

APPENDIX ELEVEN

Statutory consultee responses

Please Note: that the Consultation Report is a collection of all comments received during the consultation process. Comments included within this document are those of individuals and organisations and do not necessarily represent the views of the District Council.

Anglian Water

General Comments

Sites within 400 metres of WwTW and/or 15 metres of pumping station

The strength of the odours from a Sewage Treatment Works [or Pumping Station] at any particular time will depend on a number of factors, including the distance from the source, wind strength and direction and ambient temperatures. The concentration of odour will normally diminish as the distance from the source increases. Therefore, the cordon sanitaire around the Works should ensure that dwellings, offices and other development which is likely to be sensitive to odours are not in a location more likely to be affected by odour nuisance.

Based on our experience of odour from Sewage Treatment Works [and Pumping Stations], we would recommend a distance of 400 metres for works [and 15 metres for Pumping Stations]. This is in line with the recommended distance used elsewhere for planning purposes (eg. the Town and Country Planning (General Permitted Development) Order) from slurry tanks, etc on agricultural land, which are likely to result in similar strength odours. This distance may be relaxed (following consultation with Anglian Water) on a case by case basis depending upon the nature of the Works and the sensitivity of its locations.

WwTW Capacity

This is based on consideration of both the flow and process capacity available at the WwTW which would be expected to take flows from the development based on existing sewers. Where an alternative WwTW is likely to be an economically more viable solution, this has been indicated.

Foul Sewer Capacity

AW has an ongoing programme to develop hydraulic models for its WwTW drainage catchments. A number of the catchments have hydraulic models available and more detailed modelling will be required to assess cumulative effects of proposed sites. Generally comments at this stage have been based on existing known flooding issues or where modelling has been carried out for specific development enquiries.

Wastewater assets affected by site

We have identified sites where there are sewer pipelines that may be affected by development on the site. In order to maintain these pipelines we do require a minimum easement of 3 metres either side of the centre line of the sewer to allow access to carry out any maintenance or emergency works. If this is not possible then there may be a case for the sewer to be diverted which will be at full cost to the developer which could make the site uneconomical to develop. We are unable to provide any indicative costs and it is dependant on development site layout.

Water Treatment Works

No further comments to add

Water Treatment Capacity

No further comments to add

Water Network capacity

Where the comments field is blank, water supplies are available but local reinforcements may be required which will depend on the combined total number of sites within the area and subsequent site layouts.

uneconomical to develop. We are unable to provide any indicative costs as it is dependant on development site layout

Anglian Water

Water assets affected by site

We have identified where water pipelines cross, or where strategic pipelines cross or run adjacent to the boundary of any particular site. Water pipelines near the boundaries of a site may be affected due to future site access/highway works but these have not been identified. In order to maintain these pipelines we do require a minimum easement of 3 metres either side of the centre line of the water main to allow access to carry out any maintenance or emergency works. The easements required would be dependant on the size of the main, in the case of a strategic main an easement of up to 12m will be required. If this is not possible then there may a case for the water main to be diverted which will be at full cost to the developer which could make the site

Bedfordshire County Council Highways

The preferred development sites should abide by principles set out in national and regional policy, as well as those in the Bedfordshire Local Transport Plan. The key objective is to integrate land use and transport so that sustainable modes is made more practicable and attractive, thus reducing reliance on the private car. To achieve this, new developments must be situated in the most accessible locations.

High trip generating development such as employment and retail uses should be concentrated in areas well served by public transport and within low distances of large populations to encourage travel by foot or bicycle. As such town centre and edge of town centre sites should generally be favoured. Similarly residential development is best located at sites close to and linked by public transport to a range of key services.

All development will contribute to some extent to pressure on the road network and on sustainable travel options. It is therefore expected that all developments will contribute towards measures to mitigate these pressures. When determining where to allocate development it should be considered that some option sites offer more potential for sustainable travel improvements at a lower cost than other options. Suitable infrastructure and services will need to be provided to realise this potential. For any development there must be sufficient capacity in the road network to support development generated trips by all modes. This is difficult to assess as this stage of the process however some general comments will be included separately. When more detailed proposals for sites come forward during subsequent stages the capacity of the road network will be a key factor for consideration.

Bedfordshire County Council

The largest of sites will potentially have a need for on-site education (including pre-school), extra care housing and library provision but each would have to be assessed individually. Transportation requirements for large sites would need to be examined on a case-by-case basis in the context of agreed Transport Assessments/Travel Plans. Attached is a note prepared by the County Council Transportation Section on sustainable transport issues and accessibility of the largest key sites.

