

**DES福德 NEIGHBOURHOOD PLAN
CONSULTATION STATEMENT
APPENDIX 5 SEA Report**

Strategic Environmental Assessment for Desford Neighbourhood Plan

Environmental Report

October 2019

Quality information

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Table of Contents

Non-Technical Summary	1
What is strategic environmental assessment?	1
What is the Desford Parish Neighbourhood Plan?	1
Purpose of the Environmental Report	1
Scoping	2
Assessment of alternative approaches for the DNP	2
Assessment of the current version of the DNP	2
Mitigation	3
Monitoring	4
1. Introduction	1
1.1 Background	1
1.2 SEA explained	2
1.3 Structure of this Environmental Report.....	3
2. Local Plan context and vision for the DNP	4
2.1 Local Plan context for the DNP	4
2.2 Vision for the Desford Neighbourhood Plan.....	4
3. The Scope of the SEA.....	5
3.1 SEA Scoping Report.....	5
3.2 Key sustainability / environmental issues	5
3.2.1 Air quality	6
3.2.2 Biodiversity	6
3.2.3 Climatic factors.....	6
3.2.4 Historic environment.....	6
3.2.5 Landscape	7
3.2.6 Land, soil and water resources	7
3.2.7 Population and community	7
3.2.8 Health and Wellbeing.....	7
3.2.9 Transportation.....	8
3.3 SEA Framework.....	9
4. What has plan making / SEA involved to this point?.....	11
4.1 Introduction.....	11
4.2 Overview of plan making / SEA work undertaken	11
4.3 Assessment of reasonable alternatives for the Neighbourhood Plan	11
4.3.1 Housing Strategy.....	11
4.3.2 Site allocations	14
5. What are the appraisal findings at this current stage?	20
5.1 Introduction.....	20
5.2 Current approach in the Neighbourhood Plan and the development of Neighbourhood Plan policies	20
5.3 Approach to the appraisal.....	21
5.4 SEA Objective 1: Biodiversity	21
5.5 SEA Objective 2: Climate change	23
5.6 SEA Objective 3: Historic environment.....	24
5.7 SEA Objective 4: Landscape.....	26
5.8 SEA Objective 5: Population and community	27
5.9 SEA Objective 6: Health and wellbeing	28
5.10 SEA Objective 7: Transportation	29

5.11	Conclusions at this current stage	31
5.11.1	Summary of effects.....	31
5.12	Recommendations	32
5.13	Monitoring	33
6.	What are the next steps?	34
Appendix A: Scoping Report.....		1

Non-Technical Summary

What is strategic environmental assessment?

A strategic environmental assessment has been undertaken to inform the Desford Neighbourhood Plan (DNP). This process is required by the SEA Regulations.

Neighbourhood Plan groups use SEA to assess Neighbourhood Plans against a set of sustainability / environmental objectives developed in consultation with interested parties. The purpose of the assessment is to avoid adverse environmental and socio-economic effects through the Neighbourhood Plan, and identify opportunities to improve the environmental quality of the area covered by the Neighbourhood Plan and the quality of life of residents.

What is the Desford Parish Neighbourhood Plan?

The Desford Parish Neighbourhood Plan (DNP) presents a plan for the administrative area of Hinckley and Bosworth from the period 2009 - 2026. Prepared to be in conformity with the Hinckley and Bosworth Local Plan, it sets out a vision and a range of policies for the Neighbourhood Plan area. These relate to a range of topics, including, but not limited to, housing, open space, recreation, accessibility and housing.

Purpose of the Environmental Report

The Environmental Report, which accompanies the current consultation on the DNP, is the second document to be produced as part of the SEA process. The first document was the SEA Scoping Report (May 2019), which includes information about the Neighbourhood Plan area's environment and community.

The purpose of the Environmental Report is to:

- Identify, describe and evaluate the likely significant effects of the DNP and alternatives; and
- Provide an opportunity for consultees to offer views on any aspect of the SEA process which has been carried out to date.

The Environmental Report contains:

- An outline of the contents and main objectives of the DNP and its relationship with other relevant policies, plans and programmes;
- Relevant aspects of the current and future state of the environment and key sustainability / environmental issues;
- The SEA Framework of objectives against which the DNP has been assessed;
- The appraisal of alternative approaches for the DNP;
- The likely significant environmental effects of the DNP;
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the DNP; and
- Potential monitoring measures.

Scoping

The scoping stage involves the collection of information relating to:

- the state of the environment in the plan area; *and*
- relevant objectives and targets set out within plans, policies and programmes.

This information allowed for a range of key issues to be identified, and to establish what topics should be the focus of the SEA. The scoping process led to the following topics being scoped in or out of the SEA. These topics then formed the basis of an SEA Framework, which is the basis for appraising the Plan (and reasonable alternatives).

- Air Quality – **Scoped out**
- Biodiversity – **Scoped in**
- Climatic factors - **Scoped in**
- Historic environment – **Scoped in**
- Landscape – **Scoped in**
- Land, soil and water resources – Land and soil - **Scoped out**
- Land, soil and water resources – Water quality - **Scoped out**
- Population and community – **Scoped in**
- Health and safety – **Scoped in**
- Transportation – **Scoped in**

Assessment of alternative approaches for the DNP

The Plan proposes to allocate one site for housing development. To inform the decision on which site to allocate, the Parish Council identified a range of site options. These sites were appraised as part of a site selection process.

The highest performing / ranking site (*Barns Way Extension SHLAA Ref: LPR37 (AS203)*) was selected for allocation.

Assessment of the current version of the DNP

A draft DNP, dated May 2019, which will become the version for submission to the LPA under Regulation 15 of the Neighbourhood Plan Regulations 2012, has been appraised against each of the environmental objectives in the SEA Framework. In undertaking the appraisal, each of the policies in the Plan has been considered individually and collectively. A summary of the findings is presented below.

The plan is predicted to have mostly positive effects, and for three objectives significant positive effects are predicted (though there is an element of uncertainty for one).

With regards to environmental factors, the Plan involves a number of positive policies that identify locally important features with regards to biodiversity and heritage. These add to the existing policy framework, and in the case of the historic environment could potentially have significant benefits.

The policy framework for landscape is also positive, but a residual minor negative effect is predicted due to the loss of open land at the site allocation (this is neutral though should planning permission be secured and development occurs in line with agreed conditions).

The main benefits of the Plan relate to communities, as the delivery of new homes and high quality design will support the local population and improve their health and wellbeing. The allocated site contributes notably to these effects. In the instance that planning permission is granted on this site,

the effects are only relevant should the permission lapse. Therefore, these positive effects could actually be minor in reality.

<i>Biodiversity</i>	<i>Climate change</i>	<i>Heritage</i>	<i>Landscape</i>	<i>Population and community</i>	<i>Health and wellbeing</i>	<i>Transportation</i>
Minor +ve	Minor +ve	Potential Significant +ve	Minor +ve Minor -ve	Significant +ve	Significant +ve	Minor +ve

Mitigation

A number of recommendations were made to enhance the positive effects of the plan and mitigate any negatives. These are summarised below:

- Policy H1 currently seeks to exclude small scale leisure or tourism activities and other forms of commercial/employment appropriate to the countryside outside or adjacent to the settlement boundary which is inconsistent with the provisions as set in Policy E2.
- Policy H2 could seek to encourage some mix of uses on site in response to identified local needs while still seek to provide the level and nature of residential growth outlined. As a site specific policy it is recommended that the policy makes it clear that proposals for the site are subject to other relevant policies of the plan in particular Policy H6 including matters relating to landscape character and biodiversity. It is recommended for Policy H2 criteria (l) *Other financial contributions*Delete at full planning application stage as financial contributions requirements are not limited to full planning applications.
- Consider the inclusion of policy which seeks to encourage renewable energy infrastructure.
- Consider the inclusion of policy which seeks to protect and enhance pedestrian and cycle connections.
- Consideration should be given to the potential for rural exceptions sites in terms of helping to meet affordable housing needs.
- Policy H5/supporting text - It is recommended that it may be beneficial to identify the likely amount of anticipated windfall development that is anticipated to come forward during the plan period.
- Policy ENV 5: Consider an amendment that replaces *building or structure* to heritage asset in recognition that such assets can include landscape.
- For clarity the table of heritages assets provided at page 40 could identify those assets which are designated heritage assets and those which are non-designated heritage assts.
- Policy ENV 6: Consider the inclusion of the following *development shall be designed to sustain significant views that contribute to the character and appearance of the area.*
- Policy ENV 7: For Wind Turbine and Large-scale solar energy generation development developments seek to clarify that such proposals are subject to considerations of the rest of ENV 7 and other relevant policies in the plan.
- Policy ENV 3: Consider the inclusion of *Work constructively with other organisations to seek to consider the possibility of installing major solar facilities.*
- Policy E2: Consider the inclusion of *or on areas of previously developed land in sustainable locations.*

It is considered that the above changes would help to improve the performance of the Plan.

Monitoring

There is a requirement to present measures that could be used to monitor the effects of the Plan identified through the SEA. It is particularly important to monitor effects that are predicted to be significant, whether this be positive or negative. Monitoring helps to track whether the effects turn-out as expected, and to identify any unexpected effects.

Significant effects	Monitoring measures
A potential significant positive effect is predicted on cultural and natural heritage due to an improved protection for locally important buildings, views and historic features.	<ul style="list-style-type: none"> • Townscape character analysis. • Number of locally important buildings identified for protection. • Review of view corridors.
A significant positive effect is predicted for population and communities as the Plan will contribute towards meeting local housing needs in accessible locations.	<ul style="list-style-type: none"> • Net housing completions per annum • Number of homes for older people • Affordable housing target achievement
A significant positive effect is predicted on health and wellbeing due to cumulative effects of affordable housing, recreational facilities and accessibility.	<ul style="list-style-type: none"> • Number of affordable homes delivered. • Achievement of open space and sport standards

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1. Introduction

1.1 Background

AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of the emerging Desford Neighbourhood Plan (DNP).

The DNP is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2012. The Neighbourhood Plan area, which includes the administrative area of Desford Parish is being prepared in the context of the emerging Hinckley and Bosworth Local Plan.

A Regulation 14 Consultation on the draft Plan was undertaken in November – December 2018. At that time, the need for an SEA had not been established and so the draft Plan was not accompanied by an Environmental Report. Following an updated screening opinion, the need for an SEA was determined, and has been completed (the findings are set out in this Environmental Report).

Key information relating to the DNP is presented in **Table 1.1**.

Table 1.1: Key facts relating to the Desford Neighbourhood Plan

Name of Qualifying Body	Desford Parish Council
Title of Plan	Desford Neighbourhood Plan (DNP)
Subject	Neighbourhood planning
Purpose	Desford Neighbourhood Plan is being prepared as a Neighbourhood Development Plan under the Neighbourhood Planning (General) Regulations 2012. The plan will be in conformity with the Hinckley and Bosworth Local Plan.
Timescale	2018 – 2036
Area covered by the plan	The emerging DNP will be used to guide and shape development within the area covered by the administrative area of Hinckley and Bosworth.
Summary of content	The Desford Neighbourhood Plan will set out a vision, strategy and range of policies for the Neighbourhood Plan area.
Plan contact point	Martin Broomhead Email address: clerk@desfordparishcouncil.co.uk

1.2 SEA explained

The Desford Neighbourhood Plan was 'screened-in' as requiring an SEA.

SEA is a mechanism for considering and communicating the likely significant effects of an emerging plan, and reasonable alternatives in terms of key environmental issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding or mitigating negative environmental effects and maximising positive effects. Through this approach, the SEA for the DNP seeks to maximise the emerging Neighbourhood Plan's contribution to sustainable development.

The SEA has been prepared in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) which transpose into national law the EU Strategic Environmental Assessment (SEA) Directive¹.

The SEA Regulations require that a report is published for consultation alongside the draft plan that 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'. The report must then be taken into account, alongside consultation responses, when finalising the plan.

In line with the SEA Regulations this Environmental Report must essentially answer four questions:

- What is the scope of the SEA?
- What has plan-making/SEA involved up to this point?
 - 'Reasonable alternatives' must have been appraised for the plan.
- What are the appraisal findings at this stage?
 - i.e. in relation to the draft plan.
- What happens next?

These questions are derived from Schedule 2 of the SEA Regulations, which present 'the information to be provided within the report'. **Table 1.2** presents the linkages between the regulatory requirements and the four SEA questions.

¹ Directive 2001/42/EC

1.3 Structure of this Environmental Report

This document is the Environmental Report for the DNP and hence needs to answer all four of the questions listed above with a view to providing the information required by the SEA Regulations.

Each of the four questions is answered in turn within this report, as follows:

Table 1.2: Questions that must be answered by the Environmental Report in order to meet regulatory² requirements

Environmental Report question	In line with the SEA Regulations, the report must include... ³
What is the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
What is the sustainability 'context'?	<ul style="list-style-type: none"> The relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
What's the scope of the SEA?	<ul style="list-style-type: none"> The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan
	<ul style="list-style-type: none"> The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
What are the key issues & objectives?	<ul style="list-style-type: none"> Key problems/issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
What has plan-making/SEA involved up to this point?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives appraisal/a description of how environmental objectives and considerations are reflected in the draft plan.
What are the assessment findings at this stage?	<ul style="list-style-type: none"> The likely significant effects associated with the draft plan The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan
What happens next?	<ul style="list-style-type: none"> The next steps for plan making/SEA process.

² Environmental Assessment of Plans and Programmes Regulations 2004

³ NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

2. Local Plan context and vision for the DNP

2.1 Local Plan context for the DNP

Desford Parish Council took the decision to prepare a Neighbourhood Plan to enable the local community to influence the shape of development in the Parish.

The Parish Council felt that if development was going to have to happen in Desford, then its residents deserved the opportunity to say what this development should look like and to be involved in shaping the future of the Parish in which they live. The concept of a Neighbourhood Plan was promoted and a Working Group formed. With professional help, funded by grant applications, the Working Group has produced a number of planning policies and community actions that will help shape future development in Desford.

A very positive 'side effect' of the plan has been the relationships created, developed and strengthened both in the villages and with many other organisations..

The Parish Council has been able to incorporate into the Neighbourhood Plan the views, opinions and aspirations of residents and businesses in Desford, leading to the development of the Community Actions within this Plan.

Most importantly the Neighbourhood Plan shows the residents' vision for their Parish and for their future.

Desford Parish Council is within the Hinckley & Bosworth Borough. The Hinckley and Bosworth Borough Council (HBBC) Core Strategy was adopted in December 2009 and sets out the spatial strategy for delivering sustainable growth within the Borough between 2001- 2026. Desford has been mentioned in Policy 8 as a Key Rural Centre relating to Leicester. Policy 14 Rural Areas: Transport states that accessibility to transport in Desford will be improved and certain routes will be safeguarded. Other projects have been mentioned in this policy such as the Ratby to Desford Multifunctional Corridor. Policy 20: Green Infrastructure also mentions that Desford will be promoted as a settlement on the fringe of the National Forest and be recognised as a 'gateway' village in terms of tourism support.

2.2 Vision for the Desford Neighbourhood Plan

The vision / mission statement for the Desford Neighbourhood Plan, which was developed during earlier stages of plan development, is as follows:

“Desford will be known during the plan period for its strong community, schools, conservation area and the attractive and thriving recreational and natural environments in and surrounding the various built up areas. It is for the most part very safe and enjoyable to move around on foot and bike, and the plan will seek opportunities to improve these aspects of parish life, thus promoting a safe, family focused and invigorating environment for future well managed growth.”

Vision / Mission Statement for the Desford
Neighbourhood Plan

To support the Neighbourhood Plan’s mission statement, the DNP sets out a number of Neighbourhood Plan policies. The latest iteration of these policies has been appraised in **Chapter 5** of this Environmental Report.

3. The Scope of the SEA

3.1 SEA Scoping Report

The SEA Regulations require that: “*When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are Natural England, the Environment Agency and Historic England.⁴ These authorities were consulted on the scope of the DNP SEA for a 5 week period from 17th May 2019.

The purpose of scoping was to outline the ‘scope’ of the SEA through setting out:

- A context review of the key environmental and sustainability objectives of national, regional and local plans and strategies relevant to the Neighbourhood Plan;
- Baseline data against which the Neighbourhood Plan can be assessed;
- The key sustainability / environmental issues for the Neighbourhood Plan; and
- An ‘SEA Framework’ of objectives against which the Neighbourhood Plan can be assessed.

Only one of the statutory consultees provided a formal response to the Scoping Report within the five week consultation period. The comments made and how they have been considered and addressed, are presented in **Table 3.1** below.

Table 3.1: Consultation responses received on the SEA Scoping Report

Consultation response	How the response was considered and addressed
Environmental Agency	No comments to make.
Natural England	No response
Historic England	No response

3.2 Key sustainability / environmental issues

The full Scoping Report is attached as **Appendix A** to this report. This section sets out a summary of the key issues that were identified through scoping.

Drawing on the review of the policy context and baseline information, the SEA Scoping Report was able to identify a range of sustainability / environmental issues that should be a particular focus of SEA. These issues are as follows, presented by eight environmental themes:

⁴ In-line with Article 6(3) of the SEA Directive, these consultation bodies were selected because ‘*by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes*’.

The selected environmental themes incorporate the 'SEA topics' suggested by Annex I(f) of the SEA Directive⁵. These were refined to reflect a broad understanding of the anticipated scope of plan effects (drawing from the screening opinion and local knowledge).

The scoping process allowed for some sustainability topics to be 'scoped out'; as it was considered the Plan is unlikely to have significant effects on certain factors.

3.2.1 Air quality

- There are no Air Quality Management Areas or Air Quality Action Plans within the Neighbourhood Plan Area.
- There is likely to be continued reliance on the car to access services, jobs and facilities.

Scoped out

3.2.2 Biodiversity

- Botcheston Bog SSSI is within the Neighbourhood Plan Area.
- The Neighbourhood Plan area contains Priority Habitat areas of Deciduous Woodland, Good Quality Semi-improved Grasslands, Ancient and Semi-Natural Woodland and Lowland Meadows.
- There are no NNR, LNR, SACs, SPAs, pSPAs or Ramsar sites within or in the vicinity of the Neighbourhood Plan area.
- A Local Wildlife Site falls within the Neighbourhood Plan area.

Scoped in

3.2.3 Climatic factors

- Mitigation of and adaptation to climate change are national and local priorities that the Plan should seek to contribute towards.
- There are areas within the Plan area at risk of fluvial flooding and surface water flooding. The Neighbourhood Plan area falls predominantly within Flood Zone 1, although a stretch of Flood Zone 2 and 3 runs along Rothley Beck. Brook

Scoped in

3.2.4 Historic environment

- The Neighbourhood Plan area contains a considerable number of heritage assets including Listed Buildings and Structures and a conservation area, which could be affected by policies and proposals within the plan (either positively or negatively).
- An inappropriate approach that does not seek to conserve and enhance heritage assets could result in the erosion of the townscape quality.
- There is potential for significant effects upon the setting of heritage assets and the character of the built and natural environment.

⁵ The SEA Directive is 'of a procedural nature' (para 9 of the Directive preamble) and does not set out to prescribe particular issues that should and should not be a focus, beyond requiring a focus on *'the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors'* [our emphasis]

Scoped in

3.2.5 Landscape

- There is potential for future development to impose significant effects upon the character of landscapes, which also contributes to the rural setting of the village.

Scoped in

3.2.6 Land, soil and water resources

- The topic of Land, soil and water resources has been scoped out, as the Plan is unlikely to have a significant effect on soil / agricultural land and water quality.
- There are important soil resources in the Plan area that ought to be avoided as much as possible. However, the total loss of land is unlikely to exceed 5ha (given the scale of growth likely to be involved in any site allocations), and so a significant effect upon soil resources is considered unlikely in any event.
- Higher quality agricultural land should be protected, and such principles will need to be addressed through the site assessment process.
- It is unlikely that significant effects upon water quality would occur as a result of the plan as the scale of growth is not major, and changes to land use would not be anticipated to increase nitrate pollution. With regards to waste water treatment and drainage, the scale of growth would not be expected to cause issues. And for these reasons, soil, water and waste are scoped out.

Soil – Scoped out

Water – Scoped out

Waste – Scoped out

3.2.7 Population and community

- The population of Desford Parish has increased by 10.8% between 2011 and 2017.
- Population trends in the Neighbourhood Plan area indicate a growing and an aging population. This will need to be carefully planned for.

Scoped in

3.2.8 Health and Wellbeing

- The Plan has the potential to help tackle inequalities in access to quality green space and recreational facilities.
- There will be a need to address future healthcare infrastructure. Increased population growth will require additional provision for health and recreational facilities.
- There are several health and recreational facilities within the Neighbourhood Plan area but there is inadequate access to accessible green space and parks.

Scoped in

3.2.9 Transportation

- The Neighbourhood Plan area is well served by the highway network but does not have rail connectivity and has limited bus connectivity.
- Local residents in the Neighbourhood Plan area are significantly more likely to travel by car than people nationally.
- New development is likely to increase traffic and congestion but could also make public transport improvements viable.
- Policies and proposals in the Plan should seek to enhance accessibility and ensure that impacts upon traffic are minimised.

Scoped in

3.3 SEA Framework

The SEA framework has been established through the identification of key issues and environmental objectives as part of the scoping exercise. This draws upon the baseline position and policy context that has been prepared for a range of SEA topics.

The framework consists of a set of headline objectives and ancillary questions, which has been used to appraise the environmental effects of the draft Plan (and any reasonable alternatives).

Table 3.2 below outlines the full SEA Framework, which focuses on those issues that have been identified as the most important to consider in the preparation of the Plan; but acknowledging the limited influence that the Plan can/will have in some areas.

These issues were then translated into an 'SEA Framework'. This SEA Framework provides a methodological framework for the appraisal of likely significant effects on the baseline.

