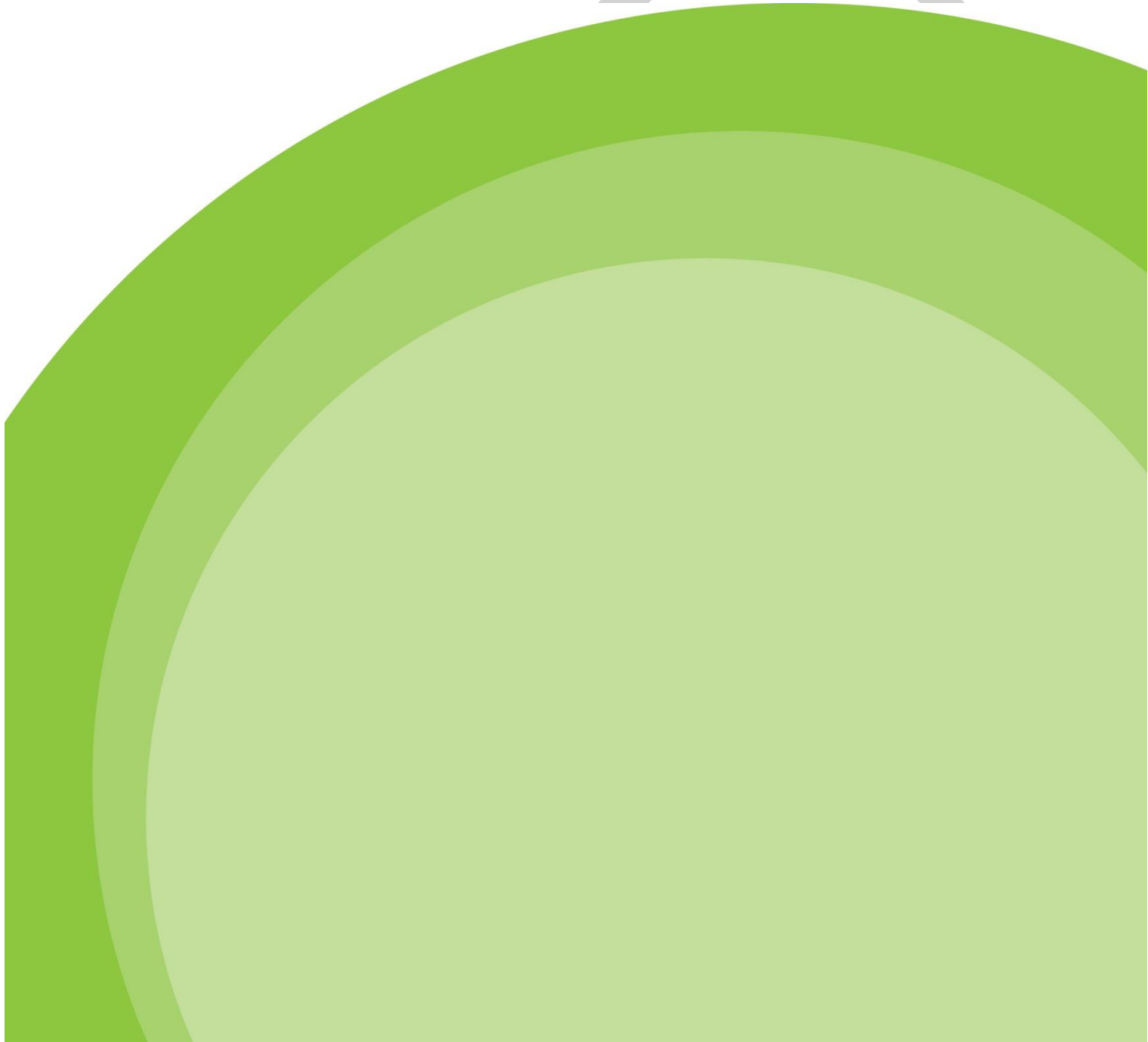


Site Assessment Forms

Sundon



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Site Assessment Framework for HOUSING¹

Site details	
Reference Number	ALP142
Site Name	Land adjacent to Sundon Quarry
Site Address	Sundon Road
Settlement	Sundon
Size	Submitted Developable Area: 40ha Submitted Whole Site Area: 55ha Measured GIS Area: 49.97
Proposed Use	
Any other information	

STAGE 1 : SUITABILITY AND AVAILABILITY (EXCLUSIONARY STAGE)

This section will exclude any sites which do not pass the exclusionary suitability criteria and they will not be assessed further.

STAGE 1A ASSESSMENT

This stage of the assessment rules out sites that are too small or conflict with national policy designations.

Provisional Site Capacity

1	Is the site likely to accommodate less than 10 dwellings? Work out the number of new homes from site size using density of 30dph and exclude up to 40 % depending on site size of land for infrastructure and services, take into account topography or significant areas of undevelopable land. Site Size Gross to net ratio standards <ul style="list-style-type: none"> Up to 0.4 hectare 100% 0.4 to 2 hectares 80% 2 hectares or above 60% <i>Note: for this calculation use the submitted Developable Area, or the area measured in GIS if this is smaller.</i>	No	Number of proposed dwellings as per proforma: 500 dwellings
			Number of proposed dwellings as per CBC methodology: 720 dwellings

Flood Risk (All sites which reach Stage 2 will be subject to the Sequential Test)

2	Is more than 50% of the site located in Flood Zone 2 or 3?	No	
3	Is more than 50% of the site at risk from surface water flooding?	No	

Nationally significant designations (All sites which reach Stage 2 be subject to detailed assessment)

4	Is more than 50% of the site covered by nationally significant designations? These are: Sites of Special Scientific Interest, National Nature Reserves, Scheduled Monuments, Registered Parks and Gardens.	No	
5	Is more than 50% of the site located within the Area of Outstanding Natural Beauty?	No	
Does the site continue to next stage?			Yes

¹ Employment sites and Gypsy and Traveller sites will be assessed using separate bespoke site assessment criteria.

STAGE 1B ASSESSMENT

This stage of the assessment rules out sites that are not well related to existing settlements but are of an insufficient size to be self contained. It also rules out sites which would cause coalescence of existing towns or villages. For the purposes of this assessment, a self-contained site is defined as a site which will provide 1,500 homes or more².

Relationship to Settlement

6	For sites that are not of a sufficient scale to be self-contained, is the site a logical extension to the settlement or are there any major physical constraints (for example A roads, rivers or railways) that separate it from the main settlement?	R	The site is not well related to Luton, Upper or Lower Sundon, separated from each settlement by agricultural land that is designated as Green Belt. The site is considerably smaller than the threshold of 1,500 homes so cannot be considered as a standalone proposal. Development of this site would not therefore be sustainable, as it is not well related to an existing settlement and does not form a logical extension.
7	Does the site cause coalescence between an existing village or town and another existing village or town? If yes, then grade as Amber if the site would be able to provide appropriate buffers or green wedges to mitigate this, or Red if it would not be possible for appropriate buffers to be provided leaving a reasonable developable area based on the individual context of the site.	G	No coalescence issues.
Does the site continue to next stage?			No

² The figure of 1,500 homes has been taken from the Government Publication 'Locally-Led Garden Villages, Towns and Cities'. This defines the eligibility criteria for Garden Villages as standalone settlements of between 1,500 and 10,000 homes. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/508205/Locally-led_garden_villages_towns_and_cities.pdf)

Site Assessment Framework for HOUSING³

Site details	
Reference Number	ALP168
Site Name	The Willows
Site Address	Common Lane, Upper Sundon, Luton, LU3 3PF
Settlement	Sundon
Size	Submitted Developable Area: 1.35ha Submitted Whole Site Area: 1.35ha Measured GIS Area: 0.52ha
Proposed Use	Residential
Any other information	

STAGE 1 : SUITABILITY AND AVAILABILITY (EXCLUSIONARY STAGE)

This section will exclude any sites which do not pass the exclusionary suitability criteria and they will not be assessed further.

STAGE 1A ASSESSMENT

This stage of the assessment rules out sites that are too small or conflict with national policy designations.

Provisional Site Capacity

1	Is the site likely to accommodate less than 10 dwellings? Work out the number of new homes from site size using density of 30dph and exclude up to 40 % depending on site size of land for infrastructure and services, take into account topography or significant areas of undevelopable land. Site Size Gross to net ratio standards <ul style="list-style-type: none"> Up to 0.4 hectare 100% 0.4 to 2 hectares 80% 2 hectares or above 60% <i>Note: for this calculation use the submitted Developable Area, or the area measured in GIS if this is smaller.</i>	No	Number of proposed dwellings as per proforma: 15-20
			Number of proposed dwellings as per CBC methodology: 13

Flood Risk (All sites which reach Stage 2 will be subject to the Sequential Test)

2	Is more than 50% of the site located in Flood Zone 2 or 3?	No	
3	Is more than 50% of the site at risk from surface water flooding?	No	

Nationally significant designations (All sites which reach Stage 2 be subject to detailed assessment)

4	Is more than 50% of the site covered by nationally significant designations? These are: Sites of Special Scientific Interest, National Nature Reserves, Scheduled Monuments, Registered Parks and Gardens.	No	No designations on site.
5	Is more than 50% of the site located within the Area of Outstanding Natural Beauty?	No	Not within AONB
Does the site continue to next stage?			Yes

³ Employment sites and Gypsy and Traveller sites will be assessed using separate bespoke site assessment criteria.

STAGE 1B ASSESSMENT

This stage of the assessment rules out sites that are not well related to existing settlements but are of an insufficient size to be self contained. It also rules out sites which would cause coalescence of existing towns or villages. For the purposes of this assessment, a self-contained site is defined as a site which will provide 1,500 homes or more⁴.

Relationship to Settlement

6	For sites that are not of a sufficient scale to be self-contained, is the site a logical extension to the settlement or are there any major physical constraints (for example A roads, rivers or railways) that separate it from the main settlement?	G	The site is situated to the north of Sundon within the settlement; the site is a logical extension although it is situated on a residential garden.
7	Does the site cause coalescence between an existing village or town and another existing village or town? If yes, then grade as Amber if the site would be able to provide appropriate buffers or green wedges to mitigate this, or Red if it would not be possible for appropriate buffers to be provided leaving a reasonable developable area based on the individual context of the site.	G	Does not cause coalescence
Does the site continue to next stage?			Yes

STAGE 1C ASSESSMENT

This stage of the assessment rules out sites that are not able to meet their critical infrastructure needs⁵.

Critical Infrastructure

8	Can the site meet the critical infrastructure requirements that will enable delivery ⁶ ?	G	N/A
Does the site continue to next stage?			Yes

STAGE 1D ASSESSMENT

This stage of the assessment rules out sites that are not available. A site is considered available for development where there are no legal or ownership problems and the landowner has expressed an intention to develop the site.

