

<b>NORTH NORTHAMPTONSHIRE JOINT PLANNING COMMITTEE</b>		Item 7	Page 1 of 12
Date	<b>3<sup>rd</sup> SEPTEMBER 2020</b>		
Report Originator	<b>HEAD OF NORTH NORTHAMPTONSHIRE JOINT PLANNING &amp; DELIVERY UNIT</b>		
Title	<b>BEDFORD LOCAL PLAN REVIEW ISSUES AND OPTIONS CONSULTATION</b>		

## 1. PURPOSE OF REPORT

- 1.1 For the Joint Planning Committee to agree the proposed response to the Bedford Local Plan Review Issues and Options consultation

## 2. BACKGROUND

- 2.1 The Bedford Borough Local Plan 2030 was adopted in January 2020 following an independent examination. National policy now requires that local plans are reviewed and if necessary, updated every five years, but in Bedford's case the examination resulted in the inclusion of a new policy in the Local Plan 2030 committing the Council to a more challenging review timetable. An updated or replacement plan must be submitted for examination by January 2023.
- 2.2 The Issues and Options consultation is the first opportunity to help shape the new local plan. The purpose of this consultation is to gather comments about the range of subjects to be covered in the plan and where in the Borough new growth should be located. A [consultation paper](#) has been prepared to help consultees think about and comment on these issues. The Issues consultation runs from 13<sup>th</sup> July until 4<sup>th</sup> September 2020. A summary of key elements of the Issues paper is set out in Section 3 of this report. The implications for North Northamptonshire and proposed response is set out in Section 4 of this report and will be submitted using the relevant response form following agreement by the Joint Planning Committee.

## 3. KEY ISSUES

- 3.1 The Issues document sets out that the plan review will focus mainly on growth and infrastructure (housing, employment and supporting infrastructure). Bedford Borough Council (BBC) considers that because they have been recently adopted, the majority of the development management policies in the Local Plan 2030 do not need to be updated. However, some policies are older and local evidence or national guidance means that these policies need to be brought up to date. Through the local plan review BBC propose to:
- develop a strategy and allocate new development sites to accommodate growth in line with national policy requirements
  - include new policies for the repurposing of the town centre
  - include policies to improve the quality of development
  - include a policy to deliver self & custom build opportunities

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- consider the need for additional policies to address climate change
- consider the need for policies to control the location of food outlets
- consider the need to update open space standards to be provided alongside new development
- consider the need to change current policies for the natural environment following the publication of the Environment Act.

3.2 The issues document discusses the Oxford-Cambridge Arc, including the opportunities that the corridor for the new East-West rail route will provide for Bedford Borough (p.6). It acknowledges that little progress has been made on how the high-level ambitions for the Arc can or will translate into identifying where strategic growth is likely to be delivered. Work on the local plan will therefore focus on how to meet Bedford Borough's own requirements based on the Government's published standard method for calculating housing need<sup>1</sup>. The document recognises that this alone will be a significant challenge because it represents a 35% increase in the annual level of housing growth contained in the Local Plan 2030.

#### *Strategy and Infrastructure*

3.3 Bedford's annual housing requirement calculated in accordance with the standard method is currently 1,305 dwellings per annum. If the end date of the plan is 2040, using this figure there would be a need to plan for 26,100 dwellings over a 20 year plan period. The Issues document recognises that during the course of the plan preparation this figure may change as the Government figures for affordability are published annually. Taking account of these uncertainties the consultation seeks views on a housing figure in the range of 800-1,305 dwellings per annum.

3.4 Once existing commitments, currently around 11,000 dwellings are taken into account (including allocations in earlier local plans, neighbourhood plans and planning permissions granted) BBC may need to make new allocations to provide between 5,000 and 15,000 additional new dwellings over a plan period to 2040, depending on the Government's formula. To 2045 BBC would need to allocate between 9,000 and 21,625 new dwellings. There is a significant difference between potential levels of development and the Local Plan will need to consider spatial development options to deliver these. The issues paper sets out (p.16) that a new strategy is therefore needed and that new housing growth will need to be supported by infrastructure, jobs, shops and other facilities, which are also discussed in the paper.

