



Local Plan 2040

Have Your Say on the Future of Your Borough

Bedford Borough Council – Local Plan 2040 Draft Plan Consultation Response Form

We would prefer to receive your comments via our online system

www.bedford.gov.uk/localplan2040

In particular, if you are a planning consultant or agent please help us to speed up the production of local plans by using the online system. If you require assistance, please contact us on 01234 718070.

Please only use this form if you cannot respond online and to make your comments on the Local Plan 2040 Draft Plan and its supporting documents. You will need to have the document you want to comment on to hand so that you can enter the appropriate references. Copies of the document are available to view on the Council's website www.bedford.gov.uk/LocalPlan2040 and in paper copy (**by 45 minute appointment**) at Bedford Central Library, Harpur Street, Bedford MK40 1PG (01234 718174). Subject to Covid restrictions being lifted on 19th July, paper copies will also be made available at all libraries in the borough, plus the key documents will be available at Rushden, St Neots, Biggleswade and Flitwick libraries during normal opening hours.

Please email this response form to us: planningforthefuture@bedford.gov.uk

Alternatively, responses can be sent by post. Please attach a stamp and send to:

Planning Policy Team
Bedford Borough Council
Borough Hall, Cauldwell Street
Bedford, MK42 9AP

PLEASE DO NOT SUBMIT COMMENTS IN MORE THAN ONE FORMAT OR SEND TO MORE THAN ONE EMAIL ADDRESS. If you have submitted comments electronically you do not need to print and post them. **All responses (electronic and paper) must be received by 5pm on 3 September 2021.**

Your contact information will be kept on the Planning Policy database so that we can keep you up to date about this and other planning policy documents. Personal data will be collected and processed in accordance with the Data Protection Act and the General Data Protection Regulations. Further information can be found on the council's Data Protection webpage and in the Privacy Notices for planning policy.

All responses will be made public.

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If you are a planning consultant or agent, you can do this on-line. You will be able to save a draft to complete later, save the final version for your records, save paper and speed up plan making. If you require assistance, please call 01234 718070

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If you are using an agent, who would you prefer any correspondence to go to?

(Please mark X one box only)

Contact agent Contact client Contact both

Your interest (Please mark X one box only)

Land owner

Resident

Consultant

Agent

Other

Please specify 'Other' (please write in)

Please use a separate form (this page) for each consultation document paragraph, policy or evidence base document you are commenting on.

Which paragraph number, policy number or evidence base document are you commenting on?

**Local Plan 2040 – Draft Plan Strategy Options and Draft Policies Consultation
1.40 Site Assessment Proformas**

Please add your comments in the box below, and continue on an additional sheet if necessary.

In response to the invitation to submit sites that could be available to meet Bedford Borough's growth needs, Hallam Land Management submitted two sites at Clapham Village including East of Clapham and North of Clapham (Site ID: 975 & 976). Hallam has reviewed the Site Assessments that have been carried out on the sites submitted by Hallam, being both Site 975: East of Clapham and Site 976: North of Clapham as set out in the 'Site Assessment Pro Forma' (Bedford Borough Council - Site Assessment Pro Formas (oc2.uk)) and is submitting separate comments, as requested to update and augment the assessment of Site 975. Hallam is also submitting comments on a separate site in Clapham (Site ID: 3234).

These are attached to these representations.