The County Council Heritage and Environment Team Leader comments that he is glad that a Planning Obligations approach to Green Infrastructure (GI) is in place but some sites would need looking at individually and may need additional contributions through a s106 agreement.

The Head of Libraries has stated that most of the problem areas where we would be seeking developer contributions for library service improvements from smaller scale development have been identified for the Planning Obligations Strategy but we would also be seeking contributions in Silsoe.

Early Years Education comment that there does not appear to be any significant impact on their service area from any of the smaller developments, however if there are a number of developments in the same area the cumulative effect could have an impact.

The County Council's Children's Services Section has produced spreadsheets, which are attached, setting out when financial contributions towards education will be required and when a new school would need to be provided. The spreadsheets include the sites listed as providing over 50 new dwellings. The sites have been assessed individually although it has been highlighted where contributions towards education provision would be required should a number of sites come forward in the same school catchment area.

East of England Development Agency

EEDA's principal role is to improve the East of England region's economic performance. Our main concern with Site Specific Allocation documents is therefore that they will help deliver, and provide the spatial framework for:

- sustainable economic development and regeneration in the East of England, and in particular,
- the Regional Economic Strategy ([A Shared Vision: the regional economic strategy for the East of England](#), 2004).

Planning Policy Statement 12 'Local Development Frameworks', 2004 reminds local planning authorities that in preparing local development documents they should take into account, inter alia, the relevant Regional Economic Strategy (see para. 1.9). The RES provides a vision for the region as a leading economy with high and growing levels of wealth, increasing levels of economic participation and inclusion, and sustainable and dynamic rural economies. This should be noted in the criteria and relevant policy, which should make reference to the full range of regional policy.

In this context the impacts of proposed development on the following issues are likely to be particularly significant and we request that, where appropriate, they are considered in your site specific allocations document:

- provision for businesses (particularly based in science and technology, research and innovation) including the supply of high quality business premises in sustainable locations;
- improving the region's skills base and human capital (and especially to address skills gaps and shortages);
- tackling deprivation and social exclusion, equality and diversity (giving communities improved opportunities to participate fully in the regional economy);
- improving provision of port, airport and transport infrastructure so as to enable corridors of economic activity, and deliver growth and sustainable communities;
- promoting sustainable development, urban renaissance and rural vitality, including the supply of high quality and affordable housing/ residential environments, balanced with provision

East of England Development Agency

for employment;

- managing growth and development sensitively and effectively;
- complementing and enhancing the position of London as a world city; and
- protecting and enhancing the region's landscapes and environmental assets.

In general, your Local Development Document should take account of the following sub regional Policies contained in the RES for Bedford/Kempston area (see p. 95 of RES):

- enabling improved access to employment for disadvantaged communities and groups through targeted skills programmes, comprehensive community regeneration programmes and by creating more cohesive and inclusive communities
- establishing Bedford as a location for investment and business activity, through the provision of high quality employment premises across the area for high value knowledge-based industries
- strengthening the role of the town centre by improving the range and quality of retail provision and transport facilities linking it to the revitalisation of the rest of the area including the riverside
- developing cultural and heritage focused tourism in Bedford through enhanced facilities and attractions centred on a cultural quarter near the town centre.

The recognition given to the Millbrook Proving Ground is welcomed in the policy document. In addition, the consultation Draft RES, 2007 highlights the need for higher and further education infrastructure including Cranfield University. It also highlights the need to promote research and development and innovation capacity at Cranfield Technology Park. The proposed new NIRAH development is also noted as a key asset. By addressing these key elements of the RES, the LDF documents will provide the context needed to maintain the prosperity of the East of England, enhancing its regional competitiveness and giving support to business growth.