Table 3.2: SEA Framework for the Desford Neighbourhood Plan

SEA Objective	Supporting questions (Will the option/proposal help to...)
<p>1. Biodiversity: Protect and enhance the function and connectivity of biodiversity habitats and species</p>	<ul style="list-style-type: none"> • Support connections between habitats in the Plan area? • Avoid impacts on the Botcheston Bog SSSI? • Support continued improvements to the designated sites in the Plan area? • Achieve a net gain in biodiversity? • Support access to, interpretation and understanding of biodiversity and geodiversity? • Increase the resilience of biodiversity in the Neighbourhood Plan area to the effects of climate change?
<p>2. Climate Change: Support the resilience of the Desford Neighbourhood Plan Area to the potential effects of climate change including flooding.</p>	<ul style="list-style-type: none"> • Improve green infrastructure networks in the plan area to support adaptation to the potential effects of climate change? • Sustainably manage surface water run-off, ensuring that the risk of flooding is not increased (either within the plan area or downstream) and where possible reduce flood risk? • Ensure the potential risks associated with climate change are considered through new development in the plan area?
<p>3. Historic Environment: Protect, enhance and manage the distinctive character and setting of heritage assets and the built environment</p>	<ul style="list-style-type: none"> • Conserve, better reveal the significance of and enhance heritage assets, their setting and the wider historic environment? • Conserve to better management of heritage assets? • Identify and protect/ enhance features of local importance? • Support access to, interpretation and understanding of the historic environment?

SEA Objective	Supporting questions (Will the option/proposal help to..)
<p>4. Landscape: Protect, enhance and manage the distinctive character and appearance of landscapes.</p>	<ul style="list-style-type: none"> • Conserve, better reveal the significance of and enhance landscape assets? • Contribute to better management of landscape assets? • Support access to, interpretation and understanding of the surrounding landscape?
<p>5. Population and Housing: Provide everyone with the opportunity to live in good quality, affordable housing which meets the needs of occupiers throughout their life.</p>	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Support the provision of a responsive range of house types and sized to meet identified needs? • Provide quality and flexible homes that meet people’s needs throughout their lives? • Create sustainable new communities with good access to a range of local services and facilities? • Enhance housing provision in existing communities?
<p>6. Health and Wellbeing: Protect and improve the health and wellbeing of residents by enhancing the quality and accessibility of open space, facilities for recreation and health.</p>	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Promote accessibility to a range of leisure, health and community facilities, for all age groups? • Provide and enhance the provision of community access to green infrastructure, in accordance with Accessible Natural Greenspace Standards? • Promote healthy and active lifestyles?
<p>7. Transportation: Support modal shift to active and sustainable modes of transport whilst reducing the need to travel.</p>	<p>Will the option/ proposal help to:</p> <ul style="list-style-type: none"> • Increase the range, availability and affordability of sustainable travel choices i.e. public transport, walking, cycling? • Improve road safety? • Promote sustainable patterns of land use and development that reduce the need to travel and reliance on the private car?

4. What has plan making / SEA involved to this point?

4.1 Introduction

In accordance with the SEA Regulations the Environmental Report must include:

- An outline of the reasons for selecting the alternatives dealt with; and
- The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.

The 'narrative' of plan-making / SEA up to this point is told within this part of the Environmental Report. Specifically, this section explains how preparation of the current version of the DNP has been informed by an assessment of alternative site options.

4.2 Overview of plan making / SEA work undertaken

The Parish Council have gathered a range of evidence, and undertaken consultation with communities and other key stakeholders to identify the issues and opportunities that need to be addressed in the Neighbourhood Plan.

The SEA process is being delivered by AECOM as part of the Locality Technical Support Programme.

The first step in the SEA Process was the development of a Scoping Report, which was published for Consultation in May 2019.

AECOM worked alongside the Parish Council to identify and appraise any reasonable alternatives, to ensure that the SEA helps to inform the approaches and policies within the draft Plan. This is important given that the Regulation 14 Consultation went ahead in the absence of an Environmental Report.

A draft Plan has been shared with AECOM, who have undertaken an appraisal of the Plan 'as a whole', taking into account each of the individual policies in combination. As part of this process, it is important to consider 'reasonable alternatives'.

4.3 Assessment of reasonable alternatives for the Neighbourhood Plan

A key element of the SEA process is the appraisal of 'reasonable alternatives' for the DNP. The SEA Regulations⁶ are not prescriptive as to what constitutes a reasonable alternative, stating only that the Environmental Report should present an appraisal of the '*plan and reasonable alternatives taking into account the objectives and geographical scope of the plan*'.

The following sections therefore describe how the SEA process to date has informed the development strategy for the Neighbourhood Plan area. Specifically, this chapter explains how the DNP's plan policies relating to housing and site allocations have been dealt with in the SEA.

4.3.1 Housing Strategy

Overall housing numbers (targets) are primarily the responsibility of the Local Planning Authority, Hinckley and Bosworth Borough Council (HBBC). The HBBC Core Strategy was adopted in December 2009 and set out spatial strategy for delivering sustainable growth within the Borough between 2001-2026. Policy 8 of the Core Strategy identifies Desford as a key rural centre.

⁶ Environmental Assessment of Plans and Programmes Regulations 2004

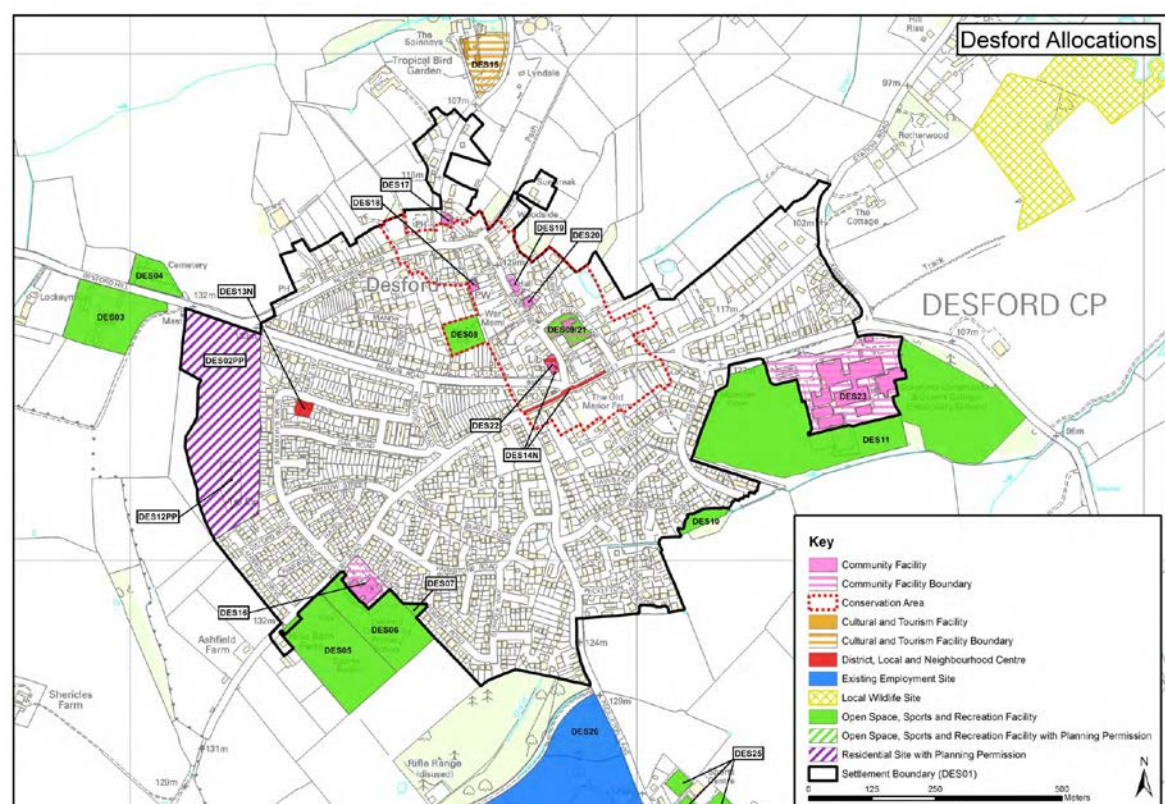
The policy seeks to:

"support the local services in Desford and, to ensure local people have access to a range of , the (HBBC)will:

- *Allocate land for the development of a minimum of 110 new homes. Developers will be expected to demonstrate that the number, type and mix of housing proposed will meet the needs of Desford taking into account the latest Housing Market Assessment and local housing needs surveys where they exist in line with Policy 15 and Policy 16.*
- *Support additional employment provision to meet local needs in line with Policy 7.*
- *Address the existing deficiencies in the quality, quantity and accessibility of green space and play provision in Desford as detailed in the council's most up to date strategy and the Play Strategy. New green space and play provision will be provided where necessary to meet the standards set out in Policy 19.*
- *Deliver improvements in the quality of Sport in Desford, including the purchase of extra land to develop the facilities and outdoor pitches across Desford Parish as detailed in the Hinckley & Bosworth Cultural Facilities Audit.*
- *Deliver safe cycle routes, as detailed in Policy 14 with particular focus on the routes from Desford to Sport in Desford and Bosworth College and to local employment at Caterpillar, Peckleton Common and Timkens.*
- *Deliver the strategic green infrastructure network detailed in Policy 20. To achieve this, strategic interventions involving Tourism Support and the Ratby to Desford Multifunctional Corridor will be implemented.*
- *Support traffic management measures and additional car parking to encourage people to shop locally, improve Desford village centre and create a true centre for the village as supported by the Desford Parish Plan.*
- *Safeguard land for the development of a new passenger railway station and associated car parking on the site of the former station yard at Desford in case the National Forest line is re-opened to passenger facilities.*
- *Require new development to respect the character and appearance of the Desford Conservation Area by incorporating locally distinctive features of the conservation area into the development.*

The development plan also includes the HBBC Site Allocations and Development Management Policies Development Plan Document which was adopted 2016. The Site Allocations and Development Management Policies Document (DPD) allocates land to deliver the development requirements outlined in the Hinckley and Bosworth Core Strategy such as housing, employment, recreation, green spaces, community uses and leisure uses.

Figure 4.1 Desford Allocations identified by HBBC Site Allocations and Development Management Policies Document.



Hinckley and Bosworth are currently going through the process of undertaking a Local Plan review, and a single plan will be prepared that covers the strategy and site allocations. This process has required a reconsideration of housing needs.

When the Desford Neighbourhood Plan was started, the position was that no further allocations were needed before 2026. However, in light of new evidence, there has been a need to reconsider site options (despite the allocation made in 2016 now been completed).

Desford Parish Council has worked with Hinckley and Bosworth Borough Council to identify how it can contribute to meeting these revised housing needs. This has involved identifying potential supply options by initiating a call for sites exercise.

With regards to the scale of growth, the target was established using the Standard Methodology and is therefore considered to be an appropriate and justified approach.

The SEA has not tested a lower level of growth, as this would not meet the objective of the Plan which is to support and influence sustainable housing growth in the Parish.

There is no specific evidence to support a higher target, and the Plan does not seek to limit further growth. Therefore, it is considered unnecessary to appraise higher housing targets.

Are there any other reasonable alternatives?

Several strategic alternatives were considered as part of the SEA process. However, these were ultimately found to be unreasonable.

One approach would be to seek to accommodate development needs in Botcheston rather than Desford.

However the adopted Core Strategy for Hinckley and Bosworth does not identify Botcheston as a key rural centre and the settlement does not have sufficient community facilities and services to support further sustainable growth.

Land South of Desford (SHELA Ref. LPR24) is a large site to the south of Desford Village that has been put forward in Hinckley and Bosworth SHELAA 2018. Whilst this could meet needs, the location is considered unsuitable for development as it represents a substantial area of good quality agricultural land which is not well related to the village centre. In terms of landscape quality it provides an important area of open countryside which plays an important part in providing a countryside gap between the employment area to the south east and Desford village. Finally it is considered that it would be difficult to deliver a safe vehicular access to the site in-light of the existing country lanes which currently define the area. Part of the site does not fall within the Plan area either.

The housing strategy was therefore essentially determined through a comparison of reasonable site options.

4.3.2 Site allocations

Having considered the housing provision target and the needs to be met, the Neighbourhood Plan Working Group (NPWG) agreed to undertake a comprehensive strategic sustainability assessment (SSA) of potential residential development sites, to enable the most sustainable and least environmentally damaging site(s) to be allocated for future housing growth.

HBBC completed three call-for-sites between 2016 and 2018. As a result of these call-for-sites the SHELAA was published in December 2018. Due to the timing of the publication of the SHELAA and the Neighbourhood Plan wanting to progress to site assessment stage, the Desford Neighbourhood Plan group agreed to assess the fifteen potential sites that had come forward for the 2014 SHELAA.

Site assessment work was undertaken in 2018 and concluded in 2019, incorporating further sites into the process that had come forward during the Regulation 14 consultation.

Through undertaking the SSA the Neighbourhood Plan Working Group prioritised the least environmentally damaging and the most sustainable locations for residential development. The SSA process is described in the appendix (Appendix D2).

As a consequence of completing the SSA process, the land off the Barns Way extension site is allocated for residential development. The conditions attached to the allocation have been agreed with the r and planning permission granted. The Strategic Site Assessment package report can be found at on the Neighbourhood Planning Website for Desford at <http://www.desfordvision.co.uk/> and includes a detailed discussion of the site sieving and appraisal process.

The site appraisal framework identified for the SEA overlaps considerably with the criteria within the site assessment package report.

Therefore, information has been drawn from this report as much as possible. Where there has been a need to gather additional information to fill any gaps in the SEA site appraisal framework, this has been undertaken. Table 4.1 outlines a high level summary of the site appraisal findings. The following colours represent the performance for each criteria:

- A **green score** reflects a strong performance and means that the development of the site will not result in any adverse impacts on the environment and is sustainable.
- Where environmental harm is possible but it can be avoidable or mitigated or development would not achieve a reasonable amount of sustainability, an **amber score** is given.
- A **red score** reflects severe environmental harm or low sustainability.

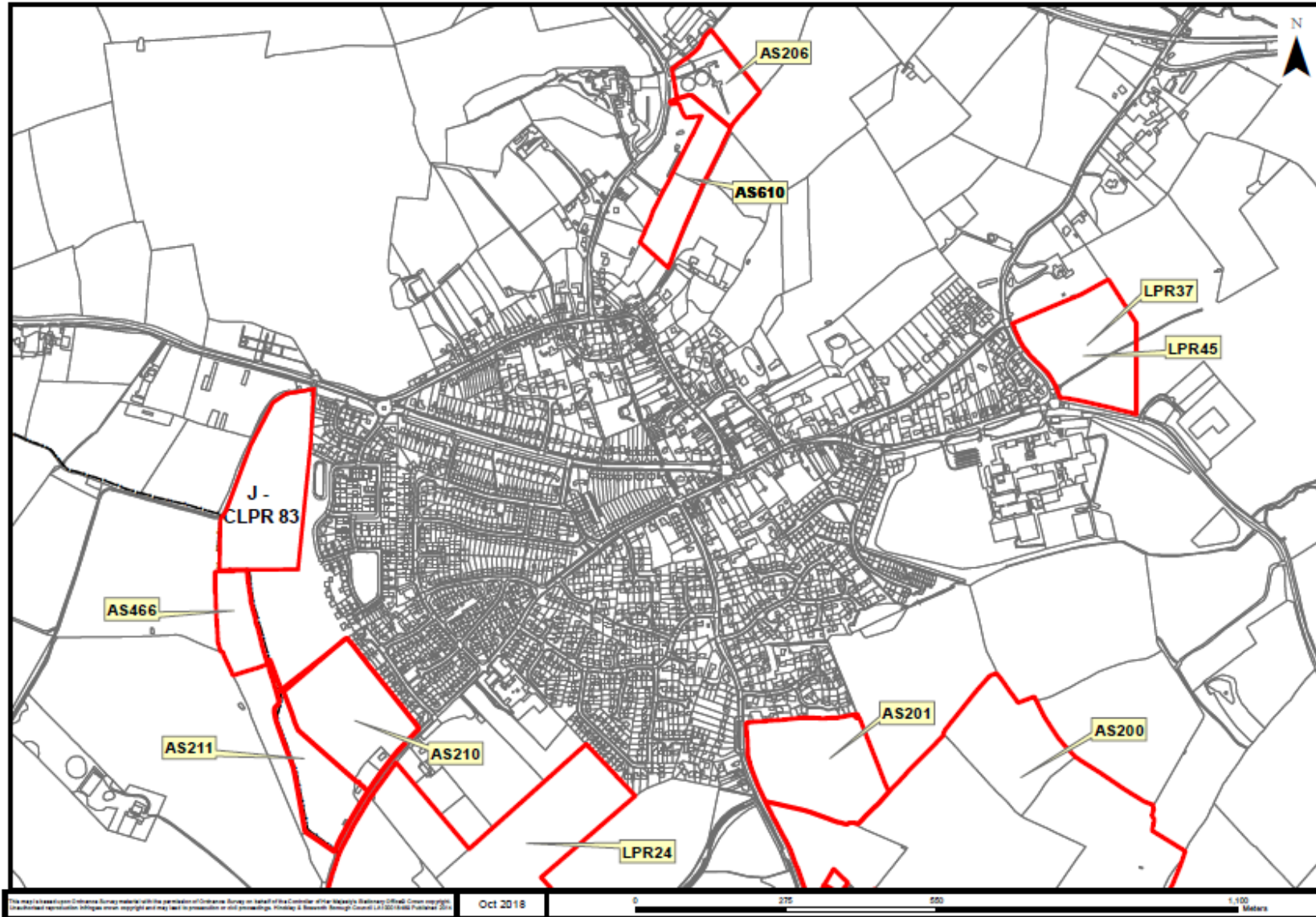
Table 4.1: Summary of site appraisal findings

Site name	1. Site capacity	2. Current uses	3. Adjoining uses	4. Site availability - Single ownership or multiple ownership	5. Distance to designated village centre.	6. Current existing informal/formal recreational opportunities on site	7. Distance to the nearest employment site	8. Any noise issues	9. Topography	10. Greenfield or Previously Developed Land	11. Good Quality Agricultural Land (by the Natural England classification)	12. Gas and/or oil pipelines & electricity transmission network. (Not water or sewage systems)	13. Any contamination issues	14. Landscape Quality, Visual Impact Assessment (VIA)	15. Relationship with existing pattern of built development	16. Local Wildlife considerations	17. Important Trees, Woodlands & Hedgerows	18. Listed Building or important built assets and their setting	19. Impact on the Conservation Area or its setting	20. Ancient monuments or archaeological remains	21. Safe pedestrian access to and from the site	22. Distance to GP/Health centre	23. Distance to Primary school	24. Safe vehicular access to and from the site	25. Impact on existing vehicular traffic	26. Safe access to public transport (specifically a bus stop with current service)	27. Any existing public rights of ways/bridle paths	28. Any known flooding issues	29. Any drainage issues
1. Botcheston A – Rear of Snowdene – Main Street SHLAA Ref: AS196	Green	Yellow	Red	Yellow	Yellow	Green	Red	Green	Yellow	Yellow	Green	Yellow	Yellow	Yellow	Green	Yellow	Yellow	Green	Green	Yellow	Red	Red	Yellow	Yellow	Yellow	Yellow	Green	Green	Yellow
2. Botcheston B – Rear of 38 Main Street SHLAA Ref: LPR 66	Yellow	Yellow	Red	Green	Yellow	Yellow	Yellow	Green	Yellow	Red	Yellow	Green	Yellow	Red	Yellow	Green	Yellow	Green	Green	Yellow	Red	Red	Red	Red	Yellow	Yellow	Yellow	Green	Yellow
3. Botcheston C – Hinds Quarters Main Street SHLAA Ref: AS 195	Yellow	Yellow	Red	Green	Green	Green	Yellow	Green	Yellow	Red	Yellow	Yellow	Yellow	Red	Yellow	Red	Yellow	Green	Green	Yellow	Red	Red	Yellow	Green	Green	Red	Green	Yellow	
4. Botcheston D – New Botcheston North of Main Street SHLAA Ref: AS 194	Red	Yellow	Yellow	Yellow	Yellow	Yellow	Red	Green	Yellow	Red	Yellow	Yellow	Yellow	Red	Red	Yellow	Green	Green	Green	Yellow	Red	Red	Red	Red	Yellow	Red	Green	Yellow	
5. Desford A – Sewage treatment plant Lindridge Lane SHLAA Ref: AS 206	Yellow	Yellow	Red	Green	Red	Green	Red	Yellow	Green	Yellow	Green	Yellow	Yellow	Red	Red	Yellow	Green	Green	Green	Yellow	Red	Red	Yellow	Red	Red	Red	Red	Green	Yellow
6. Desford B – Lyndale boarding cattery, Lindridge Lane SHLAA Ref: AS 610	Yellow	Yellow	Red	Green	Red	Green	Red	Yellow	Red	Yellow	Yellow	Yellow	Yellow	Red	Red	Yellow	Green	Green	Green	Yellow	Red	Red	Red	Red	Red	Red	Green	Yellow	
7. Desford C - Barns Way Extension	Red	Yellow	Yellow	Green	Yellow	Green	Yellow	Green	Yellow	Red	Yellow	Green	Yellow	Yellow	Yellow	Yellow	Yellow	Green	Green	Yellow	Yellow	Red	Yellow	Yellow	Green	Yellow	Yellow	Yellow	

