

Technical Note



Project	Sustainability Appraisal of the Harborough Core Strategy	Date	27 th September 2011
Note	Appraisal of Soundness Changes proposed for the Core Strategy	Ref	UE 0047
Author	NCB	Page	1 of 13
Status	Draft for Client Comment		

Introduction

1. This technical note accompanies the Soundness Changes presented in the *Schedule of Suggested Changes to Make the Plan Sound* for the Harborough Core Strategy.
2. The purpose of the note is to set out the sustainability appraisal (SA) response to the proposed Soundness Changes for the Core Strategy which were agreed with the Planning Inspectorate in August 2011 following Examination. It seeks to highlight whether any further sustainability issues are likely to arise from the updates to the Core Strategy and the potential sustainability implications of taking forward the proposed revisions
3. The technical note should be read alongside the SA Report prepared to accompany the Pre-Submission version of the Harborough Core Strategy (UE Associates, October 2010).

Soundness Changes and Comments

4. The following text presents the SA response to the proposed changes to the Core Strategy. Each Soundness Change included in the *Schedule of Suggested Changes* has been considered.

Soundness Change SC0.1

5. The extension to the timeframe of the Core Strategy from 2026 to 2028 highlighted by Soundness Change SC0.1 does not represent or introduce significant changes to previous SA findings. This has been discussed in detail for Soundness Changes SC1.1 and SC1.2 below.

Soundness Change SC0.2

6. The additional wording included in paragraph 1.7 clarifies in more detail how the Core Strategy is in conformity with national planning policies and how it links to the policies included within the East Midlands Regional Plan. It also highlights how the Core Strategy links with the district and county Sustainable Community Strategies.
7. As these additions further clarify the links between Core Strategy and the national, regional and local policy framework, the changes do not represent or introduce significant changes to previous SA findings.

Soundness Change SC1.1

8. The inclusion of the new paragraph after paragraph 4.1 highlights the reasoning for the extension of the timeframe for the Core Strategy, linked to the required 15 year timeframe for the Allocations DPD. The potential sustainability effects of rolling forward annual housing figures from the Regional Strategy for two further years will be limited and mitigated by the other policies and proposals guiding development in the district included in the Core Strategy.
9. The text also highlights that it is likely that the Core Strategy will be revised before 2028. In this context, depending on future changes to legislative and regulatory provisions, a revision to the Core Strategy is likely to require an additional sustainability appraisal process to meet the requirements of the SEA Directive.

Soundness Change SC1.2

10. The effect of an additional 700 dwellings in the district as put forward by the revised policy will be limited by fact that this provision will take place over an additional two year period.
11. In terms of the figures for the Strategic Development area to the north west of Market Harborough included in part c), changing the text from "approximately" to "at least" 1,000 dwellings is unlikely to lead to significant effects as it is understood that this figure is unlikely to be significantly higher than the 1,000 dwellings proposed by the previous wording of the policy. Longer term monitoring will however be required to address potential effects linked to additional growth associated at this location.
12. The changes to part d) of the policy concern changes to the name of the Leicester Urban Fringe and revisions of the word "adjoining" to "adjacent". The changes and clarifications made do not represent or introduce significant changes to previous SA findings.
13. The amendments to the text in part e) relate to the definition and descriptions of Green Wedges in the district. The updates are supported by the SA process as they provide additional detail on the purpose and aims of such designations.

14. The inclusion of housing provision within part f) reflects existing text elsewhere in the Core Strategy. The change therefore does not represent or introduce significant changes to previous SA findings.
15. The changes to the text for the Rural Centres aspect of Policy 1 in part g) clarifies in more detail the role of such centres. This is supported by the SA process.
16. The inclusion of the word 'principle' in part h) relates to the possibility that the Green Wedge designation may be revisited in the future. In this context the updates to the text suggests that the separation between settlements should be maintained even if Green Wedges are discontinued. This is supported by the SA process. The concept of Green Wedges and Areas of Separation have also been further supported by Soundness Change SC1.3 (see below).
17. The changes to Part i) seek to refine the text. No sustainability implications therefore.

