Hinckley and Bosworth Borough Council

Core Strategy Sustainability Appraisal Statement

January 2010

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Contents Page

1.0	INTRODUCTION	. 1
2.0	THE NEED FOR SUSTAINABILITY APPRAISAL AND STRATEGIC ENVIRONMENTAL ASSESSMENT	2
3.0	SUSTAINABILITY APPRAISAL PROCESS	. 3
3.1	STAGES IN APPRAISING THE CORE STRATEGY	. 4
4.0	THE CONSULTATION PROCESS	. 5
5.0	THE SUSTAINABILITY PERFORMANCE OF THE CORE STRATEGY	. 8
6.0	MONITORING AND IMPLEMENTATION OF THE PLAN	10

Appendix Contents

- Appendix A Report Conditions
- Appendix B Sustainability Appraisal Consultation Responses

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1.0 Introduction

As the local planning authority for Hinckley and Bosworth Borough, Hinckley and Bosworth Borough Council (HBBC) is in the process of preparing a Local Development Framework (LDF). The LDF will supersede the current Local Plan in setting out guidelines for development within the Borough and will comprise a portfolio of Local Development Documents (LDD), including Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs). The foundation document of the LDF is the Core Strategy DPD.

Under the Planning and Compulsory Purchase Act 2004 local planning authorities must subject a number of LDDs to a process of Sustainability Appraisal (SA). Similarly, under the Environmental Assessment of Plans and Programmes Regulations 2004, where planning documents setting a framework for future development consent are likely to have significant environmental effects it is a requirement that local planning authorities subject them to Strategic Environmental Assessment (SEA). Such documents include DPDs and some SPDs.

In 2005 HBBC appointed WYG Environment (formally White Young Green Environmental) to undertake the SA and SEA of LDDs emerging under the Hinckley and Bosworth LDF. These LDDs included the Core Strategy, stages in the appraisal of which are detailed in section 3.

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2.0 The Need for Sustainability Appraisal and Strategic Environmental Assessment

Article 1 of the EU Directive 2001/42 on the Assessment of Certain Plans and Programmes on the Environment determines its objective as being '...to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans...with a view to promoting sustainable development...'. Directive 2001/42 is implemented in the UK through the Environmental Assessment of Plans and Programmes Regulations 2004.

Under the Planning and Compulsory Purchase Act 2004 local planning authorities are required to undertake SA of all DPDs that make up a LDF. SA differs from SEA in that it expands the focus of the assessment process to encompass social and economic issues. SA is described in the ODPM¹ guidance as '...An iterative process that identifies and reports on the likely significant effects of the plan and the extent to which implementation of the plan will achieve the social, environmental and economic objectives by which sustainable development can be defined...'.

Although the statutory requirements for carrying out SA and SEA are distinct it is possible to satisfy both through a single but integrated SA process. Such an approach is advocated in the ODPM guidance; for ease the combined SEA and SA process is simply referred to as SA throughout the remainder of this report.

¹ ODPM (2005) Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks: Guidance for Regional Planning Bodies and Local Planning Authorities.



3.0 Sustainability Appraisal Process

The SA of the Core Strategy has been undertaken in line with the staged approach set out in the ODPM guidance, as follows:

- STAGE A Setting the context and objectives, establishing the baseline and deciding on the scope
- A1: Identifying other relevant plans, programmes and sustainability objectives.
- A2: Collating baseline information and identifying any gaps in the current data.
- A3: Identifying baseline conditions and key sustainability issues on the basis of the baseline data collated.
- A4: Developing SA objectives.
- A5: Consulting on the scope of the SA.

STAGE B Developing and refining options and assessing effects

- B1: Testing the Core Strategy objectives against the SA objectives.
- B2: Developing and appraising a range of options for delivering the Core Strategy.
- B3: Predicting the likely effects of the Core Strategy Preferred Options.
- B4: Evaluating the likely effects of the Core Strategy Preferred Options.
- B5: Developing measures to mitigate adverse effects and maximise beneficial effects.
- B6: Developing measures to monitor significant effects.
- STAGEC Preparing the SA Report
- C1: Preparing the SA Report.

STAGE D Consulting on the DPD Preferred Options Report and the SA Report

- D1: Public consultation on the Core Strategy Preferred Options and the associated SA Report.
- D2: Appraising any significant changes made to the Core Strategy Preferred Options following public consultation.
- D3: Providing information on how the SA and associated consultation responses have been accounted for in preparing the adopted Core Strategy.



STAGEE Monitoring implementation of the plan

- E1: Monitoring significant effects of the Core Strategy once adopted.
- E2: Responding to any adverse effects arising from the Core Strategy following adoption.

3.1 Stages in Appraising the Core Strategy

Stage A of the SA process was undertaken for the overall Hinckley and Bosworth LDF in 2005. The Scoping Report for consultation was published in June 2005 and this detailed 25 SA objectives developed for use when appraising LDF documents. To account for the passing of time and any significant differences between the various LDF documents, the Stage A tasks were reviewed, updated where necessary and consulted upon prior to the commencement of any appraisals.

During 2005, HBBC published some Issues Papers for the Core Strategy and held a number of public consultation events. In the Issue Papers HBBC identified the potential options for development in the Borough; WYG exposed these options to SA in March 2006.

In July 2006, accounting for the SA of the options identified, HBBC produced a Core Strategy Preferred Options Report. This set out the preferred approach to future development in the Borough and potential policies for the Core Strategy. The potential policies were appraised by WYG and a SA Report detailing this was published in July 2006 to accompany the Core Strategy Preferred Options Report for a six week public consultation period.

In early 2007 the Core Strategy Preferred Options had to be revised to reflect the housing numbers allocated in the newly published draft East Midlands Regional Spatial Strategy. HBBC considered a number of Options for Growth that identified where development should be concentrated in the Borough. These Options for Growth were appraised by WYG in April 2007 and HBBC then produced a Revised Core Strategy Preferred Options Report, which was also exposed to SA and consulted upon alongside a further SA Report in September and October 2007.

