

Harborough Local Plan Sustainability Appraisal

Proposed Submission Version (September 2017)

Duly Made Representations on SA Documents

AECOM Response, March 2018

1. Background

This document sets out a summary of all duly made representations on the SA Documents (*i.e. The SA Report and associated appendices prepared in support of the Regulation 19 pre-submission consultation in September 2017*).

AECOM, who prepared the SA documents have provided a response to each comment individually, advising:

- Whether changes are needed to the SA Report to reflect the representations; and
- Whether any changes made would lead to a significant change in the conclusions relating to the SA of the Local Plan (or reasonable alternatives).
- Whether there is a need for further SA work to address representations.

2. Conclusions

Having reviewed each comment individually and in combination, it is clear that the representations can be placed into one of the following categories.

- No explicit comments made about the SA process or the findings of the SA. No changes or further work necessary.
- Support for the findings of the SA. No changes or further work necessary.
- Factual amendments to site appraisal criteria required, but this would not substantially change the findings in relation to the overall sustainability of the site. No further work necessary.

In summary, only minor factual changes are required to reflect inaccuracies in site options assessment. These would not lead to a substantial change to the SA findings or have a significant influence on the decision making process. Therefore, no further SA work is considered necessary.

Rep ID	Details
7628	<p data-bbox="263 264 1316 389">(Comment) Harborough Local Plan Sustainability Appraisal (SA) - Harborough Local Plan 2011-2031, Related Documents</p> <p data-bbox="263 432 986 512">Agent: Heaton Planning (Mr Joel Jessup) [4913] (unconfirmed) Respondent: Tarmac Trading Ltd [4914] Received: 17/11/2017 via Paper</p> <p data-bbox="263 551 1396 631">The SA specific assessment of site E/009OC/16 contains a number of inconsistencies / inaccuracies which result in the site being under-scored, and not favoured for allocation compared to other sites.</p> <p data-bbox="263 663 1366 770">Inconsistencies and inaccuracies are identified in respect of SA site appraisal criteria; NE2 'Potential for Impact on Wildlife', NE9 'Agricultural Land', BH2 'Impact on Setting of Built Environment', BH3 'Landscape Capacity to Change', I6 'Access to Highways'. Further details are provided in the full text.</p> <p data-bbox="263 797 1388 853">The SA methodology is flawed, and the selection of sites for employment allocation based upon it are not sound.</p> <p data-bbox="263 891 1396 1081">AECOM Response: The methodology is robust and has been agreed through the correct process of consultation on the scope of the SA. However, for this particular site, the application of the scoring convention appears to be incorrect for several criteria due to human error in the colour coding (NE2 and BH2), or inaccuracies with GIS data sets (NE9). Whilst these changes improve the overall performance of the site for these three criteria, the implications for the decision making process for the Local Plan is not considered to be significant. No further SA work is required.</p> <p data-bbox="263 1120 1382 1200">NE2 – Biodiversity – The correct information is provided in the proforma to guide the judgement, but the category / colour coding has been recorded incorrectly. It should be light green '<i>Unlikely to have a major effect on trends</i>' and has been amended accordingly.</p> <p data-bbox="263 1238 1396 1375">NE9 – Agricultural land – This has been scored using GIS data for agricultural land. The site does fall within an area classified as Grade 3 according to this dataset. However, it is accepted that the site is not in fact in use for agricultural, nor is it likely to become suitable. Therefore, the classification as Grade 3 is no longer accurate. The score has been amended accordingly to '<i>promotes sustainable growth</i>'.</p> <p data-bbox="263 1413 1388 1520">BH2 – Impact on setting of the built environment – The appraisal findings are correctly described, but the wrong category has been recorded in error. It is accepted that the colour should be light green '<i>unlikely to have a major impact on trends</i>' and not amber '<i>mitigation may be required / unavoidable impacts</i>'.</p>
7530	<p data-bbox="263 1534 1316 1659">(Comment) Harborough Local Plan Sustainability Appraisal (SA) - Harborough Local Plan 2011-2031, Related Documents</p> <p data-bbox="263 1697 976 1753">Respondent: Natural England (Mr Sean Mahoney) [4428] Received: 30/10/2017 via Email</p> <p data-bbox="263 1792 1378 1899">We note and welcome the completion of a Sustainability Appraisal (SA) for the Harborough Local Plan 2011-2031 Proposed Submission. We are pleased to note that our comments in relation to the potential Strategic Development Area at Lutterworth and its potential impact on Misterton Marshes SSSI appear to have been taken into account.</p> <p data-bbox="263 1937 1043 1966">AECOM Response: Comments are welcomed. No action required.</p>