Soundness Change SC1.3

18. The insertion of an additional paragraph after paragraph 4.4 reasserts the principle of Green Wedges and Areas of Separation. As discussed in the SA Report, the Core Strategy's aim to retain these areas as key sub-regional Green Infrastructure assets will have primary benefits for settlement distinctiveness and landscape character. Secondary benefits have the potential to include health, biodiversity and drainage. The additional text reasserting this commitment is therefore supported by SA process.
19. The revised text also highlights that a review of the detailed boundaries of the Green Wedges will take place through the development of the Allocations DPD. As the Allocations DPD will undergo an SA process, the implications of any changes to boundaries of the Green Wedges and/or Areas of Separation will be assessed. This will again provide the opportunity to appraise proposals via the statutory SA process.

Soundness Change SC1.4

20. The change does not represent a significant change to previous SA findings as it replaces the references to "Leicester Urban Fringe" with references to the "Leicester Principal Urban Area".

Soundness Change SC2.1

21. SC1.1 and SC1.2 has discussed the changes included in SC2.1 in detail. The changes do not represent or introduce significant changes to previous SA findings.

Soundness Change SC2.2

22. The replacement of paragraphs 5.5 and 5.6 with the new text rationalises the text. No sustainability implications therefore.

Soundness Change SC2.3

23. The updates to Policy 2 both increases the total number of dwellings to be taken forward within the plan period and extends the timescale for delivering the proposed new housing. In this context the potential sustainability effects of rolling forward annual housing figures from the Regional Strategy for two further years will be limited by the policies and proposals guiding development in the district through the Core Strategy. Likewise, the effect of the additional 700 dwellings put forward by the policy will be limited by fact that they will take place over an additional two year period.
24. The proportion of overall development in the district proposed to take place in each settlement remains substantially the same. Therefore the appraisal presented in the SA Report continues to apply.
25. Policy 2 has also been updated to clarify the Core Strategy's recommended approach to the Limits to Development boundaries around settlements. It does this through highlighting that the Allocations DPD will review these boundaries and through clarifying in more detail when housing development may be allowed. Potential sustainability effects linked to reviews of boundaries and the location of development will be considered through the SA of the Allocations DPD.
26. The updates to part f) of the policy provides further clarification as to when a mix of housing types will be required; in this case on sites of ten or more dwellings. Whilst the previous wording of the policy suggested that all housing development would require a mix of housing types, the further clarification of when this is required is likely to improve deliverability. However, by introducing a ten dwelling criteria, a range of housing types will not need to be delivered through development proposing fewer dwellings. Whilst this may have had the effect of reducing affordable housing provision at some locations, Policy 3, which suggests that all residential housing will be required to meet affordable housing needs, will help ensure the provision of affordable housing in most cases.

Soundness Change SC2.4

27. The deletion of paragraph 5.7 does not represent or introduce significant changes to previous SA findings as it removes background information regarding the Regional Strategy.

Soundness Change SC2.5

28. The deletion of Table 2 removes the Regional Strategy figures for housing. This does not represent or introduce significant changes to the previous SA findings.
29. The updates to the figures in Table 3 have been discussed under Soundness Change 2.3 above.

Soundness Change SC2.6

30. The updates to paragraph 5.10 comprise further background information regarding the Leicester Principal Urban Area. This does not represent or introduce significant changes to the previous SA findings.

Soundness Change SC2.7

31. The updates to paragraph 5.11 incorporates additional text regarding Rural Centres. As this additional text supports existing policies, and reinforces the Core Strategy's aim to ensure new small scale development takes place in Selected Rural Villages with services rather than at locations without such facilities, this is supported by the SA process.

Soundness Change SC2.8

32. Relocating Tables 4, 5 and 6 to the appendices do not represent or introduce changes to the previous SA findings.

Soundness Change SC2.9

33. The updates proposed through Soundness Change SC2.9 clarifies how the findings of the SHLAA will be addressed through the progression of the Allocations DPD, including through the Market Harborough strategic development area. These updates do not represent or introduce changes to the previous SA findings, especially as potential sustainability effects of new development at this location will be considered through the SA of the Allocations DPD.

Soundness Change SC2.10

34. The removal of the text in paragraph 5.20 is a minor update to the background text regarding previously developed land. No sustainability implications therefore.

Soundness Change SC2.11

35. The Soundness Change relocates text from one part of the Core Strategy to another. No sustainability implications therefore.

Soundness Change SC3.1

36. The inclusion of the additional settlements in paragraph 5.26 provides further information as to the full range of settlements within each housing sub-market area. These updates do not represent or introduce changes to the previous SA findings.

