

**Sustainability Appraisal Scoping Report for Core Strategy, Loughborough Science Park and Allocations Development Plan Documents**  
**Summary of Responses**

	<b>General Comments</b>	
<b>RN188 English Heritage</b>	<p>English Heritage promotes a wide definition of the historic environment which includes not only those areas and buildings with statutory protection but also those which are locally valued and important. The historic environment is more than a cultural asset; it is an important driver for economic regeneration and for building social cohesion. The overall aim of the appraisal process should be to seek to avoid or minimise any adverse effects and to maximise potential benefits for the historic environment and to ensure that appropriate mitigation and enhancement is identified for delivery at the implementation stage. As a general comment, Strategic Environmental Assessment should be a more rigorous process than previous Sustainability Appraisals.</p> <p>We welcome the involvement of your Conservation and Design Team in the development of the Scoping Report.</p>	Noted.
<b>RN234 Highways Agency</b>	<p>At this stage general transport issues are identified but not in any specific manner. The full Sustainability Appraisal will take account of the various schemes put forward in the Core Strategy, Loughborough Science Park and Allocations DPDs and at that stage more detailed comments can be made.</p>	Noted.
<b>RN246 Leicestershire</b>	<p>Amend your records so future LDF consultation documents are sent directly to Andrew Simmonds in the Chief</p>	Noted.

<b>County Council</b>	Executives Policy Team. The Policy Team is responsible for coordinating comments from all departments within the County Council.	
<b>RN375 Government Office for the East Midlands</b>	Desirable to ensure that the SA work can be related to each DPD to be prepared. This can be done by preparing one Scoping Report and SA Report, but ensuring that there are separate sections for each DPD. In this connection I would refer you to the Interim Advice Note on FAQs on SA that is on the ODPM website.	Separate Sustainability Appraisal Reports will be published for each Development Plan Document (DPD). However, it is considered that the issues and objectives underlying the Core Strategy DPD will also underlie the Science Park DPDs and so a separate Scoping Report is not appropriate. However, for Stage A3, the Sustainability Issues will be indicated for each DPD. As there is a delay in producing the Allocations DPD, a separate Scoping Report will be prepared for this DPD.
<b>RN377 Leicester City Council</b>	The report is concise and clearly sets out the process to be undertaken and the issues to be appraised.	Noted.
<b>RN388 The Countryside Agency</b>	In general LAR considers that the Scoping Report is very comprehensive in the range of issues it covers and is logical in its approach.	Noted.
<b>RN 414 Mountsorrel Parish Council</b>	Liaise with Central Trains Ltd., to get the platforms extended at Loughborough Railway Station to allow Midland Mainline trains to access platforms for all carriages to ensure passenger safety.	This comment is not specifically relevant to the Scoping Report. However, this issue was also raised through a recent consultation on the Eastern Gateway project concerning the land off Burder Street and the railway station. It was agreed that the Council, in parallel with work on the Eastern Gateway scheme, pursue with the relevant railway authorities the potential for improvements to the station itself and its facilities.
<b>RN213 Birstall Parish Council</b>	No comments. However, wish to comment on the high level of information obtained, the useful and comprehensive nature of the report.	Noted.
	<b>AI Identifying Other Relevant Plans and</b>	

	<b>Programmes</b>	
<b>RN246 Leicestershire County Council</b>	<p>Any reference to the Leicestershire, Leicester and Rutland Structure Plan should refer to it as 'adopted'.</p> <p>3.3.2 Suggest 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. The LTP2 will be available shortly on the Leicestershire County Council website so reference should be made to this rather than the previous LTP.</p> <p>There are very useful references in Highways Transportation and Development (HTD) regarding sustainable developments. This is adopted County Council Policy based upon the Structure Plan and the Local Transport Plan. This is also available on the Web site.</p> <p>3.3.7 Second paragraph should read Green Wedges are a <i>strategic tool, set out in the Structure Plan</i>, to protect.....</p> <p>No mention of the National Forest under the section Open Space and Recreation.</p>	<p><b>Amend references to the Structure Plan to refer to it as being adopted.</b></p> <p><b>Delete reference to the Walking and Cycling Strategy and make reference to the Local Transport Plan.</b></p> <p>Noted.</p> <p><b>The report will be amended to refer to Green Wedges as a strategic tool.</b></p> <p><b>The report will be amended to refer to the National Forest.</b></p>
<b>RN375 Government Office for the East Midlands</b>	<p>The review of plans and programmes in the Appendix should be updated to reflect the publication of PPS6 and PPS10 and RSS8.</p>	<p><b>The review of plans and programmes in Appendix 2 and the report will be updated to reflect the publication of PPS6, PPS9, PPS10 and RSS8.</b></p>
<b>RN 188 English Heritage</b>	<p>Paragraph 3.3.4 page 9 and Appendix 2, pages 28 – 30 – Replace references to RPG8 by RSS8 published in March 2005. Relevant policies for the historic environment are Policy 27 Protecting and Enhancing the Region's Natural and Cultural Assets, which sets out the principles for their</p>	<p><b>The review of plans and programmes in Appendix 2 and the report will be updated to reflect the publication of RSS8.</b></p>