Availability

9	What is the existing use of the site? Would the existing use limit the development potential?	A	Residential House and garden
10	Is the land controlled by a developer or land owner who has expressed an intention to develop the site?	G	Intent on developing the site
11	Are there any legal or ownership problems that could delay or prevent development? If Yes, then can these be issues be realistically overcome?	G	No issues
12	Does the site already have planning permission for the proposed use? If yes, then score as Red	G	No planning apps

⁴ The figure of 1,500 homes has been taken from the Government Publication 'Locally-Led Garden Villages, Towns and Cities'. This defines the eligibility criteria for Garden Villages as standalone settlements of between 1,500 and 10,000 homes. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/508205/Locally-led_garden_villages_towns_and_cities.pdf)

⁵ Critical infrastructure is that which has been identified as infrastructure that must happen to enable physical development. These infrastructure items are often known as 'blockers' or 'showstoppers', and are most common in relation to transport and utilities infrastructure. Failure to provide these pieces of infrastructure could result in significant delays in the delivery of development.

⁶ This is an assessment based on the information known at this stage, a full assessment of infrastructure requirements will be undertaken before any sites are allocated.

	because it's not eligible for allocation.		
Does the site continue to next stage?			Yes

STAGE 1E ASSESSMENT

This section records the findings of the Strategic Green Belt Review and also provides a preliminary screening of sites to determine whether they may be capable of demonstrating Exceptional Circumstances. Any site in the Green Belt that is determined as suitable based on the high level SHLAA assessment would still have to demonstrate Exceptional Circumstances to be considered for allocation in the Plan.

Greenbelt

13	Is the site located within the Green Belt?	Yes	100% within Greenbelt
14	If answer to question 13 is yes, then does the site lie within one of the parcels which have been identified in the Central Bedfordshire and Luton Green Belt Study as making only a relatively weak, weak, or no contribution? If yes, site progresses through to Stage 2.	No	
15a	<p>Does the site have all of the following merits that may outweigh the harm to the Green Belt and which may contribute to identification of exceptional circumstances?</p> <ul style="list-style-type: none"> • Adjoining settlement has at least 3 of the following key local services - convenience shop, lower school, middle school, upper school, village hall, GP surgery, post office, library (use settlement audit) • Site makes a strong contribution to housing need (100 plus homes) within the Luton HMA • Site is in or directly adjacent to a settlement that has a mainline rail station or direct access (junction) to the strategic road network (A road or motorway) <p>Sites in Green Belt other than those covered by 14 and 15b that cannot meet these criteria, will not progress any further in this assessment of suitability.*</p>	No	<ul style="list-style-type: none"> • Only two of the three local services exist within Sundon • Does not make a strong contribution to Luton HMA • Sundon does not have a railway station, nor is it near strategic road network.
15b	Sites which have support from the local community as demonstrated through an allocation in an adopted or draft Neighbourhood Plan (that has been subject to Regulation 14 consultation) that do not meet the criteria in question 15a will automatically progress through this stage to be considered further at Stage 2. ⁷	No	Site is not supported by a Neighbourhood Plan
Does the site continue to next stage?			No

⁷ Draft Neighbourhood Plan allocations in Green Belt that are proposed after this site assessment phase has concluded, may still be considered for allocation.

Site Assessment Framework for HOUSING⁸

Site details	
Reference Number	ALP359
Site Name	Former Coach Depot
Site Address	Former Coach Depot, Streatley Road, Sundon, Bedfordshire
Settlement	Sundon
Size	Submitted Developable Area: Not given Submitted Whole Site Area: Not given Measured GIS Area: 0.06
Proposed Use	Residential
Any other information	

STAGE 1 : SUITABILITY AND AVAILABILITY (EXCLUSIONARY STAGE)

This section will exclude any sites which do not pass the exclusionary suitability criteria and they will not be assessed further.

STAGE 1A ASSESSMENT

This stage of the assessment rules out sites that are too small or conflict with national policy designations.

Provisional Site Capacity

1	Is the site likely to accommodate less than 10 dwellings? Work out the number of new homes from site size using density of 30dph and exclude up to 40 % depending on site size of land for infrastructure and services, take into account topography or significant areas of undevelopable land. Site Size Gross to net ratio standards <ul style="list-style-type: none"> Up to 0.4 hectare 100% 0.4 to 2 hectares 80% 2 hectares or above 60% <i>Note: for this calculation use the submitted Developable Area, or the area measured in GIS if this is smaller.</i>	Yes	Number of proposed dwellings as per proforma:
			2-4
			Number of proposed dwellings as per CBC methodology:
			2

Flood Risk (All sites which reach Stage 2 will be subject to the Sequential Test)

2	Is more than 50% of the site located in Flood Zone 2 or 3?	No	
3	Is more than 50% of the site at risk from surface water flooding?	No	

Nationally significant designations (All sites which reach Stage 2 be subject to detailed assessment)

4	Is more than 50% of the site covered by nationally significant designations? These are: Sites of Special Scientific Interest, National Nature Reserves, Scheduled Monuments, Registered Parks and Gardens.	No	No designations on site
5	Is more than 50% of the site located within the Area of Outstanding Natural Beauty?	No	Not within AONB
Does the site continue to next stage?			No

⁸ Employment sites and Gypsy and Traveller sites will be assessed using separate bespoke site assessment criteria.

Site Assessment Framework for HOUSING⁹

Site details	
Reference Number	ALP393
Site Name	Land at Common Lane, Upper Sundon
Site Address	Land at Common Lane, Upper Sundon
Settlement	Sundon (Upper Sundon)
Size	Submitted Developable Area: 4+ha Submitted Whole Site Area: 11ha Measured GIS Area: 11.12ha
Proposed Use	Residential
Any other information	Potential for mixed residential and business development is possible. Site was submitted in 2014, same as NLP 267

STAGE 1 : SUITABILITY AND AVAILABILITY (EXCLUSIONARY STAGE)

This section will exclude any sites which do not pass the exclusionary suitability criteria and they will not be assessed further.

STAGE 1A ASSESSMENT

This stage of the assessment rules out sites that are too small or conflict with national policy designations.

Provisional Site Capacity

1	Is the site likely to accommodate less than 10 dwellings? Work out the number of new homes from site size using density of 30dph and exclude up to 40 % depending on site size of land for infrastructure and services, take into account topography or significant areas of undevelopable land. Site Size Gross to net ratio standards <ul style="list-style-type: none"> Up to 0.4 hectare 100% 0.4 to 2 hectares 80% 2 hectares or above 60% <i>Note: for this calculation use the submitted Developable Area, or the area measured in GIS if this is smaller.</i>	Yes	Number of proposed dwellings as per proforma:
			40
			Number of proposed dwellings as per CBC methodology:
			72

Flood Risk (All sites which reach Stage 2 will be subject to the Sequential Test)

2	Is more than 50% of the site located in Flood Zone 2 or 3?	No	
3	Is more than 50% of the site at risk from surface water flooding?	No	

Nationally significant designations (All sites which reach Stage 2 be subject to detailed assessment)

4	Is more than 50% of the site covered by nationally significant designations? These are: Sites of Special Scientific Interest, National Nature Reserves, Scheduled Monuments, Registered Parks and Gardens.	No	No designations found on site.
5	Is more than 50% of the site located within the Area of Outstanding Natural Beauty?	No	Not within AONB
Does the site continue to next stage?			Yes

⁹ Employment sites and Gypsy and Traveller sites will be assessed using separate bespoke site assessment criteria.

STAGE 1B ASSESSMENT

This stage of the assessment rules out sites that are not well related to existing settlements but are of an insufficient size to be self contained. It also rules out sites which would cause coalescence of existing towns or villages. For the purposes of this assessment, a self-contained site is defined as a site which will provide 1,500 homes or more¹⁰.

Relationship to Settlement

6	For sites that are not of a sufficient scale to be self-contained, is the site a logical extension to the settlement or are there any major physical constraints (for example A roads, rivers or railways) that separate it from the main settlement?	A	The site is considerable in size in comparison to Sundon and not well suited to the settlement, also the site confined by an SSSI and an old disused pit. Could possible be seen as a logical extension.
7	Does the site cause coalescence between an existing village or town and another existing village or town? If yes, then grade as Amber if the site would be able to provide appropriate buffers or green wedges to mitigate this, or Red if it would not be possible for appropriate buffers to be provided leaving a reasonable developable area based on the individual context of the site.	G	Does not cause coalescence
Does the site continue to next stage?			Yes

STAGE 1C ASSESSMENT

This stage of the assessment rules out sites that are not able to meet their critical infrastructure needs¹¹.

Critical Infrastructure

8	Can the site meet the critical infrastructure requirements that will enable delivery ¹² ?	G	N/A
Does the site continue to next stage?			Yes

STAGE 1D ASSESSMENT

This stage of the assessment rules out sites that are not available. A site is considered available for development where there are no legal or ownership problems and the landowner has expressed an intention to develop the site.

Availability

9	What is the existing use of the site? Would the existing use limit the development potential?	G	Agricultural
10	Is the land controlled by a developer or land owner who has expressed an intention to develop the site?	G	Intent on developing site.
11	Are there any legal or ownership problems that could delay or prevent development? If Yes, then can these be issues be realistically overcome?	G	No issues
12	Does the site already have planning permission for	G	Does not already have planning

¹⁰ The figure of 1,500 homes has been taken from the Government Publication 'Locally-Led Garden Villages, Towns and Cities'. This defines the eligibility criteria for Garden Villages as standalone settlements of between 1,500 and 10,000 homes. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/508205/Locally-led_garden_villages_towns_and_cities.pdf)

¹¹ Critical infrastructure is that which has been identified as infrastructure that must happen to enable physical development. These infrastructure items are often known as 'blockers' or 'showstoppers', and are most common in relation to transport and utilities infrastructure. Failure to provide these pieces of infrastructure could result in significant delays in the delivery of development.

¹² This is an assessment based on the information known at this stage, a full assessment of infrastructure requirements will be undertaken before any sites are allocated.

	the proposed use? If yes, then score as Red because it's not eligible for allocation.		permission.
Does the site continue to next stage?			Yes

STAGE 1E ASSESSMENT

This section records the findings of the Strategic Green Belt Review and also provides a preliminary screening of sites to determine whether they may be capable of demonstrating Exceptional Circumstances. Any site in the Green Belt that is determined as suitable based on the high level SHLAA assessment would still have to demonstrate Exceptional Circumstances to be considered for allocation in the Plan.