Site name	1. Site capacity	2. Current uses	3. Adjoining uses	4. Site availability - Single ownership or multiple ownership	5. Distance to designated village centre.	6. Current existing informal/formal recreational opportunities on site	7. Distance to the nearest employment site	8. Any noise issues	9. Topography	10. Greenfield or Previously Developed Land	11. Good Quality Agricultural Land (by the Natural England classification)	12. Gas and/or oil pipelines & electricity transmission network. (Not water or sewage systems)	13. Any contamination issues	14. Landscape Quality, Visual Impact Assessment (VIA)	15. Relationship with existing pattern of built development	16. Local Wildlife considerations	17. Important Trees, Woodlands & Hedgerows	18. Listed Building or important built assets and their setting	19. Impact on the Conservation Area or its setting	20. Ancient monuments or archaeological remains	21. Safe pedestrian access to and from the site	22. Distance to GP/Health centre	23. Distance to Primary school	24. Safe vehicular access to and from the site	25. Impact on existing vehicular traffic	26. Safe access to public transport (specifically a bus stop with current service)	27. Any existing public rights of ways/bridle paths	28. Any known flooding issues	29. Any drainage issues
SHLAA Ref: LPR37 (AS203) *PROPOSED SITE ALLOCATION*	Red	Yellow	Yellow	Green	Yellow	Green	Red	Green	Green	Red	Yellow	Green	Yellow	Yellow	Green	Green	Green	Yellow	Yellow	Yellow	Red	Yellow	Yellow	Green	Green	Green	Green	Yellow	
8. Desford D – Hunts Lane Extension SHLAA Ref: AS 466	Green	Yellow	Yellow	Green	Red	Red	Red	Green	Green	Red	Yellow	Green	Green	Red	Red	Yellow	Green	Green	Green	Yellow	Red	Yellow	Red	Yellow	Green	Green	Green	Yellow	
9. Desford E – Ashfield Farm Extension SHLAA Ref: AS 210	Red	Yellow	Yellow	Green	Red	Yellow	Red	Green	Green	Red	Yellow	Green	Yellow	Red	Red	Yellow	Green	Green	Green	Yellow	Red	Yellow	Red	Yellow	Green	Green	Green	Yellow	
10. Desford F – Meadow Way Extension SHLAA Ref: AS 201	Red	Yellow	Yellow	Green	Red	Yellow	Red	Green	Green	Red	Yellow	Green	Yellow	Red	Red	Yellow	Green	Green	Green	Yellow	Red	Yellow	Red	Yellow	Green	Green	Green	Yellow	
11. Desford G – Kirkby Road Extension SHLAA Ref: AS 211	Red	Yellow	Yellow	Green	Red	Yellow	Red	Green	Green	Red	Yellow	Green	Yellow	Red	Red	Yellow	Green	Green	Green	Yellow	Red	Yellow	Red	Yellow	Green	Green	Green	Yellow	
12. Desford H - New Desford South Expansion SHLAA: AS 200	Red	Yellow	Yellow	Green	Red	Yellow	Red	Green	Green	Red	Yellow	Green	Yellow	Red	Red	Yellow	Green	Red	Yellow	Yellow	Red	Yellow	Red	Yellow	Green	Green	Green	Yellow	
13. Desford I – Neovia New Desford Expansion SHLAA: LPR 24	Red	Yellow	Yellow	Green	Red	Yellow	Red	Green	Green	Red	Yellow	Green	Yellow	Red	Red	Yellow	Green	Green	Green	Yellow	Red	Yellow	Red	Yellow	Green	Green	Green	Yellow	
14. Desford Site - J South of Hunts Lane Expansion site SHLAA:	Red	Yellow	Yellow	Green	Red	Green	Red	Green	Green	Red	Yellow	Green	Yellow	Red	Red	Yellow	Green	Green	Green	Yellow	Red	Yellow	Red	Yellow	Green	Green	Green	Yellow	

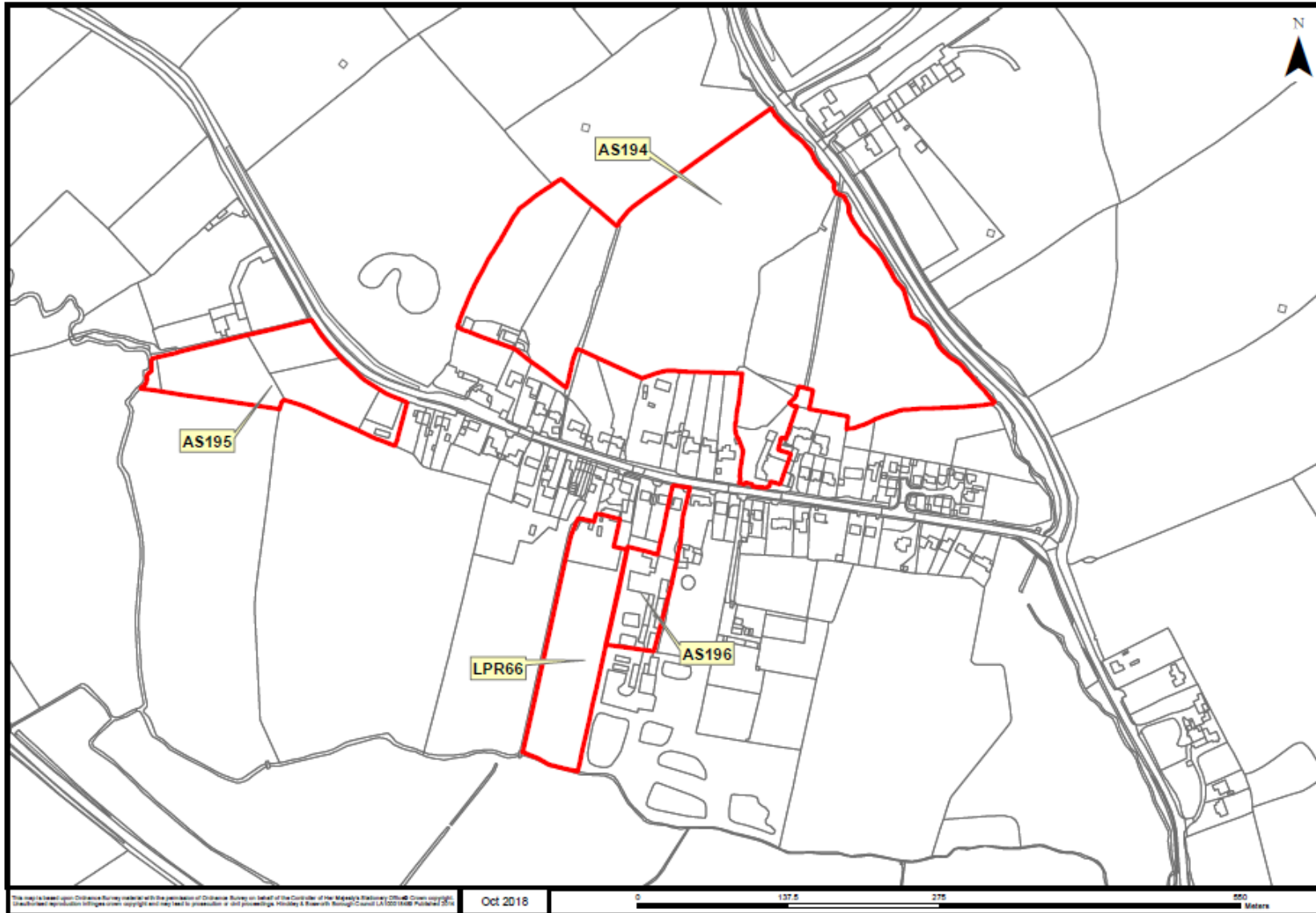
Desford Village Overview Map SHELAA 2018

Sites REF in Black Subject to SEA Site Appraisal



Botcheston Overview Map SHELAA 2018

Sites REF in Black Subject to SEA Site Appraisal



Outline reasons for selecting the preferred site option

The decision relating to the allocation of the preferred site is based primarily on the outputs from the site assessment exercise.

This demonstrates that the preferred site performs the best overall compared to the discounted site options (when considered across the full range of criteria).

Though some of the discounted sites perform better in respect of certain assessment criteria (for example, several sites are less constrained by the potential for impacts on heritage assets), the Parish Council consider that the chosen site performs better 'in the round'.

An additional consideration is the fact that site LPR37 has been granted planning permission.

Table 4.2 below sets out the site reference for the options. More detailed rationale can be found in the separate site assessment report.

Table 4.2: Reference for site selection.

Site name	Reference
Site 1. Botcheston A – Rear of Snowdene – Main Street	AS196
Site 2. Botcheston B – Rear of 38 Main Street	LPR 66
Site 3. Botcheston C – Hinds Quarters Main Street	AS 195
Site 4. Botcheston D – New Botcheston North of Main Street	AS 194
Site 5. Desford A – Sewage treatment plant Lindridge Lane	AS 206
Site 6. Desford B – Lyndale boarding cattery, Lindridge Lane	AS 610
Site 7. Desford C - Barns Way Extension	LPR 37 highest ranked site Now has permission
Site 8. Desford D – Hunts Lane Extension	AS 466
Site 9. Desford E – Ashfield Farm Extension	AS 210 *
Site 10. Desford F – Meadow Way Extension	AS 201
Site 11. Desford G – Kirkby Road Extension	AS 211 *awaiting new ref. no From LPA
Site 12. Desford H - New Desford South Expansion	AS 200
Site 13. Desford I – Neovia New Desford Expansion	LPR 24
Site 14. Desford J – South of Hunts Lane Expansion (No SHLAA Ref)	LPR 83

5. What are the appraisal findings at this current stage?

5.1 Introduction

The aim of this chapter is to present appraisal findings and recommendations in relation to the Regulation 14 version of the DNP.

5.2 Current approach in the Neighbourhood Plan and the development of Neighbourhood Plan policies

Neighbourhood Plan Policies – Desford Neighbourhood Plan

Housing and the built environment policies

H1	Settlement Boundary
H2	Residential Site Allocation
H3	Affordable Housing
H4	Housing Mix
H5	Windfall Site Development
H6	Housing Design

Natural and historic environment policies

ENV1	Protection of Local Green Space
ENV2	Protection of Other Sites and Features of Environmental Significance
ENV3	Biodiversity General
ENV4	Ridge and Furrow
ENV5	Local Heritage Assets
ENV6	Safeguarding Important Views
ENV7	Renewable Infrastructure

Community facilities policies

F1	Retention of Existing Community Facilities
F2	New or Improved Community Facilities

Transport

T1	Traffic Management
T2	Desford Railway Station
T3	Footpaths Bridleways and Cycle Routes
T4	Electric Vehicles

Employment

E1	Existing Employment Use
E2	Support for New Employment Opportunities
E3	Home Working
E4	Farm Diversification
E5	Tourism
E6	Mobile Phone and Broadband Infrastructure

5.3 Approach to the appraisal

The appraisal is structured under each of the SEA Objectives that are set out in the SEA Framework.

For each Objective, 'significant effects' of the current version of the plan on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations.⁷ So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. These effect 'characteristics' are described within the assessment as appropriate.

Every effort is made to identify / evaluate effects accurately; however, this is inherently challenging given the high level nature of the plan. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

5.4 SEA Objective 1: Biodiversity

Appraisal findings: Site Allocation

The draft DNP has allocated a site for residential development along Barns Way in Desford. The site is in line with the settlement pattern and is unlikely to disrupt biodiversity significantly. As per the site appraisal summary, it is unlikely that significant effects would occur on important trees, hedgerows or woodlands.

In the event that development progresses on the site without permission lapsing, then the effects are predicted to be neutral (i.e. the development would have come ahead anyway).

Appraisal findings: Draft Plan

Housing and the build environment

Collectively, policies H1- H6 are likely to have a **positive effect** on biodiversity. Policy H1 states that there will only be development supported within the outlined settlement boundary and any outside of the boundary will be treated as open countryside. This is a positive for biodiversity as it will reduce sprawl into open countryside/ areas which may contain biodiversity habitats. Policy H4 refers to introducing a mix of housing such as compact dwellings, and limiting 4 bedroom/ larger housing developments. This is a positive for biodiversity as it does not put as much pressure upon greenfield land and could help in terms of making space on site for green infrastructure enhancements.

Natural and historic environment

Policies ENV1 and ENV2 are likely to have a **positive effect** on biodiversity as they protect local green space, and environmental assets; stating that development should not have a significant adverse effect on designated local greenspace unless prescribed under very special circumstances. Sites of environmental significance are listed in Figure 7 within the DNP, and important open spaces are listed in Figure 8 of the DNP. It is very clear in the plan that these areas need to be treated with importance and preservation.

Policies ENV3 – ENV5 are likely to have a **positive effect** on biodiversity as they outline the importance of biodiversity and heritage value. The policies also identify areas that development should avoid and sets out the need to adequately mitigate or compensate the loss of biodiversity.

Policy ENV7 is likely to have a **neutral effect** for biodiversity. Whilst it states that renewable energy developments will be supported as long as the adverse impacts on biodiversity are mitigated/ avoided, this is an existing policy nationally and locally.

⁷ *Environmental Assessment of Plans and Programmes Regulations 2004*

Community facilities

Policies F1 and F2 are not directly related to biodiversity, and so a **neutral effect** is predicted.

Transport

Policy T1 and T2 are likely to have a **neutral effect** on biodiversity. The policies do not specifically address biodiversity, but it is unlikely that increased networks of footpaths and bridleways would significantly harm biodiversity (though care will need to be taken to ensure that biodiversity is not disturbed by new routes). Management of traffic should have some positive effect as it helps to reduce the potential for accidents (involving wildlife), and disturbance. On balance, neutral effects are predicted.

Policy T2 and T3 encourage active transport and electric vehicles. These policies are likely to have a **minor positive effect**. The policies consider transport holistically as opposed to prioritising motor vehicles. This should help to improve air quality and reduce traffic. Whilst beneficial the magnitude of effects is low.

Employment

Policy E1 and E2 will have a **neutral effect** on biodiversity as it states that development can result in a loss of employment areas if buildings have not been utilised within the last 6 months or commercial premises have no potential for reoccupation or development. Policy E2 states that development for employment must fall within the settlement boundary of Desford Village unless is related to countryside locations. The policy allows for development in countryside locations for employment under circumstances such as the size of the employment activity must not affect character, infrastructure, environment including the countryside. This somewhat considers biodiversity and reflects the current policy framework.

Policy E4 will have a **minor positive effect** on biodiversity as it considers sustainable growth for the farming industry. It suggests that conversion of existing agricultural and commercial buildings will be supported so long as development does not have an adverse impact on environmental features and respects the local character. There is no specific support for the improvement of agricultural land for wildlife protection.

Policy E5 will likely have a **minor negative effect** on biodiversity as the policy suggests that development will be supported where they do not have adverse impacts on residential or visual amenity but does not consider biodiversity. Visitor and tourist development may encroach on biodiversity, and this policy does not address the consequences of tourism development on habitat. Increases in tourism activities may weaken resilience to biodiversity as it increase visitor patronage within the neighbourhood. The effects are not considered to be significant as there are existing policies that ensure biodiversity needs to be considered (within the local plan and the neighbourhood plan).

Overall (cumulative) effects

Overall the policies demonstrate a **minor positive effect** on biodiversity within the Plan area.

The allocated site is unlikely to have notable effects on biodiversity. Furthermore, policies relating to housing suggest that development must only be supported within the settlement boundary as this will limit urban sprawl in the area. There is also emphasis on the design of housing, and that it should be kept to smaller, compact designs. These measures should help to protect areas of natural greenspace.

Policies relating to the natural and historic environment are protective of environmental areas and place emphasis on development not having adverse effects on the environment.

Transport policies suggest that existing parking areas should be reserved, that active transport should be encouraged and that electric vehicles should be promoted and accommodated throughout the

borough. These policies are likely to have a minor positive effect with regards to the protection of biodiversity. .

5.5 SEA Objective 2: Climate change

Appraisal findings: Site Allocation

Housing and employment growth proposed through the DNP will lead to increases in built up areas within Desford. This will stimulate additional traffic flows and lead to some inevitable increases in greenhouse gas emissions originating from the parish. However, given the scale of growth proposed, and the likelihood of improvements to energy efficiency and the adoption of new technologies, this is not considered to lead to significant effects in relation to climate change mitigation.

In addition, the site allocation proposed through the DNP is located within the settlement boundary and adjacent to the existing built-up area of Desford. The site demonstrates good access to local services, facilities and employment in the village. This should help limit increases in greenhouse gas emissions from transport.

The site allocation at Barns Way has been determined as low risk for flooding.

In the event that development occurs in-line with the permission granted on this site, then the effects are predicted to be neutral (i.e. the development would have come ahead anyway and not be influenced as strongly by the NP policies).

Appraisal findings: Draft Plan

Housing and the built environment

Policy H1 will have a **minor positive effect** on climate change as it limits development only within the settlement boundary, and where it respects the character of Desford. Any land outside of the boundary is treated as open countryside. This is a positive motion for climate change as it limits development within the outlined existing settlement pattern and creates less urban sprawl.

Policy H2 – H5 will have a **neutral effect** on climate change as it states where housing is planned to go, the types of housing expected, affordable housing, housing design etc. These policies do not reflect anything in favour of climate change.

Policy H6 will have a **significant positive effect** as it states that housing design should incorporate sustainable design principles and sustainable drainage systems. A Sustainable Drainage Scheme is to be submitted and approved by relevant Authority at a local plan scale. The policy also speaks about development to incorporate sustainable design and construction techniques to meet high standards for energy and water efficiency, including the use of renewable energy and low carbon technology. This is a significantly positive impact on development for climate change.

Natural and historic environment

Policy ENV1 – ENV6 will have a **minor positive effect** on climate change. Policies ENV1 – ENV3 protect existing local green space and other sites of environmental significance. This is a positive for climate change as it prioritises the environment and greenspace.

Policy ENV7 will likely have a **minor positive effect** as it discusses supporting renewable energy infrastructure. This policy addresses the conditions in which renewable energy infrastructure will be supported. This includes size, height, appearance, location, reflection, visibility etc. These conditions ensure that adverse effects on biodiversity and environment are avoided and managed.

Community facilities

Policy F1 and Policy F2 state that development should not affect existing community facilities. It also states that proposals that improve the quality of community facilities will be supported.

This will have a **neutral effect** on climate change as it does not direct any policy towards sustainable community facilities or sustainability.

Transport

Policy T1 addresses managing road traffic and improvements to parking, site access and footpaths/cycleways. Whilst this policy speaks of improving active transport infrastructure to encourage active transport such as walking and cycling, it still prioritises and refers to private motor vehicle travel. This policy has a **neutral effect**.

Policy T2 discusses the re – opening of Desford railway station, and to include additional parking facilities. This encourages private motor vehicle travel to and from the station which is unsustainable, given that the entire neighbourhood is within walking distance. This policy has a **minor negative effect**.

Policy T3 seeks to ensure active transport corridors such as footpaths, bridleways and cycle routes are maintained and upgraded. Policy T4 requires developments to provide electric vehicle cabling and charging points. This is a **minor positive effect** as walking and cycling are both sustainable modes of transport.

Employment

Policy E3 will have a **minor positive effect** on climate change as it encourages people to work from home, rather than commuting to work. This is a more sustainable lifestyle and can contribute to reducing CO².

Overall (cumulative) effects

Overall, the plan will have a **minor positive effect** on climate change. The plan focuses on supporting sustainable development, preserving existing local green spaces and sites of environmental significance, whilst promoting active modes of transport and encouraging people to travel in more sustainable ways. This will result in a minor positive effect on the neighbourhood.

5.6 SEA Objective 3: Historic environment

Appraisal findings: Site Allocation

The delivery of housing and employment land within Desford has the potential to impact the historic environment, landscape character and the visual setting and amenity of the Neighbourhood Plan area if inappropriately located and designed.

A scheduled monument is a historic building or site that is of national importance and is given protection against unauthorised change. In Desford, there is a scheduled monument, Moated site 440m south west of Lindridge Fields Farm. From a heritage perspective, the allocated site does not contain a listed building or a scheduled monument. The site is also situated well away from the conservation area in the village centre. It has been identified that there is no harm to an ancient monument or remains on site. The new development may affect the existing local character, but this could be avoided with layout and design features. Therefore, the effects are predicted to be **neutral**.

In the event that development occurs in-line with the permission granted on this site, then the effects are also predicted to be neutral (i.e. the development would have come ahead anyway and not be influenced as strongly by the NP policies).

Appraisal findings: Draft Plan

Housing and the built environment

Policy H1 – H7 are likely to have **minor positive effects** on the local area historic environment. This is because the policies consider the historic nature and character of the area. The policies have regard to the existing character of the settlement.

Policy references such as 'development must respect the character of each settlement in order to maintain its distinctive character where possible' and 'new development should enhance and reinforce the local distinctiveness' are sound.

Natural and historic environment

Policy ENV1 – ENV3 will likely have a **minor positive effect** as it states that development should not result in a loss of or have significant adverse effects on green spaces, St. Martin's Churchyard, Pickard Recreation Ground and Barns Charity Fields.

Policy ENV4 outlines that the ridge and furrow earthworks are non – designated heritage sites and that any loss to these sites is to be avoided. This is a **minor positive effect**.

Policy ENV5 will likely have a **positive effect** on the historic environment. This policy outlines the specific sites that are of importance to the community and contribute to local character. It also outlines the list of assets that are to be protected.

Policy ENV6 will likely have a **positive effect** on important view corridors within the neighbourhood. There are eight listed important views that are protected from development intruding on these views. This contributes to the historic environment as the rural setting and open countryside contribute to character and amenity of the neighbourhood.

Community facilities

Policy F1 and F2 will likely have a minor positive effect. Though community buildings are not necessarily of historic or cultural value, they are focal points for communities. Consequently, their protection and introduction could have **minor positive effects** in terms of the identity of Desford.

Transport

Policy T2 will likely have an **uncertain effect**. The inactive railway may contribute to existing historic character. The re-opening and inclusion of parking facilities may trigger the need for a character study to ensure that benefits are secured rather than negative effects.

Policy T4 will likely have a **neutral effect** on the historic environment. This policy states that charging facilities for electronic vehicles must be provided across the neighbourhood and communal vehicular charging points are encouraged. Whilst it is acknowledged that electronic vehicles are a more sustainable mode of transport than the traditional motor vehicle, this innovative new technology poses threats to the neighbourhood's existing historic character. The charging stations will need to be carefully designed to mesh with existing characteristics of Desford.

Employment

Policies E1 – E6 will likely have a **neutral effect** as they do not relate to the built environment as such.

