

Harborough Local Plan:

SA Report

**Addendum
(Main Modifications)**

January 2019

REVISION SCHEDULE					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	Jan 2019	SA Report Addendum published alongside proposed main modifications to the Harborough Local Plan	Mark Fessey Associate	Ian McCluskey Principal consultant	Steven Smith Technical Director

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NON-TECHNICAL SUMMARY

Introduction

Background

Harborough District Council submitted the Local Plan 2011 - 2031 Part on 16 March 2018 for independent examination. One of the associated documents submitted alongside the Plan was the Sustainability Appraisal (SA) Report.

Examination hearings were held in late 2018, subsequent to which the Council prepared a list of proposed modifications to the submitted plan, and agreed these with the Planning Inspector. Proposed modifications are now published for consultation.

This SA Report Addendum

The aim of this SA Report Addendum is essentially to present an appraisal of the proposed modifications, with a view to informing the current consultation.

In addition to presenting an appraisal of the proposed modifications, this report presents an appraisal of the 'the Plan as modified', thereby updating the appraisal findings presented within the SA Report.

It is also appropriate to rectify deficiencies in the SA Report through remediative work. This can be presented in an SA Report addendum.

In this instance, comments were received relating to the omission of a site option appraisal for A/BA/HSG/08 in the proposed-submission SA Report (September 2017). To clarify, this site was appraised at an earlier stage of assessment but having been wrongly identified as having planning consent, its pro-forma and a summary of its findings, were later omitted from the Proposed Submission SA Report (i.e. Technical Appendix A: Site Proforma's (Housing) and Appendix F).

However, the site proforma is available to view in the Interim SA Report – Appendix D (September 2015). This can be viewed at the following location.

<https://harborough.jdi-consult.net/documents/pdfs16/Appendix%20D%20COMPLETE.pdf>

Screening proposed modifications

The first task is to consider proposed modifications in turn, with a view to identifying those that need to be given detailed consideration, through appraisal. The conclusion is a need to subject the following modifications to further appraisal.

- MM2 - Which relates to SS1: The Spatial Strategy
- MM3 - Which relates to GD2: Settlement development
- MM8 - Which relates to H1: Provision of new housing
- MM10 - Which relates to H3: Rural exception sites
- MM15 - Which relates to BE2: Strategic distribution
- MM16 - Which relates to BE4: Bruntingthorpe Proving Ground
- MM17 - Which relates to RT2: Town and local centres
- MM28 - Which relates to IMR1: Implementation, monitoring and review
- MM29 – Which relates to SC1: Scraftoft North SDA
- MM32 – Which relates to MH3: Burnmill Farm
- MM36 - Which relates to L1: Lutterworth East SDA

N.B. the focus here is proposed '**main**' modifications only. Proposed 'Additional' or 'minor' modifications (which are being made available for information alongside the Main Modifications) are screened out

automatically due to their minor nature.

Appraising proposed modifications

The main task is to appraise the screened-in proposed modifications against the SA framework, and also discuss the 'submission plan plus proposed modifications' (thereby updating the SA Report).

The appraisal is structured under six sustainability topic headings, with the following overall conclusion -

Proposed modifications mostly perform well in terms of the full range of sustainability objectives, with only a small number of minor tensions highlighted.

Positive effects primarily stem from supplemented policy wording to guide development at the two Strategic Development Areas, the clarification of Local Plan review triggers and new detailed policy criteria to guide the expansion of Magna Park.

The nature of the modifications do not give rise to any reasonable alternative approaches, nor is there a need for mitigation or enhancement measures or additional monitoring indicators to be established.

Next steps

The next step is for the Inspector to consider the representations raised as part of the consultation, alongside this SA Report Addendum, before deciding whether he is in a position to write his report on the Plan's soundness.

Assuming that the Inspector is able to find the Plan (as modified) to be 'sound', it will then be formally considered for adoption by the Council. At the time of adoption an 'SA Statement' will be published that explains the process of plan-making / SA in full and presents 'measures decided concerning monitoring'.

1 INTRODUCTION

1.1 Background

- 1.1.1 Harborough District Council submitted the Local Plan 2011 - 2031 Part on 16 March 2018 for independent examination. One of the associated documents submitted alongside the Plan was the Sustainability Appraisal (SA) Report.
- 1.1.2 Examination hearings were held in late 2018, subsequent to which the Council prepared a list of proposed modifications to the submitted plan, and agreed these with the Planning Inspector. Proposed modifications are now published for consultation.

