

English Heritage

Comments	URS Comments
<p><u>Scoping</u></p> <p>Reference the NPPF as part of the contextual review.</p> <p>Historic environment baseline is very brief. There needs to be more local information.</p> <p>Make reference to non-designated heritage assets.</p>	<p>The contextual review has been updated to include reference to the NPPF.</p> <p>The baseline section has been updated to make explicit reference to non-designated heritage assets.</p>
<p><u>Key issues</u></p> <p>In Table 10.1, reference is only made to designated heritage assets and fails to include non-designated heritage assets. Whilst development could negatively affect the setting of assets, it could also make positive enhancements and this should be recognised. The summary fails to make reference to the historic environment as a main challenge. Again given the significant historic environment resource in the Borough (made up of both designated and non-designated heritage assets) we are surprised at this and do not consider that this is reflective of the true issues here.</p>	<p>The text in Table 10.1 relating to the historic and natural environment has been amended as follows:</p> <p>There are over 1,400 designated heritage assets located across the District and further features of local value (i.e. non-designated heritage assets). Development has the potential to affect the condition, setting, and access to these assets either positively or negatively.</p> <p>Under the key challenges summary add in:</p> <ul style="list-style-type: none"> • Protect and/or enhance the historic character of Harborough's settlements.
<p><u>Sustainability framework</u></p> <p>Concerned at the proposed objective which states 'Protect, enhance and manage the character and distinctiveness of the District's settlements and their surrounding landscapes'. This makes no reference to the historic environment at all and is not fit for purpose, particularly given the significant resource of heritage assets within the Borough.</p> <p>An additional objective is essential. Following wording suggested "conserve and enhance the historic environment, heritage assets and their settings".</p>	<p>It is considered that SA objective 3 is adequate to appraise impacts on the historic environment at a plan level. The SA is to focus on defining how strategic decisions could impact upon the character of Harborough, including consideration of impacts on heritage assets, their setting and landscapes. However, the following amendment to objective 3 is made.</p> <p>'Protect, enhance and manage the historic character and distinctiveness of the District's settlements and their surrounding landscapes'.</p> <p>The guiding criteria in the SA framework also help to differentiate historic assets from the wider impacts on settlement character. Again, to make the links with the historic environment more explicit the following changes are made.</p> <p>3.1) How could proposals affect the historic value and character of settlements and/or surrounding landscapes?</p> <p>3.2) Could proposals hinder or assist efforts to maintain and enhance features (designated and non-designated) of historic, cultural or archaeological interest?</p> <p>Adding an additional objective would lead to unnecessary duplication in appraisal and reporting. It would also encroach upon matters better addressed at a project planning level where design considerations are addressed.</p>

Harborough Local Plan: Sustainability Appraisal Scoping Report: Consultation Responses
(September 2014)

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<p><u>Alternatives</u></p> <p>We have provided comments on CS11: Promoting Design and Built Heritage in our response to the Local Plan Scoping in 2013. We consider that an alternative approach to this policy from that in the existing Core Strategy may be required in order to comply with the relevant legislation and NPPF.</p>	<p>The appraisal will examine the impacts of policy CS11. The outcome of the appraisal is anticipated to be the same regardless of whether a policy for design and historic environment was presented as one combined or two separate policies.</p>
<p><u>Site appraisal</u></p> <p>There are a number of concerns with the site appraisal methodology.</p> <ul style="list-style-type: none"> • Non-designated heritage assets are not referenced in BH1 or BH2. • Distance is used as a measure under BH1. This fails to take into account the definition of setting of heritage assets and how it contributes to significance. This is a very arbitrary methodology and is not appropriate for an SA. • It is considered that 50m is particularly small distance – site allocations can have a major impact from far greater distances for a variety of reasons, dependent upon the significance of an asset. • BH2 does not relate specifically to heritage assets and we are concerned that this would be limited in providing the qualitative assessment required for all types of heritage asset. • The table fails to recognise opportunities to enhance the historic environment. <p>Suggestions for amending the site criteria have been made in response to these concerns.</p>	<p>With regards to BH1. It is difficult to assess the impacts on non-designated heritage assets utilising a distance-based methodology as these features are not digitally mapped. It is considered that BH2 will however allow consideration of non-designated assets.</p> <p>Criterion BH1 is retained as resource constraints preclude a qualitative assessment of each site and is in line with regulations.</p> <p>At a Plan level, the proximity of heritage assets serves to highlight potential constraints and this aids the relative performance of sites rather than their absolute impact which is usually assessed at a project level. It is acknowledged that the distance threshold cannot address all facets of potential impact. Given the ability of developers to design out impacts, the 50m threshold has been selected since it identifies where this potential is more likely to be severely constrained and thus give rise to impacts that may be a material consideration.</p> <p>With regards to BH2, it is considered that identifying impacts on the setting of heritage assets require resources that are disproportionate to this stage of the planning process particularly as such impacts are dependent upon the design solutions that are unknown at this stage.</p> <p>At this level of appraisal, it is considered that the SA is most beneficial in identifying cumulative impacts on heritage assets and their settings at the settlement level. It is not considered a proportionate approach to assess detailed site level impacts.</p> <p>Regarding consideration of opportunities for enhancement, while these again are matters for project level resolution, HBC would welcome views on which aspects are capable of being addressed in the SA within the available resources. In particular, we would welcome advice on how to make the best use of resources to identify enhancement measures at the settlement level.</p>