Greenbelt

13	Is the site located within the Green Belt?	Yes	100% within Greenbelt
14	If answer to question 13 is yes, then does the site lie within one of the parcels which have been identified in the Central Bedfordshire and Luton Green Belt Study as making only a relatively weak, weak, or no contribution? If yes, site progresses through to Stage 2.	No	
15a	<p>Does the site have all of the following merits that may outweigh the harm to the Green Belt and which may contribute to identification of exceptional circumstances?</p> <ul style="list-style-type: none"> • Adjoining settlement has at least 3 of the following key local services - convenience shop, lower school, middle school, upper school, village hall, GP surgery, post office, library (use settlement audit) • Site makes a strong contribution to housing need (100 plus homes) within the Luton HMA • Site is in or directly adjacent to a settlement that has a mainline rail station or direct access (junction) to the strategic road network (A road or motorway) <p>Sites in Green Belt other than those covered by 14 and 15b that cannot meet these criteria, will not progress any further in this assessment of suitability.*</p>	No	<ul style="list-style-type: none"> • Has a lower school, village hall • Does not make a strong contribution to Luton HMA • Is not adjacent to any strategic road
15b	Sites which have support from the local community as demonstrated through an allocation in an adopted or draft Neighbourhood Plan (that has been subject to Regulation 14 consultation) that do not meet the criteria in question 15a will automatically progress through this stage to be considered further at Stage 2. ¹³	No	Site is not supported by a Neighbourhood Plan
Does the site continue to next stage?			No

¹³ Draft Neighbourhood Plan allocations in Green Belt that are proposed after this site assessment phase has concluded, may still be considered for allocation.

Site Assessment Framework for HOUSING¹⁴

Site details	
Reference Number	NLP056
Site Name	Land at Streatley Road
Site Address	Streatley Road, Upper Sundon, Bedfordshire
Settlement	Sundon
Size	Submitted Developable Area: 4ha Submitted Whole Site Area: 2ha Measured GIS Area: 3.49ha
Proposed Use	Residential
Any other information	

STAGE 1 : SUITABILITY AND AVAILABILITY (EXCLUSIONARY STAGE)

This section will exclude any sites which do not pass the exclusionary suitability criteria and they will not be assessed further.

STAGE 1A ASSESSMENT

This stage of the assessment rules out sites that are too small or conflict with national policy designations.

Provisional Site Capacity

1	Is the site likely to accommodate less than 10 dwellings? Work out the number of new homes from site size using density of 30dph and exclude up to 40 % depending on site size of land for infrastructure and services, take into account topography or significant areas of undevelopable land. Site Size Gross to net ratio standards <ul style="list-style-type: none"> Up to 0.4 hectare 100% 0.4 to 2 hectares 80% 2 hectares or above 60% <i>Note: for this calculation use the submitted Developable Area, or the area measured in GIS if this is smaller.</i>	No	Number of proposed dwellings as per proforma: 50-100
			Number of proposed dwellings as per CBC methodology: 63

Flood Risk (All sites which reach Stage 2 will be subject to the Sequential Test)

2	Is more than 50% of the site located in Flood Zone 2 or 3?	No	
3	Is more than 50% of the site at risk from surface water flooding?	No	

Nationally significant designations (All sites which reach Stage 2 be subject to detailed assessment)

4	Is more than 50% of the site covered by nationally significant designations? These are: Sites of Special Scientific Interest, National Nature Reserves, Scheduled Monuments, Registered Parks and Gardens.	No	
5	Is more than 50% of the site located within the Area of Outstanding Natural Beauty?	No	Not within AONB
Does the site continue to next stage?			Yes

¹⁴ Employment sites and Gypsy and Traveller sites will be assessed using separate bespoke site assessment criteria.

STAGE 1B ASSESSMENT

This stage of the assessment rules out sites that are not well related to existing settlements but are of an insufficient size to be self contained. It also rules out sites which would cause coalescence of existing towns or villages. For the purposes of this assessment, a self-contained site is defined as a site which will provide 1,500 homes or more¹⁵.

Relationship to Settlement

6	For sites that are not of a sufficient scale to be self-contained, is the site a logical extension to the settlement or are there any major physical constraints (for example A roads, rivers or railways) that separate it from the main settlement?	G	The site lies within the 'U' shape that Upper Sundon forms, filling in an area of back land. It can be seen as a logical extension.
7	Does the site cause coalescence between an existing village or town and another existing village or town? If yes, then grade as Amber if the site would be able to provide appropriate buffers or green wedges to mitigate this, or Red if it would not be possible for appropriate buffers to be provided leaving a reasonable developable area based on the individual context of the site.	G	No coalescence
Does the site continue to next stage?			Yes

STAGE 1C ASSESSMENT

This stage of the assessment rules out sites that are not able to meet their critical infrastructure needs¹⁶.

Critical Infrastructure

8	Can the site meet the critical infrastructure requirements that will enable delivery ¹⁷ ?	A	N/A
Does the site continue to next stage?			Yes

STAGE 1D ASSESSMENT

This stage of the assessment rules out sites that are not available. A site is considered available for development where there are no legal or ownership problems and the landowner has expressed an intention to develop the site.

Availability

9	What is the existing use of the site? Would the existing use limit the development potential?	G	100% Greenfield back land
10	Is the land controlled by a developer or land owner who has expressed an intention to develop the site?	G	Intent on developing the site
11	Are there any legal or ownership problems that could delay or prevent development? If Yes, then can these be issues be realistically overcome?	G	No issues
12	Does the site already have planning permission for the proposed use? If yes, then score as Red	G	No planning apps

¹⁵ The figure of 1,500 homes has been taken from the Government Publication 'Locally-Led Garden Villages, Towns and Cities'. This defines the eligibility criteria for Garden Villages as standalone settlements of between 1,500 and 10,000 homes. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/508205/Locally-led_garden_villages_towns_and_cities.pdf)

¹⁶ Critical infrastructure is that which has been identified as infrastructure that must happen to enable physical development. These infrastructure items are often known as 'blockers' or 'showstoppers', and are most common in relation to transport and utilities infrastructure. Failure to provide these pieces of infrastructure could result in significant delays in the delivery of development.

¹⁷ This is an assessment based on the information known at this stage, a full assessment of infrastructure requirements will be undertaken before any sites are allocated.

	because it's not eligible for allocation.		
Does the site continue to next stage?			Yes

STAGE 1E ASSESSMENT

This section records the findings of the Strategic Green Belt Review and also provides a preliminary screening of sites to determine whether they may be capable of demonstrating Exceptional Circumstances. Any site in the Green Belt that is determined as suitable based on the high level SHLAA assessment would still have to demonstrate Exceptional Circumstances to be considered for allocation in the Plan.

Greenbelt

13	Is the site located within the Green Belt?	Yes	Yes
14	If answer to question 13 is yes, then does the site lie within one of the parcels which have been identified in the Central Bedfordshire and Luton Green Belt Study as making only a relatively weak, weak, or no contribution? If yes, site progresses through to Stage 2.	No	
15a	<p>Does the site have all of the following merits that may outweigh the harm to the Green Belt and which may contribute to identification of exceptional circumstances?</p> <ul style="list-style-type: none"> • Adjoining settlement has at least 3 of the following key local services - convenience shop, lower school, middle school, upper school, village hall, GP surgery, post office, library (use settlement audit) • Site makes a strong contribution to housing need (100 plus homes) within the Luton HMA • Site is in or directly adjacent to a settlement that has a mainline rail station or direct access (junction) to the strategic road network (A road or motorway) <p>Sites in Green Belt other than those covered by 14 and 15b that cannot meet these criteria, will not progress any further in this assessment of suitability.*</p>	No	<ul style="list-style-type: none"> • Sundon has a village hall and a lower school • Could potentially make a strong contribution to the Luton HMA • Is not near any railway station or A road/motorway
15b	Sites which have support from the local community as demonstrated through an allocation in an adopted or draft Neighbourhood Plan (that has been subject to Regulation 14 consultation) that do not meet the criteria in question 15a will automatically progress through this stage to be considered further at Stage 2. ¹⁸	No	Site is not supported by a Neighbourhood Plan
Does the site continue to next stage?			No

¹⁸ Draft Neighbourhood Plan allocations in Green Belt that are proposed after this site assessment phase has concluded, may still be considered for allocation.

Site Assessment Framework for HOUSING¹⁹

Site details	
Reference Number	NLP267
Site Name	Land at Common Lane Upper Sundon
Site Address	Common Lane Upper Sundon, LUP 3PF
Settlement	
Size	Submitted Developable Area: 11ha Submitted Whole Site Area: 11ha Measured GIS Area: 11ha
Proposed Use	Residential and/or commercial business park and employment centre
Any other information	Same site as ALP393

STAGE 1 : SUITABILITY AND AVAILABILITY (EXCLUSIONARY STAGE)

This section will exclude any sites which do not pass the exclusionary suitability criteria and they will not be assessed further.

STAGE 1A ASSESSMENT

This stage of the assessment rules out sites that are too small or conflict with national policy designations.

Provisional Site Capacity

1	Is the site likely to accommodate less than 10 dwellings? Work out the number of new homes from site size using density of 30dph and exclude up to 40 % depending on site size of land for infrastructure and services, take into account topography or significant areas of undevelopable land. Site Size Gross to net ratio standards <ul style="list-style-type: none"> Up to 0.4 hectare 100% 0.4 to 2 hectares 80% 2 hectares or above 60% <i>Note: for this calculation use the submitted Developable Area, or the area measured in GIS if this is smaller.</i>	Yes	Number of proposed dwellings as per proforma:
			200+
			Number of proposed dwellings as per CBC methodology:
			198

Flood Risk (All sites which reach Stage 2 will be subject to the Sequential Test)

2	Is more than 50% of the site located in Flood Zone 2 or 3?	No	
3	Is more than 50% of the site at risk from surface water flooding?	No	

Nationally significant designations (All sites which reach Stage 2 be subject to detailed assessment)

4	Is more than 50% of the site covered by nationally significant designations? These are: Sites of Special Scientific Interest, National Nature Reserves, Scheduled Monuments, Registered Parks and Gardens.	No	No designations found on site
5	Is more than 50% of the site located within the Area of Outstanding Natural Beauty?	No	Not within AONB
Does the site continue to next stage?			Yes

¹⁹ Employment sites and Gypsy and Traveller sites will be assessed using separate bespoke site assessment criteria.

STAGE 1B ASSESSMENT

This stage of the assessment rules out sites that are not well related to existing settlements but are of an insufficient size to be self contained. It also rules out sites which would cause coalescence of existing towns or villages. For the purposes of this assessment, a self-contained site is defined as a site which will provide 1,500 homes or more²⁰.

Relationship to Settlement

6	For sites that are not of a sufficient scale to be self-contained, is the site a logical extension to the settlement or are there any major physical constraints (for example A roads, rivers or railways) that separate it from the main settlement?	A	The site lies outside the settlement envelope of Upper Sundon and extends westwards away from the village but there are no physical constraints.
7	Does the site cause coalescence between an existing village or town and another existing village or town? If yes, then grade as Amber if the site would be able to provide appropriate buffers or green wedges to mitigate this, or Red if it would not be possible for appropriate buffers to be provided leaving a reasonable developable area based on the individual context of the site.	G	Does not cause coalescence
Does the site continue to next stage?			Yes

STAGE 1C ASSESSMENT

This stage of the assessment rules out sites that are not able to meet their critical infrastructure needs²¹.