The same representations are made under section 4 of the Consultation Document

Hallam Land Management – Response to Site Assessment Proforma ID 975: Land East of Clapham			
Site Assessment Criteria		Bedford Borough Council's Assessment	Hallam Response
1a. Within or adjoining UAB SPA or built form of a small settlement	?	The site is within or adjoining a defined settlement policy area or within the built form of a small settlement.	Agree.
1e. Outside, adjoining or within the air quality management area?	+	The site is not within or adjoining the air quality management area.	Agree.
2a. Within or adjoining site of nature conservation importance	+	The site is not within or adjoining a site of nature conservation importance.	Agree.
2b. In an area where protected species are known or likely to exist?	xx	Protected species recorded on the site.	Readily resolved through ecology survey and mitigation strategy and extensive opportunities for green infrastructure and new habitat creation on largely arable agricultural site. Impact on protected species should be a neutral feature in consideration of this site.
2c. Potentially able to achieve a net gain in biodiversity?	?	Uncertain or insufficient information.	Development seeks to retain where possible and enhance existing landscape features as part of a wider landscape strategy. A key objective will be to secure biodiversity net gain. The scale and nature of the site allow for extensive opportunities for green infrastructure and new habitat creation on largely arable agricultural site. The particular characteristics of the site mean that the site should be assessed as having a positive (not neutral) benefit on terms of its ability to achieve net gain.
2d. Able to link into the green infrastructure opportunity network?		Nothing chosen.	Site lies next to the Green Infrastructure Network to the east of Green Lane and has the potential to be linked. The site proposal itself is intended to integrate green infrastructure comprising formal open space and informal spaces, including natural green space. The particular characteristics of the site mean that the site should be assessed as having a positive (not neutral) benefit on terms of its ability to link to, and deliver, green infrastructure (see previous call for sites submission for details).
3a. Proposing a renewable energy scheme or extra energy efficiency standards?		Nothing chosen.	None proposed, although requirements are anticipated through the Future Homes Standard before 2025. In this context there is the opportunity for the proposal to be guided by principles for development to be 'low carbon' ready.

<p>4a. Likely to impact on designated or non-designated heritage assets or their settings? For more detailed assessment see Site Pro formas supporting document. www.bedford.gov.uk/LocalPlan2040</p>	<p>x</p>	<p>The proposal has the potential to cause harm to heritage assets. This harm may range from low to high. There may be options to avoid, reduce or mitigate this harm and where sites have not been ruled out altogether for other reasons, further assessment will be undertaken to more fully explore impacts on significance and options for harm reduction and mitigation. This further assessment may ultimately lead to the conclusion that the site should not be allocated.</p>	<p>Hallam considers that the development can mitigate against any harm of the development on the setting of the Church and this should not be a reason that the site is not allocated. Indeed well designed development (as set out in the previous call for sites submission) indicates how development may enhance the setting of the church.</p> <p>Enhanced pedestrian access and the provision of dedicated car parking for the church would also be benefits of the proposal.</p> <p>The particular characteristics of the site, and design opportunities (see previous call for sites submission for details), mean that the site should be assessed as having a positive (not negative) benefit on terms of impact (and indeed enhancement of) designated and non designated assets.</p>
<p>Conservation Comments (informs 4a above)</p>		<p>Large scale development with the potential to impact on the setting of several listed buildings. Site located adjacent to St Thomas's (grade I), with access located close to churchyard on The Green. Could result in a moderate level of less than substantial harm to the building, as the Church draws strongly on its rural setting to north which is likely to be lost through the proposal. Late 19th century farm buildings associated with Church Farm (non-designated heritage assets) located within site.</p>	<p>The proposal seeks to mitigate the potential harm to the setting of the Church by providing a view corridor – envisaged as a tree lined avenue or similar through the site towards the Church and creating an area of open space to the immediate north of the Church.</p> <p>Although Hallam does not agree with the value of the Church Farm buildings in contributing to the setting of the Church, there may be scope to consider retaining the farm buildings as a setting feature.</p> <p>The particular characteristics of the site, and design opportunities (see previous call for sites submission for details), mean that the site should be assessed as having a positive (not neutral) benefit on terms of impact (and indeed enhancement of) on conservation.</p>
<p>Archaeology Comments (informs 4a above)</p>		<p>Potential high harm to (?)locally significant archaeological remains = low/moderate overall impact?: Known heritage assets of archaeological interest within site. Southern half of site already subject to some archaeological investigation which identified Iron Age and Roman settlement, with some later medieval and post-medieval activity. Part of the medieval settlement of Clapham Green also falls within the proposal area and the below ground remains of a 19th century farmstead. Moderate to high potential for previously unidentified heritage assets of archaeological interest. Limited potential for the proposal to impact upon the setting or settings of heritage assets of archaeological interest. If allocated, will require pre-determination archaeological evaluation.</p>	<p>Hallam considers that mitigation, as suggested would involve pre-determination archaeological evaluation.</p>