6545	<p>(Comment) Harborough Sustainability Appraisal: Technical Appendix B Employment - Harborough Local Plan 2011-2031, Related Documents</p> <p>Respondent: Leicestershire County Council (Mr Phil Larter) [6352] Received: 9/11/2017 via Web</p> <p>The potential employment site named as Shawell Quarry, Gibbet Lane (reference E/009OC/16) is described in the Sustainability Appraisal Technical Appendix B: Employment (Sept 2017) document as a brownfield site. However, the entire site (that land identified with a solid red line) is subject to restoration conditions from planning permissions issued by Leicestershire County Council as the Mineral Planning Authority. Therefore, the site should be appropriately described as a greenfield site. Details on the relevant planning permissions and the restoration requirements thereof can be provided if required.</p> <p>AECOM Response: The SELAA states that "<i>the site would constitute previously developed land</i>". In its current use it is not greenfield. All sites have been scored consistently using the classification in the SELAA, and do not take account of potential future classifications. It is considered that the score should remain the same. However, the Council will take account of the information relating to the restoration conditions when the SELAA is updated.</p> <p>No further SA work is necessary.</p>
6392	<p>(Comment) Harborough Sustainability Appraisal: Technical Appendix B Employment - Harborough Local Plan 2011-2031, Related Documents</p> <p>Agent: Marrons Planning (Dan Robinson-Wells) [5976] Respondent: Hallam Land Management Limited [5311] Received: 3/11/2017 via Web</p> <p>Site Option E005LT/11</p> <p>Access to highways is categorised as 'red' with the commentary given as 'no'. It is unclear why it is given this category given the assessment of the site in the SEELA 2017 deems highways access arrangements suitable in principle. Representations submitted to Policy H1, set out both the appropriate access arrangements off Swinford Road and traffic-light controlled pedestrian and cycle crossing at Lutterworth Road to improve existing links as effective and non-prohibitive mitigation measures. In addition, measures are already planned for the Frank Whittle roundabout as part of the mitigation strategy for the East of Lutterworth SDA.</p> <p>AECOM Response: Comments on satisfactory access to the site were provided by the Highways Authority. The SELAA states that "<i>access to the site would have to be off Swinford Road which is subject to a 60 mph speed limit with generally fast moving traffic and is unlikely to be unacceptable</i>". This is why criteria I6 is scored as red. It is suggested that the score remains the same and no further SA work is required at this stage.</p> <p>The site assessment methodology does not take potential mitigation into account from proposed schemes. This is to ensure a consistent approach across all sites (as some do not have this level of information available).</p>