1.2 This SA Report Addendum

Appraising modifications

- 1.2.1 The aim of this SA Report Addendum is essentially to present an appraisal of the proposed modifications, with a view to informing the current consultation.
- 1.2.2 In addition to presenting an appraisal of the proposed modifications, this report presents an appraisal of the 'the Plan as modified', thereby updating the appraisal findings presented within the SA Report.
- 1.2.3 It is important to emphasise that this is an *addendum* to the SA Report. It seeks to present information relevant to the current stage in plan-making, and does not attempt to present all of the information required of the SA Report

Addressing issues with the SA Report

- 1.2.4 It is also appropriate to rectify deficiencies in the SA Report through remediative work. This can be presented in an SA Report addendum.
- 1.2.5 In this instance, comments were received relating to the omission of a site option appraisal for A/BA/HSG/08 in the proposed-submission SA Report (September 2017). To clarify, this site was appraised at an earlier stage of assessment but having been wrongly identified as having planning consent, its pro-forma and a summary of its findings, were later omitted from the Proposed Submission SA Report (i.e. Technical Appendix A: Site Proforma's (Housing) and Appendix F).
- 1.2.6 However, the site proforma is available to view in the Interim SA Report – Appendix D (September 2015). This can be viewed at the following location.

<https://harborough.jdi-consult.net/documents/pdfs16/Appendix%20D%20COMPLETE.pdf>

Considering reasonable alternatives

- 1.2.7 As required by Regulations,¹ the SA Report presents detailed information in relation to reasonable alternatives, in that it presents an appraisal of reasonable alternatives and also 'an outline of the reasons for selecting the alternatives dealt with'. More specifically, the SA Report presents an appraisal of alternative approaches to the allocation of land for housing.
- 1.2.8 When developing proposed modifications the Council (working with the Inspector) was not presented with a need to appraise alternatives, given alternatives appraisal work completed prior to submission. As such, this report does not contain information on alternatives.

N.B. the appraisal of proposed modifications includes some informal discussion of alternative policy approaches that might feasibly be explored. It is also important to remember that any appraisal is in effect a description of how the proposed approach performs relative to the baseline, or 'do nothing option'.

¹ The Environmental Assessment of Plans and Programmes Regulations (2004)

2 SCREENING PROPOSED MODIFICATIONS

2.1 Introduction

2.1.1 The first task is to consider proposed modifications in turn, with a view to identifying those that need to be given detailed consideration, through appraisal (see Chapter 3).

2.1.2 This chapter gives consideration to Local Plan policies in turn.

N.B. the focus here is proposed ‘**main**’ **modifications only**. Proposed ‘Additional’ ‘minor’ modifications (which are being made available for information alongside the main modifications) are screened out automatically, as by their very nature they will not lead to significant effects / have a significant bearing on the achievement of sustainability objectives. All references in this report to proposed modifications are, therefore, to the main modifications only.

2.2 Screening conclusions

2.2.1 Conclusions are presented in **Table 2.1**. In summary, there is a need to subject the following Main Modifications to further appraisal:

- MM2 - Which relates to SS1: The Spatial Strategy
- MM3 - Which relates to GD2: Settlement development
- MM8 - Which relates to H1: Provision of new housing
- MM10 - Which relates to H3: Rural exception sites
- MM15 - Which relates to BE2: Strategic distribution
- MM16 - Which relates to BE4: Bruntingthorpe Proving Ground
- MM17 - Which relates to RT2: Town and local centres
- MM28 - Which relates to IMR1: Implementation, monitoring and review
- MM29 – Which relates to SC1: Scraptoft North SDA
- MM32 – Which relates to MH3: Burnmill Farm
- MM36 - Which relates to L1: Lutterworth East SDA

Table 2.1: Screening conclusions

Policy	Proposed MM	Is there a need to examine further through appraisal?
N/a (Key issue)	MM1	No - change to ‘key issue’ does not directly lead to policy implications.
SS1: The Spatial Strategy	MM2	Yes - understanding of objectively assessed needs, and the requirement for new housing, remains unchanged; and the total quantum of land supply remains broadly unchanged, i.e. there remains a land supply sufficient to provide for the housing requirement plus a ‘buffer’ of c.15%. However, there are some modest changes to distribution, primarily reflecting the latest situation in respect of completions and commitments, as understood from March 2018 monitoring data. See further discussion below, under MM8 (Policy H1). With regards to the spatial strategy for other land uses, including employment, the spatial strategy remains unchanged - see further discussion below, under MM15 (BE2 Strategic distribution). Finally, whilst the windfall allowance is unchanged (225 dwellings) references to windfall sites being supported at locations ‘outside’ settlements has been removed - see further discussion below, under MM3 (GD2: Settlement development).