	<p>protection and Policy 31 Regional Priorities for the Historic Environment, which stresses the importance of understanding the historic environment to inform the process of change. Paragraph 4.3.18 recommends an approach to be adopted for development plans and other strategies.</p> <p>Paragraph 3.3.5 page 10 - The quality of the built environment is also influenced by the built heritage and how change is managed, as well as the design of new development. New development should take account of its context.</p> <p>Appendix 2 page 39 - A new East Midlands English Heritage Regional Plan is to be published October2005.</p>	<p><b>Add reference to development taking account of its context including built heritage.</b></p> <p>The East Midlands English Heritage Regional Plan will be taken into account in the preparation of relevant LDF documents when it is published.</p>
<p><b>RN388 Countryside Agency</b></p>	<p>Whilst the issue rural transport and access to the countryside is covered in the section on transport and accessibility (paragraph 3.3.2) there is no mention of LAR’s interests in this issue either here or in Appendix 2, or of the relevant documents available for example “Transport for Tomorrow’s Countryside.”</p> <p>Paragraph 3.3.4 Environment - Charnwood Forest area is mentioned but there is no mention of the importance of Landscape Character Assessment. Furthermore in Appendix 2, which lists the references to the various documents assessed as part of the appraisal process, there is no direct reference to Landscape Character Assessment. Whilst PPS7 is quoted with reference to the rural economy the section on landscape issues, at paragraph 24, is not</p>	<p>The Scoping Report concentrates on the core policy documents at the national, regional and local levels. It is recognised, however, that other relevant documents exist to guide detailed policy development and their sustainability appraisal.</p> <p><b>Add specific reference to Landscape Character Assessments. Add reference to paragraphs 25 and 25 of PPS7 in Appendix 2.</b></p>

	<p>covered. We do however welcome the reference to landscape character in relation to the Leicester, Leicestershire and Rutland Landscape and Woodland Strategy at paragraph 3.9.10. While this is not a full landscape character assessment it does highlight specific landscape issues for different character areas.</p> <p>LAR recommends the scoping report also makes reference to the relevant Countryside Agency documents on the subject of landscape character, including “Landscape Character Assessment – Guidance for England and Scotland” (Countryside Agency and Scottish natural Heritage 2002) which can be viewed along with relevant topic papers on the Countryside Agency’s website <a href="http://www.countryside.gov.uk">www.countryside.gov.uk</a></p>	<p>The Scoping Report concentrates on the core policy documents at the national, regional and local levels. It is recognised, however, that other relevant documents exist to guide detailed policy development and their sustainability appraisal.</p>
	<p><b>A2 Collecting Baseline Information</b></p>	
<p><b>RNI88 English Heritage</b></p>	<p>Paragraphs 3.7 page 17 and 5.2 page 43 - Reference is made here to the principles set out in the UK Sustainable Development Strategy of 1999. This needs to be updated in the light of the publication of the revised strategy ‘Securing the Future’ earlier this year.</p> <p>Paragraph 3.9.4 page 22 - Although they are referred to in Appendix I and shown on Map 7, registered parks and gardens should be specifically highlighted as a national designation. Ridge and furrow is referred to in Appendix I, page 79; the document ‘Turning the Plough’ (EH/Northamptonshire County Council 2001) and website gazetteer is a source of information on Medieval field systems in various counties including Leicestershire. English Heritage also holds data on the East Midlands Scheduled</p>	<p><b>Amend the report to update to references to ‘Securing the Future’, the revised UK sustainable development strategy.</b></p> <p><b>Add reference to registered historic park and garden designations.</b></p> <p>Note data sources for ridge and furrow, medieval field systems and scheduled monuments at risk.</p>

	Monuments at Risk Survey (leaflet attached).	
<b>RN195 Environment Agency</b>	<p>Paragraph 3.9.7 Water - identifies flooding, water quality and groundwater and water resources as three sub-components. The Flooding section identifies fluvial flood risk and the groundwater section identifies the low permeability of strata. As a consequence of low permeability, surface water is less likely to soakaway and developments that will increase rates of run-off are likely to need to be balanced prior to discharge to the existing land drainage system or a surface water sewer. Reference should be made to this alternative source of flood risk in the Flooding sub-component.</p> <p>Appendix I, Page 69 SEA/SA Topic: Water - refers to data source for flooding being derived from "GIS Indicative Flood Plain Mapping 1994". The Environment Agency has issued Flood Zone Maps to replace Indicative Flood Plain maps and represent the best information held by the Agency. For further information, including details of properties at risk of flooding in the Borough please contact Hannah Morgan (Morgah@environment-agency.gov.uk).</p>	<p><b>Add reference to measures to balancing increased run-off due to low permeability of strata.</b></p> <p>The Scoping Report does make use of the Environment Agency's flood zone maps. The reference to the 1994 data is incorrect. <b>Amend Scoping Report to correct source reference for flood zone mapping.</b></p>
<b>RN388 Countryside Agency</b>	LAR considers that the baseline adequately covers the current situation within the Borough of Charnwood.	Noted.
<b>RN415 Dave Puxley Economic Regeneration</b>	3.6. Baseline data (and sources of data generally) - suggest that you also include the Leicester Shire Online Research Atlas (LSORA) ( <a href="http://www.lsora.org">www.lsora.org</a> ) along with ONS. This will (and does) contain local data that is not available from ONS. Should include in Appendix I	The data sources and further information column in Appendix I indicates the source of the data set out in that appendix. The Leicester Shire Online Research Atlas will be considered as a source of data in future.

3.9.3. Social considerations - suggest that list should include "Cohesion and sense of identity of population". This is distinct from the other factors listed. Things like a sense of identity can be markedly affected by the way an area is designed.