Following consultation, a Proposed Submission Core Strategy was prepared by HBBC. Any differences between this and the Revised Core Strategy Preferred Options Report were subjected to SA. The associated SA Report was published in October 2008 and contains further detail on the various appraisal stages summarised here; this SA Statement should be read in parallel with the October 2008 SA Report and forms SA Stage D3.

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4.0 The Consultation Process

Consultation on the SA commenced during Stage A prior to publication of the Scoping Report. In March 2005, in partnership with Blaby District Council and Oadby and Wigston Borough Council, a questionnaire was issued to the following stakeholders:

- Environment Agency
- English Nature
- Countryside Agency
- English Heritage
- University of Leicester
- South Leicestershire Primary Care Trust
- Leicestershire Constabulary
- Leicestershire Chamber of Commerce & Industry
- British Waterways
- Leicestershire Economic Partnership
- Government Office for the East Midlands
- Sport England East Midlands Region
- East Midlands Regional Assembly
- Transport 2000
- East Midlands Development Agency
- DEFRA Rural Development Service
- Forestry Commission
- Highways Agency
- Leicestershire & Rutland Wildlife Trust
- East Midlands Community Renewables Initiative
- Severn Trent Water
- National Farmers Union
- Leicestershire County Council
- RSPB Central England
- National Playing Fields Association
- Arriva Midlands
- Network Rail
- Leicestershire Development Agency

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- Leicestershire Rural Transport Partnership
- First Buses
- Leicestershire Rural Partnership
- Brocks Hill Environment Centre
- Oadby Civic Society
- Wigston Civic Society

The purpose of the questionnaire was to:

- Determine what interest consultees had in the Hinckley and Bosworth area.
- Identify social, economic and environmental issues that may need to be considered during the SA process.
- Identify baseline information which consultees held in relation to the Hinckley and Bosworth area.
- Identify any development studies or strategies produced by consultees that needed to be reviewed as part of the SA process.

Following this, those stakeholders that expressed an interest were invited to a consultation forum held in April 2005. The forum consisted of two workshops. The first workshop was split into three groups focussing on environmental, social and economic issues. Each group discussed the objectives most relevant to their topic; for each objective the participants were asked to consider the following questions:

- What are the key issues that should form the appraisal criteria in relation to each objective?
- Can the LDF deliver in relation to the key issues?
- Are the issues environmental, social or economic issues?
- Do key issues differ between localities?
- What should the priority issues be?

The second workshop was split into groups according to the District or Borough participants represented. The purpose of this workshop was to identify local issues of concern. For each objective the participants were asked to consider the following questions:

- How many targets should be considered in relation to each objective?
- What targets should be adopted in relation to each objective?
- Can the LDF help to meet these targets?
- Do the targets reflect the local situation?



- What are the priority targets for each local area?
- How can we measure the targets developed?
- Is data available to measure the targets?

Further consultation was undertaken on the SA Scoping Report, SA of the Issues Papers and the SA Reports produced for both Preferred Options Report and the Proposed Submission Core Strategy. The tables presented in Appendix B show the consultation responses at these different stages and how they were dealt with.

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5.0 The Sustainability Performance of the Core Strategy

The SA of the Core Strategy has been an iterative process, with the Core Strategy accounting for the findings of the SA following the various stages and sub-stages of the process.

One of the key stages at which the SA influenced the Core Strategy was following the appraisal of the 2005 Issue Papers. The findings were accounted for in selecting the Preferred Options; the 2006 Preferred Options report detailed the options considered and the reasoning behind the choice of Preferred Options. In particular, regarding the broad locations for new development in urban areas the Preferred Option was chosen due to its ability to:

- Locate the majority of new development in and around the main urban core. Thereby realising the potential to create enhanced local services and infrastructure provision.
- Create new mixed use developments which will increase local viability and vitality.
- Help regenerate existing town centres including creating a more vibrant evening economy.
- Improve access to existing services and facilities for those living within and around the main urban core.
- Promote the potential to reduce usage of the private car for shorter journeys.
- Prevent town cramming and loss of local distinctiveness by allowing a level of development that is sustainable within the main urban area.

Regarding the broad locations for new development outside urban areas the Preferred Option was chosen due to its ability to:

- Secure the best use of land resources within the Borough (including maximising the use of brownfield land opportunities).
- Maximise regeneration opportunities.
- Provide an opportunity to improve the range of housing types in key centres (including affordable housing to meet local needs).
- Help support existing services and facilities in key centres.
- Has the potential to increase the use of public transport services by making service provision more viable, thereby reducing the need to travel by private vehicle.
- Potential to enhance local leisure and recreational facilities.

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Regarding the appraisal of policies within the Preferred Options Report, a number of recommendations made by the SA were actioned within the Proposed Submission Document and these were accounted for in the appraisal tables presented within the October 2008 SA Report, which concluded that the potential benefits of implementing the Core Strategy are as follows:

- Provision of housing to meet the needs of the local community, including significant levels of affordable housing.
- Provision of employment development with associated job creation and economic growth.
- Maintenance of existing services and provision of new services to support the existing and population and accommodate growth.
- Enhancement of public transport, cycling and walking routes.
- Encouragement of sustainable design and construction of new developments.
- Encouragement of the use of renewable energy.
- Protection and enhancement of green infrastructure.

The potential adverse effects (those which should be carefully monitored) of implementing the Core Strategy were determined to be:

- Effects on landscape and biodiversity.
- Loss of greenfield land to development.
- Generation of construction and demolition waste.
- Risk of pollution during construction of developments and once operational.
- Air pollution and greenhouse gas emissions from increases in traffic.
- Increased energy and water consumption.

The Proposed Submission Core Strategy was published in October 2008, after which it underwent independent examination by the Secretary of State. Both during and following the independent examination a number of alterations were made to the Core Strategy, some of which were proposed by the Inspector. The majority of these changes comprise the correction of grammatical or factual errors, the update of information and the clarification of wording. A review has determined that, while some of the changes might be considered beneficial and others adverse to a degree, the disparities between the previous and the revised objectives/policies are insufficient to necessitate further SA.