Policy	Proposed MM	Is there a need to examine further through appraisal?
GD2: Settlement development	MM3	Yes - changes to the key policy criteria to be taken into account when making decisions on windfall sites, with the policy now listing separate criteria for sites within and adjoining settlements.
GD4: New housing in the countryside	MM4	No - changes to the list of key policy criteria to be taken into account when making decisions on windfall sites in the countryside are modest, and bring the policy into line with NPPF.
GD5: Landscape and townscape character	MM5	No - removes reference to 'townscape' and other considerations on the basis that such matters are sufficiently addressed through other policies in the plan.
GD6: Areas of Separation	MM6	No - change to supporting text to clarify the situation in respect of green wedge / area of separation policy designations.
GD7: Green Wedges	MM7	No - as above
H1: Provision of new housing	MM8	<p>Yes - the first point to note is that the plan now allocates sites to deliver a fewer number of homes (3,668 rather than 3,870) and sets a lower target in respect of the number of homes to be provided for at villages through neighbourhood plans and other non-allocated sites (300 rather than 793). This change primarily reflects the latest situation in respect of completions and commitments since the beginning of the plan period (2011); however, it also reflects some certain shifts in strategy. Notable changes to numbers are as follows -</p> <ul style="list-style-type: none"> • Burnmill Farm, Market Harborough - allocation increased 90 to 128 homes • Market Harborough in general - the requirement to deliver 100 homes through a neighbourhood plan or non-allocated sites is removed. • Lutterworth SDA - allocation decreased from 1,500 to 1,260 homes • Fleckney - the requirement to deliver 165 homes through a neighbourhood plan or non-allocated sites is removed. • Great Glen - the requirement to allocate land for 35 homes through a neighbourhood plan removed. • Houghton on the Hill - the requirement to deliver 65 homes through a neighbourhood plan or non-allocated sites is reduced to 20. • Claybrookes - the requirement to deliver 50 homes through a neighbourhood plan or non-allocated sites is reduced to 12. • Foxton and Gilmorton - the requirement to deliver 10 and 25 homes respectively, through a neighbourhood plan or non-allocated sites, is removed. <p>However, the majority of these changes reflect the latest understanding of completions and commitments. The only changes to reflect a shift in policy are A) Lutterworth East SDA reduction in housing numbers relates to phasing and delivery; and B) Burnmill Farm increase in numbers relates to more detailed transport evidence.</p>
H2: Affordable Housing	MM9	No - changes to affordable housing policy are minor, and not likely to give rise to significant effects.

Policy	Proposed MM	Is there a need to examine further through appraisal?
H3: Rural exception sites	MM10	Yes - significant change to policy criteria.
H4: Specialist housing	MM11	No - minor changes to policy criteria and clarification of the number of specialist housing units provided for.
H5: Housing density, mix and standards	MM12	No - modest adjustment to be more supportive and encouraging to self build and custom build schemes in any location which is suitable for housing; the requirement for provision of self build and custom on sites of 250 dwellings or more is retained where there is evidence of demand and the policy now recognises circumstances where provision may not be appropriate.
H6: Gypsy, Traveller and Travelling Showpeople accommodation	MM13	No - minor change to policy to support ancillary commercial uses where acceptable from a traffic perspective.
BE1: Provision of new business development	MM14	No - new text seeks to explain the situation in respect of the quantum of employment land provision. Changes to figures simply reflect latest monitoring position (to 31.3.2018).
BE2 Strategic distribution	MM15	Yes - change to policy in respect of employment growth at Magna Park. The change converts policy from 'criteria-based' to an allocation policy (taking account of completions / commitments in the plan period to Sept.2018) – it doesn't change the quantum (i.e. 700,000sq.m.) or spatial distribution (at / adjoining Magna Park) of development from the submission plan. Policy criteria now apply specifically to the allocated site.
BE4: Bruntingthorpe Proving Ground	MM16	Yes - the proposed policy is more permissive in respect of new employment development within the Bruntingthorpe Industrial Estate.
RT2: Town and local centres	MM17	Yes - the proposed policy is more permissive in respect of mixed used development within the local centres of Fleckney, Great Glen and Kibworth Beauchamp.
HC1: Built Heritage	MM18	No - the proposed change to policy wording brings the policy into line with the NPPF.
GI1: Green infrastructure networks	MM19	No - minor change to policy wording.
GI2: Open space, sport and recreation	MM20	No - minor change to policy wording.
GI3: Cemeteries	MM21	No - the proposal is to remove reference to an allocated site for a large new cemetery, and instead refer to a broad area, which would necessitate an allocation through a Local Plan review. It is not clear that this leads to any sustainability implications.
GI4: Local Green Space	MM22	No - change to policy potentially more permissive in respect of development within area designated as local greenspace; however, changes are to align the policy with the NPPF.