Critical Infrastructure

8	Can the site meet the critical infrastructure requirements that will enable delivery ²² ?	G	None
Does the site continue to next stage?			Yes

STAGE 1D ASSESSMENT

This stage of the assessment rules out sites that are not available. A site is considered available for development where there are no legal or ownership problems and the landowner has expressed an intention to develop the site.

Availability

9	What is the existing use of the site? Would the existing use limit the development potential?	G	100% greenfield
10	Is the land controlled by a developer or land owner who has expressed an intention to develop the site?	G	Intent on developing the site
11	Are there any legal or ownership problems that could delay or prevent development? If Yes, then can these be issues be realistically overcome?	G	No issues
12	Does the site already have planning permission for the proposed use? If yes, then score as Red	G	Does not already have planning permission

²⁰ The figure of 1,500 homes has been taken from the Government Publication 'Locally-Led Garden Villages, Towns and Cities'. This defines the eligibility criteria for Garden Villages as standalone settlements of between 1,500 and 10,000 homes. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/508205/Locally-led_garden_villages_towns_and_cities.pdf)

²¹ Critical infrastructure is that which has been identified as infrastructure that must happen to enable physical development. These infrastructure items are often known as 'blockers' or 'showstoppers', and are most common in relation to transport and utilities infrastructure. Failure to provide these pieces of infrastructure could result in significant delays in the delivery of development.

²² This is an assessment based on the information known at this stage, a full assessment of infrastructure requirements will be undertaken before any sites are allocated.

	because it's not eligible for allocation.		
Does the site continue to next stage?			Yes

STAGE 1E ASSESSMENT

This section records the findings of the Strategic Green Belt Review and also provides a preliminary screening of sites to determine whether they may be capable of demonstrating Exceptional Circumstances. Any site in the Green Belt that is determined as suitable based on the high level SHLAA assessment would still have to demonstrate Exceptional Circumstances to be considered for allocation in the Plan.

Greenbelt

13	Is the site located within the Green Belt?	Yes	100% within greenbelt
14	If answer to question 13 is yes, then does the site lie within one of the parcels which have been identified in the Central Bedfordshire and Luton Green Belt Study as making only a relatively weak, weak, or no contribution? If yes, site progresses through to Stage 2.	No	
15a	<p>Does the site have all of the following merits that may outweigh the harm to the Green Belt and which may contribute to identification of exceptional circumstances?</p> <ul style="list-style-type: none"> • Adjoining settlement has at least 3 of the following key local services - convenience shop, lower school, middle school, upper school, village hall, GP surgery, post office, library (use settlement audit) • Site makes a strong contribution to housing need (100 plus homes) within the Luton HMA • Site is in or directly adjacent to a settlement that has a mainline rail station or direct access (junction) to the strategic road network (A road or motorway) <p>Sites in Green Belt other than those covered by 14 and 15b that cannot meet these criteria, will not progress any further in this assessment of suitability.*</p>	No	<ul style="list-style-type: none"> • Has a lower, village hall • Does make a strong contribution to Luton HMA • Is not adjacent to a mainline station or strategic road
15b	Sites which have support from the local community as demonstrated through an allocation in an adopted or draft Neighbourhood Plan (that has been subject to Regulation 14 consultation) that do not meet the criteria in question 15a will automatically progress through this stage to be considered further at Stage 2. ²³	No	Site is not supported by a Neighbourhood Plan
Does the site continue to next stage?			No

²³ Draft Neighbourhood Plan allocations in Green Belt that are proposed after this site assessment phase has concluded, may still be considered for allocation.

Site Assessment Framework for HOUSING²⁴

Site details	
Reference Number	NLP322
Site Name	Land East of Junction 11A and North of Vauxhall Plant
Site Address	Land Adjacent to Luton Road, Sundon Road and Sundon Park Road, Sundon, Luton
Settlement	Sundon
Size	Submitted Developable Area: 35ha Submitted Whole Site Area: 74ha Measured GIS Area: 74.28ha
Proposed Use	Mixed Development: commercial, civic, residential and leisure uses
Any other information	Site has been allocated as part of the Luton North Strategic urban expansion in previous iterations of the Local Plan. In 2015 the "Luton North Framework Plan" was adopted on SPG. Same site as NLP426

STAGE 1 : SUITABILITY AND AVAILABILITY (EXCLUSIONARY STAGE)

This section will exclude any sites which do not pass the exclusionary suitability criteria and they will not be assessed further.

STAGE 1A ASSESSMENT

This stage of the assessment rules out sites that are too small or conflict with national policy designations.

Provisional Site Capacity

1	Is the site likely to accommodate less than 10 dwellings? Work out the number of new homes from site size using density of 30dph and exclude up to 40 % depending on site size of land for infrastructure and services, take into account topography or significant areas of undevelopable land. Site Size Gross to net ratio standards <ul style="list-style-type: none"> Up to 0.4 hectare 100% 0.4 to 2 hectares 80% 2 hectares or above 60% <i>Note: for this calculation use the submitted Developable Area, or the area measured in GIS if this is smaller.</i>	Yes	Number of proposed dwellings as per proforma:
			Up to 1,200
			Number of proposed dwellings as per CBC methodology:
			630

Flood Risk (All sites which reach Stage 2 will be subject to the Sequential Test)

2	Is more than 50% of the site located in Flood Zone 2 or 3?	No	
3	Is more than 50% of the site at risk from surface water flooding?	No	

Nationally significant designations (All sites which reach Stage 2 be subject to detailed assessment)

4	Is more than 50% of the site covered by nationally significant designations? These are: Sites of Special Scientific Interest, National Nature Reserves, Scheduled Monuments, Registered Parks and Gardens.	No	No designations are found on site.
5	Is more than 50% of the site located within the Area of Outstanding Natural Beauty?	No	Site is not within an Area of Outstanding Natural Beauty.
Does the site continue to next stage?			Yes

²⁴ Employment sites and Gypsy and Traveller sites will be assessed using separate bespoke site assessment criteria.

STAGE 1B ASSESSMENT

This stage of the assessment rules out sites that are not well related to existing settlements but are of an insufficient size to be self contained. It also rules out sites which would cause coalescence of existing towns or villages. For the purposes of this assessment, a self-contained site is defined as a site which will provide 1,500 homes or more²⁵.

Relationship to Settlement

6	For sites that are not of a sufficient scale to be self-contained, is the site a logical extension to the settlement or are there any major physical constraints (for example A roads, rivers or railways) that separate it from the main settlement?	A	The site is broken into four sections and is situated to the North West of Luton. The sites are situated on either side of a railway line. The north western section is situated on the same land that the junction 11a works are being done. There are two sections to the east of the railway line; one section is separated from another by Sundon Park Road.
7	Does the site cause coalescence between an existing village or town and another existing village or town? If yes, then grade as Amber if the site would be able to provide appropriate buffers or green wedges to mitigate this, or Red if it would not be possible for appropriate buffers to be provided leaving a reasonable developable area based on the individual context of the site.	G	Does not cause coalescence
Does the site continue to next stage?			Yes

STAGE 1C ASSESSMENT

This stage of the assessment rules out sites that are not able to meet their critical infrastructure needs²⁶.

Critical Infrastructure

8	Can the site meet the critical infrastructure requirements that will enable delivery ²⁷ ?	G	The M1 junction 11a improvements (under construction) and the bridging over the railway line.
Does the site continue to next stage?			Yes

STAGE 1D ASSESSMENT

This stage of the assessment rules out sites that are not available. A site is considered available for development where there are no legal or ownership problems and the landowner has expressed an intention to develop the site.

Availability

9	What is the existing use of the site? Would the existing use limit the development potential?	A	The majority of the site is primarily in agricultural land, however the north west section of the site is currently situated in the same area
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²⁵ The figure of 1,500 homes has been taken from the Government Publication 'Locally-Led Garden Villages, Towns and Cities'. This defines the eligibility criteria for Garden Villages as standalone settlements of between 1,500 and 10,000 homes. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/508205/Locally-led_garden_villages_towns_and_cities.pdf)

²⁶ Critical infrastructure is that which has been identified as infrastructure that must happen to enable physical development. These infrastructure items are often known as 'blockers' or 'showstoppers', and are most common in relation to transport and utilities infrastructure. Failure to provide these pieces of infrastructure could result in significant delays in the delivery of development.

²⁷ This is an assessment based on the information known at this stage, a full assessment of infrastructure requirements will be undertaken before any sites are allocated.

			as the works for the M1 junction 11a.
10	Is the land controlled by a developer or land owner who has expressed an intention to develop the site?	G	Yes, all developers and landowners want to develop the site.
11	Are there any legal or ownership problems that could delay or prevent development? If Yes, then can these be issues be realistically overcome?	G	There are no problems
12	Does the site already have planning permission for the proposed use? If yes, then score as Red because it's not eligible for allocation.	G	Site does not have planning permission.
Does the site continue to next stage?			Yes

STAGE 1E ASSESSMENT

This section records the findings of the Strategic Green Belt Review and also provides a preliminary screening of sites to determine whether they may be capable of demonstrating Exceptional Circumstances. Any site in the Green Belt that is determined as suitable based on the high level SHLAA assessment would still have to demonstrate Exceptional Circumstances to be considered for allocation in the Plan.

Greenbelt

13	Is the site located within the Green Belt?	Yes	100% within greenbelt
14	If answer to question 13 is yes, then does the site lie within one of the parcels which have been identified in the Central Bedfordshire and Luton Green Belt Study as making only a relatively weak, weak, or no contribution? If yes, site progresses through to Stage 2.	Yes	<i>Site is within a parcel of greenbelt land that provides weak/No contribution and moderate contribution</i>
15a	Does the site have all of the following merits that may outweigh the harm to the Green Belt and which may contribute to identification of exceptional circumstances? <ul style="list-style-type: none"> • Adjoining settlement has at least 3 of the following key local services - convenience shop, lower school, middle school, upper school, village hall, GP surgery, post office, library (use settlement audit) • Site makes a strong contribution to housing need (100 plus homes) within the Luton HMA • Site is in or directly adjacent to a settlement that has a mainline rail station or direct access (junction) to the strategic road network (A road or motorway) <p>Sites in Green Belt other than those covered by 14 and 15b that cannot meet these criteria, will not progress any further in this assessment of suitability.*</p>	Yes	<ul style="list-style-type: none"> • Luton has all of these key services • Does make a strong contribution to Luton HMA • Has direct access to the M1
15b	Sites which have support from the local community as demonstrated through an allocation in an adopted or draft Neighbourhood Plan (that has been subject to Regulation 14 consultation) that do not meet the criteria in question 15a will automatically progress through this stage to be considered further at Stage 2. ²⁸	No	Site is not supported by a Neighbourhood Plan

²⁸ Draft Neighbourhood Plan allocations in Green Belt that are proposed after this site assessment phase has concluded, may still be considered for allocation.