Policy E4 mentions that in order to support farm diversification and sustainable growth the conversion of existing agricultural and commercial buildings will be supported so long as development does not have adverse impacts on any archaeological, architectural, historic and environmental features. This should ensure that neutral effects occur.

Overall (cumulative) effects

In combination, the Plan policies are predicted to have a **potentially significant positive effect** upon the historic environment. There are several policies that seek to protect locally specific heritage assets and characteristics, which should provide an additional layer of protection and enhancement for heritage in Desford.

The allocated site is predicted to have neutral effects with regards to the historic environment; with the remaining policies likely to have neutral effects.

5.7 SEA Objective 4: Landscape

Appraisal findings: Site Allocation

The allocated site is located along Barns Way and does not impede on any wildlife corridors listed in Figure 9. of the DNP, or any surviving ridge and furrows which build up the surrounding landscape. Other factors include sites of environmental significance, important local green spaces, important scenic views and heritage assets which the site does not affect. As the site allocation is located on the edge of the settlement the treatment of landscape will be an important matter. However, the character of the site is not highly sensitive.

Appraisal findings: Draft Plan

Housing and the built environment

Policy H1 will have a **minor positive effect** on the landscape. The settlement boundary outlines the existing built up area. Only within the boundary and on the site allocation can development occur. Development outside of the boundary is treated as open countryside. This is a positive outcome when maintaining Desford's existing landscape character.

Natural and historic environment

Policy ENV5 will likely have a **minor positive effect** on the townscape/landscape. This policy outlines the specific sites that are of importance to the community and contribute to local character. It also outlines the list of assets that are to be protected. Whilst not specifically related to landscape character, there are links between the built up urban area and the settlement edges.

Policy ENV6 will likely have a **minor positive effect** on important view corridors within the neighbourhood. There are eight listed important views that are protected from development intruding on these views. This contributes to the historic environment; townscape and countryside as the rural setting and open countryside contribute to character and amenity of the neighbourhood. Without reminding and outlining that these important features are needed to be protected poses risk for development to treat view corridors less sympathetically.

Community facilities

Policy F1 and F2 will likely have a **neutral effect** as they do not mention or relate to landscape.

Transport

Policy T3 will likely have a **minor positive effect** on landscape within the neighbourhood plan area. This is because the policy suggests that footpaths, bridleways and cycle routes will be maintained and upgraded where appropriate. These features contribute to the landscape and countryside, so maintenance and upgrading where needed, should have a positive effect on the overall landscape.

Employment

Policy E1-E6 will have a **neutral effect** on landscape. The policies support new employment opportunities that are of a size and scale that does not adversely affect the character, infrastructure and environment of the Parish itself, including the countryside. The policies also support new employment that contributes to character and vitality of the local area. This is similar to the existing policy framework.

Overall (cumulative) effects

Mixed effects are predicted.

There is an allocated site that involves development in an open setting, but the policy framework will ensure that effects are not significantly negative. Furthermore, there are a range of positive effects that the Plan should achieve. On balance, a **minor negative effect** is predicted in this respect.

There are several **minor positive effects** identified in relation to policies that seek to protect the local characteristics of the landscape and townscape of Desford. In combination, these effects are unlikely to be significant.

5.8 SEA Objective 5: Population and community

Appraisal findings: Site Allocation

The DNP proposes to allocate 80 units at Barns Way to contribute towards meeting housing needs. At a minimum, 40% of housing units will be 'affordable housing' to allow for residents on a lower income to have the opportunity to live comfortably. This is also reflected in the core strategy for Hinckley & Bosworth Borough. Therefore, whilst positive, the effects are not considered to be significant.

The site is surrounded by open countryside and the site is allocated to the far east of the settlement boundary. Accessibility to services and facilities is a key influence on the quality of life of residents and community cohesion. In this respect the proposed allocation is in a location that is broadly accessible to the key services and facilities present in the village. They are also in locations relatively accessible to key public transport links. This will support accessibility to key amenities within and outside of the village.

Appraisal findings: Draft Plan

Housing and the built environment

Policy H1 is predicted to have a **minor positive effect** on population and communities as these policies address housing and the built environment. This policy sets out the settlement boundary for the neighbourhood plan area and is a transparent and clear boundary. Any development outside of this boundary will be considered as open countryside, but it is not overly restrictive.

Policy H2 is predicted to have a **significant positive effect**. The site allocated for future residential development is supported and is a suitable option to contribute towards meeting housing needs.. The policy states that a minimum of 40% affordable housing will be developed and the units will be visually indistinguishable. This aligns with the local plan provision on affordable housing.

Natural and historic environment

Policy ENV1 – ENV7 will have a **minor positive effect** with regards to population and community.. The policies address natural and historic features within the Neighbourhood Area. Policy 1 lists and protects local green space. This provides certainty for the community that open public spaces will be protected. Policies ENV2 and ENV3 protect significant features of biodiversity. Policy ENV5 protects local heritage assets and Policy ENV6 safeguards important views which residents will see on a regular basis. These are positive factors for the community as they help to maintain a sense of community identity.

Community facilities

Policy F1 will likely have a **minor positive effect**. This is because the policy states that development must not negatively affect existing community facility unless the facility is economically unviable, the facility is no longer needed or there be a relocation of community facilities. This will in turn benefit the local population and support social capital. Policy F2 states that new and improved community facilities will be supported so long as they do not impose any traffic management issues and the design is to standard.

Transport

Policy T1 is predicted to have a **minor positive effect** on population and the community within Desford. There are plans to reduce and minimise any increase in vehicular traffic, and to retain existing parking facilities. The policies discuss the re-opening of Desford Railway Station which can service the wider community and connect Desford to other localities.

Footpaths, bridleways and cycle routes will be maintained and upgraded where appropriate. This gives greater certainty to the community that there will be services and infrastructure to support their needs.

Employment

Policy E1 is predicted to have a **minor positive effect**. This policy seeks to ensure that development does not adversely affect existing employment centres. Policy E2 is also positive as it seeks to support new employment opportunities which can provide more jobs to local people. Policy E3 allows people to work from their own home, reducing the need to travel to an office space, but rather allowing people to have in built offices in their homes.

Overall (cumulative) effects

Overall, the plan is predicted to have a **significant positive effect** on population and community. The policies are overall supportive of improving housing affordability and accessibility, protection of green spaces and community facilities which are all important to the community's well-being and social value. In particular, the allocation of a housing site will contribute towards meeting housing needs, helping to maintain the local population.

5.9 SEA Objective 6: Health and well-being

Appraisal findings: Site Allocation

The site allocated at Barns Way aligns with the current settlement pattern extending to the East. The site is adjacent to an open outdoor sports facility and within close proximity to health associated services as it borders the current settlement boundary to the west. The site is surrounded by open space areas accessible to the public as well as a large local green space to the north east of the site. The local green space is listed as 167 and is to the east of the allocated site. Adding a connection between the new residential development and the open space will make it more accessible for residents. An increase of footpaths, bridleways and other walking tracks can promote a sense of community and social cohesion by connecting the neighbourhood. This can promote walkable neighbourhoods and walkability within the community.

A key contributor to health and wellbeing is the network of green spaces, green corridors, and open space for recreation and physical activity. An opportunity for health and wellbeing would be to create linkages from the site to existing public right of way paths.

Appraisal findings: Draft Plan

Housing and the built environment

Policies H1 – H6 are predicted to have a **minor positive effect** on health and wellbeing in the neighbourhood. These policies will accommodate affordable living and ensure a mix of housing is designated. Dwellings are to be equipped and built for people with restricted mobility allowing for a more inclusive environment. This results a more healthy and inclusive community that accommodates infrastructure, services and housing for all people. Development will respect the existing character of the Neighbourhood area and this contributes to sense of community. Ensuring amenity is protected throughout the community creates a more enjoyable and liveable neighbourhood. The design of development should also make a positive difference to the public realm, with benefits for wellbeing.

Natural and historic environment

Policy ENV1 secures and protects local green spaces. This is a **minor positive effect** on health and wellbeing as it safeguards areas that are used by the community for recreational purposes. Likewise, Policy ENV2 protects other sites and features of environmental significance throughout the neighbourhood (these include natural and historical environments). Policy ENV3 protects open spaces which can be used by the community for health, recreation and leisure. All of these policies are beneficial with regards to health and wellbeing.

Community facilities

Policy F1 will likely have a **minor positive effect** as it resists the loss of community facilities .

In addition, Policy F2 states that new and improved community facilities will be supported so long as they improve highway safety, do not generate additional car parking spaces, are conveniently accessible for cyclists and pedestrians, and take into account people with disability. These are positive effects given that community facilities can support recreational activities.

Transport

Policy T1 and T2 will most likely have a **neutral effect** on the neighbourhood's health and wellbeing. This is because both don't relate to active transport modes but rather driving private motor vehicles. This detracts from promoting active transport such as walking and cycling which is better for people's health and wellbeing.

Policy T3 will most likely have a **minor positive effect** on the community as it supports and promotes the maintenance and upkeep of footpaths, bridleways and cycle routes. This policy will seek to encourage walking over car usage, and will service new development to connect them to existing pedestrian footpath networks. This allows opportunity for the community to be healthy and active by utilising pedestrian networks and passages.

Employment

Policies E1 – E6 will most likely have a **neutral effect** on health and wellbeing. Jobs can have positive effects upon health and wellbeing, but there is no guarantee that these would be accessed by local people.

There are no direct policies on employment that relate to the improvement of health and wellbeing.

Overall (cumulative) effects

Overall the Plan is predicted to have a **significant positive effect** upon health and wellbeing. This is because many of the policies promote healthy and inclusive communities. For instance, servicing housing for a range of community groups and respecting existing neighbourhood character.

The protection of local green spaces and recreational facilities has also been highlighted throughout the policies which are positive for health and well-being of the community.

5.10 SEA Objective 7: Transportation

Appraisal findings: Site Allocation

The draft Plan proposes travel requirements for the allocated site. This includes improvements to the current road and parking services, improvements to cycle and pedestrian routes, and encouraging active and public transport modes. The policy requirements are broadly reflective of the existing policy framework (i.e. within the Hinckley and Bosworth Local Plan) but reiterate the need for an appropriate travel strategy for the allocated site.

Vehicular access to the site is proposed from the existing road at Barns Way (subject to Highways Authority Approval). Though the allocated site is slightly out of the neighbourhood centre it is unlikely to put a significant amount of additional pressure on other local roads.

On balance, **neutral effects** are predicted.

Appraisal findings: Draft Plan

Housing and the built environment

Policy H1 is predicted to have a **neutral effect** as it will lead to a continuation of existing travel patterns.

The other housing specific policies do not relate to transportation and so neutral effects are predicted also.

Natural and historic environment

Policy ENV1 – ENV7 is predicted to have a **neutral effect** on transportation as the emphasis is on environmental protection.

Community facilities

Policy F2 states that new and improved community facilities will be supported so long as they improve highway safety, do not generate additional car parking spaces, are conveniently accessible for cyclists and pedestrians and take into account people with disability. This is likely to bring about **minor positive effects** as it promotes access to local services.

Transport

Policy T1 will likely have a **minor positive effect** as the policy supports traffic management, which will help the flow of vehicle traffic through Desford. It also supports car parking facilities and maintaining existing car parking.

Policy T2 will have a **minor positive effect** as it supports the re-opening of the trainline in Desford. This would create a stronger transport link within the neighbourhood. There is also a provision to include car parking around the re-opening of the station. The effects are not significant as the policy itself will not lead to the line reopening.

Policy T3 is predicted to have a **minor positive effect** as it states that footpaths and cycle routes within the neighbourhood will be maintained, upgraded and extended where appropriate. This is a positive policy as it states that with new development, there will be provision for active transport corridors.

Policy T4 is predicted to have a **minor positive effect** as the policy supports the opportunity to charge electric vehicles within the community.

Employment

Policy E2 supports new development that allows for an increase in employment opportunities that fall within the settlement boundary. This is a **neutral effect** on transportation as it means that new establishments will utilise existing transport corridors.

Policy E3 is predicted to have a **minor positive effect** on transport as it reduces the need for people to travel to central business districts for work.

Overall (cumulative) effects

Overall, the plan is predicted to have a **minor positive effect** on transportation. This is because a lot of the policies promote positive traffic management, improved vehicular safety, electronic vehicle infrastructure and supporting sustainable and active modes of travel. Whilst positive, the in-combination effects are not predicted to be significant as the magnitude of impacts is minor.

The allocated site is unlikely to generate a significant amount of traffic, and could be designed so as to promote sustainable modes of travel. However, it is likely that the cars will remain the dominant mode of travel.

5.11 Conclusions at this current stage

5.11.1 Summary of effects

This section summarises the overall effects of the Plan against each of the SEA Topics. It is important to differentiate between significant effects, which are predicted to lead to changes in the baseline position, and those effects that are broadly positive or negative, but are less likely to lead to substantial changes.

Table 5.1 summarises the overall effects of the policies within the draft Local Plan for each SEA topic. Overall, there will be minor positive effects across each SEA topic.

Table 5.1: Summary of overall effects for each SEA Topic.

<i>Biodiversity</i>	<i>Climate change</i>	<i>Heritage</i>	<i>Landscape</i>	<i>Population and community</i>	<i>Health and wellbeing</i>	<i>Transportation</i>
Minor +ve	Minor +ve	Potential Significant +ve	Minor +ve Minor -ve	Significant +ve	Significant +ve	Minor +ve

The plan is predicted to have mostly positive effects, and for three objectives significant positive effects are predicted (though there is an element of uncertainty for one).

With regards to environmental factors, the Plan involves a number of positive policies that identify locally important features with regards to biodiversity and heritage. These add to the existing policy framework, and in the case of the historic environment could potentially have significant benefits.

The policy framework for landscape is also positive, but a residual minor negative effect is predicted due to the loss of open land at the site allocation (this is neutral though should planning permission be secured and development occurs in line with agreed conditions).

The main benefits of the Plan relate to communities, as the delivery of new homes and high quality design will support the local population and improve their health and wellbeing. The allocated site contributes notably to these effects. In the instance that planning permission is granted on this site, the effects are only relevant should the permission lapse. Therefore, these positive effects could actually be minor in reality.

5.12 Recommendations

A number of recommendations were made to enhance the positive effects of the plan and mitigate any negatives. These are summarised below:

- Policy H1 currently seeks to exclude small scale leisure or tourism activities and other forms of commercial/employment appropriate to the countryside outside or adjacent to the settlement boundary which is inconsistent with the provisions as set in Policy E2.
- Policy H2 could seek to encourage some mix of uses on site in response to identified local needs while still seek to provide the level and nature of residential growth outlined. As a site specific policy it is recommended that the policy makes it clear that proposals for the site are subject to other relevant policies of the plan in particular Policy H6 including matters relating to landscape character and biodiversity. It is recommended for Policy H2 criteria (l) *Other financial contributions ...Delete at full planning application stage* as financial contributions requirements are not limited to full planning applications. Consider the inclusion of policy which seeks to encourage renewable energy infrastructure. Consider the inclusion of policy which seeks to protect and enhance pedestrian and cycle connections.
- Consideration should be given to the potential for rural exceptions sites in terms of helping to meet affordable housing needs.
- Policy H5/supporting text: It is recommended that it may be beneficial to identify the likely amount of anticipated windfall development that is anticipated to come forward during the plan period.
- Policy ENV 5: Consider an amendment that replaces *building or structure* to heritage asset in recognition that such assets can include landscape.
- For clarity the table of heritages assets provided at page 40 could identify those assets which are designated heritage assets and those which are non-designated heritage assts.
- Policy ENV 6: Consider the inclusion of the following *development shall be designed to sustain significant views that contribute to the character and appearance of the area.*
- Policy ENV 7: For Wind Turbine and Large-scale solar energy generation developments consider clarifying that such proposals are subject to considerations of the rest of ENV 7 and other relevant policies in the plan.
- Policy ENV 3: Consider the inclusion of *Work constructively with other organisations to seek to consider the possibility of installing major solar facilities.*
- Policy E2: Consider the inclusion of *or on areas of previously developed land in sustainable locations.*

It is considered that the above changes would help to improve the performance of the Plan.

5.13 Monitoring

There is a requirement to present measures that could be used to monitor the effects of the Plan identified through the SEA. It is particularly important to monitor effects that are predicted to be significant, whether this be positive or negative. Monitoring helps to track whether the effects turn-out as expected, and to identify any unexpected effects.

Significant effects	Monitoring measures
<ul style="list-style-type: none"> A potential significant positive effect is predicted on cultural and natural heritage due to an improved protection for locally important buildings, views and historic features. 	<ul style="list-style-type: none"> Townscape character analysis. Number of locally important buildings identified for protection. Review of view corridors.
<ul style="list-style-type: none"> A significant positive effect is predicted for population and communities as the Plan will contribute towards meeting local housing needs in accessible locations. 	<ul style="list-style-type: none"> Net housing completions per annum Number of homes for older people Affordable housing target achievement
<p>A significant positive effect is predicted on health and wellbeing due to cumulative effects of affordable housing, recreational facilities and accessibility.</p>	<ul style="list-style-type: none"> Number of affordable homes delivered. Achievement of open space and sport standards

6. What are the next steps?

This Environmental Report should accompany a Regulation 14 version of the Desford Neighbourhood Plan for consultation. However, the Screening Opinion for the SEA was amended following the Reg14 consultation, meaning that the SEA process had to be started at the latter stages of plan making.

To ensure that the final Plan is informed by a robust SEA, the Plan has not yet been submitted to Hinckley and Bosworth Borough Council. It is important that stakeholders have sight of the Environmental Report before the Plan is submitted so that they are able to make additional representations on the draft Plan (that are informed by knowledge of the environmental impacts).

Consequently, the Environmental Report will be consulted upon for three weeks.

Following consultation, any additional representations made (both on the Environmental Report and the Plan itself) will be considered by the Neighbourhood Plan Steering Group. The Environmental Report will be updated as necessary to reflect any technical comments, and in response to Plan changes. In particular, it will be important to record how the recommendations made in this SA Report have been taken into consideration when finalising the Plan.

Following that consultation, the DNP will then be submitted to the Local Planning Authority, (Hinckley and Bosworth), after any necessary updating of this Environmental Report if significant changes are made to the NP as a result of the Reg 13 consultation. This version will be the formal version submitted under Reg 15 of the Neighbourhood Plans General Regulations 2012.

Hinckley and Bosworth will consider whether the plan is suitable to go forward to Independent Examination in terms of the DNP meeting legal requirements and its compatibility with the Local Plan.

Subject to Hinckley and Bosworth Council's agreement, the DNP will then be subject to independent examination. The Examiner will consider whether the plan is appropriate having regard to national policy and whether it is in general conformity with local policies.

The Examiner will be able to recommend that the DNP is put forward for a referendum, or that it should be modified or that the proposal should be refused. Hinckley and Bosworth will then decide what should be done in light of the Examiner's report. Where the report recommends modifications to the plan, Hinckley and Bosworth will invite the DNP Steering Group to make modifications to the plan, which will be reflected in an updated Environmental Report. Where the Examiner's Report recommends that the proposal is to be refused, Hinckley and Bosworth will do so.

Where the examination is favourable, the DNP will then be subject to a referendum, organised by Hinckley and Bosworth Council.

If more than 50% of those who vote agree with the plan, then it will be passed to Hinckley and Bosworth Council with a request it is 'made'. Once 'made', the DNP will become part of the Development Plan for the Borough.