5a. Likely to increase future economic and employment opportunities?		Nothing chosen.	<p>Agreed, although development may have indirect benefits of supporting employment arising from greater support to local services.</p> <p>The ready accessibility of the site (including for pedestrians and cyclists) to the principal commercial focus and facilities of Clapham, will result in greater use of existing village centre shops, generally locally owned, with the specific characteristics and location of the site resulting in significant additional local economic benefits (in particular in relation to other locations).</p> <p>This should be assessed as a major (XX) positive benefit of the proposals.</p>
6a. Proposing a main town centre use in, on the edge or outside of a town centre?		Nothing chosen.	Agreed.
8b. Within the existing settlement form?	+	The site adjoins a defined settlement policy area or the built form of a small settlement.	Agreed. Moreover the site is well related to the core and heart of the settlement. It is correctly assessed as a benefit.
9a. On previously developed land?	x	The site is not previously developed land as defined in the NPPF.	Agreed, although this should not be justification to discount a site if brownfield sites are not available or sustainable or deliverable.
9b. On best and most versatile agricultural land ie grades, 1, 2 or 3a?	x	All or a majority of the site is best and most versatile agricultural land as defined in the NPPF.	The degree of impact must be balanced with wider considerations and in this context should not alone be justification to discount a site.
10a. Within a groundwater source protection zone?	0	The site is located within a source protection zone but the proposed use is unlikely to be a risk to water supplies.	Agreed.
11a. At risk of flooding?	+	The site is within flood zone 1 (areas that have been shown to be at less than 0.1% chance of flooding in any year).	Agreed.
15e. Connect highway without constraint?	?	Potential access requiring mitigation.	Hallam considers constraints can be resolved.
15f. Highway or junction capacity issues	x	Serious capacity constraint.	Hallam considers constraints can be resolved. See below.
Highway comments. For more detailed assessment see Site Pro formas supporting document. www.bedford.gov.uk/LocalPlan2040		There are two access points proposed: The Slade and Green Lane. Both are narrow roads which could be quite seriously adversely affected by additional traffic from a site of this size. There is some moderate traffic in the area which would almost certainly be made worse by this size development. Via The Slade access to the site there is a bus stop 160m away	<p>High level transport assessment work has been undertaken to demonstrate that the two access points and connecting roads have adequate capacity.</p> <p>Hallam, in view of concerns raised, has explored alternative options for a direct access from the High Street. A main primary access with</p>

	<p>where the number 51 bus provides a half-hourly service between Bedford and Oakley. Both proposed access points have adequate pavements which could easily be connected to by this new development. There is no specific cycle connectivity however there are several paved PRoWs in the area which would be suitable for cycling. The proposed vehicular accesses would need to be looked at in greater depth as both currently seem like they connect to roads which would not be able to handle the traffic from 500 new homes. A Transport Assessment should be produced to assess the significant impact this and neighbouring developments will have on local networks.</p>	<p>one / two additional secondary vehicular access would introduce greater optionality and therefore flexibility to ensure that sufficient access can be provided. Consultation with County Highways has confirmed that access solutions can be safely provided within the capacity of the local network and without serious impacts on the local transport network.</p> <p>Hallam agrees with seeking opportunities to maximise pedestrian and cycle connectivity, given the proximity of the site to local services and facilities and ensuring on-site provision of a primary school is highly accessible by active travel options.</p> <p>Maximising cycle connectivity is also considered to be essential given the proximity of the site (& Clapham itself) to Bedford Town Centre and Bedford railway station – which indeed underpins the importance of Clapham forming part of a “Greater Bedford” area for the purposes of supporting sustainable growth.</p> <p>The NPPF emphasises the importance of giving priority to development that supports pedestrian and cycle movements, addresses the needs of those with reduced mobility and creates places that are safe and secure and attractive. Therefore and given the location of the site, the opportunities to deliver and support sustainable transport, the site should be scored positively (X) in terms of its transport and highway considerations (particularly relative to other sites and locations)</p>
Contaminated Land	Nothing chosen.	Agreed.
Environmental Health	No noise concerns for housing but if other uses were considered the may affect existing residential.	Other uses may include a primary school which is not considered to generate any unacceptable noise impacts.
Minerals & Waste conflict of interest	No answer given	Hallam considers there are no conflicts.
Natural England Risks Opportunities	Does not pose risk	Agreed.
Mineral Safeguarding Area	Site does not fall within the boundary of a MSA.	Agreed.