Does the site continue to next stage?	Yes
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STAGE 2 : SUITABILITY (DETAILED ASSESSMENT)

STAGE 2 ASSESSMENT

This stage further assesses the site's suitability using detailed desktop assessment. A red rating for any question does not mean that the site will be automatically excluded at this stage as the ratings across Stage 2A will be looked at as a whole using planning balance.

Previously Developed Land

16	Is the site Previously Developed Land in accordance with the NPPF definition? <ul style="list-style-type: none"> • 76% - 100% (G) • 26 - 75% (A) • 25% - 0% (Greenfield) (R) 	R	100% greenfield and is therefore not PDL
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Community

17	Neighbourhood Planning (only applicable in designated areas) Is the site identified as a housing allocation in an emerging Neighbourhood Plan?	No	Luton is not allocated as a neighbourhood plan area
18	Community Consultation Has any community consultation taken place? If yes, provide brief details on the form this consultation took and any overall community response.	No	No public consultation has taken place
19	Sustainability of Settlement Would this proposal impact on the sustainability of the settlement through the loss of services and facilities (for example, employment, retail, public house etc)	No	Would not result in the loss of services or facilities.

Cumulative Impact

20	Considering housing completions over the past 10 years, what has been the level of housing growth in the parish? <ul style="list-style-type: none"> • Less than 5% growth (G) • 5% to 20% growth (A) • More than 20% growth (R) <i>This is calculated by working out the total number of completions over the last ten years as a percentage of the dwellings in April 2006 (as calculated using census and completions data).</i>	G	No. Houses 2006: 217 No. Houses 2016: 218 % Growth: 0.46%
21	What level of housing growth would there be if all the outstanding permissions (as of April 2016) were to be completed? <ul style="list-style-type: none"> • Less than 5% growth (G) • 5% to 20% growth (A) • More than 20% growth (R) <i>This is calculated by working out the total number of outstanding permissions as of April 1st 2016 as percentage of the total number of dwellings in April 2016 (as calculated using census and completions data).</i>	G	No. Houses 2016: 218 Outstanding Permissions: 0 % Growth: 0.00%

Physical Constraints

22	Are there any physical constraints or permanent features that affect the site's developability? For example pylons, gas works, sewage treatment works, topography or wind turbines.	A	The site is split by the railway and the southern section of the site borders the M1 and B579 where there is a lot of works taking place.
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Relationship to Settlement

23	Would development of the site be complementary to the existing settlement pattern, and would it have an adverse impact on any historic, unique or distinctive characteristics of the settlement's built or natural form?	G	The site could be seen as complementary to the settlement pattern and is unlikely to have a significant impact on the natural or built form due to the proximity to the M1.
Agricultural Land Quality			
24	Would the development impact on high quality agricultural land? <ul style="list-style-type: none"> • 50% or more in non-agricultural land (G) • 50% or more in Grade 3b, 4 or 5 (A) • 50% or more in Grade 1, 2 or 3a (R) 	R	90% Grade 2, 10% Grade 3

STAGE 2 ASSESSMENT

This stage further assesses the site's suitability using comments from technical specialists. A red rating for any question does not mean that the site will be automatically excluded at this stage as the ratings across Stage 2B will be looked at as a whole using planning balance.

Transport and Access to Services

25	Facilities and services Question 26 considers the suitability and sustainability of the site for housing. It links to the Council's Settlement Hierarchy Audit. Issues relating to capacity are assessed separately		
25a	Does the settlement have a Primary/Lower school? <ul style="list-style-type: none"> • Yes, in the settlement (G) • Yes, proposed as part of the development (G) • No, but an adjoining settlement does (A) • Not in the settlement or an adjoining settlement (R) 	G	Contains more than one primary school
25b	Does the settlement have a Middle school (if applicable)? <ul style="list-style-type: none"> • Yes, in the settlement (G) • Yes, proposed as part of the development (G) • No, but an adjoining settlement does (A) • Other catchment school available (A) 	A	Does not have a middle school but other catchment school available
25c	Does the settlement have a Secondary/ Upper school? <ul style="list-style-type: none"> • Yes, in the settlement (G) • Yes, proposed as part of the development (G) • No, but an adjoining settlement does (A) • Other catchment school available (A) 	G	Does have a secondary school and a college
25d	Does the settlement have a GPs surgery or medical centre? <ul style="list-style-type: none"> • Yes, in the settlement (G) • Yes, proposed as part of the development (G) • No, but an adjoining settlement does (A) • Not in the settlement or an adjoining settlement (R) 	G	Has the Luton and Dunstable Hospital and other medial centres
26	What retail provision does the settlement offer? <ul style="list-style-type: none"> • Town Centre/ Supermarket (G) • Convenience Store / Post Office / Newsagent 	G	Has a town centre and supermarkets

	(A) • None (R)		
27	Distance to bus stops with a frequent service (at least hourly at peak times): • Less than 400m (G) • 400m-800m (A) • Over 800m (R) • OR submission form stated that improved public transport facilities could be provided as part of the development (G)	R	Site is over 800 metres away from the nearest bus stop
28	Distance to nearest train station: • Less than 800m (G) • 800m-1200m (A) • Over 1200m (R)	R	Site is over 1,200 metres away from the nearest train station
29	Is the site accessible from the existing road network?	G	Has direct access onto Luton Road and Sundon Road and Sundon Park Road
School Capacity			
30	Do the local schools have capacity at all tiers?	R	No capacity to manage a development of this size
31	If not, has a commitment been made to address this?	A	A development of this size is likely to require new schools.
Water Utilities (Gas, Electricity and Broadband Infrastructure will be assessed at a later stage)			
32	Is there the capacity to provide all required infrastructure for waste water and potable water?	A	Water utilities companies have a statutory duty to supply water and waste water infrastructure to new development sites and a lack of available capacity does not prevent future development. Any infrastructure upgrades required will depend on the quantum and location of growth falling within each catchment area. Whilst the Stage 1 Water Cycle Study (April 2017) identifies the current capacity of existing water infrastructure, a Stage 2 study will be prepared to test the cumulative effect of sites that have been shortlisted for allocation in the Local Plan and identify the nature and timing of any upgrades required.
Drainage and Flooding (All sites subject to Sequential Test)			
33	What is the conclusion of the sequential approach to site allocations, in regards to flood risk? • No assessment required (G) • Consider Further Assessment (A) • Further Assessment Required (R)	G	Site is at limited risk of surface water flooding, assessment is unlikely to be required
Environmental Health			
34	Contamination Are there any contamination constraints on site and will there be any remediation required?	G	No issues identified
35	Adjoining uses Would any adjoining uses have the potential to cause conflict with the proposed use? (for example; noise and smell)	A	Road Traffic / Industrial / Commercial / Rail. Careful consideration and assessment possible to deliver some form of

			development
Environmental Constraints			
36	Landscape character What would the impacts of development be on the landscape character or setting of the area or any designated landscapes? Would there be any direct or indirect harm to the Area of Outstanding Natural Beauty or the Nature Improvement Area?	R	elevated, exposed position impacted by A5-M1 link and associated highway infrastructure. Site area forms part of GI framework re. Luton North & Sundon RFI Framework Plan.
37	Heritage/ Archaeology What would the impacts of development be on any heritage assets and their setting? Are there any opportunities for enhancement of these assets?	H – R A - A	Heritage – Impact on historical setting of core of village. Impact on grade I listed church. Sloping fields increased impact. Archaeology - Site has multi-period archaeological potential but this would not prevent allocation providing appropriate mitigation is undertaken
38	Ecological Assets What would the impacts of development be on any biological, geological or ecological assets and are there any opportunities for their enhancement?	A	Impact to farmland species. Parcels to east of railway more sensitive. Area known for rare arable weeds,
39	Open space/leisure and GI assets Are there any potential conflicts with open space, leisure designations or Rights of Way? Is there capacity to provide the required levels of open space and green infrastructure?	A	Impact on setting of the AONB, adjacent to Sundon Wood. Parish GI plan aspiration to buffer and extend Sundon Wood. Close proximity to Sundon Quarry SSSI.
Minerals and Waste			
40	What would the impacts of development be on safeguarded minerals and waste sites, including mineral safeguarding sites?	G	No issues
Planning History			
41	What is the sites planning history? (For example planning applications and submissions to previous Allocations Plans)		CB/14/04541/SCN – EIA screening opinion, distribution centre with office accommodation
Does the site continue to next stage?			No

STAGE 2 ASSESSMENT CONCLUSION

Is the site suitable for the proposed development?

Development of the site will cause harm to the significance of the designated heritage asset, this being the Church of St. Mary, a Grade I listed building. It is not considered that the benefits of development of this site in isolation would outweigh the harm. Furthermore, development of this scale would not provide the local infrastructure that is required to support development in this location. In addition to the above, there are a number of sources of noise pollution adjacent to the site which would require mitigation. For the reasons outlined above it is considered that development within this site in isolation is not worthy of further consideration.

Site Assessment Framework for HOUSING²⁹

Site details	
Reference Number	NLP368
Site Name	Manor Farm, Lower Sundon
Site Address	Manor Farm, Lower Sundon
Settlement	Sundon (Lower Sundon)
Size	Submitted Developable Area: 2.78ha Submitted Whole Site Area: 17.31ha Measured GIS Area: 17.75ha
Proposed Use	Residential
Any other information	

STAGE 1 : SUITABILITY AND AVAILABILITY (EXCLUSIONARY STAGE)

This section will exclude any sites which do not pass the exclusionary suitability criteria and they will not be assessed further.

STAGE 1A ASSESSMENT

This stage of the assessment rules out sites that are too small or conflict with national policy designations.

Provisional Site Capacity

1	Is the site likely to accommodate less than 10 dwellings? Work out the number of new homes from site size using density of 30dph and exclude up to 40 % depending on site size of land for infrastructure and services, take into account topography or significant areas of undevelopable land. Site Size Gross to net ratio standards <ul style="list-style-type: none"> Up to 0.4 hectare 100% 0.4 to 2 hectares 80% 2 hectares or above 60% <i>Note: for this calculation use the submitted Developable Area, or the area measured in GIS if this is smaller.</i>	Yes	Number of proposed dwellings as per proforma:
			50-60
			Number of proposed dwellings as per CBC methodology:
			50

Flood Risk (All sites which reach Stage 2 will be subject to the Sequential Test)

2	Is more than 50% of the site located in Flood Zone 2 or 3?	No	
3	Is more than 50% of the site at risk from surface water flooding?	No	

Nationally significant designations (All sites which reach Stage 2 be subject to detailed assessment)

4	Is more than 50% of the site covered by nationally significant designations? These are: Sites of Special Scientific Interest, National Nature Reserves, Scheduled Monuments, Registered Parks and Gardens.	No	No designations on site.
5	Is more than 50% of the site located within the Area of Outstanding Natural Beauty?	No	Not within AONB
Does the site continue to next stage?			Yes

²⁹ Employment sites and Gypsy and Traveller sites will be assessed using separate bespoke site assessment criteria.