Appendix A: Scoping Report

Desford Neighbourhood Plan:

Strategic Environmental Assessment
Scoping Report

Desford Parish Council

May 2019

Quality information

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Table of Contents

1.	Introduction	5
1.1	Background	5
1.2	SEA explained.....	7
1.3	Introduction to scoping	7
1.4	Structure of this Scoping Report.....	8
2.	Air Quality	9
2.1	Policy Context	9
2.2	Baseline Summary.....	10
2.3	Key headline issues.....	10
2.4	Scoping outcome	10
3.	Biodiversity	11
3.1	Policy Context	11
3.2	Baseline Summary.....	12
3.3	Key headline issues.....	15
3.4	Scoping outcome	15
4.	Climatic factors (Flood risk and climate change)	17
4.1	Policy Context	17
4.2	Baseline Summary.....	18
4.3	Key headline issues.....	22
4.4	Scoping outcome	22
5.	Historic environment.....	24
5.1	Policy Context	24
5.2	Baseline Summary.....	24
5.3	Key headline issues.....	27
5.4	Scoping outcome	27
6.	Landscape.....	28
6.1	Policy Context	28
6.2	Baseline Summary.....	29
6.3	Key headline issues.....	31
6.4	Scoping outcome	31
7.	Land, Soil and Water Resources	32
7.1	Policy Context	32
7.2	Baseline Summary.....	33
7.3	Key headline issues.....	36
7.4	Scoping outcome	36
8.	Population and Housing	37
8.1	Policy Context	37
8.2	Baseline Summary.....	37
8.3	Key headline issues.....	40
8.4	Scoping outcome	40
9.	Health and Wellbeing	41
9.1	Policy Context	41
9.2	Baseline Summary.....	42
9.3	Key headline issues.....	47
9.4	Scoping outcome	48
10.	Transportation	49
10.1	Policy Context	49
10.2	Baseline Summary.....	49
10.3	Key headline issues.....	52

10.4	Scoping outcome	52
11.	The SEA Framework and Methodologies	53
11.1	The SEA Framework	53
12.	Next Steps	55
12.1	Subsequent stages for the SEA process.....	55
12.2	Consultation on the Scoping Report.....	55
13.	Glossary	56

Acronyms

(DEFRA)	Department of Environment, Food and Rural Affairs
DPD	Development Plan Document
(EA)	Environment Agency
(MHCLG)	Ministry for Housing, Communities and Local Government
(IMD)	Index of Multiple Deprivation
(LEP)	Local Economic Partnership
(LNR)	Local Nature Reserves
(LTP)	Local Transport Plan
(NNR)	National Nature Reserve
(NPPF)	National Planning Policy Framework
(ONS)	Office for National Statistics
SEA	Strategic Environmental Assessment

1. Introduction

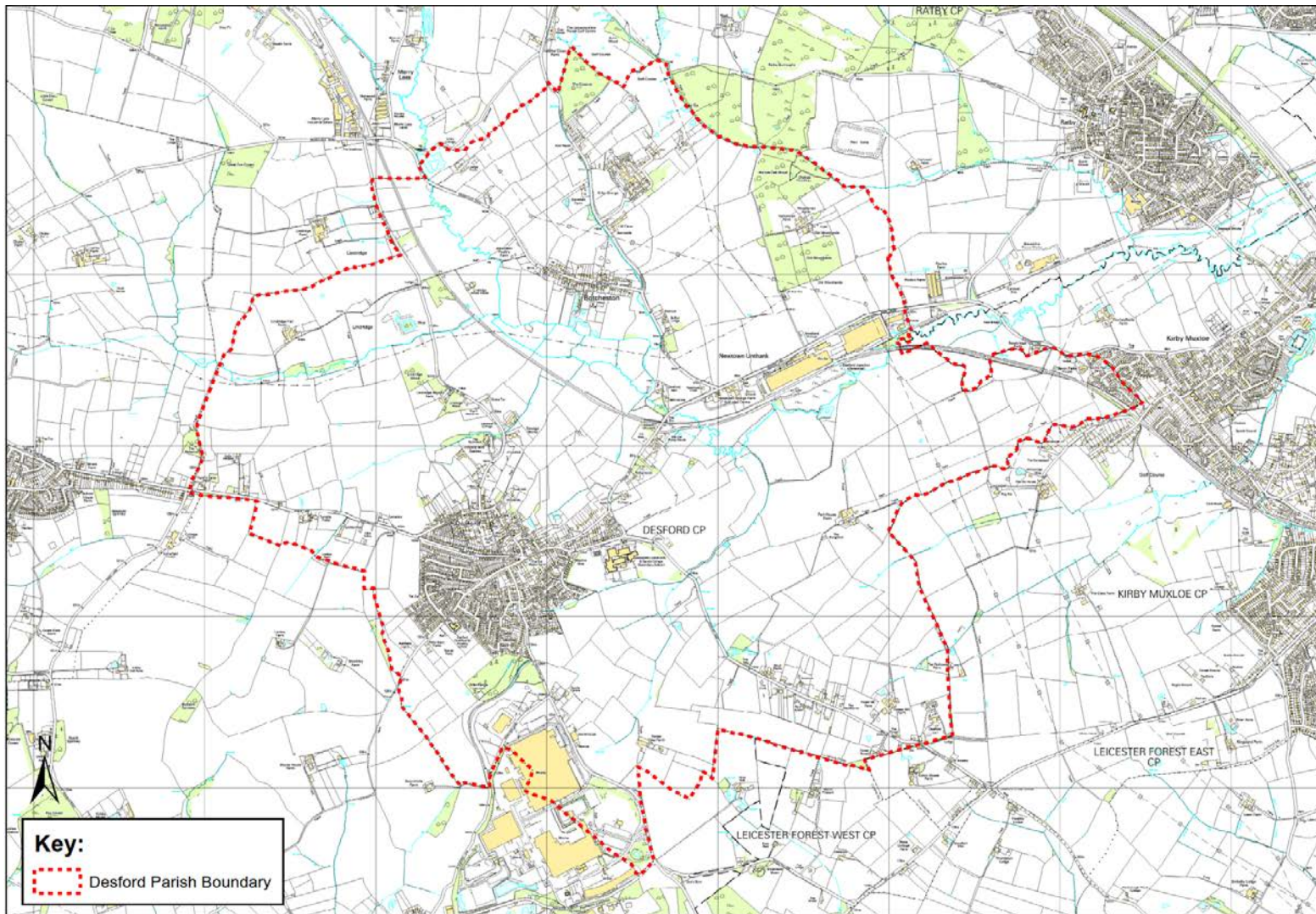
1.1 Background

- 1.1.1. Desford Parish Council is in the process of preparing a Neighbourhood Plan for the sustainable future growth of the parish. AECOM has been commissioned to undertake a Strategic Environmental Assessment (SEA) in support of Desford Neighbourhood Plan on behalf of the Parish Council.
- 1.1.2. The Neighbourhood Plan is being prepared in the context of the adopted and emerging Local Plan for Hinckley and Bosworth Borough. The adopted Local Plan consists of the Hinckley and Bosworth Core Strategy Development Plan Document (DPD) and the Site Allocations and Development Management Policies DPD. Hinckley and Bosworth Borough Council are reviewing the Local Plan and have recently undertaken consultation on the directions for growth (March 2019), with intentions to consult on preferred options in autumn 2019.
- 1.1.3. The Neighbourhood Plan will form part of the development framework for Hinckley and Bosworth Borough, alongside the Local Plan. Neighbourhood Plans are required to be in general conformity with the strategic policies of the adopted Local Plan and can develop policies and proposals to address local place-based issues. In this way it is intended for the Local Plan to provide a clear overall strategic direction for development in Hinckley and Bosworth Borough, whilst enabling finer detail to be determined through the neighbourhood planning process where appropriate.
- 1.1.4. The Key information relating to the Desford Neighbourhood Plan is presented in the table below (Table 1-1).

Table 1.1: Key facts relating to the Neighbourhood Plan for Desford Parish

Name of Responsible Authority	Desford Parish Council
Title of Plan	Desford Neighbourhood Plan
Subject	Neighbourhood Planning
Purpose	The Desford Neighbourhood Plan is being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and Neighbourhood Planning (General) Regulations 2012. The plan will be in general conformity with the Hinckley and Bosworth Local Plan.
Timescale	To 2036
Area covered by the plan	The Neighbourhood Plan area covers the parish of Desford in Leicestershire (Figure 1.1).
Summary of content	The Desford Neighbourhood Plan will set out a vision, strategy and range of policies for the Neighbourhood Plan area.
Plan contact point	Martin Broomhead, Desford Parish Clerk Email address: clerk@desfordparishcouncil.co.uk

Figure 2.1: The Desford Neighbourhood Plan Area

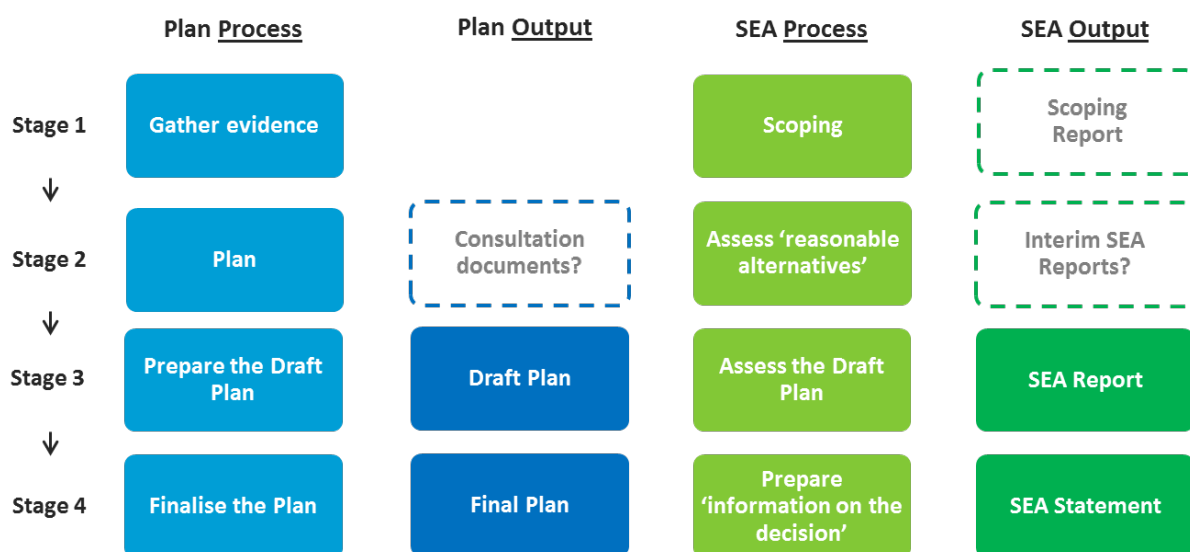


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1.2 SEA explained

- 1.2.1. SEA is a mechanism for considering and communicating the likely significant effects of an emerging plan, and reasonable alternatives in terms of key environmental issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding or mitigating negative environmental effects and maximising positive effects.
- 1.2.2. The European Directive 2001/42/EC¹ requires certain plans to be subject to a SEA. This Directive is realised in the UK through Statutory Instrument 2004 No. 1633: The Environmental Assessment of Plans and Programmes Regulations 2004 (otherwise known as the SEA Regulations). These Regulations require an environmental assessment to be carried out on certain plans and programmes that are likely to have a significant effect upon the environment. The plan has been determined to require a Strategic Environmental Assessment. To meet this requirement, the plan is undergoing an SEA process which incorporates the requirements of the SEA Directive.
- 1.2.3. SEA can be viewed as a four-stage process that produces a number of statutory and non-statutory outputs. As illustrated in Figure 1.2 below, ‘Scoping’ is a mandatory process under the SEA Directive, but the publication of a scoping report is a voluntary (but useful) output.

Figure 1.2: SEA as a four step process



1.3 Introduction to scoping

- 1.3.1. One of the first stages in the SEA process is to establish what the key issues are that the appraisal should focus on. This is called ‘scoping’, and involves a review of relevant policies, plans and programmes (a ‘contextual review’) and information about the current and future state of the environment, economy and social factors (the ‘baseline’). This information is then used to set out a framework for undertaking strategic environmental assessments as the plan is developed.
- 1.3.2. The Regulations² require that certain statutory bodies are consulted on the scope of a SEA. This can be done in a number of ways, but most often a Scoping Report is produced that presents the key information and a methodology for how future appraisals will be undertaken. Statutory Consultees have 5 weeks to comment on the scope of the appraisal. In England, the statutory consultees are Natural England, The Environment Agency and English Heritage.

¹ Directive 2001/42/EC: <http://ec.europa.eu/environment/eia/sea-legalcontext.htm>

² The Environmental Assessment of Plans and Programmes Regulations 2004

1.3.3. Developing the draft scope for the SEA as presented in this report has involved the following steps:

- Defining the broader context for the Desford Neighbourhood Plan and associated SEA (i.e. EU, UK Government and local policy and commitments), to summarise the regulatory and legislative landscape;
- Establishing the baseline for the SEA, (i.e. the current and future situation in the area in the absence of the Desford Neighbourhood Plan) in order to help identify the plan's likely significant effects;
- Identifying particular problems or opportunities ('issues') that should be a focus of the SEA; and
- Developing a SEA Framework comprising objectives and appraisal questions on the basis of these issues which can then be used to appraise the draft plan.

1.4 Structure of this Scoping Report

1.5.1. The outcomes of the scoping exercise have been presented under a series of broad environmental themes, as follows:

- Chapter 2: Air Quality;
- Chapter 3: Biodiversity;
- Chapter 4: Climatic factors (including Flood Risk);
- Chapter 5: Historic Environment;
- Chapter 6: Landscape;
- Chapter 7: Land, Soil and Water Resources;
- Chapter 8: Population and Housing;
- Chapter 9: Health and Wellbeing; and
- Chapter 10: Transportation.

1.5.2. The selected environmental themes reflect the 'SEA topics' suggested by Annex I(f) of the SEA Directive³. These were refined to reflect a broad understanding of the anticipated scope of plan effects (drawing from local knowledge and understanding).

1.5.3. In accordance with the SEA Directive, the final chapters of the report summarise the overarching sustainability issues, set out the SA Framework and document the next stages in the process. To demonstrate a clear trail of how the SEA objectives have been identified each topic Chapter (which is scoped into the SEA) concludes with suggested objectives and supporting criteria for inclusion in the SEA Framework.

³ The SEA Directive is 'of a procedural nature' (para 9 of the Directive preamble) and does not set out to prescribe particular issues that should and should not be a focus, beyond requiring a focus on *'the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors'* [our emphasis]

2. Air Quality

Focus of theme:

- Sources of air pollution
- Air quality hotspots
- Air quality management

2.1 Policy Context

- 2.1.1. The **Air Quality Strategy**⁴ (2007) establishes the policy framework for ambient air quality management and assessment in the UK. The primary objective is to ensure that everyone can enjoy a level of ambient air quality which poses no significant risk to health or quality of life. The Strategy sets out the National Air Quality Objectives (NAQOs) and government policy on achieving these objectives.
- 2.1.2. The **National Planning Policy Framework**⁵ (NPPF) (2019) outlines the importance of sustainable development and infrastructure in improving air quality and subsequently the environment and public health.
- 2.1.3. The **Local Air Quality Management Technical Guidance**⁶ (2018) issued by Defra for Local Authorities provides advice as to where the National Air Quality Objectives apply. These include outdoor locations where members of the public are likely to be regularly present for the averaging period of the objective (which vary from 15 minutes to a year).
- 2.1.4. Published in January 2018 by the UK Government, '**A Green Future: Our 25 Year Plan to Improve the Environment**'⁷ sets out a number of goals and policies in order to help the natural world regain and retain good health. In this context, Goal 1 'Clean Air' and the policies contained within 'Chapter 4: Increasing resource efficiency, and reducing pollution and waste' within the 25 year plan are relevant.
- 2.1.5. The Defra report **Action for air quality in a changing climate**⁸ (2010) focuses on the synergies between the two issues of air quality and climate change. In particular, it notes the potential for additional health benefits through the closer integration of climate and air pollution policy. It is suggested that co-benefits can be realised through a variety of means, including promoting low carbon vehicles and renewable energy.
- 2.1.6. In terms of the local context, there are no major roadways, large industry or congestion issues in the Hinckley and Bosworth Borough and air quality is generally considered to be good. The Air Quality Annual Status Report (ASR) published in June 2018 found that the nitrogen dioxide levels did not exceed the national average and therefore an air quality management area in the borough was not put in place⁹.

⁴ Defra (2007) Air Quality Strategy for England, Scotland, Wales and Northern Ireland [online] available at:

<http://www.defra.gov.uk/environment/quality/air/air-quality/approach/>

⁵ MHCLG (2019) National Planning Policy Framework [online] available at:

<https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁶ Defra (2018) Local Air Quality Management Technical Guidance [online] available at:

<https://laqm.defra.gov.uk/documents/LAQM-TG16-February-18-v1.pdf>

⁷ HM GOV (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf

⁸ Defra (2010) Air Pollution: Action in a Changing Climate [online] available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69340/pb13378-air-pollution.pdf

⁹ Hinckley and Bosworth Borough Council (2018) 2018 Air Quality Annual Status Report.

2.2 Baseline Summary

Summary of current baseline

- 2.2.1. There are currently no Air Quality Management Areas (AQMA) within the Neighbourhood Plan area or within the Hinckley and Bosworth Borough. The nearest AQMAs (NO²) are located in Leicester and along the M1, approximately 5km to the east of the Neighbourhood Plan area. There are also no diffusion tube monitoring locations within proximity to the Neighbourhood Plan area which could provide some indication of the likely air quality in Desford Parish.
- 2.2.2. According to the Hinckley and Bosworth Borough Air Quality Annual Status Report¹⁰ (2018), monitoring has shown that air quality is generally good and improving within the borough area. The report further states that net Greenhouse Gas (GHG) emissions decreased during 1 April 2017 to 31 March 2018 by 20.5% against 2015-16 to 1,923 TCO₂ (tonnes of carbon dioxide equivalent) and 37.4% (gross) against a base line year of 2009-10, mainly due to reduced electricity and transport related emissions.
- 2.2.3. The Hinckley and Bosworth Borough has 19 properties in Smoke Control Areas, meaning that the emissions from chimneys are controlled, e.g. through a requirement to use smokeless fuel or appliances that burn alternative fuels with lower emissions. This effort focuses on home and building heating systems. None of the properties are in the Desford Neighbourhood Plan area though.

Summary of future baseline

- 2.2.4. Whilst no significant air quality issues currently exist in Desford Parish, new housing provision may create adverse effects on air quality through increasing traffic flows and associated levels of pollutants such as nitrogen dioxide.
- 2.2.5. Areas of particular sensitivity to increased traffic flows are likely to be around the village centre and along High Street and Main Street.

2.3 Key headline issues

- 2.3.1. The key issues are as follows:
 - There are no Air Quality Management Areas within the Neighbourhood Plan area. Air quality in Desford parish is generally good, with no significant issues identified.
 - Traffic and congestion have the potential to increase emissions and reduce air quality in the area; however air pollution is at a low baseline so effects are unlikely to be significant given the magnitude of effects involved.

2.4 Scoping outcome

- 2.4.1. The Neighbourhood Plan is intending to allocate housing sites and these are likely to generate more trips by car than would be the case in the absence of the Plan. There is potential to generate increased particulates and nitrogen dioxide.
- 2.4.2. However, there are no AQMAs in either the Neighbourhood Plan area or in the wider Borough at present, and the scale of development is such that any effects are not likely to be significant. Therefore, due to the absence of significant and tangible air quality issues in the Neighbourhood Plan area, air quality has been **SCOPED OUT** for the purposes of the SEA process. This means that the plan will not be assessed for its performance against air quality objectives (given that no significant issues or opportunities are expected to arise through the Desford Neighbourhood Plan).

¹⁰ Hinckley and Bosworth Borough Council (2018) Air Quality Annual Status Report [online] available at: https://www.hinckley-bosworth.gov.uk/downloads/413/air_quality

3. Biodiversity

Focus of theme:

- Nature conservation designations
- Habitats and species
- Geodiversity

3.1 Policy Context

- 3.1.1. At the European level, the **EU Biodiversity Strategy**¹¹ was adopted in May 2011 in order to deliver an established new Europe-wide target to '*halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020*'.
- 3.1.2. The European Commission Guidance on **Integrating Climate Change and Biodiversity into Strategic Environmental Assessment**¹² (2013) suggests that an SEA should focus on ensuring '*no-net-loss of biodiversity*' before considering mitigation and compensation. The assessment should also take account of '*ecosystem services*' and the links between natural environment and economy.
- 3.1.3. The **NPPF** (2019) states that the planning system should contribute to protecting and enhancing the natural environment including helping to improve biodiversity, and using natural resources prudently. In support of this aim the framework states that plans should '*identify, map and safeguard components of local wildlife-rich habitats*' and should also '*promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity*'.
- 3.1.4. The Government's '**A Green Future: Our 25 Year Plan to Improve the Environment**'¹³ (2018) sets out a series of goals for improving the environment and how they will work with communities and businesses over the next 25 years to achieve them. Actions proposed of relevance to the protection and promotion of biodiversity are as follows:
- Develop a Nature Recovery Network to protect and restore wildlife, and provide opportunities to re-introduce species that have been lost from the countryside.
 - Achieve a good environmental status of the UK's seas while allowing marine industries to thrive, and complete our economically coherent network of well-managed marine protected areas.
 - Provide international leadership and lead by example in tackling climate change and protecting and improving international biodiversity.
 - Support and protect international forests and sustainable agriculture.
- 3.1.5. The **Biodiversity 2020 strategy**¹⁴ (2011), published by the government, sets out objectives to deliver: a more integrated large-scale approach to conservation, to put people at the heart of biodiversity policy, to reduce environmental pressures, an overall improvement in the status of species and prevention of further human-induced extinctions and improved public knowledge of biodiversity.

¹¹ European Commission (2011) Our life insurance, our natural capital: an EU biodiversity strategy to 2020 [online] available at: http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/2020/1_EN_ACT_part1_v7%5b1%5d.pdf

¹² European Commission (2013) Guidance on Integrating Climate Change and Biodiversity into Strategic Environmental Assessment [online] available at: <http://ec.europa.eu/environment/eia/pdf/SEA%20Guidance.pdf>

¹³ Defra (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] available at: <https://www.gov.uk/government/publications/25-year-environment-plan>

¹⁴ Defra (2011) Biodiversity 2020: A strategy for England's wildlife and ecosystem services [online] available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69446/pb13583-biodiversity-strategy-2020-111111.pdf

- 3.1.6. The **Leicester, Leicestershire & Rutland Biodiversity Action Plan**¹⁵ (2016) sets out a strategy to protect and enhance biodiversity in the region. It identifies and protects key habitats and species which are contained in the individual habitat and species action plans. These set out the importance of the species and habitat, identify their local status, threats to them and opportunities to help their recovery.
- 3.1.7. The **Hinckley and Bosworth Borough Core Strategy**¹⁶ (2009) sets out requirements for development to protect and enhance biodiversity in the borough. This includes enhancing biodiversity through green infrastructure networks and implementing a national forest north east of the borough. The emerging new Local Plan will include policies that seek to achieve net gain in biodiversity / environment.

3.2 Baseline Summary

Summary of current baseline

- 3.2.1. There are over 4,100 Sites of Specific Scientific Importance (SSSI) in England, which covers around 8% of the country's land area. SSSIs are recognised as the country's very best wildlife and geological sites. The Bocheston Bog SSSI falls within the Neighbourhood Plan area.
- 3.2.2. The SSSI comprises an area of lowland grassland and contains one of the best remaining areas of marshy grassland in Leicestershire and is representative of grazed marsh communities on peaty soils.
- 3.2.3. At the time of the last survey in 2009, the meadow that forms the eastern part of the SSSI was classed as being in 'favourable' condition and the bog to the west was classified as 'unfavourable - declining'. A recent survey in 2012 has reclassified the area covering the bog as 'unfavourable - recovering', which is a positive change.
- 3.2.4. Table 3.1 below shows the condition of the Bocheston Bog SSSI in comparison to the national average. Figure 3.1 shows the spatial context of the SSSI and other biodiversity designations in relation to the Neighbourhood Plan area.

