plan identifies three stand alone strategic employment options. This document provides a summary of the technical site assessment process.

## Important information

This Site Assessment Technical Document presents the results of the assessment work undertaken in preparation for the Local Plan. It is a relatively high level assessment and does not ultimately guarantee the development of any site.

The assessment of sites as presented in this document has been undertaken to ensure that sites that have clear constraints are excluded from assessment.

The technical site assessment work has therefore supported the identification of stand alone, strategic employment locations in the Draft Plan.

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

## 1) Introduction

### 1.1 What is the Strategic Employment Site Assessment Technical Document?

- 1.1.1 This Employment Site Assessment Technical Document presents the 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 and provides a list of all the sites which have been considered for the delivery of strategic employment. It also identifies which of the submitted sites will not be considered further as part of the Local Plan.

### 1.2 Relationship to the Local Plan

- 1.2.1 The National Planning Policy Framework (NPPF) paragraph 17 states that every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth.
- 1.2.2 It is continued in paragraphs 18-20 that : the Government is committed to securing economic growth in order to create jobs and prosperity, as well as ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Significant weight should therefore be placed on the need to support economic growth through the planning system. To help achieve economic growth, local planning authorities are required to plan proactively to meet the development needs of business and support an economy fit for the 21st century.
- 1.2.3 The assessment of employment sites therefore is an important step in the preparation of a Local Plan as it assesses the availability, suitability and achievability of land in the authority's area to meet the identified economic needs over the plan period.
- 1.2.4 The terms 'suitable', 'available' and 'achievable' are defined in Planning Practice Guidance written by national government which can be viewed using the following link <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>
- 1.2.5 Information on the minimum number of jobs CBC must plan for is set out within the Functional Economic Market Assessment and Employment Land Review study (May 2016) which was undertaken by Peter Brett Associates (PBS). This study was initiated in 2015 prior to the launch of the new local plan for Central Bedfordshire in 2016 and therefore covers the period 2011 to 2031. It is considered that the study forms a robust evidence base in the identification of a minimum jobs requirement for the draft local plan. Further work and analysis will be undertaken to inform the next version of the local plan.

- 1.2.6 Whilst there is no requirement to produce an employment site assessment paper to support the version of the Local Plan produced for this Regulation 18 Consultation, the Council considered that it would be helpful to provide a summary of the technical site assessment process at this stage and to show how the potential allocations were identified.

### **1.3 Baseline Assessment of Sites**

- 1.3.1 The assessment of potential strategic employment sites within Central Bedfordshire has been undertaken by PBA, an independent consultancy.
- 1.3.2 The site assessment process has remained independent of the planning application process. Sites have been assessed based upon the information submitted during the Call for Sites and market signals. Where planning applications have also been submitted for the sites, these planning applications are considered independently of the site assessment process, based on the information provided as part of the planning application.
- 1.3.3 In assessing each site PBA did not take into account other sites submitted nearby; this means that no assessment of the cumulative impact of multiple submissions in one area, either within Central Bedfordshire or a neighbouring authority, has yet been undertaken. Each site has therefore been considered in isolation on its own merits. Decisions about any cumulative impact of sites on an area will be made later in the plan process when deciding upon which sites should be allocated to deliver strategic employment. 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 initiated in December 2014 and the second in February 2016. A full schedule of all the sites submitted through the two processes is included within Appendix B. The schedule identifies the site name, address and size, the parish within which it is located and if it is located within or outside of the Green Belt.
- 2.1.2 For clarification, 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).
- 2.1.3 In May 2016 the Council published all the sites submitted for housing, employment or Gypsy and Traveller uses through the two call for sites processes on its website. For each Parish a map was published 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.

### **2.2 Strategic Sites**

- 2.2.1 Whilst the purpose of the 2015 Call for Sites was not to gain further employment sites, sites were none the less submitted. However, by the time the 2016 Call for Sites was undertaken, the Employment Land Review was nearing completion and the draft findings indicated that within Central Bedfordshire, there are sufficient existing employment sites and allocations to help meet the needs of the local economic market. The study did identify however, that whilst recognising the need to deliver sustainable mixed use development through the local plan, Central Bedfordshire is well placed due to our strategic transportation network, to deliver footloose strategic warehousing and distribution employment.
- 2.2.2 Due to the successful delivery of key strategic employment sites within Central Bedfordshire, there is now a lack of strategic scale, high quality sites that are well located to the strategic transportation network that are capable of meeting this specific need. Therefore, the Call for Sites undertaken in 2016 specifically requested sites to be submitted for strategic employment with a minimum of 10 hectares (Ha). Sites that did not meet the minimum site area of 10ha were not assessed as part of 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 of the housing criteria are available in the housing site assessment technical paper which is also subject to consultation during this Regulation 18 consultation.
- 3.1.2 Between 30th June and 29th July 2016, the Council consulted on the criteria for strategic employment sites. Following the consultation and in partnership with specialist officers within the Business and Economic team, amendments were made to the assessment criteria. PBA also added a Market Signals element to the criteria in order to ensure the assessment is robust. The final Site Assessment Criteria is provided in Appendix C.
- 3.1.3 The table in Appendix D summarises the results of assessment for each site.