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6.0 Monitoring and Implementation of the Plan

Once adopted, implementation of the Core Strategy must be monitored to ensure that unforeseen adverse effects are identified and acted upon. Monitoring should:

- Take an objective and target led approach.
- Determine whether the SA process has accurately predicted effects.
- Determine whether the Core Strategy is contributing to achievement of the SA objectives.
- Determine whether mitigation measures are performing as desired.
- Identify adverse effects and determine whether remedial action is required.

It is not necessary to monitor everything, or conduct monitoring indefinitely. It should be noted that although monitoring features of the baseline may indicate the effects of the Core Strategy, those features may also be open to effects beyond its influence. As such, indicators should be clearly linked to the SA process and in addition should enable the setting of targets that are within the scope of that which the Core Strategy can achieve. This may involve focusing upon the potentially significant effects predicted during the SA process.

As part of the SA process a list of general monitoring targets and indicators was developed in relation to each SA objective; these are presented within the appendices of the October 2008 SA Report. Section 6 of the adopted Core Strategy contains a monitoring framework into which HBBC has incorporated a number of targets that reflect the findings of the SA. On publication of the Annual Monitoring Report it may be necessary for HBBC to review the targets, refining or building upon them depending upon the Core Strategy's performance.



Appendix A

Report Conditions

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APPENDIX A: REPORT CONDITIONS

CORE STRATEGY SUSTAINABILITY APPRAISAL STATEMENT

This report is produced solely for the benefit of Hinckley and Bosworth Borough Council and no liability is accepted for any reliance placed on it by any other party unless specifically agreed in writing otherwise.

This report is prepared for the proposed uses stated in the report and should not be used in a different context without reference to WYG. In time improved practices, fresh information or amended legislation may necessitate a re-assessment. Opinions and information provided in this report are on the basis of WYG using due skill and care in the preparation of the report.

This report refers, within the limitations stated, to the environment of the site in the context of the surrounding area at the time of the inspections. Environmental conditions can vary and no warranty is given as to the possibility of changes in the environment of the site and surrounding area at differing times.

This report is limited to those aspects reported on, within the scope and limits agreed with the client under our appointment. It is necessarily restricted and no liability is accepted for any other aspect. It is based on the information sources indicated in the report. Some of the opinions are based on unconfirmed data and information and are presented as the best obtained within the scope for this report.

Reliance has been placed on the documents and information supplied to WYG by others but no independent verification of these has been made and no warranty is given on them. No liability is accepted or warranty given in relation to the performance, reliability, standing etc of any products, services, organisations or companies referred to in this report.

Whilst skill and care have been used, no investigative method can eliminate the possibility of obtaining partially imprecise, incomplete or not fully representative information. Any monitoring or survey work undertaken as part of the commission will have been subject to limitations, including for example timescale, seasonal and weather related conditions.

Although care is taken to select monitoring and survey periods that are typical of the environmental conditions being measured, within the overall reporting programme constraints, measured conditions may not be fully representative of the actual conditions. Any predictive or modelling work, undertaken as part of the commission will be subject to limitations including the representativeness of data used by the model



and the assumptions inherent within the approach used. Actual environmental conditions are typically more complex and variable than the investigative, predictive and modelling approaches indicate in practice, and the output of such approaches cannot be relied upon as a comprehensive or accurate indicator of future conditions.

The potential influence of our assessment and report on other aspects of any development or future planning requires evaluation by other involved parties.

The performance of environmental protection measures and of buildings and other structures in relation to acoustics, vibration, noise mitigation and other environmental issues is influenced to a large extent by the degree to which the relevant environmental considerations are incorporated into the final design and specifications and the quality of workmanship and compliance with the specifications on site during construction. WYG accept no liability for issues with performance arising from such factors.

August 2008

WYG Environment Planning Transport Ltd.



Appendix B

Sustainability Appraisal Consultation Responses

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Scoping Stage Consultation Responses		
Consultee	Comments	Response to Proposed Change
	 The requirement for Sustainability Appraisal (SA) relates to Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs) and, as your report indicates, it is an iterative process that is intended to identify the likely significant environmental effects of the plan and the extent to which implementation of the plan will achieve sustainability objectives, and inform the preparation of the plans. It also encompasses the requirements of the European Strategic Environmental Assessment (SEA) Directive. 	Noted.
Government Office for the East Midlands (GOEM)	• Section 19 (5) of the Planning and Compulsory Purchase Act 2004 specifies that SA should be carried out for the proposals in each document. However, your Scoping Report relates to the local development framework (LDF), which is the 'folder' of documents. The Scoping Report should relate to the individual documents and not the overall approach to the LDF. It should identify in sufficient detail the scope of the key sustainability issues for each individual Local Development Document (LDD). Whilst it is possible to combine sustainability appraisal work for a number of LDDs, the combined report must enable you to separate out the early work on scoping the individual LDDs, to inform the preparation of each LDD and the sustainability appraisal reports. This is particularly important where plans are to be prepared to different timetables, as is the case with the LDDs in your Local Development Scheme (LDS).	Section 2.3 of the report refers to the DPDs that the scoping report will inform. It is accepted that this should be made more explicit in Section 1.0 of the report. <u>Proposed Change</u> Scoping Report relates to the Core Strategy, Housing DPD, Employment DPD and Hinckley Area Action Plan.
	 The GOEM have considered the content of the Scoping Report against the guidance in Annex 7 of the Office of the Deputy Prime Minister (ODPM) consultation paper on SA of Regional Spatial Strategies (RSS) and LDFs (September 2004). The Scoping Report does not cover plan objectives for each LDD (it is noted that these have yet to be prepared); the broad options for consideration in each LDD; or the structure and level of detail of the sustainability appraisal reports. In the absence of the appendices, you should also ensure that the indicators and targets relate to the scope of each individual LDD and to matters that the LDD is likely to have an effect upon. 	It is not possible for the Scoping Report to cover plan objectives for the individual DPDs as these have not yet been prepared. The report aims to provide a broad scope of issues to be addressed in future DPDs and SPDs. Broad options for consideration have been identified in the report and these will be refined as DPDs are progressed.
	• In relation to more detailed matters, Section 2.3 lists the LDDs but is misleading as not all of these will be adopted by 2007, according to the local development scheme. In Table 7.1 there also seems to be some confusion between the different formal stages of consultation on DPDs. Stage D1 of the SA process should be undertaken at the Regulation 28 submission stage for a DPD.	The document states which DPDs are to be produced during the first three years (those identified in the LDS) and those that may follow. It is accepted that further scoping work may be required when these documents are produced.