#### *Potential locations for growth*

3.5 Potential locations for growth are identified and discussed on pages 17-25 of the Issues paper. The potential locations for housing and employment growth include:

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<sup>1</sup> The Issues Paper references the existing LHN not the proposed new methodology

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- further regeneration within the Bedford / Kempston urban area, particularly of any available brownfield sites;
  - expansion of the Bedford / Kempston urban area;
  - expansion within the borough boundary, of neighbouring urban areas, such as Rushden and St. Neots;
  - development along the A421 corridor;
  - development around an East West Rail northern station;
  - new settlements in locations with good accessibility;
  - more dispersed development throughout the borough including the expansion of villages.
- 3.6 Combinations of these are illustrated in the diagrams on page 18-20 of the document and the relevant extracts are set out at [Appendix 1](#). The document recognises that it may be that the local plan strategy will need to combine elements from more than one of the locations to achieve the scale of growth required.

#### *Housing*

- 3.7 In addition to setting the quantum of housing to be provided in future years the plan review will also need to respond to a number of additional policy requirements which have emerged since the drafting of the Local Plan 2030. During the course of the preparation of the Local Plan 2030 the Council considered whether new settlements might form part of the development strategy but ultimately found that none of the proposals were ready for allocation. New settlements remain an option for this plan but only where there is a clear case that they would be developable in the plan period.

#### *Employment*

- 3.8 The Issues paper (p.26) sets out that the recently adopted local plan does not allocate new sites for employment because there was already sufficient land available that had not been occupied. However, that situation will change over this plan period. Similar types of business often choose to cluster together and the improved strategic links along the A421 corridor suggest that this might be a good location for much of the much of the required growth to occur. It considers that demand for buildings in Bedford with its excellent and growing transport links and proximity to other towns, including the capital within short journey times will continue.

#### *Town Centre*

- 3.9 Page 28 of the document outlines that given the significant changes in town centres and shopping that occurring nationally, a comprehensive approach to the future of Bedford town centre will be required. Such an approach will extend beyond what the local plan can achieve and will involve everybody with an interest in Bedford.

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### *Climate change*

- 3.10 Climate change is a fundamental concern for the local plan and BBC would like to enhance its current planning policies (p.31). The issues paper sets out that once BBC hears the outcome of the Future Homes standard, it will consider how existing planning policies need to change. The paper sets out that climate change can be influenced positively through measures which encourage the use of sustainable modes of transport, such as safe and green cycleways, dedicated busways or more innovative transport systems and modes. Incorporating within developments the infrastructure to support alternatives to the car means that they can be well designed resulting in high quality services which people will want to use.

### *Environment*

- 3.11 The paper references (p.33) the Environment Bill that includes a package of new duties to improve nature, such as the production of Local Nature Recovery Strategies and a 10% biodiversity net gain requirement on new development. Once BBC hear the outcome of any national policy change, it will consider how its existing local planning policies need to change. BBC considers that the Local Plan 2030 contains robust policies relating to the environment. These policies will remain active, but the technical work that relates to these will be updated.

### *Health*

- 3.12 Page 34 of the document sets out that the Local Plan 2030 contains policies for the protection, enhancement and provision of green infrastructure which are considered up to date. It also contains a policy requiring the impact of developments on health to be assessed (health impact assessments) which is also considered to be up to date. In relation to healthy food environments, a key element identified relates to the proximity of food outlets to schools, and other locations for example where young people congregate. BBC is working with colleagues across the East of England, exploring this issue in more detail to determine whether a policy would be justified in Bedford Borough. The evidence results are awaited and will be taken into consideration when drafting the local plan.

## **4. IMPLICATIONS FOR NORTH NORTHAMPTONSHIRE AND PROPOSED RESPONSE**

- 4.1 The JPDU engaged positively with Bedford Borough Council (BBC) through the preparation of the JCS and the Bedford Borough Local Plan. A number of Duty to Cooperate meetings were held with the JPDU, BBC, East Northamptonshire Council, Borough Council of Wellingborough and Northamptonshire County Council (NCC) Highways to discuss cross-boundary issues. This positive engagement is ongoing.
- 4.2 Of most relevance to North Northamptonshire are the potential locations for growth, particularly the options described in the paper as:

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- **Brown- Urban based growth:** Growth in and around the Bedford / Kempston urban area, together with extensions to Rushden and St.Neots. Building at higher densities in and around urban areas could deliver a significant number of homes.
- **Red- New settlement based growth:** In addition to expansion of Wixams (new settlement) a number of new settlements could be developed. During the course of the preparation of the Local Plan 2030 four potential new settlement options were discussed but were not taken forward at that time. These and other new settlement options that have yet to be put forward could be considered as part of this plan.

