
Meeting: Sustainable Communities Overview and Scrutiny Committee

Date: 13 November 2014

Subject: Allocations Local Plan – Scoping Report

Report of: Cllr Nigel Young, Executive Member for Regeneration

Summary: The report outlines the proposed scope of the Allocations Local Plan as set out in the Plan-making Programme and the Development Strategy. The content of the forthcoming “call for sites” exercise is outlined for Members’ consideration.

Advising Officer: Jason Longhurst, Director of Regeneration and Business

Contact Officer: Richard Fox, Head of Development Planning and Housing Strategy

Public/Exempt: Public

Wards Affected: All

Function of: Council

CORPORATE IMPLICATIONS

Council Priorities:

1. The Allocations Local Plan will form part of the Council’s suite of planning policy documents and will sit alongside the Development Strategy. Together these documents work towards the Council priority of “*Enhancing Central Bedfordshire – creating jobs, managing growth, protecting our countryside and enabling businesses to grow*”. In doing so, there is also a contribution towards the priority of “*Promoting health and wellbeing*” (the Development Strategy acknowledges the link between planning and health and wellbeing) and “*Better infrastructure*” (the Development Strategy aims to ensure development is accompanied by the right infrastructure and that developers makes appropriate funding contributions).

Financial:

2. The financial implications of undertaking an Allocations Local Plan were considered by this committee on 12 May 2014 and by Executive on 27 May 2014 in the context of the Plan-making Programme, which agreed the principle of the Allocations Local Plan. Budgetary provision for this Local Plan has been made within the existing Development Planning and Housing Strategy budget.
3. The scale of the Council’s investment in the Allocations Local Plan should be seen in the context of the scale of new investment in Central Bedfordshire that it will enable.

Legal:

4. Planning is a statutory function under various Acts including the Planning and Compensation Act 2004 and Localism Act 2011. Once adopted the Allocations Local Plan will form part of the statutory Development Plan and will be the basis for consideration of planning applications. Until this happens the existing adopted documents will continue to set the planning framework.

Risk Management:

5. The process of producing an Allocations Local Plan is potentially long and complex and high quality project management and risk management skills will be required. Project teams are in place to oversee the work and risk management is part of the process of management. A risk assessment, along with mitigating actions is contained within the Plan Making Programme. Failing to produce a sound Allocations Local Plan could lead to a failure to deliver the required levels of housing, jobs and infrastructure proposed for growth and regeneration in the area in a planned way.

Staffing (including Trades Unions):

6. Staff resources to undertake this project are largely in place. Any resource required can be accommodated within the existing staff structures and budgets.

Equalities/Human Rights:

7. Central Bedfordshire Council has a statutory duty to promote equality of opportunity, eliminate unlawful discrimination, harassment and victimisation and foster good relations in respect of nine protected characteristics; age disability, gender re-assignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
8. The Allocations Local Plan will be subject to a specific Equality Impact Assessment.

Public Health

9. The link between planning and public health is specifically discussed in the Development Strategy, and this provides the strategic context for this Allocations Local Plan. The specific impact on health infrastructure arising from development sites proposed in the Allocations Local Plan will be subject to detailed assessment as the process moves forward.

Community Safety:

10. The Council has a statutory duty to do all that it reasonably can to address community safety across all of its functions. Plan-making has an indirect influence on community safety, setting out policy to deliver appropriate provision of community infrastructure and to ensure that individual development proposals take account of community safety issues.

Sustainability:

11. Sustainable development is at the heart of plan-making. All Local Plans are subject to a specific Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) in order to comply with the relevant regulatory requirements.

Procurement:

12. Not applicable.

RECOMMENDATION(S):**The Committee is asked to:-**

1. **Consider the suggested areas for inclusion and agree the broad parameters for the scope and content of the Allocations Local Plan.**
2. **Support the proposed “call for sites” in November/December 2014.**

Background

13. This report follows the report to this committee on 12 May 2014, where the Plan-making Programme was considered and agreed. The Plan-making Programme includes provision for an Allocations Local Plan and sets out briefly its initial scope as *“To review boundaries such as Green Belt, Settlement Envelopes etc., allocate non-strategic sites for development across a range of uses for the period up to 2031 and to provide standards for development.”*
14. The Allocations Local Plan is also needed in order to deliver sufficient housing to meet the requirements of the emerging Development Strategy. Policy 29 of the emerging Development Strategy explains the overall housing provision to be delivered within the plan period (by 2031): *“...New strategic sites are identified in this Development Strategy to deliver around 11,500 new homes. The Council is also planning for an additional 1,000 homes to come forward through the Market Led Sustainable development policy. In addition a further 2,000 homes will be planned for through an Allocations Local Plan and Neighbourhood Plans.”*
15. In essence the Allocations Local Plan will identify specific non-strategic sites to deliver at least 2,000 new dwellings. In addition to this, the Plan provides the opportunity to make and review other designations. The potential scope of the document is set out below in the following sections:
 - Housing provision
 - Boundary reviews
 - Green Infrastructure designations
 - Area profiles
 - Employment sites