Table 3.1: SSSI condition (Source: Natural England¹⁷)

Area	% area meeting PSA target	% area favourable	% area unfavourable recovering	% area unfavourable no change	% area unfavourable declining	% area destroyed / part destroyed
Bocheston Bog SSSI	100%	81.41%	18.59%	0%	0%	0%
England	94.31	38.65	55.65	3.39	2.09	0.05

- 3.2.5. With the SSSI being fairly centrally located in the Neighbourhood Plan area, depending on the proximity, much development falls within categories requiring Natural England to be consulted on the likely risks. For land within close proximity to the SSSI and north east of the built settlement of Desford, this includes any residential development of 100 or more houses within and 50 or more outside existing settlements. For other areas this does not include residential development but does include pipelines and overhead cables, transport proposal, quarries, landfill, and large industry infrastructure.
- 3.2.6. There are a total of 225 National Nature Reserves (NNRs) across England. Their purpose is to help manage habitats, species and significant geology. Most reserves also offer the

¹⁵ Timms, S. (2016) Space for Wildlife: Leicester, Leicestershire and Rutland Biodiversity Action Plan [online] available at: https://www.lrwf.org.uk/media/uploads/miscellaneous/space_for_wildlife__lrbap_2016-26_part_1.pdf

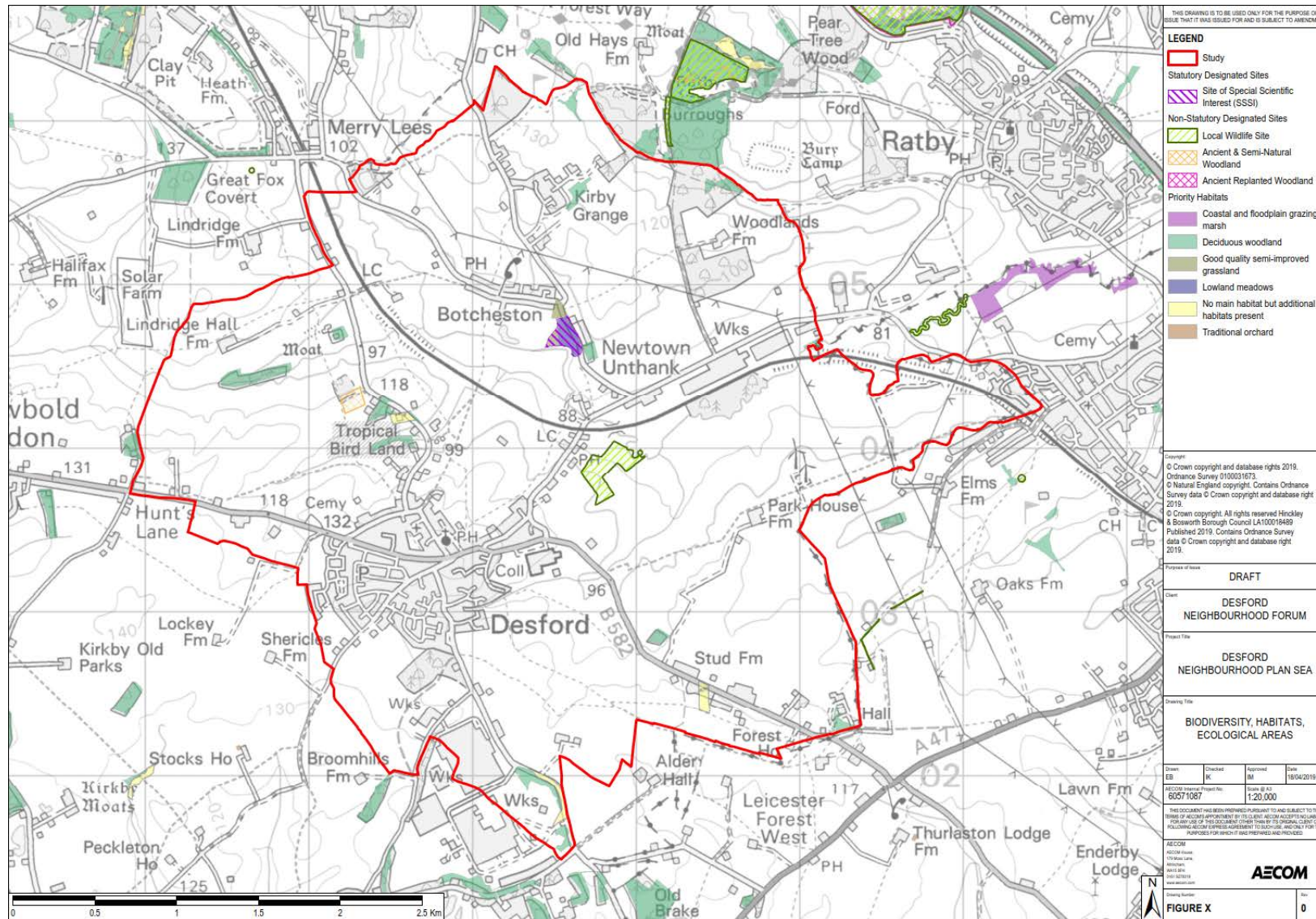
¹⁶ Hinckley and Bosworth Borough Council (2009) LDF: Core Strategy [online] available at: https://www.hinckley-bosworth.gov.uk/downloads/file/487/core_strategy_adopted_document

¹⁷ Information in relation to the condition of SSSIs throughout the area has been taken from the Natural England website. Accessed from <http://www.naturalengland.org.uk/ourwork/conservation/designatedareas/sssi/default.aspx>

opportunity for the public to experience England's national heritage. There are no NNRs within the Neighbourhood Plan area or its vicinity with the closest being the Charnwood Lodge NNR located approximately at a distance of 8.4km to the north.

- 3.2.7. There are over 1,400 Local Nature Reserves (LNR) located throughout England. The purpose of LNRs is to provide the public with opportunities to study/learn about nature. To qualify for LNR status, a site must be of importance for wildlife, geology, education or public enjoyment. There are no LNRs within the Neighbourhood Plan area or its vicinity.
- 3.2.8. There are no designated European Sites for Nature Conservation within or in the immediate vicinity of the Neighbourhood Plan area. There are also no Areas of Outstanding Natural Beauty, Special Areas of Conservation (SAC), Special Protection Areas (SPAs), possible SPAs or Ramsar sites within or in proximity to the Neighbourhood Plan area.
- 3.2.9. The Neighbourhood Plan area contains Priority Habitat areas of Deciduous woodland, Good quality semi-improved grasslands, Ancient and semi-natural woodland and Lowland meadows (see Figure 3.1). The Neighbourhood Plan area further contains a Local Wildlife Site. Key and endangered species present or likely to be present in the Neighbourhood Plan area include:
- Lapwing;
 - Curlew;
 - Tree Sparrow;
 - Yellow Wagtail;
 - Redshank; and
 - Grey Partridge.

Figure 3.1: Biodiversity Designations in Desford



Summary of future baseline

- 3.2.10. Atmospheric pollution (such as acid precipitation and nitrogen deposition) and increased flood risk that may arise as a result of climate change, could pose a risk to the habitats and species present within the Neighbourhood Plan area.
- 3.2.11. Increased development in the Neighbourhood Plan area will place increased pressure on areas of biodiversity value due to land take for development and an increase in population. An increase in population is likely to lead to an increase in leisure and recreational pressure and increased demand for natural resources such as water. New development may lead to an increase in disturbance through human activity, loss of habitat, increased predation (e.g. from domestic pets), atmospheric, land and water based pollution.
- 3.2.12. On the contrary, habitats and species are likely to continue to be afforded protection through higher level planning policy and whilst these areas face increasing pressures from future development, planning policy should safeguard the most valued areas and protect ecological networks.

3.3 Key headline issues

- 3.2.13. The key issues are as follows:
- The Bocheston Bog SSSI falls within the Neighbourhood Plan area.
 - There are no NNR, LNR, SACs, SPAs, pSPAs or Ramsar sites within or in the vicinity of the Neighbourhood Plan area.
 - The Neighbourhood Plan area contains Priority Habitat areas of Deciduous Woodland, Good Quality Semi-improved Grasslands, Ancient and Semi-Natural Woodland and Lowland Meadows.
 - A Local Wildlife Site falls within the Neighbourhood Plan area.

3.4 Scoping outcome

- 3.2.14. The SEA topic 'Biodiversity' has been **SCOPED IN** to the SEA. There is potential for localised effects at sites that could be identified for development. It will also be important to ensure that there are no significant effects upon the Bocheston Bog SSSI. It will be important to ensure that species do not rely upon or make use of habitats outside of designated habitat areas. There may also be opportunities to enhance ecological networks also.

3.5 What are the SEA objectives and appraisal questions for the Biodiversity SEA theme?

- 3.2.15. The SEA topic 'Biodiversity' has been scoped in to the SEA. Table 3.2 presents the SEA objective and appraisal questions that will be used to assess the plan in relation to this theme.

Table 3.2: SEA Framework of objectives and assessment questions: Biodiversity

SEA Objective	Supporting Questions
Protect and enhance the function and connectivity of biodiversity habitats and species	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Support connections between habitats in the Plan area? • Avoid impacts on the Bocheston Bog SSSI? • Support continued improvements to the designated sites in the Neighbourhood Plan area? • Achieve a net gain in biodiversity? • Support access to, interpretation and understanding of

biodiversity?

- Increase the resilience of biodiversity in the Neighbourhood Plan area to the effects of climate change?
-

4. Climatic factors (Flood risk and climate change)

Focus of theme:

- Flood risk
- Greenhouse gas emissions by source;
- Greenhouse gas emissions trends;
- Effects of climate change; and
- Climate change adaptation.

4.1 Policy Context

- 4.1.1. The **EU Climate Change Adaptation Strategy**¹⁸ was adopted in 2013, which supports greater coordination between areas particularly on issues that cross borders such as river basins. A key principle is to ensure that those most likely to be affected by climate change are able to take the necessary measures to adapt.
- 4.1.2. The **Carbon Plan**¹⁹ (2011) sets out the Government's plans for achieving the greenhouse gas emissions reductions committed to in the Climate Change Act 2008 and the first four carbon budgets. The Carbon Plan aims to reduce the UK's greenhouse gas (GHG) emissions by 80% by 2050, relative to levels in 1990.
- 4.1.3. As part of its environmental objective in achieving sustainable development, the **NPPF** (2019) contains a requirement to mitigate and adapt to climate change, including moving to a low carbon economy. The Framework also states that the '*planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change*'. To achieve these aims new development should be planned to ensure appropriate adaptation measures are included (including green infrastructure) and should be designed, located and orientated as to help to reduce greenhouse gas emissions.
- 4.1.4. The Framework also seeks to direct development away from areas that are currently or likely in the future to be at highest risk of flooding. Where development is required in such areas, the '*development should be made safe for its lifetime without increasing flood risk elsewhere*'.
- 4.1.5. The Government's '**A Green Future: Our 25 Year Plan to Improve the Environment**' (2018) sets out a series of goals for improving the environment and how they will work with communities and businesses over the next 25 years to achieve them. Actions proposed of relevance to the managing and addressing flood risk and climate change are as follows:
- Take action to reduce the risk of harm from flooding and coastal erosion including greater use of natural flood management solutions.
 - Provide international leadership and lead by example in tackling climate change and protecting and improving international biodiversity.
- 4.1.6. The **Clean Growth Strategy**²⁰ (2017) sets out a blue print for a low carbon future by outlining proposals for decarbonising all sectors of the UK economy. Key aims include accelerating the shift to low carbon transport and homes and enhancing the benefits and value of natural resources by preserving and establishing new natural assets such as forests, minimising avoidable waste and managing emissions from landfill.

¹⁸ European Commission (2013) Climate Change Adaptation Strategy [online] available at: https://ec.europa.eu/clima/sites/clima/files/docs/eu_strategy_en.pdf

¹⁹ DECC (2011) The Carbon Plan - reducing greenhouse gas emissions [online] available at: <https://www.gov.uk/government/publications/the-carbon-plan-reducing-greenhouse-gas-emissions-2>

²⁰ DECC (2017) Clean Growth Strategy [online] available at: <https://www.gov.uk/government/publications/clean-growth-strategy>

- 4.1.7. The **River Trent Catchment Flood Management Plan**²¹ (CFMP) was published in 2009, and acts as one of 77 CFMPs for England and Wales. The document provides an overview of the flood risk within the River Trent catchment area, and sets out the preferred plan for sustainable flood risk management over the next 50-100 years.
- 4.1.8. The **Leicestershire Local Transport Plan 3**²² (2011) discusses ways to reduce CO² emissions from the road transport network and assesses possible emission reductions from various mitigation measures.
- 4.1.9. The **Hinckley and Bosworth Borough Core Strategy** (2009) aims to minimise flood risk as a result of development; minimise the impact of climate change by promoting the prudent use of resources; increase investment in green infrastructure and reuse and recycling of natural resources; reduce reliance on car travel and promote sustainable movement; and reduce the emission of greenhouse gases. Flood management will continue to be a policy area in the emerging Local Plan.

4.2 Baseline Summary

Summary of current baseline

- 4.1.10. In relation to GHG emissions, source data suggests that Hinckley and Bosworth has had lower per capita total emissions than that of Leicestershire and the East Midlands (see Table 4.1 below). Conversely, per capita total emissions have been higher in Hinckley and Bosworth, compared with the average per capita total emissions for England. Within Hinckley and Bosworth the transport sector is identified as the biggest contributor to these emissions, as is found at the borough level.

Table 4.1: Per capita local CO² emission estimates; industry, domestic and transport sectors (t CO²)²³

	2005	2006	2007	2008	2009	2010	2011	2012
Hinckley and Bosworth								
Industrial & Commercial	3.4	3.4	2.9	2.7	2.2	2.4	2.0	2.3
Domestic	2.6	2.6	2.5	2.5	2.2	2.4	2.1	2.3
Transport	3.1	3.0	3.1	2.9	2.8	2.7	2.7	2.7
Total per capita	9.2	9.0	8.6	8.1	7.2	7.5	6.9	7.3
Leicestershire								
Industrial & Commercial	3.3	3.2	3.0	2.9	2.5	2.7	2.3	2.5
Domestic	2.6	2.6	2.5	2.5	2.2	2.4	2.1	2.3
Transport	3.4	3.4	3.4	3.1	3.0	3.0	2.9	2.9
Total per	9.4	9.3	9.0	8.6	7.8	8.1	7.4	7.7

²¹ Environment Agency (2009) River Trent Catchment Flood Management Plan [online] available at: <https://www.gov.uk/government/publications/river-trent-catchment-flood-management-plan>

²² Leicestershire County Council (2011) Leicestershire Local Transport Plan 3 [online] https://www.leicestershire.gov.uk/sites/default/files/field/pdf/2017/1/9/Local_transport_plan.pdf

²³ Department of Energy and Climate Change (2011) 2005 to 2012 UK local and regional CO₂ emissions estimates; industry, domestic, and transport sectors [online] available at: <https://www.gov.uk/government/statistics/local-authority-emissions-estimates>

capita								
East Midlands								
Industrial & Commercial	4.2	4.1	3.9	3.8	3.3	3.5	3.2	3.2
Domestic	2.6	2.6	2.5	2.5	2.2	2.4	2.1	2.3
Transport	2.7	2.6	2.7	2.5	2.4	2.4	2.3	2.3
Total per capita	9.6	9.5	9.1	8.8	7.9	8.3	7.6	7.8
England								
Industrial & Commercial	3.8	3.7	3.6	3.4	2.9	3.0	2.7	2.9
Domestic	2.5	2.5	2.4	2.4	2.2	2.3	2.0	2.2
Transport	2.3	2.2	2.3	2.1	2.0	2.0	1.9	1.9
Total per capita	8.5	8.5	8.2	7.9	7.1	7.3	6.7	7.0

4.1.11. Climate change projections for the United Kingdom published as part of the UKCP18²⁴ programme provide detailed probabilistic projections of climate change. Although there is uncertainty in climate change predictions the following changes are likely to have taken place in the East Midlands region by 2040-2059. The changes mentioned below relate to the 50th percentile emissions scenario²⁵:

- The central estimate of increase in winter mean temperature is 1oC to 2oC and an increase in summer mean temperature of 1°C to 3°C
- The central estimate of change in winter mean precipitation is 0% to 20% and summer mean precipitation is -10% to -30%

4.1.12. This means that the East Midlands region is likely to experience, in the future, a warmer climate, with drier summers and potentially wetter winters, which means that extreme events such as floods and droughts are likely to become less predictable and possibly more frequent.

4.1.13. Flood Zone 1 is defined as having a ‘Low Probability’ of flooding, and incorporates areas where the annual probability of flooding is lower than 0.1% (a 1 in 1000 year flood event). Flood Zone 2 is defined as having a ‘Medium Probability’ of flooding, with an annual probability of flooding between 0.1% and 1.0% for fluvial flooding (between a 1 in 1000 year and 1 in 100 year flood event) or 0.1% and 0.5% for tidal and coastal flooding (between a 1 in 1000 year and 1 in 100 year flood event). Flood Zone 3 is defined as having a ‘High Probability’ of flooding, with an annual probability of beyond 1.0% for fluvial floods and beyond 0.5% for tidal and coastal floods.

²⁴ Further information on the UKCP18 programme is available from: <https://www.metoffice.gov.uk/research/collaboration/ukcp>.

²⁵ Projections are set out within the UKCP09 programme, which correspond to three emissions scenarios (Low, Medium and High). The key characteristics of each of these scenarios are:

Medium emissions Scenario - describes a world that has rapid economic growth, quick spreading of new and efficient technologies, and a global population that reaches 9 billion mid-century and then gradually declines. It also relies on a balance between different energy sources.

High emissions Scenario - similar economic and population trends as the Medium emission scenario but more emphasis on power generation from fossil fuels.

Low emissions scenario - represents a more integrated ecologically friendly world, characterised by clean and resource efficient technologies, and lower global greenhouse gas emissions.

- 4.1.14. As illustrated in Figure 4.1, most of the Neighbourhood Plan area falls in Flood Zone 1, with the exception of a linear area of Flood Zones 2 and 3 along the Rothley Brook.
- 4.1.15. Surface water flooding occurs when excess water runs off across the surface of the land. Several areas of high and medium surface water flood risk exist in the Neighbourhood Plan area; however, these are dispersed with large areas of very low flood risk in between and broadly aligned to waterbodies.

Summary of future baseline

- 4.1.16. There is potential for climate change to increase the occurrence of extreme weather events in the Neighbourhood Plan area. Such weather events are likely to increase the risks associated with climate change (including fluvial flooding) with an increased need for resilience and adaptation.
- 4.1.17. In terms of the exacerbation of climate change, GHG emissions are likely to continue to decrease through the adoption of energy efficient measures and cleaner energy (especially in transport and industry, which are key contributors in the borough area).
- 4.1.18. Flood risk at any specific location may be influenced by local factors such as existing formal or informal flood defences and the capacity of existing drainage systems or road/rail culverts. The adoption of SUDs and introduction of Green Infrastructure within development schemes may reduce the speed of surface water run-off and have positive effects in terms of flood risk. Green Infrastructure presents opportunities to address multiple issues through multi-functional spaces.
- 4.1.19. Development in any instance has the potential to exacerbate flood risk within and in the vicinity of the Neighbourhood Plan area by increasing the volume of surface water run-off, or by introducing areas of hard standing which could increase the speed of surface water run-off. The risk would be most increased if development were to locate in proximity of Flood Zone 2 or Flood Zone 3 areas, such as nearby Rothley Beck but this can be easily avoided.

4.3 Key headline issues

- 4.1.20. The key issues are as follows:
- Average CO² emissions per capita are declining in Hinckley and Bosworth Borough, but whilst these are below the average across Leicestershire and the East Midlands as a whole, per capita emissions are higher in the Borough than the national average.
 - The Neighbourhood Plan area falls predominantly within Flood Zone 1, although a stretch of Flood Zone 2 and 3 runs along Rothley Beck.
 - There is potential for surface water flooding to occur across the Neighbourhood Plan area, although areas susceptible to this are scattered between areas with low risk and effects can be mitigated.
 - The likelihood of flooding from fluvial and non-fluvial sources is likely to be exacerbated by development in the Neighbourhood Plan area. However, opportunities for mitigation exist in sustainable design and development of infrastructure.

4.4 Scoping outcome

- 4.1.21. Climatic Factors has been **SCOPED IN** to the SEA as climate change and flooding is an important national and local priority. There is the potential to explore how resilience to climate change can be enhanced as well as contributing towards flood risk mitigation.
- 4.1.22. With regards to climate change mitigation, it is unlikely that the Plan will have significant effects on levels of greenhouse gas emissions as the amount of growth involved is relatively minor. Furthermore, standards for energy and water efficiency are established nationally and at a borough level. The scope for the Plan to deliver substantial improvements is therefore unlikely to be significant.

4.5 What are the SEA objectives and appraisal questions for the Climatic Factors SEA theme?

4.1.23. The SEA topic 'Climatic Factors' has been scoped in to the SEA. Table 4.2 presents the SEA objective and appraisal questions that will be used to assess the plan in relation to this theme.

Table 4.2: SEA Framework of objectives and assessment questions: Climatic Factors

SEA Objective	Supporting Questions
Support the resilience of the Desford Neighbourhood Plan area to the potential effects on climate change including flooding	Will the option/proposal help to: <ul style="list-style-type: none">• Improve green infrastructure networks in the plan area to support adaptation to the potential effects of climate change?• Sustainably manage surface water run-off, ensuring that the risk of flooding is not increased (either within the plan area or downstream) and where possible reduce flood risk?• Ensure the potential risks associated with climate change are considered through new development in the plan area?

5. Historic environment

Focus of theme:

- Designated and non-designated sites, areas and features;
- The setting of heritage assets; and
- Archaeological features.