STAGE 1B ASSESSMENT

This stage of the assessment rules out sites that are not well related to existing settlements but are of an insufficient size to be self contained. It also rules out sites which would cause coalescence of existing towns or villages. For the purposes of this assessment, a self-contained site is defined as a site which will provide 1,500 homes or more³⁰.

Relationship to Settlement

6	For sites that are not of a sufficient scale to be self-contained, is the site a logical extension to the settlement or are there any major physical constraints (for example A roads, rivers or railways) that separate it from the main settlement?	R	The overall site is not connected to the main settlement of Lower Sundon and the developable area is situated in the south western corner of the site and is isolated from the settlement by a considerable distance. This does not form a logical extension to any settlement. Furthermore on its own the site does not form a logical extension to Luton as it would extend the settlement in an isolated way and cut into the buffer between Luton and Lower Sundon.
7	Does the site cause coalescence between an existing village or town and another existing village or town? If yes, then grade as Amber if the site would be able to provide appropriate buffers or green wedges to mitigate this, or Red if it would not be possible for appropriate buffers to be provided leaving a reasonable developable area based on the individual context of the site.	G	Does not cause coalescence.
Does the site continue to next stage?			No

³⁰ The figure of 1,500 homes has been taken from the Government Publication 'Locally-Led Garden Villages, Towns and Cities'. This defines the eligibility criteria for Garden Villages as standalone settlements of between 1,500 and 10,000 homes. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/508205/Locally-led_garden_villages_towns_and_cities.pdf)

Site Assessment Framework for HOUSING³¹

Site details	
Reference Number	NLP426
Site Name	North Luton SUE
Site Address	Land to the north of Luton – Between the M1 and the A6 Barton Road
Settlement	Sundon (Luton)
Size	Submitted Developable Area: 114ha Submitted Whole Site Area: 282ha Measured GIS Area: 283 ha
Proposed Use	Mixed use urban extension including commercial development with up to 4,000 dwellings
Any other information	

STAGE 1 : SUITABILITY AND AVAILABILITY (EXCLUSIONARY STAGE)

This section will exclude any sites which do not pass the exclusionary suitability criteria and they will not be assessed further.

STAGE 1A ASSESSMENT

This stage of the assessment rules out sites that are too small or conflict with national policy designations.

Provisional Site Capacity

1	Is the site likely to accommodate less than 10 dwellings? Work out the number of new homes from site size using density of 30dph and exclude up to 40 % depending on site size of land for infrastructure and services, take into account topography or significant areas of undevelopable land. Site Size Gross to net ratio standards <ul style="list-style-type: none"> • Up to 0.4 hectare 100% • 0.4 to 2 hectares 80% • 2 hectares or above 60% <i>Note: for this calculation use the submitted Developable Area, or the area measured in GIS if this is smaller.</i>	No	Number of proposed dwellings as per proforma: 4,000
			Number of proposed dwellings as per CBC methodology: 5,076

Flood Risk (All sites which reach Stage 2 will be subject to the Sequential Test)

2	Is more than 50% of the site located in Flood Zone 2 or 3?	No	Site is not within Floodzone 2 or 3
3	Is more than 50% of the site at risk from surface water flooding?	No	Less than 50% of the site is at risk of surface water flooding

Nationally significant designations (All sites which reach Stage 2 be subject to detailed assessment)

4	Is more than 50% of the site covered by nationally significant designations? These are: Sites of Special Scientific Interest, National Nature Reserves, Scheduled Monuments, Registered Parks and Gardens.	No	Details on designations and coverage - Scheduled Monument known as Dray's Ditches, located on the south-eastern corner of the Site. Sundon Park is the site of a medieval deer park with boundary earthworks. Theedway, is an ancient Saxon route-way.
5	Is more than 50% of the site located within the Area of Outstanding Natural Beauty?	No	Details on coverage – a small area of the AONB encroaches into the

³¹ Employment sites and Gypsy and Traveller sites will be assessed using separate bespoke site assessment criteria.

		north-eastern part of the site.
Does the site continue to next stage?		Yes

STAGE 1B ASSESSMENT

This stage of the assessment rules out sites that are not well related to existing settlements but are of an insufficient size to be self contained. It also rules out sites which would cause coalescence of existing towns or villages. For the purposes of this assessment, a self-contained site is defined as a site which will provide 1,500 homes or more³².

Relationship to Settlement

6	For sites that are not of a sufficient scale to be self-contained, is the site a logical extension to the settlement or are there any major physical constraints (for example A roads, rivers or railways) that separate it from the main settlement?	G	Details – The proposed development is for up to 4,000 dwellings and associated community uses and infrastructure which will create a sustainable urban extension. There are no major physical constraints that separate it from Luton's urban area.
7	Does the site cause coalescence between an existing village or town and another existing village or town? If yes, then grade as Amber if the site would be able to provide appropriate buffers or green wedges to mitigate this, or Red if it would not be possible for appropriate buffers to be provided leaving a reasonable developable area based on the individual context of the site.	A	The site would extend Luton towards Lower Sundon, however a portion of the site could be considered for development.
Does the site continue to next stage?			Yes

STAGE 1C ASSESSMENT

This stage of the assessment rules out sites that are not able to meet their critical infrastructure needs³³.

Critical Infrastructure

8	Can the site meet the critical infrastructure requirements that will enable delivery ³⁴ ?	G	Requirements and proposals – A significant amount of work has been undertaken on viability and the delivery of the M1/A6 Link road – critical infrastructure essential to open up the site. Initial design and costing .
Does the site continue to next stage?			Yes

STAGE 1D ASSESSMENT

This stage of the assessment rules out sites that are not available. A site is considered available for development where there are no legal or ownership problems and the landowner has expressed an intention to develop the site.

Availability

³² The figure of 1,500 homes has been taken from the Government Publication 'Locally-Led Garden Villages, Towns and Cities'. This defines the eligibility criteria for Garden Villages as standalone settlements of between 1,500 and 10,000 homes. (see https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/508205/Locally-led_garden_villages_towns_and_cities.pdf)

³³ Critical infrastructure is that which has been identified as infrastructure that must happen to enable physical development. These infrastructure items are often known as 'blockers' or 'showstoppers', and are most common in relation to transport and utilities infrastructure. Failure to provide these pieces of infrastructure could result in significant delays in the delivery of development.

³⁴ This is an assessment based on the information known at this stage, a full assessment of infrastructure requirements will be undertaken before any sites are allocated.

9	What is the existing use of the site? Would the existing use limit the development potential?	G	Details – The site is 100% greenfield/agricultural fields and some woodland. The existing uses would not limit the development potential.
10	Is the land controlled by a developer or land owner who has expressed an intention to develop the site?	G	Details – The site is controlled by the North of Luton Consortium to the East (the Council has land holdings here and is currently agreeing an option with the consortium). The land to the West is controlled by AXA and both parties have agreed to work cooperatively and not to ransom each other.
11	Are there any legal or ownership problems that could delay or prevent development? If Yes, then can these be issues be realistically overcome?	A	Details – A formal land ownership agreement is required for the eastern part of the site and the Council's land ownership position needs to be resolved. This is being put in place and should not unduly delay the development coming forward.
12	Does the site already have planning permission for the proposed use? If yes, then score as Red because it's not eligible for allocation.	G	Details – There is no planning consent for this site. An adopted Council Framework Plan is in place for the mixed use SUE.
Does the site continue to next stage?			Yes

STAGE 1E ASSESSMENT

This section records the findings of the Strategic Green Belt Review and also provides a preliminary screening of sites to determine whether they may be capable of demonstrating Exceptional Circumstances. Any site in the Green Belt that is determined as suitable based on the high level SHLAA assessment would still have to demonstrate Exceptional Circumstances to be considered for allocation in the Plan.

Greenbelt

13	Is the site located within the Green Belt?	Yes	Details on coverage – The site is completely within the Green Belt.
14	If answer to question 13 is yes, then does the site lie within one of the parcels which have been identified in the Central Bedfordshire and Luton Green Belt Study as making only a relatively weak, weak, or no contribution? If yes, site progresses through to Stage 2.	No	<i>North of Luton forms Land Parcel references L2.</i> <i>As outlined within the Green Belt Study Land parcel L2 has a relatively strong contribution to check the unrestricted sprawl of large built up areas as well as a strong contribution to the purpose of the green belt for assisting in the safeguarding of the countryside from encroachment, in addition to a relatively strong contribution to preserve the setting and special character of historic towns. Furthermore parcel L2 of the greenbelt has an equally significant contribution to the purpose of</i>

			<p><i>assisting in urban regeneration by encouraging the recycling of derelict and other urban land.</i></p> <p><i>However L2 has a relatively weak contribution to prevent towns merging into one another.</i></p>
15a	<p>Does the site have all of the following merits that may outweigh the harm to the Green Belt and which may contribute to identification of exceptional circumstances?</p> <ul style="list-style-type: none"> • Adjoining settlement has at least 3 of the following key local services - convenience shop, lower school, middle school, upper school, village hall, GP surgery, post office, library (use settlement audit) • Site makes a strong contribution to housing need (100 plus homes) within the Luton HMA • Site is in or directly adjacent to a settlement that has a mainline rail station or direct access (junction) to the strategic road network (A road or motorway) <p>Sites in Green Belt other than those covered by 14 and 15b that cannot meet these criteria, will not progress any further in this assessment of suitability.*</p>	Yes	<p>The adjoining settlement, Luton is a large town with at least three of the key local services.</p> <p>The site makes a strong contribution to housing need within the Luton HMA.</p> <p>The site would provide a connection road between the A6 and the M1 motorway and Luton has a mainline railway station.</p>
15b	<p>Sites which have support from the local community as demonstrated through an allocation in an adopted or draft Neighbourhood Plan (that has been subject to Regulation 14 consultation) that do not meet the criteria in question 15a will automatically progress through this stage to be considered further at Stage 2.³⁵</p>	No	<p>Site is not supported by any neighbourhood plan</p>
Does the site continue to next stage?			Yes

STAGE 2 : SUITABILITY (DETAILED ASSESSMENT)

STAGE 2 ASSESSMENT

This stage further assesses the site's suitability using detailed desktop assessment. A red rating for any question does not mean that the site will be automatically excluded at this stage as the ratings across Stage 2A will be looked at as a whole using planning balance.