Under Characteristics of the population, I suggest that ethnicity / diversity should be mentioned

Under Social Exclusion it might also point out that social exclusion needs to be (and now is) measured at a sub-ward level (SOA level) and the the social mix / spread of deprivation in an area is important. Charnwood has a greater spread of deprivation than and other District in Leicestershire. (Source: Indices of Deprivation 2004 : Key Findings in Leics. (January 2005; Leics County Council)

P. 30 Almost 10% of 16-74 year olds in Charnwood engage in full time education compared to 5% nationally. Suggest that this is very misleading as skewed by University student population. % of 16-17 year olds is same as national average.

This factor is not considered to be a baseline characteristic but a sustainability objective or sub-objective that should be considered throughout the preparation of the Local Development Framework.

**Amend report to replace sustainability objective sub-objective 'to improve relations between communities of different ethnic backgrounds' to 'to increase racial equality and community cohesion'.**

**Add reference to the ethnicity/diversity under 'characteristics of the population' through links to paragraph 3.9.11 under the heading demographics.**

It is noted that the measurement of deprivation is at sub-ward level. The report makes reference to the spread of deprivation in Charnwood in terms of its reference to Loughborough, Shepshed, the Soar Valley villages and South Charnwood as set out in the Renewal Framework for Charnwood. **Add reference to the fact that, in Leicestershire, Charnwood one of the highest levels of deprivation in the County outside Leicester.**

The previous paragraph makes it clear that the presence of Loughborough University is a core reason for high skill levels in the Borough.

A participation level of 80% in Charnwood is considered to be slightly higher than a participation level of 78% in England and Wales.

P. 30 Employment Structure - Very high concentration of employment in distribution, public admin, education and health??? Don't think so - less than County and national averages!! Manufacturing is the only sector that is significantly above average

Last paragraph. You MAY be right that "a significant proportion of employment opportunities for the Borough's workforce are provided locally. However if you live in South Charnwood (or even Loughborough) and commute to Leicester, it is less than 20KM. Similarly commuting to Nottingham or Derby from Loughborough is probably just less than 20KM. We've tried to get hold of place of work data but without success so far. I think we need a caveat that the proximity of Leicester, Nottingham and Derby may mean that a significant number of Charnwood residents are commuting to the three cities rather than working in Charnwood.

Business Base - again point is wrong about the balance. We are lower than average in these sectors and importantly the financial one.

Next paragraph is quite wrong and we really do want this changed. Between 2000-1 and 2002-3 there was ZERO growth in Charnwood business. Charnwood is almost bottom of the league table in the East Midlands (source ODPM national LABGI, local authority business growth incentives, survey; August 2004; [www.local.odpm.gov.uk/finance/labgi.htm](http://www.local.odpm.gov.uk/finance/labgi.htm)). According to this survey Charnwood is in the lowest of seven national

Although the percentages are below the County/Leicester Shire and national averages in some cases, the distribution (22%), public administration, education & health (24%) and manufacturing (26%) together account for over 70% of employment. The next highest figure is banking, finance & insurance etc at 13%.

The data indicates the distance travelled not the location and clearly makes an inference that a significant proportion of the working age population work locally ie. Within 20km. Although, Leicester is within 20km, it is likely that only locations on the southern edges of Derby and Nottingham will be within 20km of Loughborough. Further information on commuting to work is currently being prepared by the County Council and also in relation to the Employment Land Study. These may give statistical data on the locations travelled to.

See response above on employment structure.

This paragraph describes the statistics set out on 'business base. This relates to the number of firms in Charnwood. The following paragraph describes business start-up rates and closure rates which imply poor levels of business formation in Charnwood. LABGI measures gains in rateable values for business space and indicates a very low rate for Charnwood supporting the start-up and closure rate data. **Add reference to LABGI data.**

	<p>categories in terms of business growth. Since we believe that lack of suitable good quality employment land is a factor, it is important that this data is included in this report.</p> <p>Deprivation - add that Charnwood has the highest level of deprivation in the County outside Leicester City (SOA in Hastings ward) and also the greatest spread in terms of deprivation in the County</p>	<p>See response above in relation to social exclusion. <b>Add reference to the fact that, in Leicestershire, Charnwood one of the highest levels of deprivation in the County outside Leicester.</b></p>
<b>RN416 Karl Letten Environment</b>	<p>3.9.8 CO2 emissions. Whilst there is an absence of data on greenhouse gas emissions for the borough there is available a breakdown of carbon dioxide emissions for the borough by activity sector. This is available from the National Atmospheric Emissions Inventory (NAEI) and shows the largest emissions of carbon dioxide as coming from road transport, commercial institution and residential combustion and industrial combustion.</p> <p>3.9.9 Energy. The section focuses purely on the generation of electricity from renewable sources. There is no mention of energy generation for water heating and space heating which could include solar water heating, ground source heat pumps and the use of biofuels such as wood chip and wood pellets.</p>	<p><b>Add data and reference to a breakdown of carbon dioxide emissions for the borough by activity sector.</b></p> <p><b>Add reference to energy generation for water heating and space heating which could include solar water heating, ground source heat pumps and the use of biofuels.</b></p>
	<b>Stage A.3 – Identifying Sustainability Issues</b>	
<b>RN188 English Nature</b>	<p>4.2.1 – Biodiversity, flora and fauna. English Nature agrees with all of these sustainability issues and strongly supports the opportunities for the LDF identified. Additionally English nature would recommend that:</p> <ul style="list-style-type: none"> <li>• under habitat and species loss, after the line “Compensation for features lost to development</li> </ul>	<p>Support noted.</p> <p><b>Add reference to considering higher levels of re-creation of habitats than the amount lost.</b></p> <p><b>Add an additional opportunity in relation to protecting and enhancing habitats and flora and</b></p>