Natural England

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<p><u>Scoping</u></p> <ul style="list-style-type: none"> Natural England generally welcomes the 'Natural Environment' section and considers that it has covered their interests in the natural environment comprehensively. They would however have expected to see Green Infrastructure (GI) featured more strongly in this section. We acknowledge that Green Infrastructure has been included in the Health and Well Being chapter but we would suggest that green infrastructure should be more broadly considered within the Sustainability Appraisal within both the Natural Environment (4) and Climate Change (7) chapters to emphasise the multifunctional benefits of GI. <p>Two further indicators are proposed with regards to monitoring biodiversity. (para 4.6) :</p> <ul style="list-style-type: none"> Effect on condition of SSSIs, and overall percentage of SSSI in favourable or unfavourable recovering condition. Net effect on number and area of Local Wildlife Sites. Pleased to see that green infrastructure is recognised as a potential measure for improving resilience to climate change. Follow this through into the SA objectives. Supportive of the Use of ANGST. Welcome the reference to the Leicester, Leicestershire & Rutland Landscape and Woodland Strategy. Suggest that the relevant National Character Areas (NCAs) are also referenced. 	<p>Comments welcomed. Baseline information relating to Green Infrastructure has been presented across several different topic areas to reflect the multifunctional benefits that GI can create. More specific reference to green infrastructure has been included in chapters 4 and 7.</p> <p>Indicators added to the appraisal framework. These indicators are intended to be used to monitor the significant effects of the plan.</p> <p>Comments welcomed. See comments below with regards to the SA framework and recognition of green infrastructure as a potential measure for improving resilience to climate change.</p> <p>Section added to reference NCAs.</p>
<p><u>Sustainability framework</u></p> <ul style="list-style-type: none"> Suggest that there is a specific sustainability objective on Green Infrastructure within the framework which reflects its importance in achieving multi-functional benefits. 	<p>While it is considered that green infrastructure should be a cross cutting theme across several sustainability objectives, the following changes to the guiding criteria are proposed.</p> <p>4.1) How could proposals affect open space, green infrastructure, recreation and leisure provision?</p> <p>NEW: 6.3) What will be the effects on green infrastructure and its ability to contribute to climate change resilience?</p>

Burton Overy Parish Council

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<p>St Andrews Church is identified as 'at risk' in the scoping report (section 5:3). This does not make reference to the significant fundraising and repair work that is underway to ensure the church is in good condition.</p>	<p>English Heritage classifies historic assets 'at risk' according to their condition and potential threats. In the case of St Andrews Church, the 'risk register entry recognises that repair works are underway to address identified issues. When the building is reassessed it may no longer be classified as at risk, but this is a matter for English Heritage to determine.</p> <p>Nevertheless, the SA Scoping Report has been updated to highlight the investment that has occurred in St Andrews Church (<i>and the likely effect this will have on the future baseline – i.e. that this heritage asset should be at a lower risk</i>).</p>