5.1 Policy Context

- 5.1.1. The **NPPF** (2019) sets out an environmental objective to contribute to protecting and enhancing the built and historic environment. The Framework provides a strategy to seek ‘the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect’. It further states that heritage assets should be recognised as an ‘irreplaceable resource’ that should be conserved in a ‘manner appropriate to their significance’, taking account of ‘the wider social, cultural, economic and environmental benefits’ of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.
- 5.1.2. Additionally, the **National Planning Policy Guidance** states that Neighbourhood Plans should include enough information, where relevant, ‘about local heritage to guide decisions and put broader strategic heritage policies from the local plan into action at a neighbourhood scale’ and ‘about local non-designated heritage assets including sites of archaeological interest to guide decisions’.
- 5.1.3. The Government’s ‘**Statement on the Historic Environment for England**²⁶ (2010) sets out their vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life. Also of note is the reference to promoting the role of the historic environment within the Government’s response to climate change and the wider sustainable development agenda.
- 5.1.4. The **Hinckley and Bosworth Borough Core Strategy** (2009) sets out a spatial objective for the safeguarding and enhancement of the Borough’s distinctive built environment including its wider setting particularly that associated with Conservation Areas, Listed Buildings and historic industries.

5.2 Baseline Summary

Summary of current baseline

Designated Heritage Assets

- 5.2.1. The NP area has a rich historical environment, containing numerous features, with many recognised through designations, including the statutory listed buildings which are nationally designated, and one conservation area designated at the local level (see Figure 5.1).
- 5.2.2. The statutory listed buildings, that are of Grade II and Grade II*, are broadly clustered in the conservation area and along Main Street and High Street. Exceptions include Bosworth Academy and buildings along Station Road, but these are either well screened by trees and green infrastructure or of a nature that could accommodate development nearby if delivered sensitively, without undermining its character or the character of its setting.
- 5.2.3. A scheduled monument, Moated site 440m south west of Lindridge Fields Farm, falls within the north west of the Neighbourhood Plan area.

²⁶ DDCMS (2010) The Government’s Statement on the Historic Environment for England [online] available at: <https://www.gov.uk/government/publications/the-governments-statement-on-the-historic-environment-for-england>

- 5.2.4. Historic England is the statutory consultee for certain categories of listed building consent and all applications for scheduled monument consent. The historic environment is protected through the planning system, via conditions imposed on developers and other mechanisms.
- 5.2.5. The Neighbourhood Plan includes 40 locally listed buildings and structures. These include prominent village buildings including the village hall and pubs.

Heritage at Risk

- 5.2.6. Since 2008, Historic England has released an annual Heritage at Risk Register. The Heritage at Risk Register highlights some of the Grade I, Grade II and Grade II* listed buildings, scheduled monuments, conservation areas, wreck sites and registered parks and gardens in England deemed to be 'at risk'. There are no heritage assets identified in the Heritage at Risk Register within the Neighbourhood Plan area. However, as the Register does not cover all Grade II listed buildings, buildings in conservation areas and non-designated heritage assets, it is likely that some locally significant heritage may be at risk.

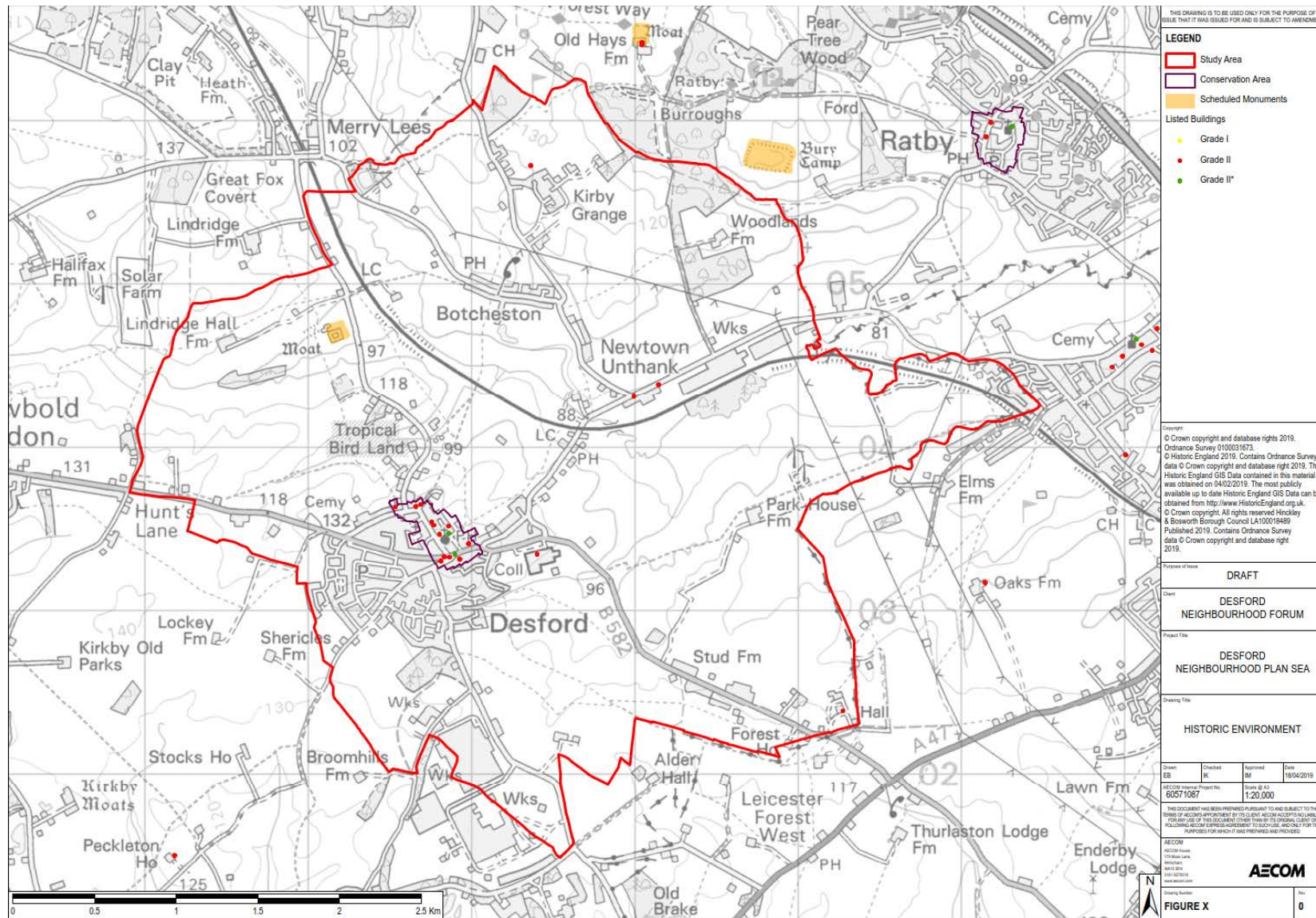
Desford Conservation Area

- 5.2.7. The Conservation Area was designated in 1981 in response to the clear historic and architectural significance of the village centre that can be traced back to 1640, which marks the construction of the Old Hall situated in the high Street.
- 5.2.8. The character of designated area is derived from four key factors:
- The agricultural origins of the settlement - identified by occasional open view of the countryside between buildings, woodland trees within and adjacent to the settlement and a number of farm buildings.
 - Land ownership - the majority of the imposing buildings with large green spaces and mature trees are to the eastern side of Main Street, on land held by the Church.
 - The typography - this varies throughout the conservation area but the way the level differences have been overcome has had a significant impact on the character of the area.
 - Medieval street pattern - subtle twists and turns add further distinctiveness to the area.
- 5.2.9. The Conservation Area has a management plan to preserve and enhance its character. It requires all new development to make a positive contribution to maintain the distinct character of the Conservation Area. It further sets out requirements and additional planning controls to ensure changes to buildings and new development is in-keeping with the character profiles outlined above.

Archaeology and other historic records

- 5.2.10. Several archaeological studies and watching briefs have been undertaken within the Plan area, with the following findings noted:
- Up to four ditches and a pit that could form part of a wide sub-rectangular enclosure were located by Adrian Butler on land at Hunts Lane, Desford.
 - A survey for Twigden Homes found several anomalies including a possible large rubble surface, two ditches and a backfilled pond on land off Leicester Lane, Desford.
- 5.2.11. A search of the Historic Environment Record will be requested from the County Council, and the findings will be included in the next iteration of the scoping report. This will help to inform the appraisal of the Plan (and any reasonable alternatives).

Figure 5.1: Historic Environment Designations in Desford



Summary of future baseline

- 5.2.12. New development in the Neighbourhood Plan area has the potential to impact on the fabric and setting of heritage assets and upon the character of the townscape. This may incur negative effects, such as the adoption of unsympathetic design and material choice, or positive effects through targeted redevelopment of derelict and underused land and buildings.
- 5.2.13. It should be noted, however, that existing historic environment designations and the historic environment based policies within the Hinckley and Bosworth Borough Core Strategy will offer a degree of protection to heritage assets and their settings.

5.3 Key headline issues

5.2.14. The key issues are as follows:

- The Neighbourhood Plan area contains a considerable number of heritage assets including Listed Buildings and Structures and a conservation area, which could be affected by policies and proposals within the plan (either positively or negatively).
- An inappropriate approach that does not seek to conserve and enhance heritage assets could result in the erosion of the townscape quality.

5.4 Scoping outcome

5.2.15. Historic Environment has been **SCOPED IN** to the SEA as there is potential for significant effects upon the setting of heritage assets and the character of the built and natural environment.

5.5 What are the SEA objectives and appraisal questions for the Historic Environment SEA theme?

5.2.16. The SEA topic 'Historic Environment' has been scoped in to the SEA. Table 5.1 presents the SEA objective and appraisal questions that will be used to assess the plan in relation to this theme.

Table 5.1: SEA Framework of objectives and assessment questions: Historic Environment

SEA Objective	Supporting Questions
Protect, enhance and manage the distinctive character and setting of heritage assets and the built environment	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Conserve, better reveal the significance and enhance heritage assets, their setting and the wider historic environment? • Contribute to better management of heritage assets? • Identify and protect / enhance features of local importance? • Support access to, interpretation and understanding of the historic environment?

6. Landscape

Focus of theme:

- Landscape and townscape character and quality

6.1 Policy Context

- 6.1.1. The **NPPF** (2018) includes recognition for the intrinsic character and beauty of the countryside, and the wider benefits from natural capital. Importantly, great weight is to be given to protecting and enhancing landscapes and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty.
- 6.1.2. The Government's '**A Green Future: Our 25 Year Plan to Improve the Environment**' (2018) sets out a series of goals for improving the environment and how they will work with communities and businesses over the next 25 years to achieve them. Actions proposed of relevance to the conservation and enhancement of landscape character are as follows:
- Working with AONB authorities to deliver environmental enhancements.
 - Identifying opportunities for environmental enhancement of all England's Natural Character Areas, and monitoring indicators of landscape character and quality.
- 6.1.3. There are 159 Character Areas that collectively form the **National Character Area Profiles**²⁷ (2015) each of which is distinctive with a unique 'sense of place'. These broad divisions of landscape form the basic units of cohesive countryside character, on which strategies for both ecological and landscape issues can be based. The Leicestershire and South Derbyshire Coalfield and Leicestershire Vales Character Areas cover the Neighbourhood Plan area.
- 6.1.4. The **Hinckley and Bosworth Borough Landscape Character Assessment**²⁸ (2017) identifies areas of distinct landscape character across the Borough Council administrative area. These areas are described in detail with regard to geology, topography, soils, biodiversity, woodland, human and historic influences, landform, land use and built form. It further sets out general guidelines relevant to the whole borough but also specific guidelines for the management of each of the landscape character areas presented.
- 6.1.5. The **Hinckley and Bosworth Borough Landscape Sensitivity Assessment**²⁹ (2017) provides context to identified key sensitivity areas in particular in relation to built development and its integration with the landscape.
- 6.1.6. The **Hinckley and Bosworth Borough Core Strategy** (2009) sets out a spatial objective for the enhancement and the protection of the Borough's distinctive landscapes, woodlands, geology, archaeological heritage and biodiversity and encourage its understanding, appreciation, maintenance and development.

²⁷ In-depth profiles are available at: <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles>

²⁸ Hinckley and Bosworth Borough Council (2017) Hinckley and Bosworth Borough Landscape Character Assessment [online] available at: https://www.hinckley-bosworth.gov.uk/downloads/download/308/landscape_character_assessment

²⁹ Hinckley and Bosworth Borough Council (2017) Hinckley and Bosworth Landscape Sensitivity Assessment [online] available at: https://www.hinckley-bosworth.gov.uk/downloads/download/1418/landscape_sensitivity_study

6.2 Baseline Summary

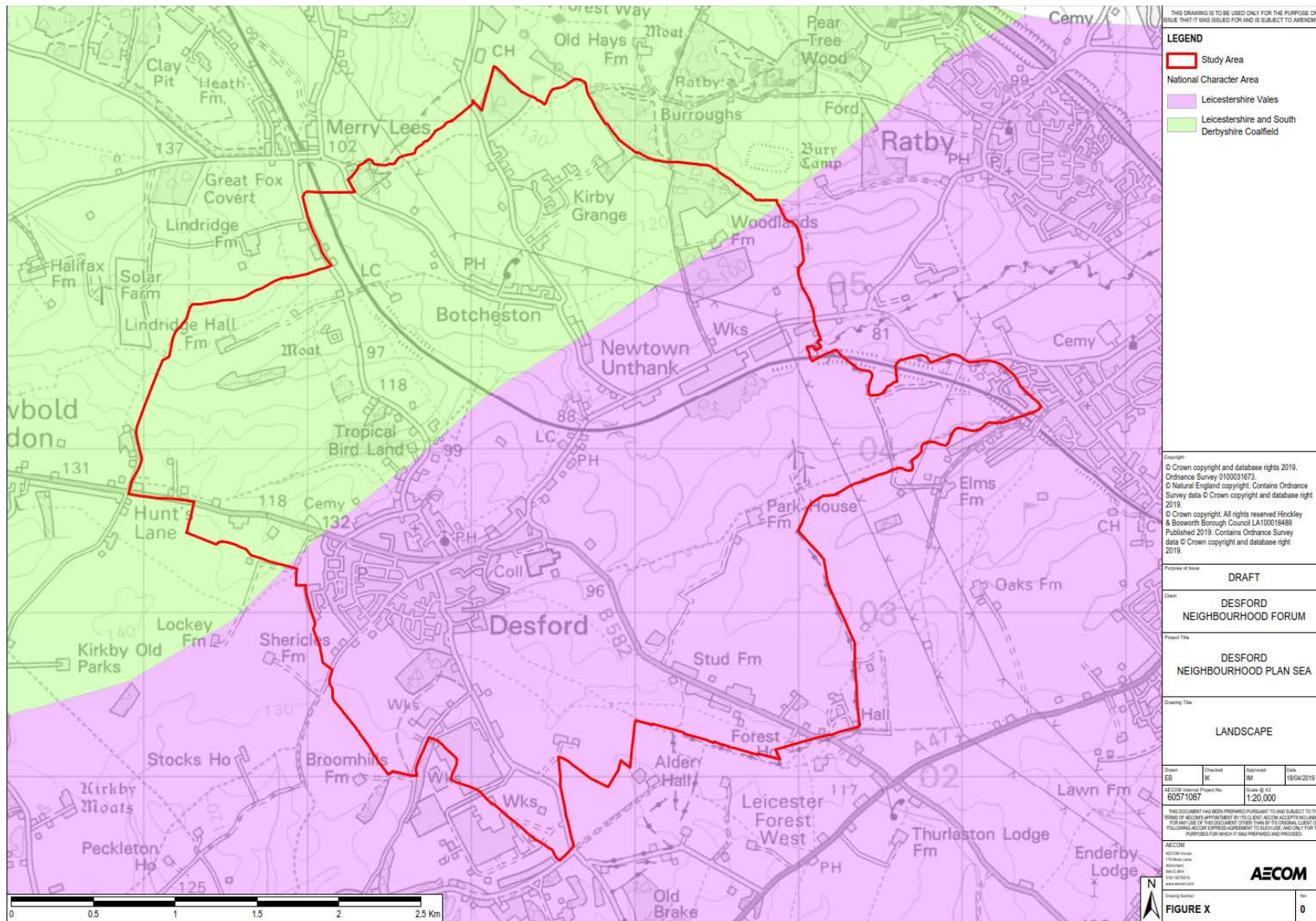
Summary of current baseline

- 6.2.1. The Neighbourhood Plan area lies within two National Character Areas (NCA); Leicestershire and South Derbyshire Coalfield (71, north) and the Leicestershire Vales (94, south). The spatial context of the NCA is illustrated in Figure 6.1 below.
- 6.2.2. The Leicestershire and South Derbyshire Coalfield NCA is a continuing transition from an unenclosed rolling landform that was extensively scarred by abandoned collieries, spoil tips and clay pits, to a matrix of new woodland, restored colliery sites, active brick pits and commercial developments that are woven into an essentially rural, agricultural landscape.
- 6.2.3. The Leicestershire Vales NCA is a large, relatively open, uniform landscape composed of low-lying clay vales interrupted by a range of varied river valleys. The north of the area, including the area in and around Desford, has a predominance of settlements and a general lack of tranquillity which contrasts strongly with the distinctly more rural feel in the south, where a mixture of arable and pastoral farmland is found.
- 6.2.4. The Hinckley and Bosworth Borough Landscape Character Assessment provides the most detailed assessment of the landscape character of the Neighbourhood Plan area. The Neighbourhood Plan area falls within the Newbold and Desford Rolling Farmland character area. Key characteristics include:
- Gently rolling landform rising to the north from the lower lying land around the River Soar.
 - Clustered villages of varying size centred on crossroads.
 - Predominantly arable farmland with clustered areas of industry and recreational facilities near to the village fringes.
 - Tree cover is limited, with scattered trees and small linear woodland copses.
 - Large to medium sized field pattern defined by single species hawthorn hedgerows.
 - Open views where hedgerows have been removed, giving an impression of a large scale landscape.
 - Electricity pylons and wind turbines are often prominent vertical features in this open landscape.
- 6.2.5. The Hinckley and Bosworth Borough Landscape Sensitivity Assessment sets out key sensitivities and values for the area to the south of the built area of Desford. These are as follows:
- Rural and sparsely settled character with a relative sense of tranquillity.
 - Long distance views from relatively elevated areas create a high scenic quality and add to visual amenity.
 - Role of the landscape as the rural setting to Desford.
 - Low hedgerows and mature headrow trees define historic field patterns and form part of the overall ecological network.

Summary of future baseline

- 6.2.6. Existing Development Plan policies will offer a degree of protection to landscape assets and their settings. However, depending on the scale of development, a lack of overall vision and framework could result in the delivery of different development styles, layouts and material choices. This could have a disruptive impact on the landscape through the lack of cohesive development. Insensitive development could also result in the loss of landscape features and visual impact. In contrary, sensitive development presents an opportunity to enhance the existing townscape character of Desford whilst respecting the key characteristics of the landscape.

Figure 6.1: Landscape Character Areas covering Desford



6.3 Key headline issues

6.3.1. The key issues are as follows:

- The landscape is predominantly gently rolling and low lying and has limited tree cover.
- Existing Development Plan policies offer a degree of protection to landscape assets and their settings but insensitive development could have a disruptive impact on landscape.

6.4 Scoping outcome

6.3.2. Landscape has been **SCOPED IN** to the SEA as there is potential for significant effects upon the character of landscapes, which also contributes to the rural setting of the village.

6.5 What are the SEA objectives and appraisal questions for the Landscape SEA theme?

6.3.3. The SEA topic 'Landscape' has been scoped in to the SEA. Table 6.1 presents the SEA objective and appraisal questions that will be used to assess the plan in relation to this theme.

Table 6.1: SEA Framework of objectives and assessment questions: Landscape

SEA Objective	Supporting Questions
Protect, enhance and manage the distinctive character and appearance of landscapes.	Will the option/proposal help to: <ul style="list-style-type: none">• Conserve, better reveal the significance and enhance landscape assets?• Contribute to better management of landscape assets?• Identify and protect/enhance features of local importance?• Support access to, interpretation and understanding of the surrounding landscape?• Improve linkages to open space and the countryside?

7. Land, Soil and Water Resources

Focus of theme:

- Soil resource and quality;
- Watercourses;
- Water availability; and
- Water quality.

7.1 Policy Context

- 7.1.1. The EU's **Soil Thematic Strategy**³⁰ (2006) presents a strategy for protecting soils resources in Europe. The main aim of the strategy is to minimise soil degradation and limit associated detrimental effects linked to water quality and quantity, human health, climate change, biodiversity and food safety.
- 7.1.2. The **NPPF** (2018) states that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued soil and the economic and other benefits of the best and most versatile agricultural land. Policies should also prevent new and existing development from '*contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution*'.
- 7.1.3. The Framework further stresses the importance for development to have adequate provision for water supply and wastewater. It also asserts that development should not have any detrimental effects on water quality.
- 7.1.4. In **Safeguarding our Soils: A strategy for England**³¹ (2009), a vision is set out for the future of soils in the country. It suggests that changing demands on our soils need to be better understood and it must be ensured that appropriate consideration is given to soils in the planning process.
- 7.1.5. The **Future Water**³² strategy (2011) seeks to achieve a secure supply of water resources whilst protecting the water environment. This means greater efficiency in water use, application of Sustainable Urban Drainage Systems, managing diffuse pollution from agriculture, tackling flood risk and reducing greenhouse gas emissions.
- 7.1.6. The Government's '**A Green Future: Our 25 Year Plan to Improve the Environment**' (2018) sets out a series of goals for improving the environment and how they will work with communities and businesses over the next 25 years to achieve them. This includes using and managing land sustainably by protecting the best agricultural land, improving soil health and restoring and protecting peatlands. This also includes respecting nature by using our water more sustainably and requiring developments to bring about a net environmental gain which can include water quality.
- 7.1.7. The **Draft Water Resources Management Plan**³³ (2018) by Severn Trent Water sets out how the organisation will ensure the sufficient supply of water over a 25 year period.