	<p>where loss is completely unavoidable.” The addition of such compensation should reflect that higher levels of re-creation are needed compared to the amount of lost features.</p> <ul style="list-style-type: none"><li>• an additional Sustainability Issue should be added concerning brownfield sites. An opportunity for the LDF is : To protect and enhance habitats and flora and fauna populations that have developed on the brownfield sites.</li></ul> <p>4.2.2 – Human Health. English Nature supports the provision of an infrastructure for healthy pursuits as, if correctly designed, these can offer valuable opportunities for biodiversity.</p> <p>4.2.3 – Social considerations. With regard to the Sustainability Issue, Lack of Quality and available green space in certain locations, English Nature supports all of the opportunities for LDF identified, and very strongly supports “undertake an assessment of need and use planning obligations to address current and projected shortfalls.”</p> <p>4.2.4 – Soils. English nature supports the promotion of good soil handling process and the minimization of hazards to the environment.</p> <p>4.2.6 – Water. English Nature strongly supports the use of sustainable urban drainage systems and the retention of the riparian zone. However, we would recommend the adding retention and enhancement of the riparian zone and its habitats.</p>	<p><b>fauna populations that have developed on the brownfield sites.</b></p> <p>This section relates to water. The section on biodiversity, flora and fauna allows for such opportunities.</p>
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	<p>4.2.7 – Climatic Factors. English Nature strongly supports the opportunities for LDF to ensure:</p> <ul style="list-style-type: none"> <li>• New development schemes take account of increased flooding levels. Also it should be added that there are opportunities for biodiversity gain through flood protection/management methods.</li> <li>• Abstractions do not compromise flows in rivers.</li> </ul> <p>4.2.8 – Cultural heritage. The opportunity for the LDF to retain features of historic landscape significance is important in protecting valuable habitats, such as parkland, unimproved grassland, hedgerows, woodlands and water bodies.</p> <p>4.2.9 – Landscape. English nature agrees with all of these sustainability issues and strongly supports the opportunities for the LDF identified.</p> <p>4.2.10 – Material Assets. Under the sustainability issue “Consumption of minerals” the following opportunity for the LDF should be added: Promote habitat creation and biodiversity gain through restoration plans, in line with the Charnwood Biodiversity Action Plan.</p>	<p>This section relates to climatic factors. The section on biodiversity, flora and fauna allows for such opportunities.</p> <p>This section relates to cultural heritage. The section on biodiversity, flora and fauna allows for such opportunities.</p> <p>This section relates to material assets. The section on biodiversity, flora and fauna allows for such opportunities.</p>
<p><b>RNI88 English Heritage</b></p>	<p>Paragraph 4.2.8 pages 39 and 40 and Appendix I, page 78 - This seems to be a fairly comprehensive analysis. However, more emphasis could be given to the issue of protecting the ‘setting’ of historic assets.</p> <p>It is not clear what ‘advocate a programme of archaeological investigation prior to initial earthworks’ means. PPG16 clearly sets out the procedures for dealing with archaeological sites that may be affected by development,</p>	<p><b>Add reference to the protection of the ‘setting’ of historic assets.</b></p> <p><b>Amend report, in line with PPG16, to indicate that archaeological sites that may be affected by development, advocating a presumption in favour of the preservation of nationally important sites,</b></p>

	<p>advocating a presumption in favour of the preservation of nationally important sites, including Scheduled Monuments, 'preservation in situ' as a preferred option for other cases and only 'preservation by record' (excavation and recording) where the former is not justified.</p>	<p><b>including Scheduled Monuments, 'preservation in situ' as a preferred option for other cases and only 'preservation by record' (excavation and recording) where the former is not justified.</b></p>
<p><b>RN195 Environment Agency</b></p>	<p>4.2.6 There is an opportunity for the LDF to ensure that development does not take place in areas of high flood risk other than in exceptional circumstances following the precautionary principle advocated in PPG25. The reference to Sustainable Drainage is welcome. Please note that SuDS can be used other than in the urban environment and 'Urban' reference should be omitted. In the Opportunities for the LDF in relation to Groundwater it should be ensured that new polluting processes are located in areas where groundwater is <i>least</i> vulnerable.</p> <p>4.2.7 Increased flooding. The LDF should ensure that development schemes should not exacerbate flooding <i>nor be at flood risk</i>. The precautionary principle to flood risk should be applied as advocated in PPG25.</p>	<p><b>Amend report, in line with PPG25, that development does not take place in areas of high flood risk other than in exceptional circumstances following the precautionary principle.</b></p> <p><b>Amend report to delete reference to 'urban'.</b></p> <p><b>Amend report to ensure that development schemes should not exacerbate flooding <i>nor be at flood risk</i>.</b></p>
<p><b>RN388 The Countryside Agency</b></p>	<p>LAR considers that the identification of the sustainability issues is very thorough and particularly supports the Landscape section at 4.2.9.</p> <p>Also, supports the issue of a lack of green spaces in certain locations under the Social Considerations section at 4.2.3 but consider that this issue could be broadened out to include issues within the landscape and biodiversity sections.</p> <p>Little coverage within the scoping report or indeed in the</p>	<p>Support noted.</p> <p>The intention was not to repeat issues and opportunities through sections.</p> <p><b>Add reference to countryside recreation in the</b></p>