Soundness Change SC3.2

37. Overall, the affordable housing policy has been strengthened through Soundness Change SC3.2, which is supported by the SA process.
38. The addition to the end of the opening paragraph in Policy 3 clarifies that the policy will apply when there is a net increase in dwellings, and that it will apply when there is a change of use and conversion of existing buildings. This provides further guidance in relation to when the policy applies.
39. The amendments to part a) are designed to ensure that requirements for affordable housing provision do not undermine the viability of delivering new housing. Whilst the changes may in some cases reduce the number of affordable houses delivered at some locations, an increase in the deliverability of housing should increase opportunities for providing a range of types and tenures of housing. It is also acknowledged that the changes to part a) do not apply to the highest value sub-market areas in Harborough.
40. The updates to part b) clarify in more detail how affordable housing may be delivered off site in exceptional circumstances, including through commuted sums. The provision of additional detail does not represent or introduce changes to the previous SA findings.
41. The amendments to part e) strengthens the policy relating to the provision for affordable housing in rural areas through enabling 100% affordable housing units on sites which otherwise would not be released for general market housing. The introduction of these Rural Exception Sites will support the vitality and viability of rural areas and as such is supported by the SA process.

Soundness Change SC3.3

42. The additional text included in paragraph 5.27 acknowledges issues linked to availability of suitable housing and its deliverability, and highlights that an updated Affordable Housing SPD will provide more detail on the operation of the policy. The provision of additional detail does not represent or introduce changes to the previous SA findings.

Soundness Change SC3.4

43. The addition of a new paragraph after 5.32 supports the amendments to part e) of Policy 3, as discussed above under Soundness Change SC3.2. This is supported by the SA process

Soundness Change SC4.1

44. The updates to Policy 4 simplifies the Gypsy and Traveller policy, largely through streamlining the policy. Whilst the policy has been rationalised, the changes do not weaken or change the impetus of the policy. Therefore the changes do not represent or introduce changes to the previous SA findings.

Soundness Change SC6.1, 6.2 and 6.3

45. The updates to Policy 6 will reinforce the vitality of existing centres by stating that additional retail in settlement centres will be 'minimum' provision. The revised wording of the policy and background text will particularly benefit Broughton Astley, where current underprovision of services and facilities exists. For these reasons the updates are supported by the SA process.

Soundness Change SC7.1

46. The changes do not represent or introduce changes to the previous SA findings as they are minor updates to existing text.

Soundness Change SC7.2

47. The deletion of parts b), i) and k) has taken place in the context of the changes made to paragraph 5.70. These changes have been discussed under Soundness Change SC7.2.
48. The updates to part g) provide additional clarification to the policy through promoting the re-use of buildings which are suitable for conversion and preferably closely related to towns and villages. This will strengthen the policy's benefits in relation to supporting rural communities.

Soundness Change SC7.3

49. The updates to paragraph 5.70 comprise a rationalisation of the text to reflect that there is currently no overall need for additional strategic employment land in the district. As the text states, if any new allocations are considered, they will do so through the Allocations DPD. As the Allocations DPD will undergo an SA process, no additional sustainability issues have been highlighted at this stage.

Soundness Change SC7.4

50. The changes to paragraph 5.72 reflect the updates to 5.70 (see Soundness Change 7.3). No sustainability implications therefore.

Soundness Change SC8.1

51. The updates to the text provide further clarification as to the purpose of Green Wedges to state that they also guide development form. This is supported by the SA process as it provides additional information as to their role in terms of the protection of landscape quality.

Soundness Change SC9.1

52. The changes to the text for part d) ii) has the potential to reduce the effectiveness of the BREEAM aspect of Policy 9 by stating that non residential development will be "encouraged" rather than required to meet high BREEAM standards. Whilst this will support the deliverability of non

residential development, this has the potential to reduce the sustainability of building design for such development.

Soundness Change SC9.2

53. The updates to the text strengthens the consideration of new renewable energy provision in terms of potential effects on landscape quality and local distinctiveness by stating that the Harborough Landscape Character Assessment should be considered. The update is therefore supported by the SA process.

Soundness Change SC11.1

54. The changes to Policy 11 strengthen the policy by providing it with further clarity and a more comprehensive framework in terms of heritage protection. The updates are therefore supported by the SA process.

Soundness Change SC11.2

55. The update to the text reflects the established terminology for Scheduled Monuments. This is supported by the SA process.

