

Local Plan 2040 Site assessment proformas: Response by Hallam Land Management Ltd

Including separate submissions on Sites ID 975 and 3234

Hallam Land Management Limited welcomes the opportunity to review the position that Bedford Borough Council has reached in assessing potential sites, as presented in the Site assessment proformas.

In response to the earlier Call for Sites, Hallam submitted two sites at Clapham Village including East of Clapham and North of Clapham (Site ID:975 & 976). Hallam has reviewed how Bedford Borough Council has assessed these sites in the proformas and has also reviewed Site ID 3234: Land West of Milton Road Clapham to determine how well they are placed in delivering growth in Clapham and form part of a preferred growth strategy. Separate comments are set out for Sites ID 975 and 3234 in a table structured on the site proforma criteria drawn so far from the Site Assessment Methodology, with Hallam's response set out in response to the Borough Council's assessment for each criterion.

In responding to the site assessment proformas, Hallam note from BBC's narrative that the site assessments are yet to be completed in full. With reference to the full criteria set out in the Site Assessments Methodology, Hallam considers that the sites remain to be assessed against a further 20 criteria, as set out in the following table.

Site Assessment Methodology – remaining criteria to be applied in the site assessment
<p>Air quality – 1. Improve air quality</p> <p>1b. Accessible on foot to a food store?</p> <p>1c. Accessible on foot to a primary school?</p> <p>1d. Accessible on foot or by bus to a major employer?</p>
<p>Biodiversity and green infrastructure – 2. Protect, maintain and enhance biodiversity and habitats</p> <p>2e. Likely to impact on an area currently providing ecosystem services.</p>
<p>Climate Change and energy – 3. Reduce emissions of carbon dioxide and improve energy efficiency</p> <p>3b. Within or adjoining the urban area, a defined settlement policy area or the built form of a small settlement?</p> <p>3c. Accessible on foot to a food store?</p> <p>3d. Accessible on foot to a primary school?</p> <p>3e. Accessible on foot or by bus to a major employer?</p>
<p>Health and wellbeing – 7. Encourage and support physical activity</p> <p>7a. Within 400m of an existing open space or proposing open space within it?</p> <p>7b. Within 800m of a sports facility or proposing a sports facility within it?</p>
<p>Landscape & townscape - 8. Protect and enhance landscape and townscape character and the sense of place in settlements.</p> <p>8a. Likely to have a significant adverse impact on the surrounding landscape?</p>
<p>Population, housing and community – 12. Promote good quality housing, ensuring an appropriate mix of house types and sizes.</p> <p>12a. Likely to provide a mix of housing, including affordable housing?</p> <p>12b. Able to address a particular housing need?</p>
<p>Population, housing and community – 13. Provide for residents' needs and improve access to community services and facilities.</p> <p>13a. Within 800m of a facility where cultural or social activities can be accessed?</p>
<p>Population, housing and community – 14. Promote social cohesion, the prevention of crime and reduce the fear of crime.</p> <p>14a. Likely to encourage social cohesion?</p> <p>14b. Likely to help make the area safer?</p>
<p>Transport – 15. Reduce the need to travel and promote sustainable modes of transport.</p> <p>15a. Within or adjoining the urban area, a defined settlement policy area or the built form of a small settlement?</p> <p>15b. Accessible on foot to a food store?</p>

15c. Accessible on foot to a primary school?
15d. Accessible on foot or by bus to a major employer?

Hallam acknowledge that the criteria reflect the objectives and criteria of the Sustainability Appraisal and in this context anticipate that the proformas when complete will also comprise a Sustainability Appraisal of all development site options that will in turn inform potential site allocations.

Until the assessments are completed against the criteria above, Hallam considers that any conclusions for each site should only be reached then and not before. Reaching overall conclusions in absence of the above are otherwise likely to distort the relative overall merits of all of the sites being assessed. For instance Hallam are promoting two sites - Land East of Clapham (Site ID 975) and Land North of Clapham (Site ID 976). When assessed in full against all criteria including those above, Hallam anticipates that both sites ID 975 and ID 976 are likely to be more sustainable and favourable to the alternative site being considered at Land at Milton Road, Clapham (Site ID 3234), mainly due to their connectivity over favourable distances to local services and facilities, capacity to deliver open space and being able to mitigate landscape impacts. Furthermore, in the submitted tables Hallam has also identified where there are opportunities to address issues raised and where the scoring should properly be updated or corrected in the light of a more detailed consideration of the information available- (e.g. for Land at East Clapham, exploring alternative opportunities for primary access, and mitigating potential conservation, landscape and nature conservation impacts).

In essence, Hallam considers that the assessments in full and their conclusions will be able to bring into focus the shortcomings of sites such as Land at Milton Road, particularly due to its distance from the centre of Clapham and greater landscape prominence. Certainly, in context of the adopted Plan and role of Key Service Centres such as Clapham, Land at Milton Road is an example of a site being allocated in the emerging Clapham Neighbourhood Development Plan that may undermine adopted Local Plan objectives to deliver the expected scale of development (i.e. 500 dwellings) necessary to support the planned provision of a primary school, but critically with a form, density and character that is appropriate to Clapham. Hallam considers such issues are more than likely to be inherent in the ongoing delays to the Neighbourhood Development Plan reaching submission stage - now over a year since the Local Plan 2030 was adopted, and now at a stage where BBC is entitled to intervene in the process. This example underlines the importance of completing the site assessments to inform decisions on site allocations and the preferred development strategy, and perhaps is also critical as evidence to support Neighbourhood Development Plan decisions going forward at a local level.

For the Local Plan Review itself, a comprehensive assessment of all sites is, in Hallam's view, fundamental for informing the extent to which the alternative growth and spatial strategy options can be achieved (i.e. with an adequate supply of suitable and sustainable sites that have sufficient capacity to deliver housing requirements on an appropriate trajectory), and whether they in the round confirm or otherwise the sustainability of the emerging preferred growth strategy option, whichever is identified following responses to this Regulation 18 consultation, in which Hallam has responded.

In response to the growth strategy options presented in the Draft Plan, Hallam anticipates that a range of preferred and sustainable sites that contribute to a smooth and sufficient supply of housing in sustainable locations will be more reflective of the combination of the growth strategy options presented in The Development Options Topic Paper that have been discounted (i.e. Options 1 & 3-7), rather than the preference already indicated for the Option 2 variants. Hallam would argue in this context that the sustainability merits of all the site options when known will be essential for demonstrating that the preferred option is the most sustainable.