Policy	Proposed MM	Is there a need to examine further through appraisal?
CC2: Renewable energy generation	MM23	No - changes the policy from a permissive policy where certain criteria are met, to a restrictive policy except in certain circumstances; however, no clear implications for delivering renewable energy generation schemes.
CC3: Managing flood risk	MM24	No - the proposed change to policy wording brings the policy into line with national policy.
IN2: Sustainable Transport	MM25	No - clarifies that development contributions should go towards the delivery of identified mitigation schemes
IN3 Electronic connectivity	MM26	No - minor clarification
IN4 Water resources and services	MM27	No - minor clarification
IMR1: Implementation, monitoring and review	MM28	Yes - clarification of Local Plan review triggers, which has a particular bearing in respect of ensuring that unmet housing needs from Leicester are met in a timely fashion.
SC1: Scraftoft North SDA	MM29	Yes - significant change to site specific policy for an SDA.
MH1: Overstone House	MM30	No - additional policy wording only to clarify that development contributions should go towards the delivery of identified mitigation schemes.
MH2: East of Blackberry Grange	MM31	No - as above.
MH3: Burnmill Farm	MM32	Yes - increase in development quantum.
MH4: Land at Aifield Farm	MM33	No - additional policy wording only to clarify that development contributions should go towards the delivery of identified mitigation schemes.
MH5: Airfield Business Park	MM34	No - as above.
MH6: Compass Point Business Park	MM35	No - as above.
L1: Lutterworth East SDA	MM36	Yes - significant change to site specific policy for an SDA.
L2: Land south of Lutterworth Road/Coventry Road	MM37	No -minor clarification.
F1: Land off Arnesby Road	MM38	No -minor clarification.
F2: Land off Marlborough Drive	MM39	No -minor clarification.

Policy	Proposed MM	Is there a need to examine further through appraisal?
K1: Land south and west of Priory Business Park	MM40	No -minor clarification.
K1: Land south and west of Priory Business Park	MM41	No - increased support for retail is in accordance with extant permission.
Appendix G	MM42	No - new appendix showing housing trajectory.

3 APPRAISING PROPOSED MODIFICATIONS

3.1.1 This chapter presents an appraisal of the screened-in proposed modifications, and also discusses the 'submission plan plus proposed modifications' (thereby updating the SA Report).

3.1.2 The appraisal is structured under the six sustainability topics identified through SA scoping (and used to structure the appraisal findings within the SA Report).

3.2 Natural environment

Appraisal of proposed modifications

3.2.1 As discussed in Table 2.1, **MM2/MM8** involve very modest adjustments to spatial strategy, and it is not apparent that there will be any notable implications for the achievement of 'natural environment' objectives.

3.2.2 With regards to site specific policy -

- **MM15** (BE2: Strategic distribution) - supplements the policy criteria to apply to any application for employment development adjoining Magna Park, notably requiring *"impacts on nature conservation are mitigated and a Biodiversity Management Plan (specifying the mitigation requirements) is to be submitted to and approved..."*
- **MM29** (SC1: Scraftoft North SDA) proposes to make green infrastructure central to the masterplanning process, stating *"The masterplan will guide the creation of a sustainable and high quality living environment within a network of green infrastructure which maintains and enhances the existing areas of highest ecological value, creates new habitats of local Biodiversity Action Plan priorities, provides recreational opportunities and maintains the distinct identity of Scraftoft village."* Supplementary text is also proposed in order to require: *"pursuance of measureable net gains for biodiversity by retaining and enhancing species-rich grassland habitats of highest value; creating new wetland and grassland habitats to deliver local Biodiversity Action Plan priorities and compensate for any habitat losses; maintaining and improving habitat connectivity; and mitigating impacts on protected species and local Biodiversity Action Plan priority habitats."* Development of the site would require the de-declaration of a Local Nature Reserve, but the retention and improved management of the best part of the existing area of biodiversity rich grassland will form the basis of a larger area of restored and created species-rich grassland habitat, which, together with improvements to the wildlife value of the Scraftoft brook corridor and creation of wetlands and other habitats, will compensate for the loss of part of the existing species-rich grassland and scrub.
- **MM36** (L1: Lutterworth East SDA) proposes a generic reference to 'greenways' rather than a more specific requirement for greenways *"as part of a central green spine distributor route through and beyond the site, to provide structure to the distribution of development and incorporate most existing hedgerows, trees, field ponds, and footpaths"*.