### Brown- Urban based growth

- 4.3 This option would include extensions within Bedford borough that would functionally act as an extension to Rushden. The scale and location of growth at Rushden is a matter for the update of the JCS through the North Northamptonshire Strategic Plan, although cross-boundary considerations will need to be progressed with BBC as the plans are developed. It is important to note that the consultation paper makes no reference to a need for North Northamptonshire or other adjoining authorities to take Bedford's growth. This has also not been raised in discussion to date with BBC.
- 4.4 It is noted that Table 1 in the Issues paper provides a high-level summary of potential advantages and disadvantages of the options. It is noted that this identifies as a disadvantage for Urban based growth that "Growth may overstretch existing services, facilities and infrastructure in towns". Infrastructure and service provision will be a key consideration in assessing options. The issues identified in this response should be included in this assessment process.
- 4.5 The potential option identified in the Issues paper relates to zone RUS1 *Rushden South, Between Wymington and south of Bedford Road (A6)* that was previously assessed and discounted in considering options for expansion to Rushden. This work is summarised in the [Rushden Sustainable Urban Extension Background Paper January 2015](#). The key positive attribute(s) were summarised as "*Good connectivity to Rushden town centre via Wymington Road (emerging USS)*" and the key negative attribute(s) as "*Development would lead to coalescence with Wymington. Contrary to adopted Bedford Borough Core Strategy*". The summary/overview of the assessment recognised the need for issues to be considered through concurrent plan-making: "*Expansion to south would entail full/ fundamental review of Bedford Borough Core Strategy. This would need to run concurrently with the NNCS Review and would be likely to lead to major delays in the process*".
- 4.6 As previously identified, coalescence and the impact of growth on settlements such as Wymington will be an important consideration in assessing potential growth options in this locality.

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- 4.7 Whilst the comments regarding conformity with the Bedford Borough Core Strategy and the impact on the NNCS Review have been superseded, it will be important to consider opportunities/issues relating to growth at Rushden through both plans. The timetable for the Bedford Local Plan is set out on page 10 of the document and includes Draft Plan consultation Summer 2021, Plan for submission consultation in Summer 2022 and adoption by Winter 2023. The potential timetable for the NN Strategic Plan agreed by the JPC at its 25<sup>th</sup> July 2019 meeting runs behind the Bedford Local Plan but includes Proposed Submission consultation in Winter 2022 and adoption in Winter 2023. It is considered that the timetables are sufficiently aligned to ensure cross-boundary issues can be fully considered through respective plan-making. To this end, it is noted that the proposed plan end date is 2040, and consideration should be given as to whether an end date of 2050 to align with the Arc would be beneficial.
- 4.8 In considering future levels and locations of growth at Rushden, alongside the issues identified in the summary table, and the issue of coalescence, the impact of future growth on the Upper Nene Valley Gravel Pits Special Protection Area (SPA) will also be a key consideration in developing the respective plans. In North Northamptonshire, the current SPA mitigation strategy focuses on the impact of recreational disturbance to the wintering waterbirds. Natural England (NE) are becoming increasingly concerned regarding functionally linked land to the SPA. There is a need to understand the interaction with the SPA and surrounding land as well as the impact from visitors. The JPDU have initiated discussions with NE regarding the scope of this work and it is noted that officers from BBC have stated they would wish to be involved in discussions.
- 4.9 BBC has undertaken preliminary investigations into the potential for a new station on the Wymington Loop. This work is still in the exploratory stages and they will be keeping neighbouring authorities informed as work progresses. This is not identified in the consultation document so at this stage there is no detail on specific location and whether this may be deliverable. Provision of a deliverable station in this locality could provide future opportunities that may benefit North Northamptonshire.
- 4.10 Opportunities provided by a deliverable railway station could provide significant benefits for North Northamptonshire and would be a key consideration in assessing the sustainability of potential growth options to the south/south west of Rushden. Policy 17 of the JCS *North Northamptonshire's Strategic Connections* identifies investigating the longer-term potential for a railway station at Irchester (to serve Irchester, Higham Ferrers and Rushden) as a priority for further work and investment at criterion a) iv. Substantive progress has not been made on investigating this potential. Should a railway station at Wymington be proven to be deliverable, the impact on service provision from Wellingborough station, and the relationship with potential for a station at Irchester will be important considerations. It may be the case, that such a station could provide the same benefits sought by the JCS.