Billesdon Parish Council

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<p>It appears that the 'Rural Centres' in the old 'Core Strategy' (and to appear in the revised Local Plan?) are not to be examined as a separate category under the SA. Since all other categories of settlement type are to be given their own separate appraisals, the PC considers that the villages within the 'Rural Centres' category should be similarly treated.</p>	<p>The SA will examine the implications of the draft plan across the District at a range of different scales. This will include consideration of the impacts on 'villages' as a result of the spatial strategy, allocations and plan policies.</p> <p>The appraisal will also examine alternative approaches to the delivery of development at a strategic level. For example, identifying where there are opportunities and constraints to development at and between the larger settlements and rural centres. At this scale, there may be important decisions to make about the scale and location of development.</p> <p>It is not deemed necessary or proportionate to examine alternative strategies for each village.</p>

Environment Agency

Comments	URS Comments
<p>4.4 water quality</p> <p>We would like to see the information on watercourses in the plan area set out in a map. This would show clearly the extent of the water environment and how it links to other themes within the SA.</p>	<p>This information is already shown in figure 7.1</p>
<p>The data referred in table 4.5 and 4.6 goes back to 2006. We are not sure why such old data has been used as the latest water quality information is readily available to Harborough council through the Environment Agency 'Datashare' web site. There is some further information in the text that refers to data from 2012, but we consider it is important for the base line data to provide as clear, comprehensive and up to date view of water quality as possible. We therefore propose that the data in 4.5 and 4.6 is replaced with more up to date information.</p>	<p>Data referred to is not in a useable format and does not aggregate data to district level.</p>
<p>The Harborough plan sets out areas of new development and housing. All these will have to be serviced with sewerage and sewage disposal. This SA has not raised the issues of the impact of development on the current sewerage and sewage disposal</p>	<p>These issues would be explored through the SA process.</p>
<p>.. or the capacity in the river system to accept an increase volume of treated sewage effluent</p>	<p>Harborough District Council is engaging with local service providers (Anglian Water and Severn Trent Water) to establish capacity issues. This information will be taken into account as part of the SA process.</p>
<p>We encourage all LA's to carry out a Water Cycle Study to help identify water related issues at an early stage. No Water Cycle Study has been referred to in this report so we are assuming there is no current study for Harborough. If there has been no water infrastructure planning for Harborough we consider the SA should highlight this as an issue or raise it for further consideration.</p>	
<p>Both Anglian Water and Severn Trent Water have assets in the Harborough district. Each company will have a 5 year Asset Management Plans that will direct investment in water infrastructure including the Harborough plan area. These documents are clearly very relevant and should be part or the evidence base for this SA</p>	<p>Reference to the Water Resources Management Plans has been included within the contextual review at 4.4</p>
<p>We consider the SA should be assessing whether the local plan has policies that 'makes space for water' and supports an improved water environment. We would like the SA to consider whether there are polices which ensure new development includes good sustainable drainage solutions in well planned green space.</p>	<p>The SA will address these issues when appraisals are undertaken.</p>

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<p>Issues and opportunities water quality</p> <p>We consider it important that water issues are considered at a <u>strategic scale</u> rather than a <u>project scale</u>. The SA should therefore be asking for a strategic overview, whether this is in the form of a Water Cycle Study or working groups of key players such as the Local Authorities, Water Companies and the Environment Agency.</p> <p>New development can increase contaminated run-off into water courses. The use of Sustainable Drainage Systems however can greatly mitigate this pollution and help improve water quality, particularly in urban areas. The SA should be assessing the local plan for its contribution to reducing diffuse pollution through water management in new development.</p>	<p>The issues raised here will be explored as part of the Sustainability Appraisal process.</p>
<p>Soil quality</p> <p>The Environment Agency along with Local Authorities has a defined role in supporting the remediation of contaminated land. The redevelopment of contaminated sites can remove or stabilise soil pollutants and bring these sites back into productive use. It is true there are risks to receptors such as ground water and implications for public health when sites are being redeveloped, but there is considerable guidance and experience in the UK in redeveloping contaminated land. There are many examples of significant environmental improvements due to contaminated land redevelopment. We therefore consider the section has overplayed the risks and underplayed the benefits of Brownfield land redevelopment.</p>	<p>Further text to reflect EA comments added to the soil quality section.</p>
<p>4.6 Sustainability objectives</p> <p>We would like 2.1 and 2.2 replaced with What would be the impact on water quality of the development? What is the impact on air quality? What would be the impact on land quality?</p> <p>Indicators</p> <p>Impact on WFD compliance HA of contaminated land brought back into productive use Number of new systems or area of land covered by Sustainable Drainage Systems Air quality data</p>	<p>Guiding criteria 2.2 has been amended in line with the suggested text to cover a wider range of land quality issues than only best and most versatile agricultural land.</p> <p>It is not considered necessary to specifically refer to air quality separately as this is inherent in the overall objective to enhance 'environmental resources'. Air quality is also covered by other criteria. For example, under 'Human Health and Wellbeing.</p> <p>Water quality has been scoped in to reflect strategic issues of planning for increased demand for waste water and drainage.</p>