Scoping Stage Consultation Responses		
Consultee	Comments	Response to Proposed Change
GOEM	• The Scoping Report includes a considerable amount of baseline information that will assist in moving forward with the plan preparation programme. For further guidance GOEM would refer to the ODPM (September 2004) consultation draft on SA and the April 2005 interim advice note.	Noted.
	 National Level (para 4.1) - It would be relevant to review "Safer Places – The Planning System and Crime Prevention (ODPM 2004)" and include under this heading. This would emphasise the Council's commitment to reducing crime and disorder through the planning system. 	Disagree. The SA Scoping Report can only consider a limited number of plans and programmes. Whilst 'The planning system and crime prevention' will provide useful guidance in preparing future DPDs, it is not a priority for review as part of the SA Scoping Report.
Leicestershire Constabulary Police Architectural Liaison Officer	 Analysis (para 4.1). It should be noted that crime reduction through design (Buildings and the Built Environment) can also apply to the design of open spaces particularly those associated with amenity, leisure and recreation facilities. 	Agree. The SA objective "Improving community safety, reducing anti-social behaviour and the fear of crime" relates to all forms of development and open spaces, not just buildings.
	• Key Sustainability Issues (5.3.7). As the provision of improved facilities is not the only way to tackle anti-social behaviour, the Police Architectural Liaison Officer would suggest that the bullet point be expanded to read "The need to tackle anti-social behaviour including the provision of improved facilities for young people".	Disagree. The SA objective "Improving community safety, reducing anti-social behaviour and the fear of crime" addresses this issue.
	Further base line data regarding Local Biodiversity Action Plan (LBAP) habitats and species and legally protected species is available from the Leicestershire Environmental Records Centre.	Noted.
English Nature	 Under section 5.8.5 Key Sustainability Issues, the following two issues should be added: The need to protect and enhance habitats and flora and fauna populations that have developed on the brownfield sites. The compensation for biodiversity and geodiversity features lost to development where loss is completely unavoidable, should reflect the fact that higher levels of recreation are needed compared to the amount of lost features. 	The SA Scoping Report refers to key sustainability issues identified in collecting the baseline data. Whilst the two suggestions were not considered key following this research it is acknowledged that they are important through references in the sustainability objectives.

Scoping Stage Consultation Responses		
Consultee	Comments	Response to Proposed Change
	• English Nature is concerned with some of the targets and indicators that have been put forward in Appendix G: Objectives, Targets and indicators. The suggested indicator 'Area of statutory and non statutory designated sites of ecological importance in favourable condition' for the specific objective "to protect and enhance the natural environment (species and habitats) whilst contributing to the achievement of BAP habitats" is considered to be a bit of an odd target with regard to Sites of Special Scientific Interest (SSSI) condition as this target is more dependant upon the actions of the management of the SSSI rather than the LDF.	Noted. Account will be taken of the suggested indicators when monitoring this objective. Due to the large number of suggested indicators, however, it is not intended to include them all in the SA Scoping Report.
English Nature	 English Nature suggests the following indicators that could be added: The number of developments that enhance wildlife habitats found on brown field sites. The number of mineral extraction site restoration plans which promote biodiversity gain/contribute towards biodiversity action plan targets. The area (ha) of newly created accessible urban green space. The area (ha) of existing urban greenspace for which management is implemented to enhance wildlife. The number of protected species populations identified. Number of mitigation projects necessary. Degree of alteration for protected species habitats. The number of LBAP species and habitats. The number of habitats enhancement projects taken forward. The number of geological interest features enhanced/ protected. The number of historic landscape enhancement/protection projects implemented. 	Noted. Account will be taken of the suggested indicators when monitoring this objective. Due to the large number of suggested indicators, however, it is not intended to include them all in the SA Scoping Report.

Scoping Stage Consultation Responses		
Consultee	Comments	Response to Proposed Change
English Nature	 With regard to Appendix H: Compatibility Index, English Nature encourages planners and developers to maximise the opportunities for biodiversity in the planning and design of sustainable communities. If this is done at a very early stage then the environment should not only be protected, but also enhanced. English Nature recommends that provision should be made of at least two hectares of accessible natural greenspace per 1000 population according to a system of tiers into which sites of different sizes fit: No person should live more than 300 metres from their nearest area of natural greenspace; There should be at least one accessible 20ha site within 2Km from home; There should be one accessible 100 ha site within 10 km. This data is taken from "Providing accessible natural greenspace in towns and cities – A Practical guide to assessing the resources and implementing local standards for provisions" published by English Nature. 	Noted. This will be achieved through policies in the various DPDs.
	• In general the Countryside Agency considers that the Scoping Report is very comprehensive in the range of issues that it covers and is logical in its approach. Furthermore the interests that the Countryside Agency is concerned with are, for the most part, dealt with in sufficient details. The Countryside Agency does, however, have a number of the comments on the following aspects for the report:	Noted.
The Countryside Agency	 In chapter 5, Social, Economic and Environmental Baseline, Section 5.4 deals with Tourism and Recreation and lists the reference to Countryside Agency references, either to the Agency's website of to the specific documents relating to countryside recreation or tourism. In particular the Countryside Agency draw attention to "The Countryside in and Around Tours", a joint vision between the Agency and Groundwork which provides a vision for connecting town and country, and "Planning Sustainable Communities". This document is a green infrastructure guide, developed on behalf of the Milton Keynes and South Midlands Environment and Quality of Life Sub Group, specifically for Milton Keynes and the South Midlands but would be of relevance to the East Midlands region as a whole. In addition there were a number of other documents of the different aspects involved in countryside recreation on the Countryside Agency website. 	Disagree. The SA Scoping Report can only consider a limited number of plans and programmes. Whilst these documents will provide useful guidance in preparing future DPDs, they are not a priority for review as part of the SA Scoping Report.