Soundness Change SC11.3

56. The changes in wording of the text extends the consideration of the Foxton Locks to include the adjacent Scheduled Monument. This will enhance the heritage protection of the area; it is therefore supported by the SA process.

Soundness Change SC11.4

57. The updates to the text provides further clarity as to the potential mechanisms and approaches which should be undertaken in relation to the enhancement of historic environment assets included on the Heritage at Risk register. This is supported by the SA process.

Soundness Change SC11.5

58. The changes to paragraph 5.126 enhances the text relating to the Foxton Locks and the surrounding area. This is supported by the SA process.

Soundness Change SC12.1

59. The updates to Policy 12 provide further guidance as to how development will contribute to new infrastructure in the district. This is supported by the SA process.

Soundness Change SC12.2

60. The updates to paragraphs 5.131 to 5.134 highlights how CIL will be implemented in conjunction with planning obligations. The changes do not represent or introduce changes to the previous SA findings.

Soundness Change SC13.1

61. The updates to the first parts of the policy for Market Harborough relating to part a) rationalise the wording of the text. No sustainability implications therefore.
62. The replacement of the text in part b) iii) seeks to ensure that the provision of a future link road will not be prejudiced by new development in Market Harborough. Whilst a new link road has the potential to lead to a number of potential sustainability effects, including those linked to a stimulation of traffic growth over the longer term, with implications for air and noise quality, the quality of the public realm, townscape/landscape, and other aspects, the changes to the text themselves do not directly seek to implement a new road link. Transport considerations linked to the option of a new link road will therefore need to be carefully planned at a strategic level through a variety of mechanisms, including through a future Leicestershire Local Transport Plan or its equivalent and Environmental Impact Assessment.
63. The amendments to part c) i) withdraws the prescription that the capacity of the bypass around Market Harborough should be improved, in favour of a broader policy. This is supported by the SA process.
64. Updates to part c) iv) clarify where improved public transport provision will take place around Market Harborough. The changes do not represent or introduce changes to the previous SA findings in respect of this aspect of the policy as the main aims of the policy in relation to public transport provision remain.
65. The removal of the reference to traffic calming and low speed zones in part c) v) will reduce the effectiveness of the policy to improve road safety and promote improvements to the public realm in the locations affected. This change is therefore not supported by the SA process.
66. The new wording of part c) v) highlights that changes to parking availability influences the extent to which car use is encouraged. The amendments to the text also no longer suggest that new parking provision will be provided in the town. These updates are supported by the SA process.
67. The inclusion of part c) vi) does not represent or introduce changes to the previous SA findings.

Soundness Change SC13.2

68. The deletion of paragraph 6.10 does not represent or introduce changes to the previous SA findings.

Soundness Change SC13.3

69. The amendments to paragraph 6.14 do not represent or introduce changes to the previous SA findings.

Soundness Change SC13.4

70. The changes to paragraphs 6.17 to 6.18 update the text in relation to the completion of recent transport studies and provides further information as to the types of transport measures previously proposed by the Submission Core Strategy. The amendments to the paragraphs do not represent or introduce changes to the previous SA findings.

Soundness Change SC14.1

71. Whilst the policy relating to Lutterworth provides additional clarity as to where any extensions to Limits of Development will occur, it reflects the previous wording of the text, which highlighted that any such extensions would take place to the north of the town. Similarly the updates to the location of the Area of Separation between Lutterworth and Bitteswell in Annex 6 reflects other diagrams in the Core Strategy.
72. Text which has been removed regarding housing numbers, previously developed land and affordable housing has been addressed by other policies in the Core Strategy.
73. The remaining amendments to the policy are minor and do not represent or introduce changes to the previous SA findings

Soundness Change SC14.2

74. The amendments to paragraph 6.24 rationalise the text. No sustainability implications therefore.

Soundness Change SC14.3

75. The amendments to paragraph 6.25 streamline the text. No sustainability implications therefore.

Soundness Change SC14.4

76. The updates to the Key Diagram in Annex 6 moves the proposed Area of Separation near Lutterworth further west than its previous location. This reflects more closely the diagram within Policy 14 and the illustrative location previously assessed through the Pre-Submission Core Strategy. No sustainability implications therefore.

Soundness Change SC15.1

77. The amendment to Policy 15's title updates "Leicester Urban Fringe" to "Leicester Principal Urban Area". The change in the name of the area does not represent or introduce significant changes to previous SA findings.