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Red- New settlement based growth

- 4.11 The North Northamptonshire JPC previously made representations objecting to the Bedford Borough Local Plan 2035: Plan for Submission. These representations related to the proposed Colworth Garden Village (Policy 27 of the Local Plan 2035) and raised concerns as to whether the necessary supporting evidence base (specifically transport modelling) had been undertaken to justify the Garden Village proposal; such that the scheme as envisaged by policies 26 and 27 was not (considered to be) justified. They also set out that given the scale of Colworth Garden Village, that to be effective Policy 27 should give further consideration to the wider spatial implications of CGV beyond its immediate locality (Sharnbrook/Santa Pod). To be justified (in accordance with the soundness test) policy criteria should give consideration to broader connectivity; with particular reference to green infrastructure, walking, cycling and public transport. Following substantive changes to the Local Plan, including the removal of the Colworth Garden Village from the Plan, the JPC's substantive objections were withdrawn.
- 4.12 It is considered that the issues raised in the representation remain relevant to any consideration of the Colworth Garden Village site through the Local Plan Review. The recognition in the disadvantages section of the summary table that *"Issues with new settlement proposals previously put forward would need to be resolved before they could be allocated"* is welcomed. It is noted that the Issues Paper states that: *"New settlements remain an option for this plan but only where there is a clear case that they would be developable in the plan period"*.

*Other issues*

- 4.13 In respect of transport modelling, the consultants who are undertaking the model for BBC have contacted the JPDU regarding growth assumptions to be incorporated in the development of the transport model. The JPDU have worked with the partner LPAs to provide this information and advised the consultants on the importance of NCC being satisfied with the model.
- 4.14 Notwithstanding the potential for a new railway station, it will be important to consider sustainable transport links between North Northamptonshire and Bedford Borough, notably on the A6. Future retail strategy and hierarchy and employment are likely to be cross-boundary issues that require consideration through the development of the respective plans.
- 4.15 It is noted that the Environment section of the document references 'Biodiversity Net Gain'. It is considered that, in accordance with the government's '25 year Plan to Improve the Environment' and the stated aims for the Oxford to Cambridge Arc, the plan should be seeking to achieve an overall net environmental gain. As referenced above, the impact of future growth on the Upper Nene Valley Gravel Pits SPA will also be a key consideration.

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## 5. CONCLUSION

- 5.1 The JPDU engaged positively with Bedford Borough Council (BBC) through the preparation of the JCS and the Bedford Borough Local Plan. A number of Duty to Cooperate meetings were held with the JPDU, BBC, East Northamptonshire Council, Borough Council of Wellingborough and Northamptonshire County Council (NCC) Highways to discuss cross-boundary issues. This positive engagement is ongoing.
- 5.2 The implications for North Northamptonshire and proposed response in section 4 of this report will be submitted using the relevant response form following agreement by the Joint Planning Committee. Alongside the advantages and disadvantages identified in the Issues Paper, the issues identified in this response should also be included in this assessment process.
- 5.3 It is recognised that the Issues Paper is first stage of the Local Plan process and is seeking feedback on issues and a range of spatial options. The strategy will be developed following a consideration of alternatives and the sustainability implications of each of these. The scale and location of growth at Rushden is a matter for the update of the JCS through the North Northamptonshire Strategic Plan, although cross-boundary considerations will need to be progressed with BBC as the plans are developed. It is considered that the timetables of the NN Strategic Plan and Bedford Local Plan review are sufficiently aligned to ensure cross-boundary issues can be fully considered through the respective plan-making process.