Scoping Stage Consultation Responses		
Consultee	Comments	Response to Proposed Change
The Countryside Agency	 In chapter 5, Section 5.9 Landscape and Visual Amenity, the topic of landscape character is well covered. The Countryside Agency would, however, suggest that where the topic of open space within urban areas is discussed that the concept of "Green Infrastructure" is mentioned. Green Infrastructure is network of multi-functional greenspace that contributes to the high quality natural and built environment required for existing and new sustainable communities in the future. The key sustainability issues should therefore be "to protect and enhance existing areas of urban open space and link together to establish a green infrastructure". 	Disagree. The suggested key sustainability issue is an objective rather than an issue.
	• The specific SA objectives for Hinckley and Bosworth set out in Section 6.3 include many of the particular interests of the Countryside Agency, including conservation and enhancement of the rural landscape, diversification of agriculture, promotion of sustainable design and construction and improving access to services in rural areas. There is, however, no mention of countryside recreation and would suggest that this is mentioned in conjunction with the objective regarding the conservation of the rural landscape.	Disagree. This is adequately covered under the objective of to improve access to and participation in cultural and leisure activities and does not fit easily alongside the suggested objective.
	 Although water is included in the Analysis (p16), reference to Planning Policy Guidance (PPG) 25 has not been included in the plans and programmes review. Planning Policy Statement (PPS) 23 has also not been included in the review, which is relevant to general environment impact of the analysis. 	Disagree. The SA Scoping Report can only consider a limited number of plans and programmes. Whilst these documents will provide useful guidance in preparing future DPDs, they are not a priority for review as part of the SA Scoping Report.
	• Section 5.6.6: the reduction of land which is contaminated should be included as a key sustainability issue.	Disagree. Contaminated sites are not necessarily a key issue in the three council's administrative areas.
Environment Agency	• Section 5.7.1: the Environment Agency website has been used as a source of baseline data. The Council should have also received a CD of baseline data sets. If not, please contact Dr Sue Hornby (021 711 5849) for additional information. Further data sets may also be available.	Noted.
	• Section 5.7.5: flooding has been identified, which may be attributed to the rate at which run-off reaches the receiving watercourse. An increase in hard surfaced area as a result of new development will have the potential to increase flood risk. Surface water may require attenuation, either as part of a comprehensive strategy for a major development or on a site-by-site basis, assuming that underlying ground conditions will make the use of soakaways unsuitable.	Noted. This has been included in the SA.

Scoping Stage Consultation Responses		
Consultee	Comments	Response to Proposed Change
Environment Agency	• Flooding is not solely restricted to the floodplain and the Key Sustainability Issues listed in Table 5.2 should include the management of surface water. The Implications of Sustainability Issue 'Future flooding risk associated with climate change' could be expanded to 'Future development in the floodplain and increased surface water run-off could increase flood risk to properties.' The LDF should restrict development in the floodplain and ensure the sustainable management of surface water.	Agree. Key sustainability issues will be amended to include management of surface water.
University of Leicester	• There is an apparent conflict in Paragraph 5.12.2 which indicates that there are four Air Quality Management Areas (AQMAs) which require particular attention. I would draw your attention to the Central Leicestershire Provisional Local Transport Plan (LTP) published in July which states that there is no longer justification for any AQMAs in the Borough.	Disagree. There are 4 AQMAs in place in the Borough which are regularly monitored. They will be reviewed during 2006.
Leicestershire County Council	 From an Educational perspective the only comment Leicestershire County Council would wish to make is the importance of District Councils and Boroughs supporting schools in their areas in achieving Eco Schools status. Generally speaking in Leicestershire Eco Schools are a particular strength and according to the Eco Schools website 48% of Eco Schools in the East Midlands are in Leicestershire. There are, however, significant variations between District and Boroughs, The key sustainability issues (Implications for the LDF) and SA objectives should reflect the Strategic objectives of Leicestershire, Leicester and Rutland Structure Plan. 	Noted. This has been included in the baseline.
	 It should be noted that the Leicestershire Provisional LTP 2006-2011 has now been submitted and has been published. There are now two overlapping provisional LTPs covering Oadby and Wigston. The Borough Council is required to have regard to the LTPs when producing its LDF. Reference should also be made to Leicestershire County Council's "Highways, Transportation and Development" (HTD) documents, which have been prepared with sustainability in mind. 	Agree. It is considered that this is the case. Disagree. The SA scoping report can only consider a limited number of plans and programmes. Whilst these documents will provide useful guidance in preparing future DPDs, it is not a priority for review as part of the SA Scoping Report.
	• Para 2.1 It is not strictly accurate to say that Hinckley and Bosworth is bounded by M1 and M69.	Noted.
	• Para 4.1 County Level bullet 5: Leicestershire County Council suggests that the reference to the Walking and Cycling Strategy should not be made as this has largely been taken over by the Provisional Local Transport Plan 2006-2011.	Agree. Delete reference to this strategy.

Scoping Stage Consultation Responses		
Consultee	Comments	Response to Proposed Change
	 Para 4.2 Access and Transport third bullet should include bridleways since these are also used by walkers and cyclists 	Agree. The bullet point will be amended.
	• 6 th bullet – do this mean travel plans?	Agree. The bullet point will be amended.
	• Para 4.2 Air and Climate, bullet 4. The air quality impacts of traffic generated by new development may be covered to an extent by the preceding bullets. However, it would be useful to have clarity as to whether or not the 4 th bullet includes the air quality impacts of newly generated traffic, since this is only one which specifically discourages development that would adversely affect pollution areas.	Disagree. It is felt that the current wording sufficiently explains the issue, in a clear and concise manner.
	 Para 5.4.4 Encouraging tourism can generate traffic. Is this a key sustainability issue? 	Agree. <u>Proposed Change</u> Reference made to this in Sustainability Report.
	• Para 5.5.2. It is not strictly accurate to say that Hinckley and Bosworth is bounded by the M1 and M69.	Noted.
Leicestershire County Council	 The Secretaries of State are minded to confirm the CPO and Side Order for the Earl Shilton Bypass subject to success in bidding for funding. The bypass already has planning permission. 	Agree. <u>Proposed Change</u> Reference made to this in Sustainability Report.
	 Access from M69 motorway junction is mentioned as an issue, but without saying which junction. The south facing slip roads were originally omitted from junction 2 because they would draw traffic through Sapcote and Stoney Stanton unless bypasses were built. 	Agree. <u>Proposed_Change</u> Text amended to clarify which junction of the M69 is the main issue.
	 5.5.4: there is no reference to Park and Ride. There is an existing facility (LERTS) serving A47 near Braunstone Crossroads. The County and City Councils are looking to provide a further new park and ride facility, though possibly in the vicinity of Junction 21. 	These park and ride facilities are located outside Hinckley and Bosworth, but affect travel patterns for people living within the borough. <u>Proposed Change</u> Reference made to this in the Sustainability Report.
	• 4.2 (bullet point 6): uncertain whether this refers to travel plans.	Noted. Needs clarification. <u>Proposed Change</u> Amend bullet point 6 to read travel plan.