	<p>LDF itself on the issue of Countryside Recreation. This is an omission and that the provision of informal countryside recreation opportunities within the capacity of the environment and heritage is an important consideration. LAR also supports a wider role for the countryside in terms of recreational opportunity, particularly where these can support more traditional rural activities, which may help the upkeep and management of the landscape.</p> <p>Welcomes the issue within the Cultural Heritage section on protecting village identity and local distinctiveness and that the opportunity has been identified to prepare and support Village Design Statements.</p>	<p><b>section on social considerations (Paragraph 4.2.3) in relation to lack of quality and available green spaces in certain locations.</b></p>
<p><b>RN415 Dave Puxley Economic Regeneration</b></p>	<p>Cannot find any reference to community cohesion. In view of the work at Hallam Fields and Warwick Way and the fact the term community cohesion is being increasingly used by the Government. It is probably covered by the statement on page 13 (PPS1) 'ensure that the impact of development on the social fabric of communities is considered and taken into account'. Include the words "Community Cohesion" at the appropriate places.</p> <p>4.2.3. Column 2 Promote the dual use of facilities. Add "Extended schools programme" as a way of doing this.</p> <p>Row 3 Deprivation. Address the wide spread in terms of deprivation in Charnwood as this could potentially lead to a lack of cohesion. Also remove the word relatively in Column 1. Levels in Hastings and some other areas are high.</p>	<p>The fact that there are relatively high levels of ethnic diversity in some parts of Charnwood indicates a need to make reference to ensuring that the LDF takes account of racial equality and community cohesion. There needs to be a clear definition of 'community cohesion'. <b>Add reference to racial equality and community cohesion in terms of government policy in the section on plans, policies and programmes and also in terms of sustainability issues.</b></p> <p><b>Add reference to the 'extended schools programme' in terms of examples.</b></p> <p><b>There are pockets of deprivation spread across the Borough, but the areas with the highest levels in Loughborough. Amend report to make reference to consider whether the LDF supports tackling deprivation across the Borough or whether some</b></p>

	<p>P 37 under Provision of employment opportunities - add "Encourage retention of graduates"</p> <p>4.2.10 Row 1 - add "Make better use of disused quarries".</p> <p>4.2.10 Row 2. Lack of energy generated by renewable sources - Add "Support growth of crops for, and production and use of biofuels, e.g. biodiesel". Energy could be used more efficiently - add "Encourage use of combined heat and power"</p> <p>4.2.11. Add "Lack of good quality employment land and premises". This is probably jumping the gun in anticipation of the employment land and property survey</p>	<p><b>areas are given priority status.</b></p> <p>Some areas experience higher levels of deprivation than others and Hastings is within the worst 10% for England but others are less deprived.</p> <p><b>Add reference to the retention of graduates paragraph 4.2.11 in relation to the ‘dual economy’.</b></p> <p>Many mineral uses are subject to restoration through the granting of planning permission to excavate the minerals. However, there should be reference to the re-use of previously developed land. <b>Add reference to the re-use of previously developed land in the material assets section.</b></p> <p><b>Add reference to energy generation for water heating and space heating which could include solar water heating, ground source heat pumps and the use of biofuels.</b></p> <p>The section on social considerations under ‘provision of employment opportunities’ indicates that land should be allocated and existing sites protected. The employment land study will provide data to assist in deciding how much land is allocated and which existing sites should be protected.</p>
<p><b>RN416 Karl Letten Environment</b></p>	<p>4.2.6 Sustainability issues and opportunities - water. The second bullet point on the second point reads 'ensure new polluting processes are located in areas where ground water is vulnerable. Is that right? Shouldn't they be located where</p>	<p><b>Amend to read ‘where groundwater is not vulnerable’.</b></p> <p><b>Amend to include reference to rainwater collection and greywater recycling.</b></p>

<p>ground water isn't vulnerable? The last point in the table under opportunities for the LDF should include rainwater collection and greywater recycling.</p> <p>4.2.7 Sustainability issues and opportunities - climatic factors. The first point should include a comment about the development of the local food economy to reduce food miles - the distance our food travels from where it is grown to where we buy it. The second paragraph of the first point in the table should include 'promote renewable energy sources, for both electricity and water and space heating including micro scheme'.</p> <p>There is also an opportunity for the LDF to require that a certain percentage, 20% as a minimum, of the energy used by a development must come from renewable sources of energy generated on the development site.</p> <p>The third point in the table could include something about encouraging farm diversification to facilitate the production of locally produced food to reduce food miles as mentioned above.</p> <p>The final point in this table regarding water shortages could include a comment on rainwater recycling and also 'encourage' rather than 'consider' water demand reduction measures.</p> <p>4.2.9 Sustainability issues and opportunities - landscape. There potentially could be conflict between landscape and the promotion of renewable energy forms. The growing of energy crops such as miscanthus (up to 15ft tall) could have</p>	<p><b>Add reference to developing the local economy to reduce food miles.</b></p> <p><b>Amend second paragraph to read “promote renewable energy sources, for both electricity and water and space heating including micro schemes”.</b></p> <p><b>Add reference to a requirement of a certain percentage of the energy used by a development must come from renewable sources of energy generated on the development site.</b></p> <p><b>Add reference to encouraging farm diversification to facilitate the production of locally produced food to reduce food miles.</b></p> <p><b>Add reference to rainwater recycling and amend to ‘encourage’ rather than ‘consider’.</b></p> <p>Noted.</p>
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	<p>an impact upon landscape.</p> <p>4.2.10 Sustainability issues and opportunities for material assets - Lack of energy generated by renewable sources within the borough. Add 'renewable energy generation for electricity and for water and space heating e.g solar water heating, ground sources heat pumps, biofuels including wood chip and pellet, single turbines.....'</p> <p>Energy could be used for efficiently - could you add 'encourage the use of district heating schemes for commercial and domestic developments'.</p> <p>Add a comment on encouraging developers to meet recognised environmental standards for development such as BREEAM.</p> <p>4.2.11 Sustainability issues and opportunities for economic considerations - a section should be added on the benefits of encouraging the development of social enterprises which benefit the local economy and local environment. Social enterprises can take the form of community enterprises, credit unions, social firms and co-operatives.</p>	<p><b>Add reference to energy generation for water heating and space heating which could include solar water heating, ground source heat pumps and the use of biofuels.</b></p> <p><b>Add reference to encouraging the use of district heating schemes for commercial and domestic developments.</b></p> <p><b>Add reference to recognised environmental standards for development such as BREEAM.</b></p> <p><b>Add reference to encouraging the development of social enterprises.</b></p>				
	<p><b>A4 Developing the Sustainability Appraisal Objectives and Framework</b></p>					
<p><b>RNI62 English Nature</b></p>	<p>Regarding the indicators for the above, English Nature has the following observations to make:</p> <table border="1" data-bbox="465 1273 1249 1391"> <thead> <tr> <th data-bbox="465 1273 763 1353">Sustainability Objectives</th> <th data-bbox="763 1273 1249 1353">Suggested Indicator</th> </tr> </thead> <tbody> <tr> <td data-bbox="465 1353 763 1391">To maintain and</td> <td data-bbox="763 1353 1249 1391">Changes in areas designated for</td> </tr> </tbody> </table>	Sustainability Objectives	Suggested Indicator	To maintain and	Changes in areas designated for	<p><b>Amend indicators in line with the recently published guidance on monitoring 'Local Development Framework Monitoring: A Good Practice Guide' (ODPM, 2005).</b></p> <p><b>Amend, in line with guidance, to read:</b></p>
Sustainability Objectives	Suggested Indicator					
To maintain and	Changes in areas designated for					