## 6. RECOMMENDATIONS

- 6.1 **The Head of the NNJPDU recommends that the Joint Planning Committee agrees the response to the Bedford Local Plan Review Issues and Options consultation set out in Section 4.**

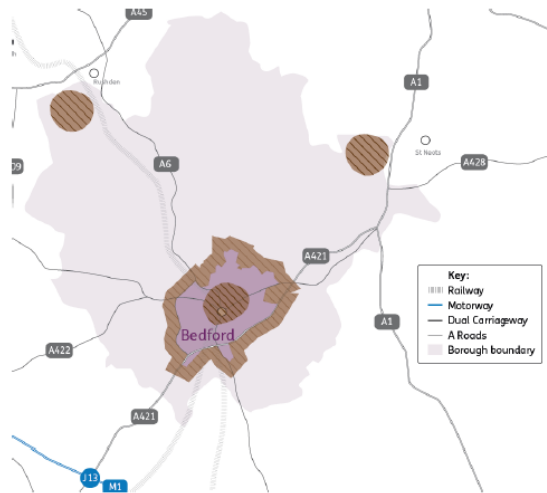
Contact Officer: Simon James tel. 01832 742361



**Appendix 1: Potential locations of growth and advantages and disadvantaged of the potential locations extracts from Issues Paper**

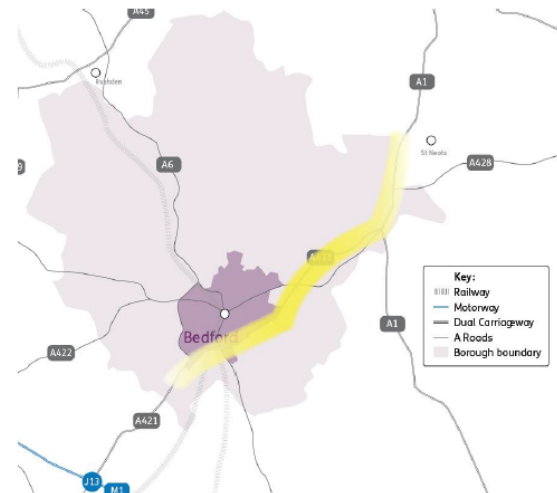
**Brown - Urban based growth**

Growth in and around the Bedford / Kempston urban area, together with extensions to Rushden and St.Neots. Building at higher densities in and around urban areas could deliver a significant number of homes.



**Yellow - A421 based growth**

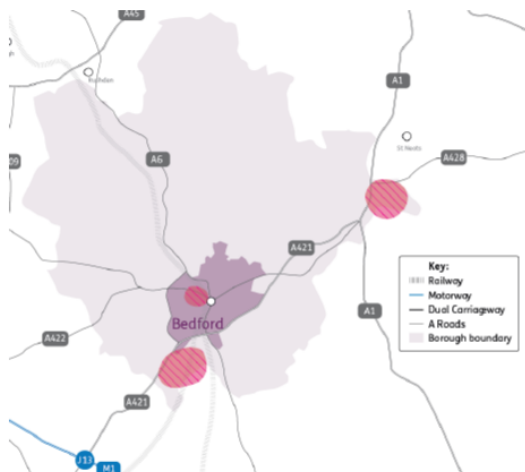
Growth along the A421 road corridor where there are already good road links and opportunities to improve road-based public transport. It could involve growth around the south side of the Bedford / Kempston urban area and the expansion of villages between Stewartby and Great Barford.



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**Pink – Rail growth**

Growth along the planned route of the East – West railway taking advantage of the sustainable connectivity that it could bring with growth south and west of the Bedford / Kempston urban area where the railway already runs and centrally benefiting from the interchange at a redeveloped Bedford Midland Station. There would be significant potential for growth around Tempsford to the east



**Orange - East – West rail northern station growth**

This relies on an additional station to the north of Bedford. There would be significant potential for growth north of Bedford, which could also link with a new settlement.



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**Grey – Dispersed growth**

Growth spread proportionately across the borough. There would be growth in and around the urban area and some expansion in all villages.