Scoping Stage Consultation Responses		
Consultee	Comments	Response to Proposed Change
Leicestershire County Council	 5.5.3: Although transport links may be excellent at off-peak times, congestion at peak times may be an issue on some routes. 	Agree. <u>Proposed Change</u> Amend 5.5.6 to identify congestion on major routes at Peak times as a key sustainability issue.
Sport England	 Section 4 Links to Relevant Plans and Programmes Reference should be made to Change 4 Sport, the regional plan for sport in the East Midlands. It can be found on the Sport England website at <u>www.sportengland.org</u>. 	Disagree. The SA Scoping Report can only consider a limited number of plans and programmes. Whilst these documents will provide useful guidance in preparing future DPDs, they are not a priority for review as part of the SA Scoping Report.
	 Another key issue is the need to maintain and enhance access to existing and new sports facilities. A proposed CPA target is the % of population within 20 minutes travel time (urban areas by walk; rural areas by car) of a range of three different sports facility (playing fields/ swimming pools/sports hall/ golf courses/ health and fitness/ synthetic turf pitches) of which one has achieved a quality assured standard. 	Disagree. The suggested key sustainability issue is an indicator rather than an issue. SA Objective 2 set out in Appendix F addresses this issue.
	• Active Places Power is a website designed to help organisations involved with sports facility investment and strategy. The website is free to use and provides a planning tool for sports, leisure and fitness facilities	Noted.
English Heritage	 Generally, while the report covers the baseline, sustainability issues and objectives, it is not explicit in the report how the appraisal of the Development Plan Documents will actually be undertaken (paragraph 3.5). As well as looking at the mitigation of impacts, the appraisal process should look at the opportunities for enhancement. English Heritage recommends that the Conservation Officer should be involved in the appraisal process. 	Amend report state that: The report aims to provide a broad scope of issues to be addressed in future DPDs and SPDs. Broad options for consideration have been identified in the report and these will be refined as DPDs are progressed. Scoping Report relates to the Core Strategy, Housing DPD and Employment DPD. Comment relates to a later stage in the SA process.
	 Paragraph 4.1 Regional Level. The Regional Environment Strategy should be added to the list. Also, 'Viewpoints on the Historic Environment' provides an overview of the region's historic environment. English Heritage also publishes an annual 'Heritage Counts' document, which looks at different aspects of the state of the historic environment, including data. An East Midlands 'Heritage Counts' is published as well as a national version. 	Disagree. The SA Scoping Report can only consider a limited number of plans and programmes. Whilst these documents will provide useful guidance in preparing future DPDs, they are not a priority for review as part of the SA Scoping Report.

Scoping Stage Consultation Responses		
Consultee	Comments	Response to Proposed Change
	 Page 14 Buildings and the Built Environment. There is no reference here to conserving or enhancing townscape and the quality of the public realm or local distinctiveness, although I note that objective 8 in Appendix G relates to local distinctiveness. 	The SA Scoping Report refers to key sustainability issues identified in collecting the baseline data. Whilst the two suggestions were not considered key following this research it is acknowledged that they are important through references in the sustainability objectives.
	 Page 16 The Historic Environment. With reference to the 4th bullet point on the re-use of buildings, PPG15 makes it clear that in the case of changes of use of listed buildings 'The aim should be to identify the optimum viable use that is compatible with the fabric, interior and setting of the historic building. This may not be the most profitable use if this would entail more destructive alterations than other viable uses.' This section should also refer to the issue of 'setting'. This could be added to the second bullet point. 	Agree. Amend to include word 'optimum' instead of 'suitable'. Add last sentence of suggestion to clarify what optimum use means. Disagree. The current wording would cover the issue of 'setting'.
English Heritage	 Page 28, 5.9.2 Landscape Character Leicestershire County Council is to undertake a Historic Landscape Characterisation of the County, which will provide a time depth to landscape character assessments in the County. The County Council should in any case advise you on the location of areas of historic landscape, which can inform the process of landscape change, such as in the National Forest. 	Noted.
	 Page 29, 5.10.5: There should be reference to 'setting', i.e. 'The need to preserve and enhance sites of archaeological and cultural heritage interest and their setting'. 	Agreed. <u>Proposed Change</u> Amend 1 st bullet point to include reference to the setting of sites of archaeological and cultural heritage.
	 Appendix G objectives, targets and indicators: Objective 9 – This should address 'the character, appearance and setting of archaeological sites' There is a need to distinguish between the registers of Buildings at Risk (BAR) (the national register for Grade I and II* buildings is published annually by English Heritage) and the number of listed buildings that might be at risk, either directly and indirectly (e.g impact on setting) as a result of development proposals or policies in the DPD. The SEA should address the latter, unless the policy or proposal specifically provides for the conservation of BAR on the register. Similarly, while a pilot East Midlands Scheduled Monuments at Risk Survey has been undertaken by English Heritage, the indicator should measure the number of SAMs that might be affected by the DPD. 	Noted. The report aims to provide the broad scope of the issues to be addressed in future DPDs and SPDs. The suggested indicator applies to individual DPDs and this will be taken into account as appropriate for each individual DPD.