East of England Regional Assembly

Mid Beds Council has used an interesting interactive method of online consultation which is likely to encourage a high level of public involvement. Potential sites are grouped within parish boundaries and comments are invited on each location. The Issues and Options consultation puts forwards sites that have been proposed to the District Council. Whilst there is a basic commentary from the District Council on some of the key issues arising on the sites, it is not a list of sites agreed and recommended by the District Council. As such there are a number of sites that, by reason of scale and location, do not conform to the emerging Core Strategy in the District. By implication, some of these are likely to raise issues of consistency with the regional policy approach as set out in the Further Proposed Changes (such as significant scale of development in settlements identified by the District Council only as Small Villages). As the District Council has already identified those sites that are unlikely to conform to the Core Strategy is not considered necessary in this report to itemise all 400 sites with a separate regional response. Instead, a response is recommended that supports the District Council's overall approach and relates it back to the aspirations of the Spatial Strategy Policies in the emerging East of England Plan It is considered that the Mid Bedfordshire District Council Site Allocations Issues and Options DPD does not give rise to any general conformity issues as specific development sites have not been proposed at this stage. The specifics of individual development schemes that are above the Regional thresholds for consideration will be assessed for conformity when they come forward as planning applications

General Comments

English Heritage promotes a wide definition of the historic environment which includes not only those areas and buildings with statutory designated protection but also those which are locally valued and important, as well as the landscape and townscape components of the historic environment. The importance and extent of below ground archaeology is often unknown, although information in the County Historic Environment Record (HER) will indicate areas of known interest, or high potential where further assessment is required before decisions are made.

As a general observation, the Site Allocations consultation information has been rather time consuming to work through in terms of assessing individual sites. The maps and supporting information rarely contain information on historic environment constraints affecting each site (e.g. scheduled ancient monuments or listed buildings), which has resulted in a significant amount of research for us. Given the large number of consultation documents that we have to respond to, it would be useful to have more information on constraints. The absence of a Sustainability Appraisal report has made this task harder, as such a report would have assessed individual allocations against a set of objectives, hopefully including one relating to the historic environment.

It is unfortunate that no SA has been prepared for this stage of the DPD's preparation. We note that Mid Beds' Local Development Scheme does not commit to the production of an SA document for its Issues and Options stage, although a scoping report would have been useful to establish basic issues and principles. It is not clear how Mid Bedfordshire intends to reduce the number of site allocations from 400+ to a smaller number of "preferred options". Criteria within a SA or other assessment document would have helped to give some indication as to how this might be done. In any case, the preferred options stage needs to demonstrate how the number of sites has been reduced and the SA report needs to fully address historic environment issues.

Please note that due to data issues, we have not been able to identify conservation areas when assessing every site. However, conservation areas are an important historic environment features and proper consideration must be given to the potential impacts on their character, appearance and setting. Furthermore, we have not considered areas of archaeological interest beyond scheduled monuments in most cases, nor have we looked at historic landscape issues beyond registered historic parks & gardens. However, wider archaeological and landscape impacts are important considerations and need to be factored into site assessment. The possible cumulative impact of a number of site allocations in one location could cause significant harm to the historic landscape.

All allocations should be scoped for archaeological potential (including earthworks) before taking them forward to the next stage, as there is a high likelihood of archaeological sites not on the HER. Archaeological assessment and evaluation should be in line with PPG16 and best practice guidance so that impacts can be assessed at the earliest opportunity. Historic landscape character needs to be identified and assessed early on, using relevant data from the HER (such as Historic Landscape Characterisation) and other sources. Conservation and archaeology staff at the district and county level should be consulted on matters relating to archaeology, landscape/townscape and the historic environment generally.

Finally, our comments on specific sites have been informed by desk-based analysis rather than site visits. We have not been able to judge the potential impacts more accurately on the ground and we have focussed on those sites with the greatest historic environment impact. This does not mean there are no issues with any other site and we therefore reserve the right to comment on any site as and when proposals develop. Notwithstanding this, the comments made in this letter should be taken in consideration when reviewing the Site Allocations document.

Environment Agency

In terms of flood risk, the sites will need to be assessed against the most up-to-date baseline information available. We are aware of, and have been consulted throughout, the production of the Strategic Flood Risk Assessment (SFRA) for Mid Bedfordshire District Council. This allocations consultation stage has been undertaken prior to the final publication of the SFRA. Therefore, as the most recent information available, the EA Flood Map will be used to determine the flood risk to the proposed sites. We will use the finalised SFRA for assessment of sites at the Preferred Options stage of the development planning process.

In line with the current Government Guidance, PPS25: Development and Flood Risk (paragraphs 16 & 17 and Annex D), the sequential test should be applied to ensure that new development is directed to areas of land at least flood risk. Due to the geography of Mid Bedfordshire District Council and relatively small areas of high risk and medium Flood Zones (Zone 3 and 2), we would expect any future allocations to be located within areas of Low Flood Risk (Zone 1).