	<p>enhance and maintain biodiversity, flora and fauna,</p>	<p>their intrinsic environmental should concentrate on local designations such as Biodiversity Action Plan (BAP) Habitats, Sites of Importance for Nature Conservation (SINCs), urban greenspaces and Local Nature Reserves, as the creation of these is more dependent on local development activities.</p> <p>How will your Authority be able to distinguish between changes in SSSI condition as a result of landowner management and the result of the LDF?</p> <p>Add the contribution the LDF has made to achieving Biodiversity Action Plan targets.</p>	<p><b>Change in areas and populations of biodiversity importance, including:</b></p> <ul style="list-style-type: none"> <li>(i) <b>change in priority habitats and species (by type); and</b></li> <li>(ii) <b>change in areas designated for their intrinsic environmental value in sites of international, national, regional or sub-regional significance.</b></li> </ul> <p>The measurement is an indicator. It is not possible to distinguish between changes in SSSI condition as a result of landowner management and the result of the LDF.</p> <p>It is difficult to indicate whether the LDF or another source specifically contribute to Biodiversity Action Plan targets.</p> <p><b>Add as an indicator for ‘To reduce vulnerability to climate change’.</b></p> <p>There has to be a limit to the number of indicators. It is not considered that there are not the resources to monitor this indicator at this time.</p> <p>There has to be a limit to the number of indicators. It is not considered that there are not the resources to monitor this indicator at this time.</p>
	<p>To protect and improve surface and groundwater quality</p>	<p>The number of sustainable urban drainage schemes implemented.</p>	
	<p>To conserve and where appropriate enhance the historic and cultural environment</p>	<p>The number of historic landscape enhancement/protection projects implemented.</p>	
	<p>To increase the (appropriate reuse of previously</p>	<p>The number of developments that enhance wildlife habitats found on brownfield sites.</p>	

	developed land and buildings.		<p>There has to be a limit to the number of indicators. It is not considered that there are not the resources to monitor this indicator at this time.</p> <p>There has to be a limit to the number of indicators. It is not considered that there are not the resources to monitor these indicators at this time.</p>
	To support the sustainable extraction, re-use and recycling of minerals and aggregates resources	The number of mineral extraction site restoration plans which promote biodiversity gain/contribute towards biodiversity action plan targets.	
	To encourage appropriate access to the countryside, open spaces and semi urban environments (eg. parks.)	The area of newly created accessible urban green space. The area of existing urban greenspace for which management is implemented to enhance wildlife.	
<b>RNI 62 English Nature</b>	<p>5.5 – Additional criteria for assessing sites. In this section Figure 6.2 omits the provision of accessible green space. 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:</p> <ul style="list-style-type: none"> <li>• No person should live more that 300 metres from their nearest area of natural greenspace;</li> <li>• There should be at least one accessible 20ha site within 2km from home;</li> <li>• There should be one accessible 100ha site within 5km;</li> <li>• There should be one accessible 500ha site within 10km.</li> </ul>		<p>The indicator for ‘To encourage appropriate access to the countryside, open space and semi-urban environments’ relates to access to green spaces. The Council’s Green Spaces Strategy indicates that for 1,000 population about 4 hectares of open space of recreational value should be provided in or immediately adjacent to urban areas. It sets out the following hierarchy:</p> <p>Regional (100+ hectares) - within 8km  Country Parks (60+ hectares) – within 3.2km  District parks (10-20 hectares) – within xx  Local Parks (2.5+ hectares) – within 400m  Greenways – within 300m (in line with English Nature standard)  Very local open spaces – within 200m</p>