Hallam Land Management – Response to Site Assessment Pro Forma ID 3234: Land West of Milton Road, Clapham			
Site Assessment Criteria		Bedford Borough Council's Assessment	Hallam Response
1a. Within or adjoining UAB SPA or built form of a small settlement	?	The site is within or adjoining a defined settlement policy area or within the built form of a small settlement.	It must be noted that development of the site would elongate the overall form of the village along the former A6 corridor to over a considerable distance from the village centre by 1.6km.
1e. Outside, adjoining or within the air quality management area?	+	The site is not within or adjoining the air quality management area.	Noted.
2a. Within or adjoining site of nature conservation importance	x	The site is within or adjoining a site of nature conservation importance.	Noted.
2b. In an area where protected species are known or likely to exist?	x	Protected species could be affected.	Noted. The limited scale of the site and implications for density etc (see below) significantly limit the opportunities to put in place an effective ecological mitigation strategy and or biodiversity strategy to deliver net gain. This is considered as a major (XX) negative of the site.
2c. Potentially able to achieve a net gain in biodiversity?	?	Uncertain or insufficient information.	500 dwellings and primary school are proposed for a site of 24.3ha which will require development densities which may compromise the wider character of Clapham, or conversely with lower densities will impact on opportunities for green infrastructure to contribute to biodiversity net gain. This is considered as a major (XX) negative of the site.
2d. Able to link into the green infrastructure opportunity network?		Nothing chosen.	It is considered opportunities are constrained by the A6 Paula Radcliffe Way and existing development. This is considered as a (X) negative of the site.
3a. Proposing a renewable energy scheme or extra energy efficiency standards?		Nothing chosen.	Noted.
4a. Likely to impact on designated or non-designated heritage assets or their settings? For more detailed assessment see Site Pro formas supporting document. www.bedford.gov.uk/LocalPlan2040	x	The proposal has the potential to cause harm to heritage assets. This harm may range from low to high. There may be options to avoid, reduce or mitigate this harm and where sites have not been ruled out altogether for other reasons, further assessment will be undertaken to more fully explore impacts on significance and options for harm reduction and mitigation. This further assessment may ultimately lead to the conclusion that the site should not be allocated.	Agreed.