3.2.3 In **conclusion**, there has been an adjustment of site specific policy at both SDAs, one with clear positive implications for biodiversity and the other with more questionable (but also more minor) implications.

Appraisal of the submission plan plus proposed modifications

3.2.4 The SA Report concluded the following -

"The development of housing and employment through the Plan allocations and growth targets for each settlement are predicted to be negative for the natural environment in some locations. This is related to the cumulative loss of agricultural land of best and most versatile value, disturbance to wildlife, and potential increases in traffic."

In particular, there is potential for more prominent negative effects associated with the SDAs due to their proximity to wildlife sites and the loss of agricultural land. However, the plan seeks to mitigate these potential negative effects in a number of ways.

Individual site specific policies seek to protect biodiversity, and implement green infrastructure enhancements, whilst a range of other plan policies seek to ensure that development protects and enhances the environment where possible.

Overall, the effects on biodiversity, water and air quality are predicted to be neutral, as the application of Plan policies ought to ensure that potential negative effects are mitigated and/or offset.

With regards to soil, a minor negative effect will remain as there would be loss of best and most versatile agricultural land. Whilst the total amount of agricultural land lost is fairly substantial, it is not significant in the context of the resources across the district. It is also unclear the extent to which the Grade 3 land being lost is Grade 3a or 3b."

- 3.2.5 This conclusion **broadly holds true** for the 'submission plan plus proposed modifications'. The proposed modifications add clarity on the requirement for biodiversity mitigation and enhancement, which is clearly a positive step. However, these changes will not give rise to significant effects or alter the overall conclusions notably.

3.3 Built and natural heritage

Appraisal of proposed modifications

- 3.3.1 As discussed in Table 2.1, **MM2/MM8** involve very modest adjustments to spatial strategy, and it is not apparent that there will be any notable implications for the achievement of 'built and natural heritage' objectives.
- 3.3.2 The first proposed modification of note with regards to this SA topic is **MM3** (GD2: Settlement development), which involves changes to the key policy criteria to be taken into account when making decisions on windfall sites, with the policy now listing separate criteria for sites within and adjoining settlements. This is helpful in and of itself, and it is also noted that the proposal is to supplement a number of policy criteria, with potential positive effects for 'built and natural environment'. However, on the other hand, the proposal is to replace a requirement to ensure development does not "harmfully diminish the physical and/or visual separation of neighbouring settlements" with a simplified requirement that development "*it complies with Policies GD6 and GD7*" (relating to Areas of Separation and Green Wedge respectively). There are however, clauses within these two policies that require a qualitative judgement of impacts.
- 3.3.3 With regards to site specific policy -
- **MM15** (BE2: Strategic distribution) - supplements the policy criteria to apply to any application for employment development adjoining Magna Park, notably requiring "*heritage assets and their settings are protected and where possible enhanced, including Bittesby Deserted Mediaeval Village (DMV) which is a Scheduled Monument and non-designated heritage assets including Bittesby House which forms part of the setting of the DMV. Any planning application will be informed by a heritage impact assessment, which forms the basis for approaches to design, scale and layout of development. Green space, such as a community park, is to be provided to protect the setting of the DMV*".
 - **MM16** (BE4: Bruntingthorpe Proving Ground) seeks to remove the requirement that development within the industrial estate should deliver "*a comprehensive upgrade or improvement to the physical environment of the estate in accordance with an approved development brief or master-plan*".
 - **MM29** (SC1: Scraftoft North SDA) proposes "*creation of an area of publicly accessible open space immediately to the north of Scraftoft Brook, the design of which shall enhance the ecological value of this part of the site, whilst also creating a setting to help maintain the distinct identity of the existing Scraftoft village. The future management and*

maintenance of this open space shall be agreed through a planning application, in accordance with Policy GI2.”