	<p>This data is taken from “Providing accessible natural greenspace in towns and cities – A practical guide to assessing the resource and implementing local standards for provisions” published by English Nature.</p>	
<p><b>RNI88 English Heritage</b></p>	<p>Page 45 Sustainability objectives and indicators - welcome the objective relating to landscape and townscape character, but do not understand the link that the proposed indicator relating to the cleanliness of highways has with this objective. While there are subjective elements to defining character, the purpose of tools such as Landscape Character Assessment and Conservation Area Appraisals is to do this. The loss of characteristic landscape features would be a more relevant indicator.</p> <p>We also suggest that the objective for the historic environment omits the words ‘where appropriate’ as this is both unnecessary and could discourage action to enhance the historic environment. The suggested indicators should be broadened to include Scheduled Monuments as a proxy for the impact on archaeology.</p>	<p>The indicator does appear to have a poor relationship to the sustainability objective. <b>Amend report to delete indicator and replace with ‘Loss of Landscape Character areas where marked changes or significant changes inconsistent with character’.</b></p> <p><b>Amend report to delete the words ‘as appropriate’.</b>  <b>Add an indicator ‘Loss of Scheduled Ancient Monuments’.</b></p>
<p><b>RNI65 Environment Agency</b></p>	<p>The indicator for ‘To Protect and Improve Surface and Ground Water Quality’ should not refer to flooding, nor should the Minimisation of Water Consumption refer to SuDS. However there should be a Sustainability Objective to reduce flooding and the Indicators would be:</p> <ul style="list-style-type: none"> <li>• Number of Planning Applications Granted Contrary to the Advice of the Environment Agency on Grounds of Flood Risk (note - not Flood Defence)</li> <li>• Number of Developments Approved that Incorporate Sustainable Drainage Systems</li> </ul>	<p><b>Amend to move listed indicators to sustainability objective to ‘To reduce vulnerability to climate change’.</b></p>

	<ul style="list-style-type: none"> <li>• Number of Developments Approved that Mitigate Flood Risk</li> </ul>	
<b>RN375 Government Office for the East Midlands</b>	<p>Where possible the SA objectives should be expressed in the form of targets that can be measured (para 2.2.16 of the ODPM consultation paper on SA refers). Targets and indicators should relate to the scope of each DPD, therefore you may wish to consider varying them, to relate to the different DPDs proposed.</p> <p>You may also wish to consider whether you identify a common set of sustainability issues for each DPD, or whether additional issues specific to individual DPDs are also added where necessary.</p>	<p><b>Amend to revise sustainability objectives to indicate direction of change.</b></p> <p>A framework has been developed that will ensure consistency in terms of sustainability objectives and targets. Individual sustainability reports will make reference to additional indicators where this is considered necessary.</p> <p>The sustainability issues will relate to the Development Plan Document to which the Scoping Report relates.</p>
<b>RN388 The Countryside Agency</b>	<p>Whilst LAR support the second objective in the table, to maintain the landscape and townscape character, we consider that the suggested indicator is very limited as it only refers to the highway cleanliness. More suitable indicators could be for example as follows, “Number of planning applications refused on landscape grounds”; “Number of conservation Area Enhancement Schemes under effective implementation”; or “Number of sites and transport corridors with landscape enhancement”.</p> <p>Alternatively it may be possible to use the indicator contained within the East Midlands Regional Spatial Strategy (RRS8) Sustainability Appraisal “Percentage of Countryside Character areas where marked changes or significant changes inconsistent with character”.</p> <p>Again with the objective relating to access to the countryside the suggested indicator seems limited.</p>	<p>The indicator does appear to have a poor relationship to the sustainability objective. <b>Amend report to delete indicator and replace with ‘Loss of Landscape Character areas where marked changes or significant changes inconsistent with character’.</b></p> <p>The indicator for ‘To encourage appropriate access to the countryside, open space and semi-urban environments’</p>

	<p>Additional suggestions are as follows – “Achievement of Accessible Natural Green space Standards” or “Number of schemes improving accessibility of the countryside to the public via the Rights of Way network”.</p>	<p>relates to access to green spaces. The Council’s Green Spaces Strategy indicates that for 1,000 population about 4 hectares of open space of recreational value should be provided in or immediately adjacent to urban areas. It sets out the following hierarchy:  Regional (100+ hectares) - within 8km  Country Parks (60+ hectares) – within 3.2km  District parks (10-20 hectares) – within xx  Local Parks (2.5+ hectares) – within 400m  Greenways – within 300m (in line with English Nature standard)  Very local open spaces – within 200m</p>
<p><b>RN415 Dave Puxley Economic Regeneration</b></p>	<p>One key problem as far as lack of economic growth has been the loss of employment land to housing (in accordance with Government directives!!). Therefore I'm not happy that row 7 combines these two needs in one line. "To meet needs for homes, including affordable housing, jobs, including a second science park, in line with strategic requirements". On a brownfield site, homes and jobs will be competing claims and it is important that this table reflects that tension. Suggest that these are split into separate issues. Table needs rows about allocation of new land for housing and employment as separate items to reflect the problem you have in Planning. You have got "safeguard (existing) employment sites"; if necessary combine with allocation of new employment land but we need employment separated from Housing.</p>	<p>This spatial objective is intended to indicate that the Local Development Framework will make provision for new homes and will make provision for new jobs through the allocation of land and the safeguarding of sites. Separating housing and employment is unlikely to remove the tension that exists. The LDF has to make sure that there is enough land whether previously used or new (Greenfield) for housing, employment and any other development needs.</p>
<p><b>RN416 Karl Letten Environment</b></p>	<p>Page 45 To minimise water consumption - the addition of rainwater collection to the suggested indicator.</p>	<p><b>Add indicator ‘Number of new developments given planning permission that incorporate water reduction measures eg. Rainwater and greywater recycling’.</b></p>