In absence of any mapping of the functional floodplain, all Flood Zone 3 is to be categorised as Flood Zone 3(b) (functional floodplain). In accordance with Table D3 of PPS25, only water compatible (i.e. Not Housing or Employment land use purposes) should be located within this Flood Zone.

We have used the recently completed Mid Bedfordshire SFRA to identify any sites that are considered to be at an inappropriate flood risk. The SFRA should be used in this way to apply the principles of the sequential test, as detailed in PPS25: Development and Flood Risk. As stated, "due to the geography of Mid Bedfordshire District Council and relatively small areas of high risk and medium Flood Zones (Zone 3 and 2), we would expect any future allocations to be located within areas of Low Flood Risk (Zone 1)".

Highways Agency

In summary, Technical Note provided by Faber Maunsell concluded that the lack of specific detail relating to the impact individual sites may have on the Trunk Road Network (TRN) restricted FM's ability to provide definitive comment on the acceptability of the proposed development sites put forward as part of the first consultation. However, by adopting a 'broad brush' approach FM were able to identify those sites which could be expected to cause the HA most concern, and therefore which should be subject to a Transport Assessment should they be carried forward to the Preferred Options stage.

National Grid

To facilitate competition in the supply and generation of electricity, National Grid must offer a connection to any proposed generator, major industry or distribution network operator who wishes to generate electricity or requires a high voltage electricity supply. Often proposals for new electricity projects involve transmission reinforcements remote from the generating site, such as new overhead lines or new development at substations. If there are significant demand increases across a local distribution electricity network area then the local network distribution operator may seek reinforcements at an existing substation or a new grid supply point. In addition National Grid may undertake development works at its existing substations to meet changing patterns of generation and supply.

Gas Transmission

National Grid owns and operates the high pressure gas transmission system in England, Scotland and Wales that consists of approximately 4,300 miles of pipelines and 26 compressor stations connecting to 8 distribution networks. National Grid has a duty to develop and maintain an efficient co-ordinated and economical transmission system for the conveyance of gas and respond to requests for new gas supplies in certain circumstances.

New gas transmission infrastructure developments (pipelines and associated installations) are periodically required to meet increases in demand and changes in patterns of supply. Developments to our network are as a result of specific connection requests e.g. power stations, and requests for additional capacity on our network from gas shippers. Generally network developments to provide supplies to the local gas distribution network are as a result of overall demand growth in a region rather than site specific developments.

Gas Distribution

National Grid also owns and operates approximately 82,000 miles of lower-pressure distribution gas mains in the north west of England, the west Midlands, east of England and north London – almost half of Britain's gas distribution network, delivering gas to around 11 million homes, offices and factories. National Grid does not supply gas, but provides the networks through which it flows. Reinforcements and developments of our local distribution network generally are as a result of overall demand growth in a region rather than site specific developments. A competitive market operates for the connection of new developments.

National Grid and Local Development Plan Documents

The Energy White Paper makes clear that UK energy systems will undergo a significant change over the next 20 years. To meet the goals of the white paper it will be necessary to revise and update much of the UK's energy infrastructure during this period. There will be a requirement for:

- An expansion of national infrastructure (e.g. overhead power lines, underground cables, extending substations, new gas pipelines and associated installations).
- New forms of infrastructure (e.g. smaller scale distributed generation, gas storage sites).

Our gas and electricity infrastructure is sited across the country and many stakeholders and communities have an interest in our activities. We believe our long-term success is based on having a constructive and sustainable relationship with our stakeholders. Our transmission pipelines and overhead lines were originally routed in consultation with local planning authorities and designed to avoid major development areas but since installation much development may have taken place near our routes.

In Annex E E3 of Planning Policy Statement (PPS) 12 - 'Local Development Frameworks' National Grid is listed as one of the 'other consultees', which Local Planning Authorities should also consider the need to consult during the preparation of local development documents.

National Grid

We therefore wish to be involved in the preparation, alteration and review of Development Plan Documents (DPDs) which may affect our assets including policies and plans relating to the following issues:

- Any policies relating to overhead transmission lines, underground cables or gas pipeline installations
- Site specific allocations/land use policies affecting sites crossed by overhead lines, underground cables or gas transmission pipelines
- Land use policies/development proposed adjacent to existing high voltage electricity substation sites and gas above ground installations
- Any policies relating to the diverting or undergrounding of overhead transmission lines
- Other policies relating to infrastructure or utility provision
- Policies relating to development in the countryside
- Landscape policies
- Waste and mineral plans

In addition, we also want to be consulted by developers and local authorities on planning applications, which may affect our assets and are happy to provide pre-application advice. Our aim in this is to ensure that the safe and secure transportation of electricity and gas is not compromised.