Scoping Stage Consultation Responses		
Consultee	Comments	Response to Proposed Change
English Heritage	You may be aware of the new Best Value Performance Indicator relating to Conservation Area Appraisals, which could be used as an indicator here.	Noted. The suggested indicator will be born in mind as a local indicator for our monitoring report.
	English Heritage has just published new guidance on Conservation Area Appraisals that can be viewed on <u>www.helm.org.uk</u>	Noted.
	• Section 4: This section should include reference to the National Forest Strategy, particularly as PPS7 states that local planning authorities should have regard to the National Forest when developing LDDs. At a local level the National Forest BAP also covers the area of the Borough in the National Forest.	Disagree. The SA Scoping Report can only consider a limited number of plans and programmes. Whilst these documents will provide useful guidance in preparing future DPDs, it is not a priority for review as part of the SA Scoping Report. These documents were used in determining the baseline.
	Biodiversity and Nature Conservation: NFC supports the references to the National Forest. Bullet points five and six may, however, be better placed in the Buildings and Built Environment Section, as they relate to woodland planting and landscaping associated with new development.	Noted.
National Forest	 Leisure, Recreation, Community and Tourism: The part that the National Forest is playing in relation to all these activities should be included, in particular, the creation of new woodlands with public access close to where people live. (See specialist chapters in the National Strategy 2004 – 14). 	Agreed. <u>Proposed_Change</u> Reference to this in the Sustainability Report.
	 Section 5.2.3 – Rural Economy: The reference to agricultural diversification should be broadened to refer to rural diversification; and include reference to the opportunities for woodland, conservation and leisure related diversification (as well as tourism) in The National Forest. 	Agree. <u>Proposed Change</u> Sustainability Report to include reference to broader definition of rural diversification to take into account woodland related diversification.
	 Section 5.3.4 – Health: Promoting healthy walking initiatives should be included, particularly in The National Forest where many new woodlands provide new recreational access for local people and visitors. 	Disagree. Healthy walking initiatives comes within the banner of increasing physical activity. The purpose of the section is to provide a broad overview of issues, and the suggestion is considered too specific for this section.

Scoping Stage Consultation Responses		
Consultee	Comments	Response to Proposed Change
	 Section 5.4.3/4 – Leisure and Recreation: The NFC supports the references to The National Forest. The potential for tourism and recreation is significant, but it should also be noted that an increasing number of new woodlands with public access are available now 	Agree. <u>Proposed Change</u> Sustainability Report to include increasing number of new woodlands with public access being available.
	 Section 5.5.6 – Traffic and Transport: Another key sustainability issue is the poor availability of public transport to rural recreation attractions. 	Agree. <u>Proposed Change</u> Sustainability Report includes amended key issue referencing public transport to rural visitor attractions.
National Forest	 Section 5.6.3 - Geological Environment: The NFC supports the references to The National Forest in relation to derelict land reclamation. The reference to after use for Nailstone Colliery should refer to Forest-related uses (this includes potential for woodland, conservation, recreation and sports). 	Agree. <u>Proposed Change</u> Sustainability Report includes amend ed paragraph to include the word 'related' so that woodland, conservation, recreation and sports can be included.
	Section 5.8.1 - Biodiversity and Nature Conservation: Reference should also be made to the National Forest BAP.	Disagree. The SA Scoping Report can only consider a limited number of plans and programmes.
	• Section 5.8.3 - Biodiversity and Nature Conservation: The reference to the National Forest should include "creation of woodland and other wildlife habitats; and the word designation" should be deleted (to avoid any confusion – as the Forest area is not statutorily designated).	Agree. <u>Proposed Change</u> Sustainability Report to include "creation of woodland and other wildlife habitats; and the word 'designation' should be deleted.
	Section 5.9 - Landscape and Visual Amenity: The NFC supports the references to The National Forest and the Forest Strategy in relation to landscape and visual amenity.	Noted.
	• Section 5.12 - Air and Climate: The relatively small, but significant role of The National Forest in helping to improve local air quality should be mentioned – in relation to tree planting 'soaking up' Carbon Dioxide and particulates in the atmosphere.	Agree. Amend report to include references to role of National Forest in terms of air quality and climate change.

Scoping Stage Consultation Responses		
Consultee	Comments	Response to Proposed Change
National Forest	 Table 5.2 – Key Sustainability Issues: "The need to maintain and enhance the setting of the The National Forest" – the NFC see the potential influence of the LDF as 'major' in relation to this. 	Disagree. The National Forest covers a relatively small portion of the borough and the so this affects the potential influence of the LDF. A moderate influence is considered appropriate.
	 The NFC think that the LDF has a 'major' influence in maintaining the rural economy and opportunities for diversification" – by establishing a supportive policy framework. 	The maintenance of the rural economy and opportunities for diversification is likely to be affected by other policies and sources of funding beyond the remit of the LDF. A moderate influence is considered appropriate.
	 Table 6.1 - SA Objectives: "Improving access to and participation in cultural and leisure activities" – this will also have an economic impact, as more people visit paid attractions. 	Noted. It is acknowledged that for many objectives there would be social, environmental and economic dimensions. In this instance the social and economic dimensions are not apparent enough to warrant inclusion in the table.
	• Table 6.1 - SA Objectives: "Conserve and enhance woodland cover, particularly in The National Forest" – the social and economic boxes should be ticked, as new woodlands are creating new recreation opportunities for local people and visitors and woodland management and creation are both adding to the development of the wood land economy in the area.	Noted. It is acknowledged that for many objectives there would be social, environmental and economic dimensions. In this instance the social and economic dimensions are not apparent enough to warrant inclusion in the table.
	 Table 6.1 – SA Objectives: "Protecting and improving the natural environment" – also has social dimensions (improving quality of life) and economic (through local employment creation). 	Noted. It is acknowledged that for many objectives there would be social, environmental and economic dimensions. In this instance the social and economic dimensions are not apparent enough to warrant inclusion in the table
	Figure 4 should include new woodlands with public access in the National Forest.	Noted.
	Figure 11 should include the boundary of the National Forest.	Noted.