### 3.2 Assessment 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 cannot be mitigated;
  - **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 key basic criteria. This allowed the most unsuitable sites to be screened out and reduced the number of sites 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, PBA used professional knowledge and judgement to determine 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 market signals and if and when it would be developed, with a decision made based upon professional knowledge and judgement at the end of the stage.



## 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. Where specialist information was required, this was sourced by the Council (i.e. from our flood risk consultants) and forwarded to PBA to translate and input in to the assessment.

#### Provisional Site Capacity

4.3.2 Those who submitted a site were asked if the site met the minimum 10ha requirement as well as the estimated floor space that could be accommodated. To be considered as strategic, sites were required to be capable of delivering a minimum of 40,000sqm of floor space

## Flood Risk

- 4.3.3 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).

- 4.3.4 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.
- 4.3.5 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.
- 4.3.6 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

- 4.3.7 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)
- 4.3.8 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, and therefore listed buildings are instead considered at stage two with input from internal historic conservation professionals.
- 4.3.9 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.

### Critical Infrastructure

- 4.3.10 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.
- 4.3.11 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

- 4.3.12 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.

4.3.13 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 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

4.3.14 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. 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, particularly where it was considered that there may be merits to a site which may outweigh the harm to the Green Belt.

4.3.15 In order to ensure a consistent approach and to ensure the proposals within the plan are evidence based, PBA considered the outcomes of the Strategic Green Belt Review, noting if the proposed site was situated within a parcel of land identified within the Green Belt study as making only a '*weak*' or '*relatively weak*' contribution to the wider Green Belt. Where a site sits within a parcel making a '*strong*' or '*relatively strong*' contribution, PBA used their professional knowledge and judgement to identify any merits to the site or proposed use that may outweigh the harm to the Green Belt and which may contribute to identification of exceptional circumstances.

## 5) Site Assessment: Stage Two

### 5.1 Purpose of Stage Two

- 5.1.1 Stage two of the Site Assessment Criteria was 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. The expertise of Council Officers as well as external consultants provided information which PBA utilised to undertake this stage of the assessment.

### 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 an informed judgement at the end of the stage using 'planning balance'. This enabled 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.

### 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 and reviews the status of any Neighbourhood Planning in the area.

### Physical Constraints

- 5.3.5 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.

### Relationship to settlement

- 5.3.6 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.
- 5.3.7 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 therefore makes an assessment on whether development of a site to deliver strategic employment would have an adverse impact on the natural or historic forms of the settlement.

### Agricultural Land Quality

- 5.3.8 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.
- 5.3.9 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.

#### Transport & Access to Services

- 5.3.10 All sites must be accessible and 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 for strategic employment purposes. These questions assesses the proximity of a stand alone strategic site to town and local centres, bus stops with frequent services and distance to the nearest train station in order to consider the ability of workers to access the site and amenities during the working day by sustainable forms of transport.
- 5.3.11 This section also considers the proximity of the proposed site to the strategic road network. A Key element of locating footloose employment is proximity to the strategic road network. Sites with direct access scored Green, sites with access via limited use of local roads scored as Amber whilst sites without access to the strategic road network scoring as red.
- 5.3.12 The assessments made on transport and access is representative of the information known at the time of assessment, and accessibility will be further considered as part of the allocation process.

#### Drainage and Flooding

- 5.3.13 At stage two, further work has been carried out by the Council's flood consultants, JBA Planning, and consideration has been given as to whether there is currently capacity to supply potable water and remove waste water from strategic employment sites.
- 5.3.14 These questions use the JBA work to categories 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
  - Amber: Ordinary Watercourse Present, further assessment required to confirm flood risk
  - Green: Site is at limited risk of surface water flooding, assessment is unlikely to be required

#### Environmental Health

- 5.3.15 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.
- 5.3.16 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.