Natural England

Sites of Special Scientific Interest: The majority of Natural England's concerns with regard to development proposals in close proximity to SSSIs are related to potential increases in visitor numbers which are likely to negatively impact upon the condition of the designated sites. Proposed mitigation and enhancement measures should include buffer zones together with the provision of additional multifunctional greenspace areas within and alongside proposed developments. Cumulative effects of proposed development should be considered with regard to local designated sites, for example Cooper's Hill SSSI & Flitwick Moor SSSI. Although many of the options are small proposals and thus receive no comment individually, in combination, they could potentially result in a significant increase in visitor pressure on SSSIs.

Where options are likely to significantly negatively impact upon designated sites, Natural England would have serious concerns regarding likely recreational impacts, and in select cases where the options are immediately adjacent to the designated sites and are of a reasonable size, we have **objected** to the proposed option; for example H248 with regard to Flitwick Moor SSSI.

Flitwick moor objection: Natural England has serious concerns regarding potential residential development in close proximity to **Flitwick Moor SSSI**. Flitwick Moor is the largest area of wetland in Bedfordshire, containing a rich mosaic of biodiverse habitats such as valley mire, wet meadow and alder woodland together with rare species including nine Sphagnum mosses and many different ferns. This wetland habitat performs many essential ecosystem functions, recycling nutrients and removing sediments from the water. The site's complex biological, chemical and hydrological functions are likely to be negatively impacted by any development in close proximity to the Moor. Other potential threats include increases in visitor numbers, predation by domestic pets and an increased risk of pollution incidents. Natural England advises that even with the proposed addition of a buffering woodland belt, development at H248 would result in significant negative impacts to the SSSI. Therefore, we do not believe that development in this location is appropriate.

Natural England remains concerned about the potential for cumulative negative impacts on the SSSI from other proposed options within the surrounding area. Should any of these options be taken forward, proposals should include a high proportion of quality multifunctional open space and follow best practice guidance with regard to hydrology and biodiversity and potential impacts on the Flitwick Moor SSSI.

County Wildlife Sites: We have restricted our replies to potential impacts on SSSIs, however, some of the preferred options sites are located within or near to County Wildlife Sites (CWS). The role of sites such as County Wildlife Sites in conserving and enhancing wildlife habitats and species takes on a higher significance in counties such as Bedfordshire with a low proportion of land cover protected by statutorily designated sites such as Sites of Special Scientific Interest (SSSI), which in this county is only 1.2%. Habitats and species detailed in local and/or national Biodiversity Action Plans may be present on CWS.

We therefore advise that impacts to CWS should be avoided where possible. If this is considered to be unavoidable, suitable resource contributions (financial and/or land) should be sought from developers to provide opportunities to mitigate and compensate for any adverse impacts. The main representation with regard to issues relating to CWS is provided by the County Ecologist and/or the local Wildlife Trust and we advise that consultations should be made with them, where CWS are involved.

Chilterns AONB: We have made no comment about the impact of these proposals on the landscape and built and historic environment of the AONB or its setting, and Natural England refers the Local Planning Authority to the Chilterns Conservation Board for comments regarding the AONB.

Green Infrastructure: PPS9 states specifically at paragraph 12 that “*Local authorities should aim to maintain networks by avoiding or repairing the fragmentation and isolation of natural habitats through policies in plans.*” All development should incorporate sufficient new green space in accordance with Natural England’s **Accessible Natural Greenspace Standards (ANGSt)** which provides a set of benchmarks for ensuring access to places of wildlife interest. These standards recommend that all homes should be within 300 m of an accessible natural green space of at least two hectares (ha) which is equivalent in size to two football pitches. Each home should also have access to:

- at least one accessible 20 ha site within 2 km;
- at least one accessible 100 ha site within 5 km and;
- at least one accessible 500 ha site within 10 km.

As many existing wildlife features as possible should be retained, and new features such as green roofs created. This approach links to the Breathing Places campaign (2005-2009) to create wildlife friendly green spaces across the UK.