**Red - New settlement based growth**

In addition to expansion of Wixams a number of new settlements could be developed. During the course of the preparation of the Local Plan 2030 four potential new settlement options were discussed but were not taken forward at that time. These and other new settlement options that have yet to be put forward could be considered as part of this plan.

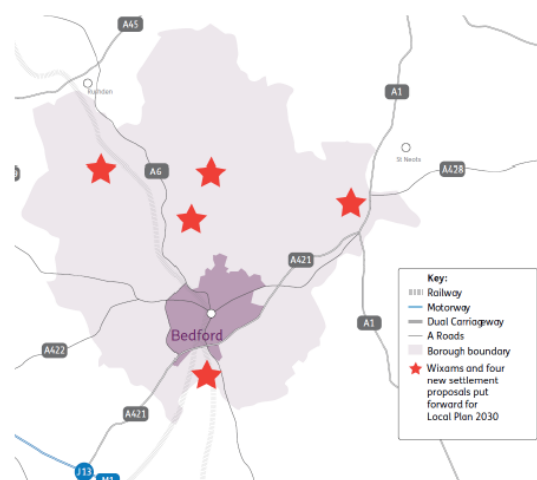
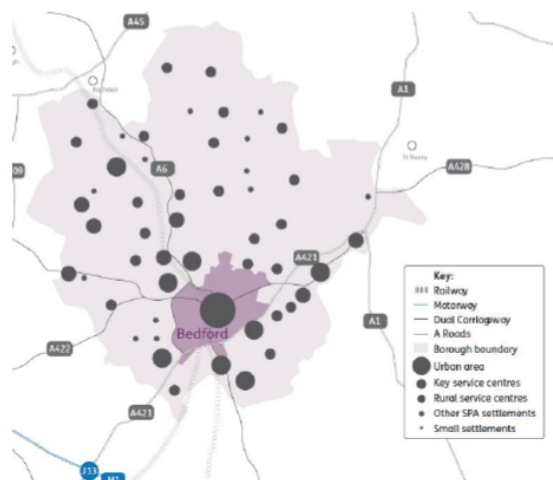


Table 1 Advantages and disadvantages of the potential locations

Location	Pros – advantages	Cons – disadvantages
<b>Brown – Urban based growth</b>	<ul style="list-style-type: none"> <li>• Supports services, facilities and businesses in urban areas, particularly Bedford town centre.</li> <li>• Urban locations have the greatest potential for residents to make sustainable travel choices (walking, cycling and public transport).</li> <li>• Increasing development density improves public transport viability.</li> <li>• Makes good use of brownfield and under-used land. Higher density development more appropriate in urban locations.</li> <li>• Reduces need for growth in rural areas.</li> <li>• More employment uses (e.g. business services) within centre will improve viability and create direct benefits of other associated business uses such as retail and leisure.</li> </ul>	<ul style="list-style-type: none"> <li>• Opportunities for growth within urban areas are limited, so most growth would be on edge of urban area and closer to existing villages.</li> <li>• Very high density schemes could be out of character and affect local distinctiveness.</li> <li>• Growth may overstretch existing services, facilities and infrastructure in towns.</li> <li>• Expansion of Rushden and St.Neots (within Bedford borough) may not be supported by those towns.</li> <li>• Rural locations would miss the benefits associated with growth.</li> <li>• Restricted sites sizes can restrict scheme options and opportunities to mitigate risk for investors.</li> <li>• More development at high density in the urban area may contribute to poor air quality issues.</li> </ul>