6099	<p>(Comment) Harborough Local Plan Sustainability Appraisal (SA) - Harborough Local Plan 2011-2031, Related Documents</p> <p>Agent: Sworders (Mrs Rachel Bryan) [6013] (unconfirmed) Respondent: Mr Ivan Crane [6014] Received: 1/11/2017 via Web</p> <p>The Sustainability Appraisal (SA) fails to appraise all reasonable alternatives. On a settlement level, the SA does not test any level of development at all at Broughton Astley. Of the 9 different distribution options and combinations of options considered, none of these included any development at all at Broughton Astley. On a site level, site A/BA/HSG/08 Land adjacent to land south of Crowfoot Way has not been appraised. As such, the reasonable alternatives have not been considered, nor is the evidence proportionate.</p> <p>AECOM Response: As explained in the SA Report on pages 108 (Appendix B) and 405 (Appendix D) of the SA Report, the level of growth for Broughton Astley had already been tested and established through the Neighbourhood Plan. The Council therefore deemed it unnecessary to undertake further appraisal of different growth scenarios at the settlement level. An appraisal of site options was undertaken to determine if there were appropriate sites for allocation to complement the Neighbourhood Plan. The Council determined that no sites needed to be allocated. Outline reasons are set out on page 148 of the SA Report stating that <i>"The settlement has a made Neighbourhood Plan, which includes site allocations expected to deliver dwellings in excess of any target for the settlement under the preferred option. In addition to completions and commitments no dwellings are required to be found"</i>.</p> <p>Site A/BA/HSG/08 was assessed at issues and options stage, but following it being granted approval for Planning Permission, it was no longer considered to be a reasonable alternative for the SA. In error it is still listed in the table at section 16.4 / page 148 of SA report, but should be deleted.</p> <p>No further SA work is considered necessary at this stage.</p>
5903	<p>(Comment) Harborough Sustainability Appraisal: Technical Appendix A Housing - Harborough Local Plan 2011-2031, Related Documents</p> <p>Agent: Marrons Planning (Dan Robinson-Wells) [5976] Respondent: LANDOWNWER CONSORTIUM FOR EAST OF LUTTERWORTH SDA [6054] Received: 2/11/2017 via Web</p> <p>With respect to the Technical Appendix A: Site Proformas (Housing), there are number of discrepancies and queries to raise:</p> <p>A/LT/MXD/03 - Land East of Lutterworth</p> <p>H7 - Community Facilities NE9 - Agricultural Land I4 - Energy Grid Constraints</p> <p>AECOM Response</p> <p>H7 – The distance from the site along realistic walking routes is approximately 1.4km to Lutterworth Methodist Church and 1.3km to Chapel Street Christian Fellowship (Measured from access point along Gilmorton Road).</p> <p>From the same starting point, the Town Hall is slightly closer at 1.28km and the Wycliffe Rooms are closer still at 1.18km. However, both of these still fall within the same amber categorisation.</p>

	<p>The Volunteer Centre was not picked up in the assessment, which is closer at 790m. This would change the category to 'Green'.</p> <p>The consideration of community facilities being provided on site has not been established for the site options assessment, as this information is not available for all site options. However, such factors are taken into account in the appraisal of the preferred approach / draft Plan which involves firmer detail about the type of developments that will be promoted.</p> <p>NE9 – The colour coding / category has been recorded correctly. However, the category description is incorrect. There is over 20ha of grade 2 land.</p> <p>I4 – A red score was provided on the basis of comments from utilities providers. The red score relates to the potential cost of mitigation, but it is acknowledged that there ought to be better scope to provide buffers. It is suggested that the red score remains.</p> <p>The changes to the two criteria scores (NE9 and H7) improve the overall performance of the site slightly. However, this is not likely to have a substantial bearing on the decision making process relating to site allocations. Nor will these changes affect the findings of the SA Report in general.</p>
5902	<p>(Comment) Harborough Local Plan Sustainability Appraisal (SA) - Harborough Local Plan 2011-2031, Related Documents</p> <p>Agent: Marrons Planning (Dan Robinson-Wells) [5976] Respondent: LANDOWNER CONSORTIUM FOR EAST OF LUTTERWORTH SDA [6054] Received: 2/11/2017 via Web</p> <p>The Sustainability Appraisal accompanying the Local Plan examines the effects of the proposed strategy, policies and allocations and alternatives. This process emphasises the importance and necessity of looking in the round to assist the Council in coming to a reasoned and balanced judgement on the most appropriate strategy and allocations, which examines amongst other things the sustainability effects of the chosen pattern of growth in relation to the settlement hierarchy and the likelihood of reducing the need to travel and thus have a lesser impact on resources.</p> <p>Response: General comments / support. No action required.</p>
5632	<p>(Comment) Harborough Local Plan Sustainability Appraisal (SA) - Harborough Local Plan 2011-2031, Related Documents</p> <p>Respondent: mr Leo Collins [6056] Received: 27/10/2017 via Web</p> <p>I regard the proposal to build 1200 houses at Scraftoft North as unsustainable for the following reasons:-</p> <p>a) The roads in and out of Scraftoft are already congested particularly Hamilton Lane and Station Lane. It is suggested that Keyham Lane be used as a major route for the development. This road has two schools with 20mph restrictions and speed humps newly installed and traffic already backs up beyond Tesco roundabout at busy times. The village one way system is unable to cope with extra traffic.</p> <p>b) Infant and secondary schools already at full capacity as are doctor surgeries.</p> <p>Response: These comments are not strictly related to the SA, which already acknowledges that there may be potential effects in terms of traffic and social infrastructure without appropriate investment.</p>