In combination, many small developments have the potential to reduce accessible greenspace within the parishes of the district. We support the proposals for Country parks, but they would have to be of an adequate size and multifunctionality to cater for the potential increases in resident numbers and to include areas specifically tailored to conserve and enhance biodiversity. Natural England notes that access to green space was not included in the ‘*Accessibility Information*’ provided at the end of each option description, and recommends that as an important factor in the consideration of new residential and employment developments, it may be appropriate for inclusion in the summary tables.

Landscape: The Mid Bedfordshire Landscape Character Assessment provides a comprehensive landscape evidence base to underpin planning and management decisions in the District, an approach detailed in Planning Policy Statement 7: Sustainable Rural Development (PPS7). In general, we would hope that any proposed options would consider appropriate legislation and guidance and give due regard to the conservation and enhancement of landscapes, and the maintenance of distinctive local character.

Protected Species & habitats: We cannot comment in detail on protected species issues that are likely to occur until a later stage when more detailed proposals are outlined. In general, within any proposed development we would like to see details of appropriate retention and enhancement of existing habitat features such as ponds, hedgerows, woodland or unimproved grassland. Natural England would be likely to encourage any proposals that seek to retain and enhance habitats of regional or national importance such as orchards (a UK BAP habitat).

There are a number of developments proposed that would involve the loss of **river corridor habitat**. Natural England has serious concerns regarding any proposed development within river floodplains, and would like to see within any such proposals details of appropriate enhancements to river corridor habitat. These habitat features accommodate floodwater at times of heavy rain and provide essential habitat corridors for species dispersal, roles that are likely to become increasingly important given the likely impacts of climate change. Retention and appropriate enhancement measures within developments have the potential to ensure that these essential ecosystem functions and wider habitat features are maintained to enhance the ability to react to climate change.

Sport England

In response to the consultation, I would like to make the following observations which frame the allocation of sites for development from the perspective of sport and active recreation. The demands are best expressed as a series of questions:

- Has a local needs assessment been undertaken to identify which facilities should be protected?
- Have specific sites been allocated for sports interests, as a result of a needs assessment and/or as part of new development?
- Where existing facilities are identified for development, has consideration (based on the findings of facility assessments) been given to whether a linked site specific allocation is required for providing replacement facilities or whether replacement provision should be made through other measures (e.g. financial contributions in lieu of direct replacement provision)?
- Can it be verified that allocation of existing or former sports facilities for development (without replacement provision being made) will only be acceptable if it has been satisfactorily demonstrated through a detailed assessment that there is an excess of facility provision within the catchment and no demand exists for replacement facility provision? It is Sport England policy to object to allocations which involve the loss of sports facilities unless it can be demonstrated through a PPG17-compliant assessment that they are surplus to requirements. We understand that a PPG17 Assessment is currently being prepared for the District and this should be employed as soon as possible to help inform any site allocation decisions.
- Has the provision of sports facilities been considered as part of the wider development of community infrastructure, thus forging links between policy areas?

More generally, consideration of how services are accessed should be a fundamental consideration of spatial planning. For example, the principle of 'co-location' of services should be considered. Access to services is intimately related to travel considerations and this needs to be a substantive part of policy development. Appropriately located facilities, accessible by foot and bicycle, can be a significant part of creating a culture of greater activity, whilst contributing to securing greater sustainability across the District. The integration of different modes of travel is equally important. The role of cross-boundary issues in facility provision should be noted, particularly where sport and recreation facilities need to be shared between partner Boroughs and Districts. The provision of well-planned open space is integral to high quality new development. To help meet this aspiration, Sport England has produced a guide to assist the development of environmental design which encourages physical activity. Taking widely accepted principles of good design (character, continuity, quality, legibility etc) as a starting point, the guidance uses three objectives to frame advice on positive design: improving accessibility; enhancing amenity; and increasing awareness. Using the three design objectives, the guidance explores in detail their application to three activity settings:

- Everyday activity destinations (shops, homes, schools workplaces)
- Informal activity and recreation (play areas, parks & gardens)
- Formal sports and leisure activities (sports pitches, swimming pools etc)

The needs of specific sectors of the population and user-groups (e.g. young people, older age groups, specialist sports [these having diverse facility requirements and spatial constraints]) should be identified. The development of integrated community facilities, perhaps using a sport facility as an anchor, should be considered, and the idea of 'dual-use' provision (notably through community of school facilities) should also be explored.