Scoping Stage Consultation Responses		
Consultee	Comments	Response to Proposed Change
	 Appendix D - Plans and Programmes: PPS7 – As the National Forest is specifically mentioned in PPS7 this review should highlight this as relevant to the LDF. 	Disagree. This is referred to within the report.
	 National Forest BAP and National Forest Strategy – the NFC is pleased to see these documents included. In terms of the relationship of the Forest Strategy to the LDF this should highlight the opportunities to improve sustainable transport and to enhance biodiversity. 	Noted.
National Forest	• Appendix 9 – Targets and Indicators: The indicator of <u>number</u> of Black Poplar trees would be better expressed as planting <u>sites</u> . Numbers of trees are not likely to be large, but it more important that they are planted in appropriate locations.	Agree. <u>Proposed_Change</u> Targets and Indicators amended with this in mind.
	 A useful indicator would be to measure the number of successful new farm diversification schemes. 	Agree. <u>Proposed_Change</u> Targets and Indicators amended with this in mind.
GVA Grimley (on behalf of Jelson Homes)	• GVA Grimley has viewed the above document and is supportive of the general approach to the SA set out within the document. GVA Grimley would like to take this opportunity to register continued interest in the LDF and request that they continue to be notified of any further consultations with regard to the above.	Noted.

Issues and Options Stage Consultation Responses		
Consultee	Comments	Response
English Nature Anna Collins	 English Nature is satisfied that the SA / SEA appropriately assess the impacts of most of the key issue options against objective 7. Issue Paper 6, Question 10: English nature notes that encouragement of living over shops may reduce the pressure to develop brownfield and greenfield sites which may have biodiversity value. 	Noted.
Environment Agency David Marsh	No comments.	
English Heritage Ann Plackett	No comments.	
Countryside Agency Karen Davenport	No comments.	

Preferred Options Stage (2007) Consultation Responses		
Consultee	Comments	Response
	 Appendix D, pg D8, Consultation responses: Please note that 'Heritage Counts' was recommended as a data resource and not a 'plan and programme'. 	Noted. The Baseline Spreadsheet (Appendix C) has been updated to reflect the 2007 Heritage Counts Report for the East Midlands.
	• 5.3.7 pg 41, Registered Battlefields: There is a factual error at the end of this section; Bosworth Battlefield is not included on English Heritage's register of historic parks and gardens.	Noted. This has been amended.
	 Appendix H, pg H2, Targets and indicators: SA Objective 10 - There seems to be an error in the third indicator as this refers to 'historic' landscape enhancement/ protection projects and then quotes English Nature as the indicator source. It would seem to be better just to refer to 'landscape enhancement/ protection projects' which could include different types of project. 	Noted. This has been amended.
English Heritage	While the SA provides a broad brush overview of the environmental implications of the options as assessed against the SA objectives, the assessment and the mitigation measures are very generalised and could mostly apply to any location. Clearly, the list of mitigation measures (pages 63 to 65) provides a useful checklist. In the case of the historic environment, the assessment and mitigation measures add little to what is already part of government advice in PPGs 15 and 16. We do not agree with the statement in paragraph 6.5, page 54 that 'the SA of the options was a tool for informing decision-making by HBBC' and as such the role of the SA was to highlight sustainability implications rather than recommending appropriate options for implementation.' The purpose of SEA should be to identify potential adverse impacts and only propose mitigation measures where adverse impacts cannot be avoided. This should surely include some statement of which option is least damaging to the environment. Also, it needs to inform others, including the environment and why.	Noted. The SA has appraised all options considered in the development of the Core Strategy. The implications of the different options are detailed in the appraisal matrices in the appendices of the SA. A summary of the SA implications of all options considered is provided in the Directions for Growth document and in the Core Strategy itself. Providing more of a summary of the SA implications for all options considered in the non-technical summary of the SA will be investigated for other SAs.
Environment Agency	No comments.	
Natural England	No comments.	

Preferred Options Stage (2007) Consultation Responses		
Consultee	Comments	Response
Countryside Agency	No comments.	
Leicestershire And Rutland Wildlife Trust	 Page 100 (appendix C17) of the revised Sustainability Appraisal lists the baseline evidence that has been used in preparing the SA. The content of this table underlines the main problem that we find with Hinckley and Bosworth's LDF process: the lack of evidence on biodiversity, and a inconsistency in the use of what evidence is available. We feel that the SA should acknowledge this gap in data. There are many question marks (meaning 'Data not currently available / data trend unknown / no target set') in the table against species information. The table does not refer to Wildlife Sites/Sites of Importance for Nature Conservation, or to local BAP priority habitats. The criteria for selecting Wildlife Sites reflect local BAP priorities. The state of a comprehensive suite of these sites is therefore the most important local indicator of biodiversity trends. Wildlife Sites/SINCs and the LBAP are rightly referred to in 3.26 of the Core Strategy, yet the SA does not refer to them. Although the 'Directions for Growth' appraisal of options relies heavily on the old 'County/District/Parish' sites for biodiversity information, these sites are not referred to in the SA. One of the SA Objectives (7) is to 'Protect and enhance the natural environment (species and habitats) whilst contributing to the achievement of Biodiversity Action Plan targets.' The evidence base should therefore identify BAP habitats and opportunities for creation/restoration of such within the Borough. 	 Noted. The Sustainability Appraisal uses the most up to date evidence available. Local wildlife sites have been referred to in the baseline section of the Sustainability Appraisal (Section 5.3.3 of the SA Report) and were considered in the detailed Options Appraisal Matrices (Appendix E). The Sustainability Appraisal also refers to the BAP and the fact that Hinckley and Bosworth are undertaking a Habitat Survey which will identify the habitats listed under the Leicester, Leicestershire and Rutland BAP that are of most relevance to the Borough. Effects upon local wildlife sites associated with the Proposed Submission Core Strategy have considered in more detail in the appraisal of the Core Strategy Policies (Appendix G). Opportunities for creation/restoration of BAP Habitats have been identified as a key recommendation of the SA.
Nailstone Parish Council	 The Core Strategy SA 'BAP identifies the following species which may be present in the Hinckley and Bosworth area- Mammals- Barn Owl'- clearly a mistake. 	Noted. This has been amended.