- 5.3.17 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.
- 5.3.18 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

- 5.3.19 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.
- 5.3.20 This question incorporates comments from the Council's Landscape Officers. It addresses potential issues new strategic employment 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.
- 5.3.21 Potential impacts on important 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.

#### Heritage and Archaeology

- 5.3.22 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.
- 5.3.23 With regard to archaeology, strategic employment 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.



- 5.3.24 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.
- 5.3.25 The Council's Archaeological Officers have used the information in the Central Bedfordshire Historic Environment Record to inform the comments that they have made. This information was passed to PBA to include within the assessments.

#### Ecological Assets

- 5.3.26 The biological, geological and ecological assets of an area that a site may affect were assessed by the Council's Ecologist and provided to PBA. 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).
- 5.3.27 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

- 5.3.28 This question addresses how the potential development of the submitted site for strategic employment purposes would affect green infrastructure and open space. Assessment and comment is provided by Green Infrastructure and Leisure Officers within the Council and provided to PBA to include within the assessment.
- 5.3.29 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.
- 5.3.30 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. Information on the planned green infrastructure network is set out in County, District and Town and Parish Green Infrastructure Plans.

## Minerals and Waste

- 5.3.31 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.
- 5.3.32 Also, this question identifies any impacts from new strategic employment 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

- 5.3.33 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. It is also important to understand whether previous land uses could have potentially polluted the land.

## **6) Site Assessment: Stage Three**

### **6.1 Purpose of Stage Three**

- 6.1.1 The availability of the site for strategic employment purposes is assessed in stage three. This considers whether there is a reasonable prospect that the site would be delivered within the period covered by the Local Plan as well as market signals that could indicate the likelihood of the site delivering the proposed employment.

### **6.2 Categories of Assessment**

#### Achievability

- 6.2.1 This section uses the submitted information to make an assessment as to when development could realistically commence as well as the indicative build out time for the entire site.

#### Market Signals

- 6.2.2 Stage three also considers market signals which is an element added by PBA to ensure the robustness of the assessment. The market signals sought to identify any factors which may impact delivery of a site, the over/under supply of similar developments in the area, the likelihood of a site being developed and occupied, and a realistic timeline for delivery of the site for strategic employment.
- 6.2.3 For Stage 3, the summary of achievability and the market review provided further understanding of the likelihood of the site being recommended for employment allocation. This information and PBA's professional knowledge contributed to whether the site passed this stage of the assessment.
- 6.2.4 If the site succeeded in passing stages 1-3 then it passed the overall site assessment.

## **7) Results**

### **7.1 Table of Results**

- 7.1.1 A list of all the sites that have been assessed are included in Appendix D, along with the identification of those that have passed the assessment undertaken by PBA, and those that have not.
- 7.1.2 Where sites have been excluded from the process, a brief explanation is provided as to why the site will not be considered any further. The full Site Assessments undertaken by PBA are included at Appendix F.
- 7.1.3 Of the sites that were submitted to CBC for strategic employment purposes, 15 passed the site assessment process undertaken by PBS. However, not all of the sites that passed the assessment are required within the current plan period (2015-2035) to deliver strategic employment development. Consideration was given to each site that passed the assessments by CBC officers who used professional knowledge and judgement to identify if the site should be included within the Draft Local Plan as a strategic employment options to deliver footloose demand. Factors such as proximity to the strategic road network and whether the site was submitted as a mix use site and could therefore alternatively be considered for the delivery of employment as part of a sustainable development were considered. Judgement was also given as to whether the site was capable of delivering a stand alone strategic employment use which would meet the identified footloose demand.
- 7.1.4 Appendix E identifies for each of the 15 sites the summary of the PBA assessment, CBC Officer comments and an overall summary as to whether the site is a discounted employment location (Red), has potential as a reasonable employment location as part of a mixed use scheme (Amber) or if it is a preferred employment location option to deliver stand alone, strategic employment opportunities (Green).

## **8) Next Steps**

### **8.1 Site Allocations in the Local Plan**

- 8.1.1 The draft Local Plan (Regulation 18) identifies three options that could deliver stand alone strategic employment uses to meet the demand for footloose employment as identified within the FEMA and Employment Land Review (May 2016) for Central Bedfordshire.
- 8.1.2 These three options will be subject to consultation, and the results of this consultation along with a number of evidence studies will be used to determine if the locations are taken forward as sites for allocation within the next version of the plan which is expected to be published in Spring 2018.
- 8.1.3 Sites that have not been selected as options at this stage may be bought forward to deliver strategic employment opportunities as part of mixed-use sustainable developments. Further work will be undertaken to inform the next version of the local plan.