Previously Developed Land

16	<p>Is the site Previously Developed Land in accordance with the NPPF definition?</p> <ul style="list-style-type: none"> • 76% - 100% (G) • 26 - 75% (A) • 25% - 0% (Greenfield) (R) 	R	The site is 100% greenfield
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Community

17	<p>Neighbourhood Planning (only applicable in designated areas)</p> <p>Is the site identified as a housing allocation in an emerging Neighbourhood Plan?</p>	Yes	Details – no neighbourhood plan area designation.
18	<p>Community Consultation</p> <p>Has any community consultation taken place?</p>	Yes	Details - Through the Plan making process including the Joint Core

³⁵ Draft Neighbourhood Plan allocations in Green Belt that are proposed after this site assessment phase has concluded, may still be considered for allocation.

	If yes, provide brief details on the form this consultation took and any overall community response.		Strategy for Luton and Southern Central Bedfordshire (2011), the Submission Central Bedfordshire Development Strategy (2014) and the Framework Plan (2015).
19	Sustainability of Settlement Would this proposal impact on the sustainability of the settlement through the loss of services and facilities (for example, employment, retail, public house etc)	No	Details – Proposed development takes place on 100% greenfield site and therefore no loss of services or facilities
Cumulative Impact			
20	Considering housing completions over the past 10 years, what has been the level of housing growth in the parish? <ul style="list-style-type: none"> • Less than 5% growth (G) • 5% to 20% growth (A) • More than 20% growth (R) <i>This is calculated by working out the total number of completions over the last ten years as a percentage of the dwellings in April 2006 (as calculated using census and completions data).</i>	G	Details Sundon Number of houses in 2006: 217 Number of houses in 2016: 218 Percentage Growth: 0.46% Streatley Number of houses in 2006: 761 Number of houses in 2016: 762 Percentage Growth: 0.13% Total Percentage Growth: 0.20% Total Percentage Growth: 21.06%
21	What level of housing growth would there be if all the outstanding permissions (as of April 2016) were to be completed? <ul style="list-style-type: none"> • Less than 5% growth (G) • 5% to 20% growth (A) • More than 20% growth (R) <i>This is calculated by working out the total number of outstanding permissions as of April 1st 2016 as percentage of the total number of dwellings in April 2016 (as calculated using census and completions data).</i>	G	Details Sundon Number of houses in 2016: 218 Number of outstanding completions 2016: 0 Percentage Growth: 0% Streatley Number of houses in 2016: 762 Number of outstanding completions 2016: 1 Percentage Growth: 0.13% Total Percentage Growth: 0.13%
Physical Constraints			
22	Are there any physical constraints or permanent features that affect the site's developability? For example pylons, gas works, sewage treatment works, topography or wind turbines.	G	There are electricity pylons which traverse the middle of the site from north west to south east. A corridor will need to be provided if the cables are undergrounded or left in situ. However, this will not affect the overall developability of a site of this scale. Part of the land to the east is relative steep.
Relationship to Settlement			
23	Would development of the site be complementary to the existing settlement pattern, and would it have an adverse impact on any historic, unique or distinctive characteristics of the settlement's built or natural form?	A	Details – The site forms a natural extension to the north of Luton. Although only bordered on one side to the South this boundary of Luton extends for the entire length of the development.
Agricultural Land Quality			
24	Would the development impact on high quality agricultural land? <ul style="list-style-type: none"> • 50% or more in non-agricultural land (G) • 50% of more in Grade 3b, 4 or 5 (A) 	R	Any relevant additional detail – The majority of the site is Grade 2 agricultural land with approximately 25% Grade 3

	<ul style="list-style-type: none"> • 50% or more in Grade 1, 2 or 3a (R) 		
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STAGE 2 ASSESSMENT

This stage further assesses the site's suitability using comments from technical specialists. A red rating for any question does not mean that the site will be automatically excluded at this stage as the ratings across Stage 2B will be looked at as a whole using planning balance.

Transport and Access to Services

25	Facilities and services Question 26 considers the suitability and sustainability of the site for housing. It links to the Council's Settlement Hierarchy Audit. Issues relating to capacity are assessed separately		
25a	Does the settlement have a Primary/Lower school? <ul style="list-style-type: none"> • Yes, in the settlement (G) • Yes, proposed as part of the development (G) • No, but an adjoining settlement does (A) • Not in the settlement or an adjoining settlement (R) 	G	Yes three primary schools proposed as part of the development.
25b	Does the settlement have a Middle school (if applicable)? <ul style="list-style-type: none"> • Yes, in the settlement (G) • Yes, proposed as part of the development (G) • No, but an adjoining settlement does (A) • Other catchment school available (A) 	N/A	
25c	Does the settlement have a Secondary/ Upper school? <ul style="list-style-type: none"> • Yes, in the settlement (G) • Yes, proposed as part of the development (G) • No, but an adjoining settlement does (A) • Other catchment school available (A) 	G	Yes new Secondary school proposed as part of the development.
25d	Does the settlement have a GPs surgery or medical centre? <ul style="list-style-type: none"> • Yes, in the settlement (G) • Yes, proposed as part of the development (G) • No, but an adjoining settlement does (A) • Not in the settlement or an adjoining settlement (R) 	G	New primary healthcare facility proposed as part of development, if required.
26	What retail provision does the settlement offer? <ul style="list-style-type: none"> • Town Centre/ Supermarket (G) • Convenience Store / Post Office / Newsagent (A) • None (R) 	G	Retail provision offered however detail of which has not been disclosed.
27	Distance to bus stops with a frequent service (at least hourly at peak times): <ul style="list-style-type: none"> • Less than 400m (G) • 400m-800m (A) • Over 800m (R) • OR submission form stated that improved public transport facilities could be provided as part of the development (G) 	G	Submission form states that new public transport provision could be provided as part of the development.
28	Distance to nearest train station: <ul style="list-style-type: none"> • Less than 800m (G) • 800m-1200m (A) 	R	Luton Train Station is over 1200 metres from the site.

	<ul style="list-style-type: none"> Over 1200m (R) 		
29	Is the site accessible from the existing road network?	G	The site is accessibly from the A6 and M1.
School Capacity			
30	Do the local schools have capacity at all tiers?	R	No capacity to manage a development of this size.
31	If not, has a commitment been made to address this?	G	A development of this size will require new schools. New primary and secondary schools would be required, the size of which would be dependent on the scale of development. A new secondary school is considered to be crucial.
Water Utilities (Gas, Electricity and Broadband Infrastructure will be assessed at a later stage)			
32	Is there the capacity to provide all required infrastructure for waste water and potable water?	A	Water utilities companies have a statutory duty to supply water and waste water infrastructure to new development sites and a lack of available capacity does not prevent future development. Any infrastructure upgrades required will depend on the quantum and location of growth falling within each catchment area. Whilst the Stage 1 Water Cycle Study (April 2017) identifies the current capacity of existing water infrastructure, a Stage 2 study will be prepared to test the cumulative effect of sites that have been shortlisted for allocation in the Local Plan and identify the nature and timing of any upgrades required.
Drainage and Flooding (All sites subject to Sequential Test)			
33	<p>What is the conclusion of the sequential approach to site allocations, in regards to flood risk?</p> <ul style="list-style-type: none"> No assessment required (G) Consider Further Assessment (A) Further Assessment Required (R) 	A	Ordinary Watercourse present, consider further assessment.
Environmental Health			
34	<p>Contamination</p> <p>Are there any contamination constraints on site and will there be any remediation required?</p>	R/A/G	Awaiting Comments
35	<p>Adjoining uses</p> <p>Would any adjoining uses have the potential to cause conflict with the proposed use? (for example; noise and smell)</p>	A	Various noise sources, Road Traffic / Industrial / Commercial.
Environmental Constraints			
36	<p>Landscape character</p> <p>What would the impacts of development be on the landscape character or setting of the area or any designated landscapes? Would there be any direct or indirect harm to the Area of Outstanding Natural Beauty or the Nature Improvement Area?</p>	A	Development of site acceptable dependent on appropriate and substantial landscape mitigation reducing visual impact to & enhancement of ANOB and with significant GI.

			<p>Visual impact of change on AONB setting and views of considerable concern; impact on views from AONB to east (Warden / Galley Hills) a key concern. AONB designation is the highest national landscape designation and requires the same level of protection to that of National Parks. Any development must be landscape and GI led and employed to mitigate impact of change on landscape character and views on to development. Significant landscape corridors required to connect existing green infrastructure to new and wider rural landscape and including substantial green bridges. Landscape enhancement of AONB should be sought as part of development.</p>
<p>37</p>	<p>Heritage/ Archaeology What would the impacts of development be on any heritage assets and their setting? Are there any opportunities for enhancement of these assets?</p>	<p>R</p>	<p>Conservation Officer has advised an amendment to site boundary: Impact on setting of the historic village. Western part of proposal site not acceptable due to the significant open countryside setting of Sundon Village. Eastern side acceptable</p> <p>The significance of the listed buildings as a result of the development will likely suffer a degree of harm to their significance which includes their setting, however the public benefits of any development on the land will be required to outweigh any identified harm.</p> <p>Archaeology Comments:</p> <p>“This site lies immediately adjacent to Drays Ditches a triple ditched Iron Age boundary feature that is a Scheduled Monument. The site also contains multi-period archaeological remains and abuts Sundon Park and medieval and post medieval designed landscape. Allocation and development would cause substantial harm to the setting of Dray’s Ditches and be contrary to 132 of the NPPF. Attention must also be paid to para 126 of the NPPF with reference to</p>

			<p>the duties of Local Planning Authorities towards the historic environment when creating Local Plans. Allocation of this site would be inappropriate”.</p> <p>Notwithstanding the above comments it is considered that such harm is to be weighed against the public benefits of any development in accordance with Paragraphs 132 – 134 of the NPPF. Development of this site would provide significant public benefits in an area of need and a connection between the A6 and the M1 motorway which is considered to form a significant benefit of the site. When considering the site would not cause a loss of a designated heritage asset but would cause harm to the significant of the asset which includes its setting, it is considered that these significant public benefits could outweigh a degree of harm. An appropriate setback of development from the ditches would likely be necessary to mitigate harm.</p>
38	<p>Ecological Assets What would the impacts of development be on any biological, geological or ecological assets and are there any opportunities for their enhancement?</p>	A	<p>Farmland species, Chalk habitats and woodland would be affected. Appropriate surveys will need to be undertaken to identify any protected species and any development will be required to provide a net gain for biodiversity.</p>
39	<p>Open space/leisure and GI assets Are there any potential conflicts with open space, leisure designations or Rights of Way? Is there capacity to provide the required levels of open space and green infrastructure?</p>	A	<p>GI comments:</p> <p>Direct impact on AONB, impact on its setting. Parish GI plan aspirations to link Sundon Wood to Sundon Park, and create extensive green corridors linking Bramingham Park to George Wood, and Great Bramingham Wood to the pockets of woodland to the north. Current proposals do not deliver these GI aspirations. Extensive RoW network in area.</p> <p>Leisure comments:</p> <p>No Loss of leisure Strategy open space. However additional footfall could impact upon nearby leisure/countryside sites: Sundon</p>

			Chalk Quarry, and CWS Sundon Wood, George Wood and Bramingham Wood.
Minerals and Waste			
40	What would the impacts of development be on safeguarded minerals and waste sites, including mineral safeguarding sites?	G	No impact upon safeguarded minerals and waste sites.
Planning History			
41	What is the sites planning history? (For example planning applications and submissions to previous Allocations Plans)		Site was an allocated site within the withdrawn draft Development Strategy (local plan) for Central Bedfordshire. A significant amount of master planning and viability work has been undertaken.
Gypsy and Traveller Provision			
Does the site continue to next stage?			Yes

STAGE 2 ASSESSMENT CONCLUSION

Is the site suitable for the proposed development?