Soundness Change SC15.2

78. The revisions to the text under paragraph 6.29 do not represent or introduce significant changes to previous SA findings as it updates the background to the Core Strategy's proposed approach to the Leicester Principal Urban Area.

Soundness Change SC15.3

79. The updates to the first paragraph of Policy 15 rationalises the text, with no sustainability implications linked to the proposed approach.
80. The Soundness Change removes the second paragraph. This does not lead to potential sustainability implications as the information previously included in this paragraph, including regarding housing numbers, previously developed land and affordable housing has been addressed by the other policies in the Core Strategy.
81. The remaining amendments to the text in the policy relate to the definition and descriptions of Green Wedges. The updates are supported by the SA process as they provide additional detail on the purpose and aims of such designations.

Soundness Change SC15.4

82. The Soundness Change reflects background information relating to changes elsewhere in the document. No sustainability implications therefore.

Soundness Change SC15.5

83. The removal of the paragraph does not represent or introduce significant changes to previous SA findings.

Soundness Change SC16.1

84. The rewording and rationalisation of Policy 16, especially in relation to part c) will support the vitality of Broughton Astley. This is supported by the SA process. Detailed proposals for Broughton Astley presented in the Allocations DPD will be assessed through the SA process for the document.

Soundness Change SC16.2

85. The rationalisation of the text in paragraph 6.49 does not represent or introduce significant changes to previous SA findings.

Soundness Change SC16.3

86. The revisions to paragraph 6.51 promote new community, commercial and local employment provision to accompany new housing in Broughton Astley. This is support by the SA process. Detailed proposals for Broughton Astley presented in the Allocations DPD will be assessed through the SA process for the document.

Soundness Change SC17.1

87. The updates to Policy 17 provide further clarification as to the role of the Rural Centres and other rural settlements in the district in terms of housing provision, and retail, employment and community provision. It also sets out how new development outside of the selected rural villages will be strictly controlled. Through strengthening this hierarchy the changes will support the vitality of the rural settlements and promote development which suits the purpose of each settlement. These updates are therefore supported by the SA process.
88. The updates to part d), including the removal of text regarding employment land do not lead to additional sustainability implications, as the types of development to be allowed in the countryside has already been specified earlier in the policy.

Soundness Change SC17.2

89. The updates to the text in paragraph 6.60 reflect the updates regarding the extension to the timescale of the Core Strategy from 2026 to 2028 and the housing distribution policy (Policy 2). These have been discussed under Soundness Changes 1.1, 1,2 and 2.3.

Soundness Change SC17.3

90. The revisions to the text reflect the extension of the timeframe of the Core Strategy to 2028. This has been discussed under Soundness Changes 1.1 and 1.2.

Significant Changes relating to the Appendices

91. The updates to the appendices reflect the Soundness Changes already discussed. These relate to changes in housing figures and trajectories; the extension to the timeframe of the Core Strategy; the updates to the highways and transportation section for Market Harborough; and the revisions to the settlement policies.

92. The implications of these changes have been discussed under the other Soundness Changes. In this context the revisions to the appendices do not introduce or represent further significant changes to the SA findings.

Conclusion: Sustainability Implications of the Soundness Changes for the Harborough Core Strategy

93. This technical note has appraised the Soundness Changes proposed for the Harborough Core Strategy following Examination.
94. The assessment has highlighted that in most cases, the appraisal findings presented in the October 2010 SA Report, and the mitigation measures and recommendations proposed, still apply. A number of the Soundness Changes will also improve the sustainability performance of aspects of the plan.
95. The appraisal of the Soundness Changes has however highlighted potential adverse effects linked to the proposed revisions to two of the Core Strategy policies. These are as follows:
- ▶ The changes to Policy 9 have the potential to reduce the sustainability of new building design for non residential development; and
 - ▶ The updates to Policy 13 will reduce the effectiveness of the policy for improving road safety and promoting enhancements to the public realm.
96. The Technical Note, and the potential sustainability effects highlighted within it, should be considered alongside consultation responses on the proposed 'Soundness Changes' to the Core Strategy issued on 22nd August 2011. Matters affecting compliance with the Planning Act 2008 & Regulations and the soundness of the Core Strategy, including where appropriate those relating to sustainability issues, will be considered and addressed within any binding recommendations issued by the Planning Inspector in his report into the examination of the Harborough Core Strategy.