- **MM36** (L1: Lutterworth East SDA) proposes *“protection and enhancement of heritage assets and their settings, including the grade II* listed Church of St Leonard at Misterton and grade I listed Church of St Mary, Lutterworth and non-designated heritage assets including a double moat north of the Church of St Leonard, which forms part of the deserted medieval village. The master plan will be informed by a heritage impact assessment, which must form the basis for approaches to design, scale and layout of development. Green space, such as a community park, should be provided in the southern part of the site together with height restrictions on buildings in the southern part of the site, in order to protect the setting of the Church of St Leonard. The proposed new access road should be routed to have regard to any undesignated archaeology and minimise its impact on all heritage assets, particularly the inter-visibility between the Church of St Leonard and the Church of St Mary.”*

3.3.4 In **conclusion**, the proposed modifications are strongly supportive of ‘built and natural heritage’ objectives.

Appraisal of the submission plan plus proposed modifications

3.3.5 The SA Report concluded the following -

“The Plan is likely to have some negative effects upon built and natural heritage due to new development affecting the character of settlements. In the main, the effects on settlements across the district are likely to be minor. More prominent effects are predicted at the proposed SDAs, due to their effects on landscape. However, mitigation and enhancement measures detailed in site policies and broader Plan policies would help to ensure that these effects were not significant.

The Plan generally seeks to protect and enhance the built and natural environment through its development management policies, and these should help to offset the potential significant negative effects that could arise from development.

Overall, a minor negative effect is predicted; acknowledging that changes to the landscape and settlement character will be inevitable, but that the residual effects will be minor in nature.”

3.3.6 This conclusion **broadly holds true** for the ‘submission plan plus proposed modifications’. There is increased clarity on the mitigation requirements for the sites, which ought to help ensure that negative effects are managed in this respect. However, the overall picture is still likely to remain a minor negative for the district as a whole.

3.4 Health and wellbeing

Appraisal of proposed modifications

3.4.1 As discussed in Table 2.1, **MM2/MM8** involve very modest adjustments to spatial strategy, and it is not apparent that there will be any notable implications for the achievement of ‘health and wellbeing’ objectives. MM8 increases the number of homes to be delivered at Burnmill Farm, Market Harborough from 90 to 128 homes; however, this is on the basis of there being updated transport evidence to indicate that this quantum of homes can be accommodated.

3.4.2 Focusing on site specific policy -

- **MM15** (BE2: Strategic distribution) - supplements the policy criteria to apply to any application for employment development adjoining Magna Park, notably requiring *“impacts on Lutterworth Air Quality Management Area are minimised and an HGV routing agreement (to include a monitoring and enforcement scheme) is to be submitted to and approved by the Local Planning Authority [and] impacts of construction on air quality through dust and other emissions are mitigated and a dust management plan is to be submitted to and approved by the Local Planning Authority”.*

- **MM29** (SC1: Scraftoft North SDA) proposes strengthened policy wording in respect of green infrastructure and open space provision, as has already been discussed above, and furthermore requires that provision of a primary school should be *“in parallel with the progress of housing development, with at least a one form entry primary school to be open the first September before the completion of 300 dwellings.”* However, the requirement for a neighbourhood centre to be delivered *“before the completion of 500 dwellings”* is replaced with a requirement for delivery *“in accordance with a phasing plan to be agreed with the Local Planning Authority”*.
- **MM36** (L1: Lutterworth East SDA) requires that a key masterplanning principle should be addressing *“the issue of community severance resulting from the presence of the M1, to create a sustainable urban extension which is permeable and well-connected to Lutterworth via legible walking and cycling routes with good natural surveillance.”* However, the requirement for a neighbourhood centre to be delivered *“before the completion of 700 dwellings”* is replaced with a requirement for delivery *“in accordance with a phasing plan to be agreed with the Local Planning Authority”*. There is also clarification that there should be *“a minimum of 5 crossings which provide dedicated walking and cycling connections into Lutterworth across the M1, forming part of a network of legible, direct, safe and attractive routes, which will all be well-lit, surfaced, with good natural surveillance and provide connections to Lutterworth town centre, the local centre and employment uses within the SDA, and to existing cycle routes, bridleways and footpaths, including the National Cycle Network, in accordance with Policy IN2”*. Finally, it is noted that there is a new requirement for: *“Appropriate traffic management and public realm improvements in Lutterworth town centre to facilitate the movement of pedestrians and cyclists, particularly across Leicester Road.”*

3.4.3 Finally, there is a need to state that a number of proposed modifications seek to supplement policy aimed at avoiding traffic congestion, and delivering necessary upgrades to transport infrastructure, notably: **MM15** (BE2 Strategic distribution) - lists a number of required upgrades, including improvements to two roundabouts and an extension to the dual carriageway of the A5; and **MM32** (MH3: Burnmill Farm) - there is a new requirement for *“a construction traffic management plan, including the proposed routing of different sizes of construction vehicles which seeks to maximise use of the existing farm track for construction traffic”*.