This site is located to the north of the built edge of Luton, between the M1 to the west and A6 to the East. The villages of Lower Sundon, Upper Sundon and Streatley lie to the north of the site. The area to the north is also designated as an Area of Outstanding Natural Beauty (the Chilterns AONB). This site is within the Green Belt, meaning exceptional circumstances would need to be demonstrated to alter Green Belt boundaries to allow development within this site.

The North Luton site is a Greenfield site forming part of the landscape character area known as “Houghton Regis – North Luton Rolling Chalk Farmland”, but largely lies beyond the AONB to the east. This chalk dipslope landscape is defined by a gently rolling terrain, dominated by arable crop production, generally with large regular Parliamentary enclosure fields, but with some smaller enclosures adjacent to settlements. There are isolated areas of ancient woodland but the site is largely open in character. Soft landscaping will be essential to mitigating visual impacts within this landscape. Busy transport corridors interrupt the landscape including the M1, A6 and the Midland Mainline Railway.

This site could benefit from direct connections to the M1 and the A6, providing a new link road between these two strategic roads. This site is also adjacent to Luton with access to Leagrave Train Station and an opportunity to connect to the Luton and Dunstable Guided Busway. Such transport connections would form significant public benefits in favour of development in this location.

The M1-A6 link road could effectively form a northern bypass for Luton by connecting into the wider strategic road network at the new Junction 11a of the M1 and the new A5-M1 Link. The provision of the M1-A6 link road would relieve existing congestion within surrounding settlements, without which strategic scale development in this area would cause additional pressure on the road network within Luton and surrounding villages. The delivery of the M1-A6 link road is therefore critical for development in this location.

Development in this site could be required to provide public transport infrastructure within the development and provision of an efficient public transport route through the site that links to the Luton and Dunstable Guided Busway and contribute to improving public transport links to both Leagrave Station and Luton Town Centre.

Development in this could be required to improve connections (serving both the development and neighbouring settlements) including cycleway connections and footpaths (Rights of Way).

A portion of site is located within the Chilterns AONB and within its setting. Great weight is given

to conserving the landscape and scenic beauty of the Chilterns AONB, as well as its value for conservation of wildlife and cultural heritage. Development within this site including built development and new green infrastructure will be required to respond to and respect its attractive setting and location adjoining, and partly within the Chilterns AONB. Major built development should be located beyond the boundaries of the AONB, however there is space within the site to ensure development is beyond the AONB. Any major development within the AONB will require exceptional circumstances to be demonstrated and that such development would be in the public interest.

The Council's Landscape Officer has not objected to the site subject to mitigation to reduce visual impact to and enhancement of the AONB and with significant green infrastructure. It is noted that the development would have a visual impact upon the setting of the AONB and views of considerable concern, notably views from the east (Warden and Galley Hills) are a key concern. Site specific policies would be required to mitigate impact of development upon the AONB and its setting. Great weight is to be given to conserving landscape and scenic beauty in Areas of Outstanding Natural Beauty.

Development would be required to protect endangered species, provide a net gain for biodiversity. The site contains a SSSI, ancient woodland and CWSSs, any development within the site would be required to identify and mitigate impacts upon such areas when giving an appropriate weight to their importance. Development would be required to provide a net gain for biodiversity.

Strategic scale development within this location could cause coalescence of Luton and Lower Sundon. Appropriate landscape buffers to ensure separation between the urban extension to Luton and existing neighbouring settlements will be required.

This site is located near to the following sources of air and noise pollution:

- M1;
- A6;
- neighbouring business uses; and
- The East Midlands Main Line.

There is potential for land contamination within the site due to historic uses within the landscape. Potential development within this site will require appropriate mitigation in accordance with national and local planning policy.

This site contains and/or is within the setting of the following Designated Heritage Assets:

- Drays Ditches, Scheduled Monument;
- St Mary's Vicarage, Lower Sundon, Grade II Listed Building;
- Aubers Farmhouse, Lower Sundon, Grade II Listed Building;
- Chestnut Cottage, Lower Sundon, Grade II Listed Building; and
- Church of St Mary, Lower Sundon, Grade I Listed Building.

The site contains and/or is within the setting of the following Non Designated Heritage Assets:

- Theed Way (ancient Saxon route way); and
- Historic landscape associated with Sundon Manor Park.

The Growth Location has the potential to contain multi-period archaeological remains which would not form an overriding constraint to development but will require investigation, recording and where necessary preservation in situ.

It is considered that strategic development within this site could cause substantial and less than substantial harm to heritage assets. However it is considered that the degree of harm to these

heritage assets could be mitigated through a combination of detailed design and master planning to mitigate the degree of harm and prevent loss. Whereby any Substantial harm to the significance of a Scheduled Monument, Grade I Listed Building or any other heritage assets of the highest significance should be wholly exceptional; any substantial harm to a Grade II Listed Building should be exceptional; and any harm to heritage assets will require clear and convincing justification, and where that harm is found to be substantial harm, such harm will require the development to achieve substantial public benefits that outweigh that harm.

It is considered that development of the site has the potential to deliver significant public benefits including the provision of a significant number of homes, the provision of local infrastructure, provision of local employment opportunities, provision of a significant amount of green/blue infrastructure, the potential to provide a connection to the Luton and Dunstable Guided Busway, the potential to provide a strategic link-road between the M1 and the A6 (benefiting from the A5-M1 Link; as well as the potential for development to be within close proximity to Luton and its services and facilities, whilst meeting Luton's Housing need where it arises. Therefore it is considered that development within the site has the potential to provide benefits that could in combination outweigh a degree of harm to the setting of, and thereby the significance of heritage assets. Exceptional circumstances will be required to review the greenbelt boundary.

It is considered that the site is worthy of further assessment.

STAGE 3 : ACHIEVABILITY

This section assesses whether the site is Achievable in line with NPPG Guidance:

A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of the site, and the capacity of the developer to complete and let or sell the development over a certain period.

Viability

43	<p>Referring to the Viability Assessment undertaken by consultants, is the probability of the site being viable high, medium or low?</p> <ul style="list-style-type: none"> • High (G) Benchmark land value comfortably exceeded by likely residual value • Low (A) Marginal viability, with likely residual land value close to benchmark land value • Very Low (R) Likely residual value well below benchmark land value 	A	<p>The Council's Residential Development Viability Report (Feb 2017) indicates that residual value of development in this value area and at this scale with £38k infrastructure costs would not exceed both the upper and lower benchmark land value and as such the report indicates that such development may not be viable.</p> <p>However the Council's Residential Development Viability Report (Feb 2017) is based upon residential property figures between 2013 and 2016 and based on the average building costs during 2016. The housing market within Central Bedfordshire has seen significant increases in residential property values in a relatively short period of time, whereby it is considered that the viability of developments within</p>
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		<p>this report has been cautious. For example in 2016 Dunstable has benefited from a 17.9% housing price increase with an average annual house price increase in 2016 for housing within Central Bedfordshire of 10.74%.</p> <p>This increase in property value has been a result of not only national trends in house prices and existing transport links to economically successful areas but also significant infrastructure projects within the pipeline including: East-West Rail; M1-A5 link road; A421 upgrades; Oxford to Cambridge Express Way; Luton and Dunstable Guided Busway; M1 improvements; and potential A1 improvements. It is considered that as such infrastructure projects progress that property prices within the Local Authority will likely continue to increase which has and will increase viability/deliverability of development not only in the higher value areas but also the lower value areas of the Authority.</p> <p>For the reasons outlined above it is considered that this scale of development within this value area may be viable.</p> <p>Site specific infrastructure requirements are necessary to make development of this site acceptable. Additional/ up to date viability information will be required.</p>
Achievability		
44	Are there any market factors which would affect deliverability?	<p>None that solely relate to this development.</p> <p>The Council's Residential Development Viability Report (Feb 2017) is based upon</p>

		<p>residential property figures between 2013 and 2016. The housing market within Central Bedfordshire has seen significant increases in residential property values in a relatively short period of time, whereby it is considered that the viability of developments within this report has been cautious. For example in 2016 Dunstable has benefited from a 17.9% housing price increase with an average annual house price increase in 2016 for housing within Central Bedfordshire of 10.74%.</p> <p>This increase in property value has been a result of not only national trends in house prices and existing transport links to economically successful areas but also significant infrastructure projects within the pipeline including: East-West Rail; M1-A5 link road; A421 upgrades; Oxford to Cambridge Express Way; Luton and Dunstable Guided Busway; M1 improvements; and potential A1 improvements. It is considered that as such infrastructure projects progress that property prices within the Local Authority will likely continue to increase which has and will increase viability/deliverability of development not only in the higher value areas but also the lower value areas of the Authority.</p>
45	<p>When can the scheme realistically commence delivery?</p> <ul style="list-style-type: none"> • 0 to 5 years (deliverable) • 6 to 10 years • 11 to 15 years • 15 to 20 years • Outside Plan Period 	0 to 5 years (deliverable).
46	What is the indicative build out time of the site?	The Case Study Sites outlined within the Council's Residential Development Viability Report (Feb 2017) indicates that after

			the site has received detailed planning permission six housebuilders would likely take one year to first completion and would build out the site at a rate of 300 dwellings per annum there after.
Does the site pass this stage?			Yes

SUMMARY

The sites that pass through this assessment process will not automatically be allocated for development in the Local Plan.

Sites will be selected with reference to a number of other factors including:

- The strategy, vision and objectives proposed in the draft plan
- Technical evidence studies
- The sustainability appraisal process
- The results of public consultation
- Flood Risk Sequential Approach
- Further transport modelling
- Consultation with neighbouring authorities

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