Housing provision

16. The Housing Background Paper (June 2014) published to support the Development Strategy sets out a number of possible sources of supply for the 2,000 homes to be allocated. The Development Strategy has considered strategic sites whereas the Allocations Local Plan will consider non-strategic sites. Possible sources are:
 - Sites around settlements in the Green Belt – although, current and recent policy has been largely restrictive to new development here, the Development Strategy enables some limited development to come forward through the Allocations Local Plan. This process can help to deliver sites emerging through Neighbourhood Plans.
 - Sites outside the Green Belt – given the extent of previous allocations the Housing Background Paper considered the scope for additional sites here might be more limited. However, there may be particular opportunities for development, especially where these are locally supported, where they address specific infrastructure issues or where they offer significant community benefit.
17. 2,000 homes is the figure set out in the Development Strategy. It may be that a small additional amount is needed by way of contingency to ensure the 2,000 can be delivered. This issue can be considered further in due course. There is also the potential that changes to the Development Strategy may impact on the Allocations Local Plan, including changes to delivery rates from the strategic sites. It is partly for this reason that substantive progress on the Allocations Local Plan is scheduled to take place after the Public Examination of the Development Strategy.
18. The Development Strategy gives particular emphasis to the issue of accommodation for older people. Within the 2,000 homes to be planned for through the Allocations Local Plan, the Council would expect a significant proportion to be specifically designed for older people. It is suggested that site promoters be asked to consider how their site could help meet the accommodation needs of older people. In addition, specific site submissions should be invited for “extra care” facilities and residential care homes.

19.

Call for Sites

It is anticipated that a 'call for sites' will be issued in November/December 2014 whereby landowners, developers and other interested parties are invited to put forward sites for consideration. Sites submitted on Council-owned land would also be considered as part of this process. The following information should be requested for all sites submitted:

- Location plan
- Site area
- Estimated site capacity
- Existing constraints
- Type and tenure of residential development proposed, including provision for older people and specific needs groups.
- Ownership details (single ownership or multiple)
 - Do all land owners intend to develop the site?
- Information to prove that development of the site will be viable, given the package of S106 likely to be required
- Details on delivery
- Infrastructure package to accompany proposals

20.

Site size threshold

Past experience suggests that a large number of sites are likely to be submitted, many of which are for small sites delivering relatively few dwellings. Using a site size threshold is a useful way of focusing attention on those sites that can make a meaningful contribution to meeting housing need, without diverting extensive resources to smaller sites. The level at which this threshold is set can be discussed in due course but it is suggested that potential site promoters are made aware of the likelihood of site size threshold.

21.

Site Assessment Criteria

Once submitted, the sites will undergo a rigorous site assessment process. The proposed site assessment criteria will be considered by Members of this committee at a later date and will also need to be subject to public consultation. At this stage the criteria is likely to include questions/scoring on the following:

- Sustainability criteria
 - Is the site suitable? / is it sustainably located?
 - Will the site offer benefits to the local community?
 - Does it represent the best possible location/option in comparison with other available sites?
- Availability
 - Is the site available?
 - Are there any land ownership issues which may delay/prevent development?
- Achievability
 - Is the site viable?

22.

The "Market-Led Sustainable Development" policy contained in the Development Strategy contains a list of criteria that apply to schemes coming forward under that policy. As criteria, these could form a useful starting point for the Allocations Local Plan, given their emphasis on high quality and well-located development. This will be considered further in due course.

Boundary reviews

23. While the housing provision set out above is a required element of the Allocations Local Plan there are other potential issues that could be included within the scope of the plan. The Allocations Local Plan presents an opportunity to review the detailed designations on the adopted Policies Map, two such examples – Settlement Envelopes and Green Belt infill boundaries – are set out below.
24. Settlement Envelope review
Settlement Envelopes are an important element of local planning policy. They define the main part of each settlement; help to focus development in the best located areas while preventing most forms of development in the open countryside (the area beyond the Settlement Envelope). It is important that the Settlement Envelopes as defined on the Policies Maps are robust in order to maintain their credibility. Settlement Envelopes were last fully reviewed and updated 15 years ago.
25. The Allocations Local Plan presents an opportunity to revisit and refresh the Envelopes – essentially to check the lines on the map are still in the right position. This review would require a desk-top and site survey exercise of Settlement Envelopes across Central Bedfordshire. This work could potentially be time consuming, although modern technology should help this process to be undertaken more quickly than on previous occasions.
26. It is recommended that the Council invites submissions for changes through the Call for Sites process. The purpose of this exercise would not be to allocate land for development, merely to update and correct the Settlement Envelopes.
27. Review of Green Belt Infill boundaries
The Allocations Local Plan presents an opportunity to review the Green Belt Infill boundaries which were drawn up by the legacy authorities. Green Belt infill boundaries exist in some Green Belt settlements as a way of allowing small-scale infill development within defined parts of the village. Such a review would ensure there is consistency in approach across all of Central Bedfordshire. Existing boundaries can be amended where appropriate and new boundaries created where needed.
28. It is recommended that a comprehensive desk-top and site survey exercise of all Green Belt Infill boundaries be undertaken, including inviting submissions for change and possible new designations. As with the Settlement Envelope Review, the purpose of this exercise would not be to allocate land for development, merely to update and correct the Green Belt Infill Only boundaries. It is recommended that the Council invites submissions for change through the 'call for sites' process.