Conservation Comments (informs 4a above)		No likely impact on built heritage assets.	Noted. In the context of wider design and placemaking considerations we would question the impact of developing a site of this size with 500 dwellings and a school, which will require higher densities at the edge of Clapham, impacting on the wider overall character of Clapham and rural edges. While impacts on conservation may be neutral the impacts in terms of place making are negative (and should be factored in)
Archaeology Comments (informs 4a above)		Potential high harm to (?)locally significant archaeological remains = low/moderate overall impact? Known heritage assets of archaeological interest within site (cropmarks). Moderate to high potential for previously unidentified heritage assets of archaeological interest. Limited potential for the proposal to impact upon the setting or settings of heritage assets of archaeological interest. Will require pre-determination archaeological evaluation.	Agreed.
5a. Likely to increase future economic and employment opportunities?		Nothing chosen.	Noted. However since the site is located a substantial distance from the principal village centre and shops and commercial businesses, there will be very limited economic benefits arising from the development and/or an increase in car borne journeys for local services. This is considered as a major (XX) negative of the site.
6a. Proposing a main town centre use in, on the edge or outside of a town centre?		Nothing chosen.	Noted.
8b. Within the existing settlement form?	+	The site adjoins a defined settlement policy area or the built form of a small settlement.	It must be noted that development of the site would elongate the overall form of the village along the former A6 corridor to over a considerable distance from the village centre by 1.6km. The site's location – relative to the built form – should be considered as a major (XX) negative of the site.
9a. On previously developed land?	x	The site is not previously developed land as defined in the NPPF.	Noted.
9b. On best and most versatile agricultural land ie grades, 1, 2 or 3a?	x	All or a majority of the site is best and most versatile agricultural land as defined in the NPPF.	Noted

10a. Within a groundwater source protection zone?	0	The site is located within a source protection zone but the proposed use is unlikely to be a risk to water supplies.	Noted.
11a. At risk of flooding?	+	The site is within flood zone 1 (areas that have been shown to be at less than 0.1% chance of flooding in any year).	Noted.
15e. Connect highway without constraint?	+	No access constraints.	<p>Whilst noting there are no access constraints, it is considered that wider accessibility considerations need to be considered including the proximity of local services and facilities in Clapham and their accessibility by walking and cycling.</p> <p>The potential impacts of providing a primary school in this location must be considered if its catchment is likely to attract journeys across Clapham.</p>
15f. Highway or junction capacity issues	?	Potential capacity problem requiring mitigation.	Noted.
Highway comments. For more detailed assessment see Site Pro formas supporting document. www.bedford.gov.uk/LocalPlan2040		<p>New vehicular access is proposed at two separate points onto Milton Road, both of which seem appropriate. There can be some light traffic in the area, however the site has excellent access to the A6, though this development and other neighbouring ones may contribute to congestion. There are a pair of bus stops directly outside the northern vehicular access where the 51 bus provides a roughly hourly service between Bedford and Rushden. Both proposed access points have a pavement on the opposite side of the road. Near the north of the site on Bedford Rd there is a shared cycle/pedestrian path running along the A6 to Milton Ernest. A Transport Assessment is required to assess cumulative impacts of this site and others proposed in the vicinity. Include pedestrian crossings at both proposed access points to ensure pedestrian access to the existing pavement on Milton Road.</p>	<p>A key disadvantage of this site is the remote location from the village centre (by some 20 minutes or 1.6km). The function and character of Milton Road and High Street and its attractiveness as a route for walking and cycling between the site and village centre must also be considered.</p> <p>Both Milton Road and the High Street are former sections of the A6 through Clapham village and despite the benefits of diverting the A6 along Paula Radcliffe way, the physical legacy of the A6 remains insofar that the High Street and Clapham Road corridor retains the majority of engineering features that supported the trunk road's function – movement remains to be prioritised over place.</p> <p>Significant improvements are required to improve connections between the site and Clapham Village if they are to provide attractive environments where walking and cycling become modes of choice. Locating a primary school at this site makes this ever more important.</p> <p>Traffic generation from the site moving in the prevailing direction to Bedford will result in significant flows through Clapham. Traffic choosing this (shorter) route will travel the length of the village.</p> <p>It is recommended/apparent that traffic issues should result in a negative score on this criteria..</p>

Contaminated Land		Nothing chosen.	Noted.
Environmental Health		Noise concerns relate just to proximity to A6. Twinwoods business park may be a source of noise.	Agreed.
Minerals & Waste conflict of interest		No answer given.	Noted.
Natural England Risks Opportunities		Does not pose risk.	Noted.
Mineral Safeguarding Area		Site does not fall within the boundary of a MSA.	Noted.

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.