5538	<p>(Comment) Harborough Sustainability Appraisal: Technical Appendix B Employment - Harborough Local Plan 2011-2031, Related Documents</p> <p>Respondent: Mr Richard Painter [6039] Received: 25/10/2017 via Web</p> <p>I'm sure that there is no need to further expand the distribution complex of magna park there are empty warehouses on the site now which have been so for some time. As for more housing in lutterworth this simply is not Necessary the town cannot cope now the lack of infurstructure and aminities. The new estates being built have very few affordable homes and are truly only catering for the higher end of the market. The town is being slowly turned Into a commuter hub and giant car park. If these plans go ahead then it will truly be devastating</p> <p>Response: These comments relate to the spatial strategy and land allocations within the Plan itself rather than the findings within the SA. No changes required.</p>
5537	<p>(Comment) Harborough Sustainability Appraisal: Technical Appendix B Employment - Harborough Local Plan 2011-2031, Related Documents</p> <p>Respondent: Mr Richard Painter [6039] Received: 25/10/2017 via Web</p> <p>I'm sure that there is no need to further expand the distribution complex of magna park ther</p> <p>Response: These comments relate to the spatial strategy and land allocations within the Plan itself rather than the findings within the SA. No changes required.</p>
5403	<p>(Comment) Harborough Sustainability Appraisal: Technical Appendix B Employment - Harborough Local Plan 2011-2031, Related Documents</p> <p>Respondent: dr Neil Burton [5931] Received: 7/10/2017 via Web</p> <p>M1-4 - sensible places although as they are all on carparks it is essential that any development also results in an increase in the number of available parking places. As this will probably mean multi-storey there would be much wider ramifications for the areas chosen. I note that 007M/11 is already partially being used as a retirement development. There needs to be further though to identify employment areas beyond those already in use. I do note that there are a number of existing 'brown field' sites within MH with are either underused or currently unused.</p> <p>Response: These comments do not relate to the SA findings. No changes required.</p>

5402	<p>(Comment) Harborough Sustainability Appraisal: Technical Appendix A Housing - Harborough Local Plan 2011-2031, Related Documents</p> <p>Respondent: dr Neil Burton [5931] Received: 7/10/2017 via Web</p> <p>comments relate to housing options ending 06; 34-7; 50-1;54; 61 in Market Harborough where there are serious underassessment of: Transport needs - substantial feeder/bypass roads need between A6 & Northampton Road & Lutterworth Road & Leicester Road to avoid gridlock of central MH. Education needs - primary schools are at capacity (has Little Bowden Primary been forgotten). Healthcare needs - the constant mention of Kibworth surgery rather than the 2 in MH shows the deperate lack of capacity. Primary schools, doctors surgeries and new roads need to be included in plans before submission - infrastructure needed.</p> <p>Response: These comments do not appear to relate directly to the SA findings. The site appraisals do not consider potential for mitigation, but these issues are addressed in the Local Plan (and reflected in the SA findings). No changes or further SA work are considered necessary.</p>
5393	<p>(Comment) Harborough Sustainability Appraisal: Non-Technical Summary - Harborough Local Plan 2011-2031, Related Documents</p> <p>Respondent: KIBWORTH HARCOURT Parish Council (Dr Kevin Feltham) [3789] Received: 6/10/2017 via Web</p> <p>On pages 8 and 9 - Health & Wellbeing Air Quality No mention is made of the Air Quality Management Area (AQMA) being declared for the Kibworths in July 2017. This needs to be included wherever the Lutterworth AQMA is mentioned.</p> <p>Response: At the time the SA Scope was established and the SA Report was finalised, there was no proposal for an AQMA at the Kibworths. The AQMA was only established in November 2017 after the SA Report was published for consultation. The appraisal of strategic alternatives concludes that a bypass developed as part of an SDA at Kibworth could in fact help to tackle air quality and congestion, and this would still be the case. However, the preferred approach does not involve substantial growth at the Kibworths beyond existing completions and commitments. The conclusions relating to air quality are therefore likely to remain the same, despite the newly established AQMA.</p>



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