3.4.4 In **conclusion**, proposed modifications are strongly supportive of ‘health and wellbeing’ objectives, but there is a question-mark relating to increased flexibility in respect of when new neighbourhood centres must be delivered at the two SDAs.

Appraisal of the submission plan plus proposed modifications

3.4.5 The SA Report concluded the following -

“The Plan is predicted to have a significant / major positive effect through the provision of new housing and jobs, and accompanying improvements to the environment, and social / physical infrastructure. The delivery of two SDAs as an integral part of the strategy ought to bring about significant positive effects for new communities here, and also within surrounding communities.

The majority of plan policies also seek to ensure that development brings about positive outcomes for local communities; and in combination should contribute to improvements to the health and wellbeing of the population. For example, through the provision of green infrastructure improvements, improved access to jobs, homes and facilities, supporting active travel, and preserving the character of settlements where possible.

The inclusion of a link road as part of the Lutterworth East scheme should also help to reduce congestion through Lutterworth town centre, which would have positive effects on air quality in this settlement. However, uncertain negative effects are recorded for other nearby settlements that could be affected by increased traffic.”

3.4.6 This conclusion **broadly holds true** for the ‘submission plan plus proposed modifications’.

There is increased support and clarity for infrastructure improvement measures which should help to address potential issues relating to traffic, air quality and amenity. This should help to better address potential minor negative effects. However, it is still not possible to entirely rule out negative effects, and so the implications are broadly the same.

3.5 Resilience to climate change

Appraisal of proposed modifications

- 3.5.1 No proposed modifications have notable implications for the achievement of flood risk objectives, or any other objectives relating to climate change resilience.

Appraisal of the submission plan plus proposed modifications

- 3.5.2 The SA Report concluded the following -

“The plan is unlikely to lead to substantial changes to flood risk, or resilience to climate change. In the main, the allocated sites, and targets for housing growth at settlements would not be likely to put new development at risk of flooding. Though this is positive, the effects on the baseline position would be neutral (i.e. there would be insignificant changes to the number of properties and people at risk of flooding on new development sites).”

However, a variety of the Plan policies seek to mitigate potential flood risk both on site and downstream. For example, through measures which support green infrastructure, SUDs and site specific policies to minimise risk. These are positive measures, and should help to ensure that new development does not lead to incremental and cumulative adverse effects on flooding.

Overall, the policy is likely to be beneficial with regards to climate change resilience, and so a minor positive effect is predicted. However, changes to the baseline position are not expected to be significant unless enhancement occurs as part of development.”

- 3.5.3 This conclusion **holds true** for the ‘submission plan plus proposed modifications’.

3.6 Housing and economy

Appraisal of proposed modifications

- 3.6.1 As discussed in Table 2.1, **MM2/MM8** involve very modest adjustments to spatial strategy, and it is not apparent that there will be any notable implications for the achievement of ‘housing and economy’ objectives.
- 3.6.2 **MM10** (H3: Rural exception sites) deletes the requirement that “the development would accommodate households who are either current residents of the parish or have a strong local connection with the local community”; however, this change is to bring the policy into line with the NPPF.
- 3.6.3 With regards to **MM15** (BE2: Strategic distribution), Table 2.1 explains that the proposal does not involve provision for additional employment land, but rather the proposal is now to formally allocate an extension to Magna Park and provide detailed criteria based policy, rather than to rely on more general criteria based policy. This change is supportive of the achievement of ‘economy’ objectives by providing greater certainty of what is acceptable and being supported.
- 3.6.4 **MM17** (RT2: Town and local centres) is more permissive in respect of mixed used development within the local centres of Fleckney, Great Glen and Kibworth Beauchamp; however, there is little reason to suggest that this will have significant implications for the functioning of these local centres.
- 3.6.5 **MM27** (IMR1: Implementation, monitoring and review) provides clarification in respect of Local Plan review triggers, which has a particular bearing in respect of ensuring that any unmet housing needs from Leicester are met in a timely fashion.