	<p>Page 45 To reduce vulnerability to climate change/ Page 46 To promote sustainable design and construction – Broaden indicator to include commercial, retail and office developments. EcoHomes is the residential part of Buildings Research Establishment's Environmental Assessment Method (BREEAM). BREEAM now also includes residential, commercial, retail and office developments. Strengthen indicator to only have ratings of 'good, very good and excellent'.</p>	<p><b>Amend indicator to refer to residential, commercial, retail and office developments and to ratings of 'good, very good and excellent'.</b></p>
	<p><b><u>Testing the Development Plan Objectives Against the Sustainability Appraisal Framework</u></b></p>	
<p><b>RNI62 English Nature</b></p>	<p>Concerned that certain spatial objectives are identified as being of uncertain compatibility when measured against sustainability issues such as “to maintain and enhance biodiversity, flora and fauna”. English Nature encourages planners and developers to maximise the opportunities for biodiversity in the planning and design of sustainable communities. In this way it should be possible to make many of the uncertain compatibility linkages, compatible.</p>	<p>The spatial objectives that tend to be identified as being of uncertain compatibility relate to new built development. It is difficult to indicate the effect of the development on biodiversity, flora and fauna until a specific site is known. However, the decisions about choosing such sites will take into account these issues and where necessary mitigation measures will be taken to reduce any potential harmful effects and/or maximise opportunities for enhancing biodiversity, flora and fauna.</p>
<p><b>RNI88 English Heritage</b></p>	<p>Table 7.1 page 52 - Agree that, as stated in paragraph 6.2, the appraisal is a 'highly subjective and judgemental exercise' and much will depend upon how the objectives are delivered. Therefore, we suggest that the following sustainability objectives fall into the 'uncertain' category when compared with the spatial objective relating to the built heritage:</p> <ul style="list-style-type: none"> <li>• 'To promote vibrant and viable settlements and townscapes' – unsympathetic redevelopment could have an adverse effect on historic town centres;</li> </ul>	<p>The potential for an uncertain impact on the built heritage is recognised. However, relevant policies will be developed through the Local Development Framework to ensure sympathetic design and mitigation measures are taken to safeguard the built heritage.</p> <p><b>Amend Table 7.1 to recognise that the sustainability objectives 'To promote vibrant and viable settlements', 'To minimise the use of energy and optimise the use of renewable resources', To support the sustainable extraction, re-use and</b></p>

	<ul style="list-style-type: none"> <li>• ‘To minimise the use of energy and optimise the use of renewable resources’ – some energy efficiency measures, such as plastic windows, can have an adverse effect on historic buildings and similarly, renewable energy installations and energy crops can have adverse impacts;</li> <li>• Mineral extraction, especially in river valleys, where the water table is high, can adversely affect buried archaeology either directly or by changing the groundwater conditions.</li> </ul>	<b>recycling of mineral and aggregates resources, may have uncertain compatibility with the built heritage spatial objective.</b>
	<b>A5 Consulting on the Scope of the Sustainability Appraisal</b>	
<b>RN415 Dave Puxley Economic Regeneration</b>	<p>P 53 Consultees. Add:</p> <ul style="list-style-type: none"> <li>• Leicester Shire Economic Partnership</li> <li>• Leicestershire Chamber of Commerce &amp; Industry</li> <li>• Charnwood Learning Forum</li> </ul>	In terms of Sustainability Appraisal scoping reports the guidance indicates the types of organisations to consult. The reports will be published on the Council’s website to enable other organisations and individuals to comment. However, the listed organisations will be added to the database to ensure notification of relevant Local Development Framework consultation documents.
	<b>Options to be Considered in Next Stage of the Sustainability Appraisal</b>	
<b>RN286 Leicestershire County Council</b>	8.2.1- The third sentence in the first paragraph should read “Loughborough and Shepshed are identified as ‘Main Towns’, and Birstall and Thurmaston, on the edge of Leicester, are part of the Leicester and Leicestershire Urban Area, as defined in the adopted Structure Plan”.	<b>Amend paragraph 8.2.1 to read ‘Loughborough and Shepshed are identified as ‘Main Towns’, and Birstall and Thurmaston, on the edge of Leicester, are part of the Leicester and Leicestershire Urban Area, as defined in the adopted Structure Plan’.</b>
<b>RN415 David Puxley</b>	8.2.2. The balance of strategic requirements should recognise the very poor performance of Charnwood in terms of business growth in recent years and consider whether employment land and buildings should be given a	This paragraph relates to identifying site options set out in strategic guidance ie. Currently the Leicestershire, Leicester and Rutland Structure Plan but to be reviewed through the revision of the Regional Spatial Strategy. This

	higher priority in future.	review will take into account a number of factors in terms of setting employment land requirements, including the Employment Land Study currently being undertaken. The paragraph also makes reference to exploring the extent of the re-use of existing employment sites for housing development.
	<b><u>Methodology for Future Stages of the Sustainability Appraisal</u></b>	
<b>RNI88 English Heritage</b>	<p>Paragraph 9.2.1 page 56 - Support use of Round Table Sessions attended by local authority officers. However, these should include the Conservation Officer and, if possible, an archaeologist.</p> <p>Page 58 Sustainability Appraisal Matrix -While this seems acceptable, it is important that the written comments set out the reasons for the judgements being made, as well as the recommendations for mitigation and enhancement.</p>	<p>Noted.</p> <p>The matrix includes a column for commentary. It is agreed that it is clear what assumptions have been made in making judgements as well as recording recommendations for mitigation and enhancement.</p>