Location	Pros – advantages	Cons – disadvantages
Yellow – A421 based growth	<ul style="list-style-type: none"> <li>• Takes advantage of existing and proposed road infrastructure improvements.</li> <li>• Close to existing employment areas with good connections.</li> <li>• Continues the regeneration of the Marston Vale and the creation of the Community Forest.</li> <li>• Reduces need for growth in other rural areas.</li> <li>• Opportunity to extend the established settlement at Wixams with access to the new rail station.</li> <li>• Provides the opportunity to phase growth, linked to upgraded infrastructure.</li> <li>• Could incorporate a western expansion of St Neots or a new settlement at Wyboston.</li> <li>• Capitalise on proximity and reduced travel time to high-value Cambridge market.</li> </ul>	<ul style="list-style-type: none"> <li>• Could encourage car use and increase pressure on A421 junctions.</li> <li>• Requires improved connections into urban areas in order to access facilities otherwise residents may travel on to larger towns.</li> <li>• Could appear as urban sprawl and join-up nearby villages.</li> <li>• Other locations would miss the benefits associated with growth.</li> </ul>
Pink – Rail growth	<ul style="list-style-type: none"> <li>• Combines some of the benefits of urban and A421 growth location options.</li> <li>• Opportunity to extend the established settlement at Wixams with access to the new Wixams rail station (Thameslink) and a link to an enhanced station on the East-West rail line.</li> <li>• Reduces need for growth on villages.</li> <li>• Opportunities for high-tech employment development in association with East-West rail services in balanced communities with the option to live and work locally.</li> <li>• Increases employment opportunities in the urban area and sustainable methods of transport for those residents in most deprived areas.</li> </ul>	<ul style="list-style-type: none"> <li>• Would also have the disadvantages of growth focused on the urban fringe, including visual impact of strategic-scale growth on local landscapes.</li> <li>• Exact route of the railway not yet known.</li> <li>• Other locations would miss the benefits associated with growth.</li> </ul>

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Location	Pros – advantages	Cons – disadvantages
Orange – East-West rail northern station growth	<ul style="list-style-type: none"> <li>• A new parkway rail station north of Bedford could reduce traffic congestion in the town and provide parking. It could also serve any new settlements north of Bedford.</li> <li>• Reduces need for growth on villages.</li> <li>• Opportunities for high-tech employment development in association with a new East-West rail station providing option to live and work locally.</li> <li>• Provides opportunities for sustainable and active transport links, both between new settlements and to the urban area.</li> </ul>	<ul style="list-style-type: none"> <li>• Would also have the disadvantages of growth focused on the urban fringe, including visual impact of strategic-scale growth on local landscapes.</li> <li>• Exact route of the railway not yet known.</li> <li>• Rail station north of Bedford is not currently part of the route proposal. Addition of a station would increase journey times between Oxford and Cambridge.</li> <li>• Development north of Bedford is unlikely to be possible without a northern station.</li> <li>• Other locations would miss the benefits associated with growth.</li> </ul>
Grey– Dispersed growth	<ul style="list-style-type: none"> <li>• Every community contributes proportionately to achieving the growth target.</li> <li>• The impact of growth on infrastructure is spread around the borough rather than focused on a smaller number of locations.</li> <li>• Would open up new markets, assist in providing small housing sites and help early delivery of new homes.</li> <li>• A greater number of communities see the benefits of growth for example in supporting local services and facilities.</li> </ul>	<ul style="list-style-type: none"> <li>• May require growth in communities that have no or very few facilities. This may encourage more car use as residents have to travel further, making walking and cycling less attractive.</li> <li>• Would still require significant growth in and around Bedford if it were to take its proportionate share.</li> <li>• Lack of a focused critical mass of development makes providing new strategic infrastructure more difficult.</li> <li>• Unlikely to facilitate employment growth due to dispersed nature.</li> </ul>

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Location	Pros – advantages	Cons – disadvantages
<b>Red – New settlement based growth</b>	<ul style="list-style-type: none"> <li>• Potential for sustainable growth using garden village principles, creating self-contained new communities with good infrastructure provision.</li> <li>• Would reduce the amount of development that must be accommodated in other locations.</li> <li>• Detached 'rural' setting enable property construction and create ambiance which higher value occupiers aspire to.</li> <li>• Provides opportunities for sustainable and active transport links, both between new settlements and to the urban areas.</li> </ul>	<ul style="list-style-type: none"> <li>• New settlements take a long time to plan and build, leading to short to medium-term housing supply shortages.</li> <li>• There could be an adverse impact on local landscapes, loss of agricultural land and countryside.</li> <li>• Issues with new settlement proposals previously put forward would need to be resolved before they could be allocated.</li> <li>• Significant new infrastructure may be required to accommodate growth.</li> </ul>