- 3.6.6 In **conclusion**, proposed modifications have modest implications for the achievement of 'housing and economy' objectives. In respect of housing, the clarification of plan review triggers is a positive step; whilst clear criteria for expansion of Magna Park is supported from an 'economy' perspective.

Appraisal of the submission plan plus proposed modifications

- 3.6.7 The SA Report concluded the following -

“Overall, the Plan is predicted to have a significant / major positive effect on the provision of housing and the local economy. Policies H1 and BE1 are the key policies for delivering the spatial strategy and are supported through the Places and Sites policies. These policies should ensure the delivery of sufficient housing to meet objectively assessed needs, including affordable and specialist provision as required through other Plan policies.

Although there are some minor negative effects recorded for policies that could be restrictive to growth (GD4, GD7, CC1, CC3) these would not affect the achievement of the plans housing and employment land targets. Furthermore, a large number of the Plan policies ought to be positive in terms of creating attractive environments to live and work.

Focusing a large amount of housing to Market Harborough and at two Strategic Development Areas ought to match new housing and employment opportunities well, whilst still ensuring that settlements throughout the district experience positive effects in terms of local housing provision.”

- 3.6.8 This conclusion **holds true** for the 'submission plan plus proposed modifications'. The changes with regards to policy BE2 are positive, but significant positive effects are already recorded due to the intention for growth in this location. Other changes are relatively minor with regards to the overall delivery of housing.

3.7 Resource use

Appraisal of proposed modifications

- 3.7.1 No proposed modifications have notable implications for the achievement of objectives relating to resource use.. The broad scale and location of growth remains the same, and there are no specific policy changes relating to resource use. Therefore, no effects are likely.

Appraisal of the submission plan plus proposed modifications

- 3.7.2 The SA Report concluded the following -

“Development typically leads to an increase in energy use, water use and disposal, and travel; which subsequently increase the amount of greenhouse gases that are emitted. However, it is important to understand the context of the Local Plan, and that development would still be likely to occur in the absence of a Plan. Therefore the effects of the Plan are based upon how the distribution of development could have effects upon resource use, and whether this is more beneficial than the baseline position.

For this Plan, the distribution of development focuses mainly on accessible locations such as Market Harborough, Lutterworth and Scraftoft. The inclusion of two SDAs will also ensure that new communities are created that promote sustainable forms of transport and a reduced need to travel. Therefore, with regards to emissions from transport, the Plan is likely to have positive implications.

In terms of energy and water use, no particular opportunities have been identified to achieve higher levels of sustainability. However policies CC1 and CC2 are identified as having a positive effect by making it clear that development should seek to be high quality, and by identifying areas that are potentially suitable for wind development (which should help assist this energy sector).

In combination with a number of other policy areas which encourage the recycling/reuse of land, and accessible modes of transport, the Plan is predicted to have a significant / moderate positive effect on resource use overall. ”

3.7.3 This conclusion **holds true** for the ‘submission plan plus proposed modifications’.

4 CONCLUSIONS AT THIS CURRENT STAGE

- 4.1.1 Proposed modifications mostly perform well in terms of the full range of sustainability objectives, with only a small number of minor tensions highlighted.
- 4.1.2 Positive effect primarily stem from supplemented policy wording to guide development at the two SDAs, the clarification of Local Plan review triggers and new detailed policy criteria to guide the expansion of Magna Park.
- 4.1.3 Whilst there are positive implications highlighted for several modifications, these are not predicted to lead to a change in the overall conclusions with regards to the significance of effects.

4.2 Mitigation and enhancement

- 4.2.1 The modifications are in themselves seeking to address potential issues that have been identified by the Inspector. Therefore, the need to consider mitigation and enhancement measures is unnecessary / not appropriate.

4.3 Monitoring

- 4.3.1 Section 4.1 of the SA Report sets out potential monitoring indicators for each of the Sustainability Themes. The proposed modifications do not give rise to a need for any adjustment.

5 NEXT STEPS

- 5.1.1 The next step is for the Inspector to consider the representations raised as part of the consultation, alongside this SA Report Addendum, before deciding whether he is in a position to write his report on the Plan's soundness.
- 5.1.2 Assuming that the Inspector is able to find the Plan (as modified) to be 'sound', it will then be formally considered for adoption by the Council. At the time of adoption an 'SA Statement' will be published that explains the process of plan-making / SA in full and presents 'measures decided concerning monitoring'.