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<p>7 RESILIENCE (TO CLIMATE CHANGE) Flooding is a natural phenomenon which needs to be managed and would be an issue with or without climate change. The report highlights a number of flood events in towns in the Harborough plan area. These reflect the current trend of increased surface water flooding in urban areas. However the text does not identify one of the main causes which is the increase in impermeable surface in urban areas. Many flood events are the result of heavy rain running off impermeable surfaces which then over whelms drainage systems or small water courses resulting in fast rising flood water. Climate change is likely to cause more extreme weather events so the only way to reduce the risks of surface water flooding in urban areas is to reduce the percentage of impermeable surface. There are many ways this can be done-car parks can be made of permeable material and roads can have rain gardens to help water soak away. These sustainable drainage systems are not mentioned in the scoping report and this in our opinion is a significant omission.</p>	<p>A paragraph has been added to section 7.3 under 'surface water flooding' to make the issue of impermeable surfaces more explicit.</p>
<p>7.5 sustainability objectives We think this sustainability criteria needs to be made clearer and include people and property.</p> <p>Replace</p> <p><i>6. Reduce the risks from local and global climate change upon economic activity, delivery of essential services and the natural environment.</i></p> <p>With:</p> <p>6 .Make the natural environment, people, property, business and essential services more resilient to a changing climate</p> <ul style="list-style-type: none"> • How does the proposal affect the risk of flooding to business? • How would the proposal affect the risk of flooding to private dwelling? • How would the proposal affect the delivery of essential services? 	<p>Suggested amendments to the SA framework have been made.</p>

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<p>9.2 Water Availability</p> <p>The availability of water for supply is clearly an important issue for the SA. Water companies are responsible for providing potable water and they set out how this is to be achieved in Water Resource Plans. Managing water for supply is complex and needs to factor in variables such as leakage, storage, climate change and population among other things. It is also important to recognise that water for supply is managed on a large scale in water resource zones. In this way the source of water does not need to be local to the point of supply. Water can also be moved between water resource zones over long distances. Local water issues as identified in the Catchment Abstraction Management plans are therefore not relevant in terms of water for supply. On this basis it is unlikely that development will impact on water resources in the river Welland.</p>	<p>Water availability has been ‘scoped out’ of the SA in response to this information.</p>
<p>Water companies’ plans are reviewed on a five yearly basis, but set out how water will be made available for the next 25 years. There has been extensive consultation on these documents and so Local Authorities should have inputted to them and identified their future water needs. The 2014 plan has recently been published and will be an important document to reference in this scoping report.</p>	<p>A reference to the Anglian Water Resources Management Plan has been included within the contextual review.</p>
<p>9.7 Sustainability objectives</p> <p>A third of all the energy used in this country is in the home. It is much more efficient to reduce the use of energy than it is to produce it –even from renewable sources. Energy efficiency is referred to in the report but we consider the SA should be more explicate about how this can be achieved and the value of efficiency measures such as thermal insulation.</p>	<p>These issues will be explored throughout the appraisal process. It is not considered necessary or appropriate to establish how energy efficiency can be achieved.</p>
<p>The report sets out potential monitoring indicators based on the Code of Sustainable Homes. It is good to have a standard to aim for, but of course there is considerable uncertainty about the future of the code.</p>	<p>Whilst there is uncertainty about the future of the code there are no other comparative measures to determine success. This indicator has been kept in for now, as these indicators are only envisaged at this stage and not formally determined.</p>