29. The now-revoked East of England Plan included reference to the potential for compensatory additions to the Green Belt in recognition of the removal of land from the Green Belt around Dunstable and Houghton Regis. This issue was not considered in the Development Strategy but arguably should form part of the scope of the Allocations Local Plan. It is suggested that specific site submissions for extensions to the Green Belt be invited to aid consideration of this issue.

Green Infrastructure designations

30. Designation of Local Green Space
Local Green Space is provided for by the National Planning Policy Framework (NPPF) and once designated is afforded the same strong development restrictions as Green Belt. The Development Strategy identifies a specific area of Local Green Space around Aspley Guise, although the Strategy does provide for other areas to be subsequently identified.
31. It is recommended that work be undertaken with Town and Parish Councils to identify and allocate green space which is 'demonstrably special' to the local community. These sites should not include land which is in the Green Belt. Prior to the commencement of this work, it would be necessary to assess what work has already been undertaken to inform the Leisure Strategy to avoid duplication of tasks across the Council.
32. Open Space Review
There are current disparities between the treatment and designation of open space in the north of Central Bedfordshire and in the South. A review would provide an opportunity to address the two policy approaches and provided a blanket approach to all of Central Bedfordshire.
33. Work on auditing open space across the authority area has already been undertaken by the Leisure team as part of work on the Leisure Strategy. To avoid duplication it is recommended that this be used to form the basis of this review. A combined mapping exercise with Leisure would provide opportunities for efficiencies across the two directorates.
34. An examination of the scope of the Leisure Strategy will need to be carried out in order to assess how well the existing work supports the requirements of the emerging Development Strategy. Depending on the outcome of this, a consultation exercise with Town and Parish Councils may need to be undertaken in order to identify other potential areas of Important Open Space which may not have fallen within the scope of the Leisure Strategy.
35. This review should be aligned with the proposed Settlement Envelope Review as only land within the Settlement Envelope can carry the Important Open Space designation.

Area profiles

36. There is currently information in chapter 3 of the adopted Core Strategy and Development Management Policies document (CSDM) setting out a spatial description for places – known as “area profiles”. This place-based information has proved useful for a number of spatial planning purposes. However, the Development Strategy will supersede the CSDM and therefore on adoption of the Development Strategy the area profiles will be lost. The area profiles are in need of updating and the Allocations Local Plan provides an opportunity to revisit and update these area profiles in the context of new allocations being made. This aspect does not relate to the call for sites exercise but it is important that it is not lost in the overall scope of the Allocations Local Plan.

Employment sites

37. The Allocations Local Plan presents an opportunity to allocate non-strategic sites for employment generating uses, to complement those identified in the Development Strategy. However, the Development Strategy makes sufficient provision for employment land and provides flexible policies relating to new development coming forward. It is not considered necessary to make further employment land available through the Allocations Local Plan.
38. Given the new employment allocations made by the Development Strategy, if there are existing employment sites that would be better put to alternative uses then the Allocations Local Plan would be the opportunity to do this.
39. There is also potential for the Allocations Local Plan to reflect the current emphasis on a sector-based approach to commercial development. The Allocations Local Plan could set out a spatial expression of the current clusters of commercial development and their needs in terms of infrastructure etc.

Summary

40. As discussed above, the scope of the Allocations Local Plan will go beyond the allocation of dwellings. It is therefore recommended that the ‘call for sites’ advertise for the following:
- Sites to accommodate the 2,000 dwellings required by the Development Strategy, including sites identified in Neighbourhood Plans;
 - Changes to Settlement Envelopes, where the existing boundary is not reflective of current land use;
 - Changes to Green Belt Infill Boundary, where the existing boundary is not reflective of current land use;
 - Local Green Space and changes to Important Open Space;
41. Publicity for the ‘call for sites’ will include press releases, advertisements, and letters to be sent to all on the consultation database. Individual letters will be sent to town and parish councils in relation to the Settlement Envelope Review, Green Belt Infill Only Review, Neighbourhood Plan sites and Local Green Space designations.

Conclusion and Next Steps

42. Subject to the Committee's views on the above, the call for sites is anticipated to begin later in November and will run for around 6 weeks. The site submissions would then be considered before public consultation begins. This is currently scheduled for October 2015.
43. Members are invited to provide comments on the initial scope of the Allocations Local Plan set out above.

Appendices:

None

Background papers and their location: (open to public inspection)

None