³⁰ European Commission (2006) Soil Thematic Strategy [online] available at: http://ec.europa.eu/environment/soil/three_en.htm

³¹ Defra (2009) Safeguarding our Soils: A strategy for England [online] available at: <http://archive.defra.gov.uk/environment/quality/land/soil/documents/soil-strategy.pdf>

³² Defra (2011) Future Water – The government's water strategy for England [online] available at: <https://www.gov.uk/government/publications/future-water-the-government-s-water-strategy-for-england>

³³ Severn Trent Water (2018) Draft Water Resources Management Plan [online] available at: <https://www.severntrent.com/about-us/future-plans/water-resource-management/wrmp-19-documents/>

7.2 Baseline Summary

Summary of current baseline

- 7.2.1. The Agricultural Land Classification classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are the 'best and most versatile' land and Grades 3b to 5 are of poorer quality.
- 7.2.2. The Neighbourhood Plan area consists of Grade 2 and Grade 3 agricultural land (as illustrated in Figures 7.1 and 7.2 below). Although it is unclear whether the Grade 3 land is amongst the best and most versatile, most of the area does fall within this status.
- 7.2.3. More detailed data sets confirm that some of the land within the Plan area and surrounding areas is indeed Grade 3a, and so assumptions can be made that such resources exist.
- 7.2.4. The Rothley Brook runs from the east to the north west of the Neighbourhood Plan area, and is a left bank tributary of the River Soar. It acts as the main watercourse in the wider locality. There are also several minor unnamed watercourses that intersect Rothley Brook and fall within or in proximity to the Neighbourhood Plan area.
- 7.2.5. Groundwater Source Protection Zones (SPZs) have been designated by the Environment Agency in England and Wales to protect groundwater sources such as wells, boreholes and springs that are used for public drinking water supply. The zones show the risk of contamination from activities that might cause groundwater pollution in the area.
- 7.2.6. There are no such zones designated by the Environment Agency in the Neighbourhood Plan area.
- 7.2.7. The Nitrates Directive (91/676/EEC) requires Member States to identify areas where groundwaters have nitrate concentrations of more than 50 mg/l nitrate or are thought to be at risk of nitrate contamination. Areas associated with such groundwaters are designated as Nitrate Vulnerable Zones (NVZs) within which, Member States are required to establish Action Programmes in order to reduce and prevent further nitrate contamination. The Neighbourhood Plan area falls within the S309 - River Soar Surface Waters NVZ.

Summary of future baseline

- 7.2.8. In terms of water quality, requirements as set out in the Water Framework Directive, are likely to lead to continued improvements to water quality in watercourses in the wider area. Water quality could be affected by pollution incidents in the area, the presence of non-native species and physical modifications to water bodies.
- 7.2.9. Water availability in the area may be affected by increases in population and an increased occurrence of drought exacerbated by the effects of climate change, but this is likely to be negligible.
- 7.2.10. Development which requires sewage treatment may, if not designed correctly or located appropriately, result in an increased risk of pollution to groundwater and surface water. Development will therefore need to have due consideration to the capacity of sewage works.
- 7.2.11. With regards to soil, it is unlikely that large amounts of agricultural land would be lost to development, as there are restrictions to growth in the countryside. However, it might be possible that higher grades of land are affected with un-planned, ad hoc growth.

Figure 7.1: Indicative Agricultural Land Classification

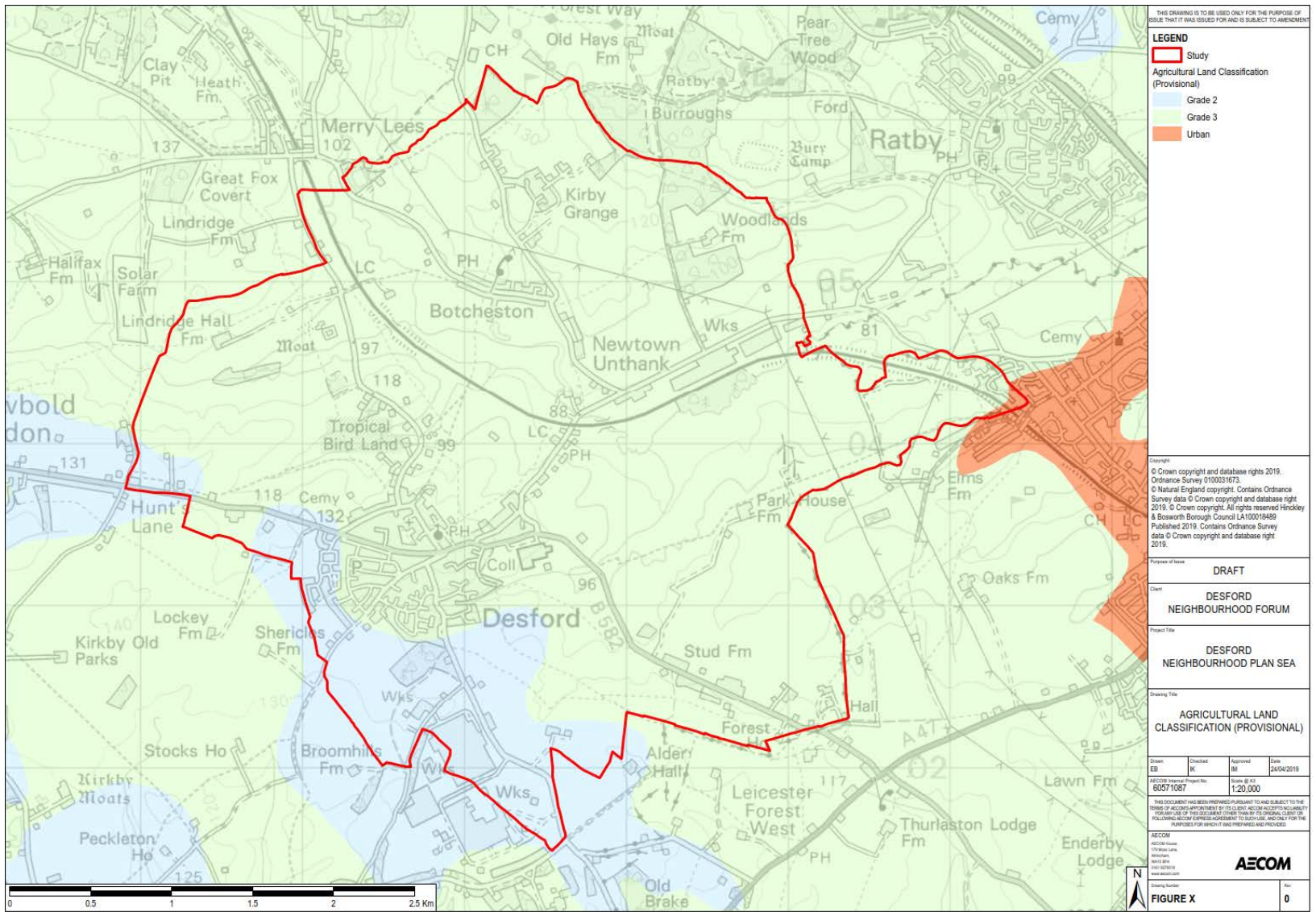
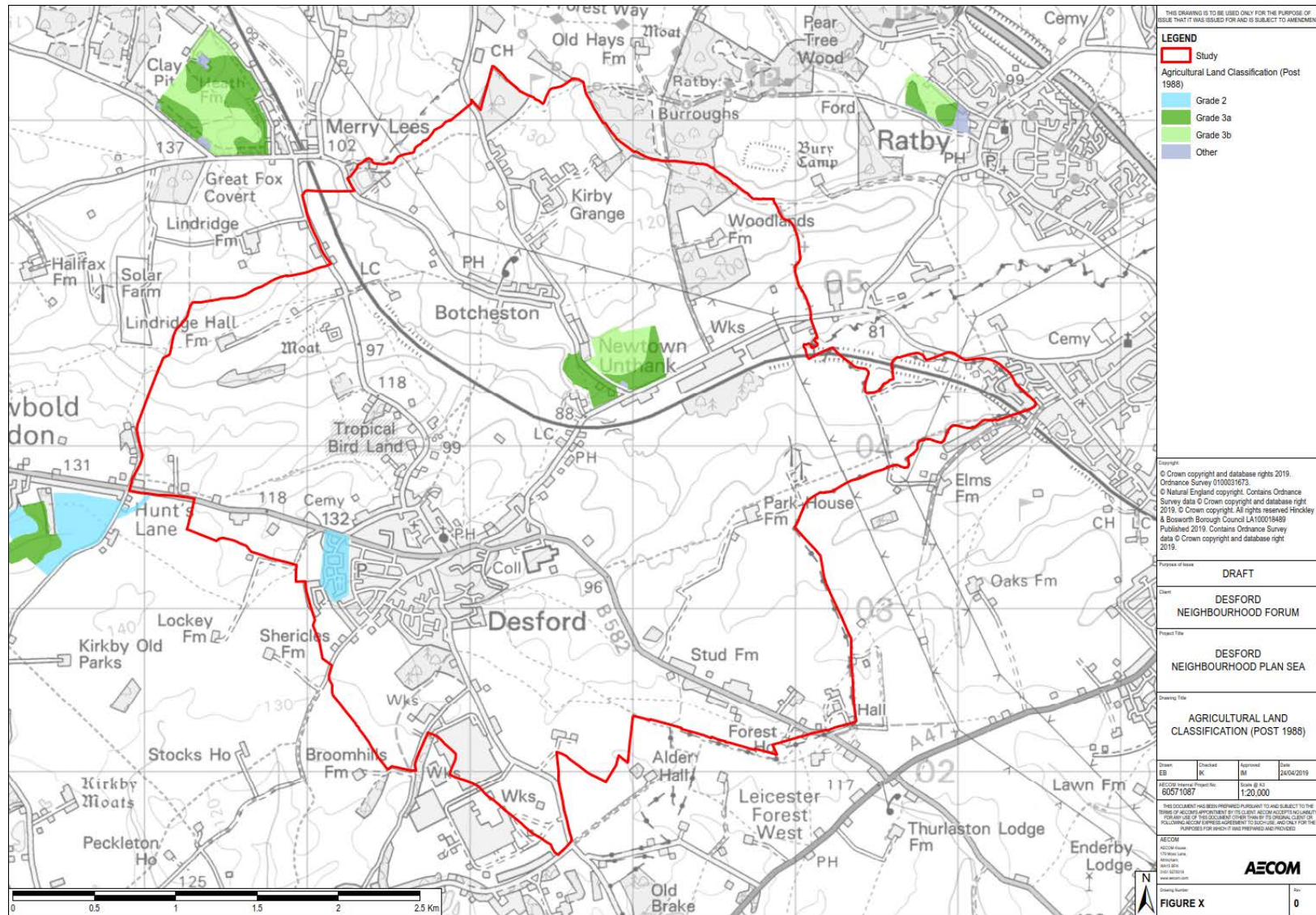


Figure 7.2: Agricultural Land Classification Detailed Surveys (Post-1988)



7.3 Key headline issues

7.3.1. The key issues are as follows:

- The Neighbourhood Plan area consists of mainly Grade 3 agricultural land. However, some of these areas are Grade 2 and 3a, which are categorised as best and most versatile.
- Rothley Brook, a tributary of the River Soar, runs through the Plan area.
- The Neighbourhood Plan area falls within the S309 - River Soar Surface Waters NVZ.
- Development could drastically change the land and soil quality and adversely affect water quality, but effects could be avoided.

7.4 Scoping outcome

7.4.1. The topic of 'Land, Soil and Water Resources' has been **SCOPED OUT** of the SEA, as the Plan is unlikely to have a significant effect on soil / agricultural land and water quality.

7.4.2. There are important soil resources in the Plan area that ought to be avoided as much as possible. However, the total loss of land is unlikely to exceed 5ha (given the scale of growth likely to be involved in any site allocations), and so a significant effect upon soil resources is considered unlikely in any event. For this reason, soil is **SCOPED OUT** of the SEA.

7.4.3. This does not mean that higher quality agricultural land should not be protected though, and such principles will need to be addressed through the site assessment process.

7.4.4. Despite the Plan area being covered by a nitrate vulnerable zone, it is considered unlikely that significant effects upon water quality would occur as a result of the Plan. The scale of growth is not major, and changes to land use would not be anticipated to increase nitrate pollution. With regards to waste water treatment and drainage, the scale of growth would not be expected to cause issues to existing and planned infrastructure, and so significant effects in this respect are also unlikely. Consequently, water quality has been **SCOPED OUT** of the SEA.

8. Population and Housing

Focus of theme:

- Population size;
- Age structure;
- House prices and affordability; and
- Housing types and needs.

8.1 Policy Context

- 8.1.1. The **NPPF** (2018) contains as part of its three overall overarching objectives, a social objective to ‘*support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations*’. It further emphasises the need for homes to be of a size, type and tenure to meet needs of different social groups, with at least 10% of new homes to be provided for affordable home ownership subject to conditions and exemptions.
- 8.1.2. In February 2017, the Government published a housing white paper entitled ‘**Fixing our broken housing market**’. This establishes the government’s plans to reform the housing market and increase the supply of new homes in England through a series of four proposals. These including planning for the right homes in the right places, building homes faster, diversifying the house building market and supporting people in need of housing.
- 8.1.3. The **Leicester and Leicestershire Housing and Economic Development Needs Assessment**³⁴ (2017) provides a review of housing requirements in the Local Enterprise Partnership area including need in Hinckley and Bosworth Borough for the period 2011-2036. The report concludes that between 2011 and 2036 an additional 454 dwelling per annum are required within the local plan area including 41 affordable units.
- 8.1.4. The **Hinckley and Bosworth Core Strategy** (2009) aims to support the growth of housing including affordable housing in the Borough. In regards to housing in village and countryside locations, such as Desford Parish, it supports housing ‘*within settlement boundaries that provides a mix of housing types and tenures*’.
- 8.1.5. The **Desford Housing Needs Report**³⁵ (2017) provides a review of current housing trends and requirements in the Desford Parish area.

8.2 Baseline Summary

Summary of current baseline

- 8.2.1. The population of Desford Parish (including outer settlements) is currently estimated at 4,500³⁶. In 2017, the population of the Desford village built up area³⁷ was 3,529, having grown by 10.8% since 2011 (3,186)³⁸.
- 8.2.2. Table 8.1 shows the age structure of the local population in comparison with the Borough and national averages. It is apparent that Desford village has a higher than average 0-14 year old and lower than average 15-24 year old population compared to the borough and nationally. Both Desford village and Hinckley and Bosworth Borough have a higher than usual 65-84 year old population.

³⁴ Harrogate Borough Council (2016) Strategic Housing Market Assessment Update [online] available at: https://www.harrogate.gov.uk/downloads/file/1569/harrogate_borough_council_strategic_housing_market_assessment_shma_update_report_june_2016

³⁵ Midlands Rural Housing (2017) A Detailed Investigation into the Housing Needs of Desford.

³⁶ Desford Neighbourhood Plan calculations.

³⁷ ONS Desford BUASD area.

³⁸ ONS Population Estimates 2019.

Table 8.1: Age Structure in 2016 (ONS Population Estimates)

	Desford village built up area	Hinckley and Bosworth Borough	Great Britain
0-14	19%	16.6%	18.8%
15-24	8%	10%	12.2%
25-44	22.2%	23.7%	26.4%
45-64	28.5%	28.5%	25.7%
65-84	20%	18.7%	15.8%
85+	2.2%	2.6%	2.4%
Total population	3,359	109,881	63,785,900

- 8.2.3. With regards to housing delivery, Table 8.2 shows that over the last 5 years 520 dwellings were completed per annum on average; which is considerably higher than the target set out in the Hinckley and Bosworth Core Strategy. A variation in delivery rates is also apparent with the highest number recorded in 2014/15 (752) and the lowest a year earlier in 2011/12 and 2012/13 (227). The recent trend in net completions suggests an increase in housing delivery in the Borough.

Table 8.2: Net Housing Completions in Hinckley and Bosworth Borough (Source: Hinckley and Bosworth Borough Council)

	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17
Completions (net)	227	373	227	480	752	585	556
Housing requirements	450 ¹	454 ²	454	454	454	454	454
Supply	-223	-81	-227	+26	+298	+131	+102

¹ Annualised Borough Housing Requirement (2006-2011).

² Annualised Borough Housing Requirement (2011-2026).

- 8.2.4. With regards to housing tenure, Hinckley and Bosworth Borough has a considerably higher number of owned households compared to the regional average and the rest of England (see Table 8.3). Subsequently there are significantly fewer households which were classified under socially rented and shared ownership.

Table 8.3: Housing Tenure in 2011 (ONS Housing Tenure)

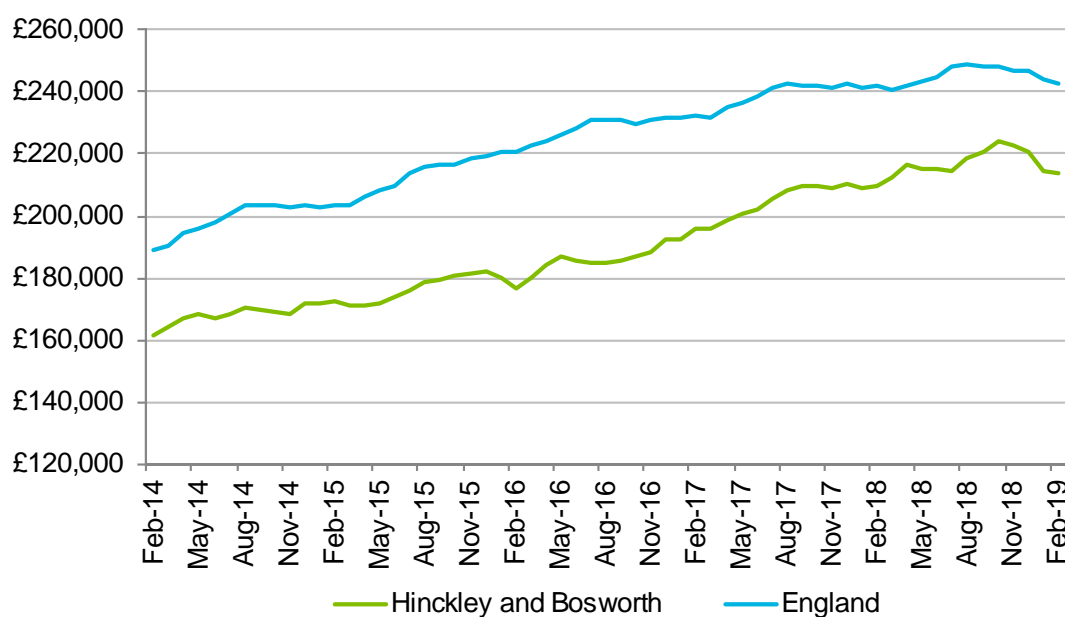
	Hinckley and Bosworth (numbers)	(%)	East Midlands (%)	England (%)
All Categories	45,377	-	-	-
Owned (Total)	34,826	76.7%	67.2%	63.3%
Shared Ownership	267	0.59%	0.67%	0.8%
Socially Rented	4,685	10.3%	15.85%	17.7%
Private Rented	5,156	11.4%	14.9%	16.8%
Living Rent Free	443	0.98%	1.34%	1.3%

8.2.5. The average house price in Hinckley and Bosworth Borough in February 2019 (£214,078) showed a 2% increase on February 2018 despite fluctuations (see Figure 8.1).

8.2.6. Average prices in Hinckley and Bosworth are significantly lower compared to the national average. The average house price in Desford village in February 2019 was £286,768, greater than nearby Newbold Verdon (£211,918) but lower than Ratby Muxloe (£333,081)³⁹.

8.2.7. The average detached house price in the borough of Hinckley and Bosworth in February 2019 was £302,086, which is a 2.1% increase on February 2018. The average semi-detached house price was £192,340, and the average terrace was £157,692.

Figure 8.1: Average house prices for all property types February 2014 to February 2019 (Source: UK HPI)



³⁹ HM Land Registry house price data.

Summary of future baseline

- 8.2.8. Population trends in the Neighbourhood Plan area indicate a growing and an aging population. This is evident through the existing larger than average proportion of people under 14 years old and the high proportion of people aged over 65 years.
- 8.2.9. The Leicester and Leicestershire Housing and Economic Development Needs Assessment (2017) suggests that due to a combination of factors including the forecasted increase in population and economic growth, 454 additional dwellings are required annually in Hinckley and Bosworth Borough between 2011 and 2036 to meet local housing needs.

8.3 Key headline issues

8.2.10. The key issues are as follows:

- The population of Desford village has increased by 10.8% between 2011 and 2017.
- Net completions in the Hinckley and Bosworth Borough fall short of local housing need.
- Average house prices in Hinckley and Bosworth Borough are considerably lower than the national average and have increase by 2% over the last year.
- 454 additional dwellings are required annually in Hinckley and Bosworth Borough between 2011 and 2036 to meet local housing needs.

8.4 Scoping outcome

8.2.11. The SEA topic 'Population and Housing' has been **SCOPED IN** to the SEA as the Plan will influence housing delivery and the delivery of other infrastructures and services that are required to deliver and sustain sustainable communities.

8.5 What are the SEA objectives and appraisal questions for the Population and Housing SEA theme?

8.2.12. The SEA topic 'Population and Housing' has been scoped in to the SEA. Table 8.4 presents the SEA objective and appraisal questions that will be used to assess the plan in relation to this theme.

Table 8.4: SEA Framework of objectives and assessment questions: Population and Housing

SEA Objective	Supporting Questions
Provide everyone with the opportunity to live in good quality, affordable housing which meets the needs of occupiers throughout their life.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Support the provision of a responsive range of house types and sizes to meet identified needs? • Provide quality and flexible homes that meet people's needs throughout their lives? • Create sustainable new communities with good access to a range of local services and facilities? • Enhance housing provision in existing communities?

9. Health and Wellbeing

Focus of theme:

- Health indicators and deprivation; and
- Influences on health and wellbeing.

9.1 Policy Context

- 9.1.1. The **NPPF** (2019) contains as part of its three overall overarching objectives, a social objective to *'support strong, vibrant and healthy communities... by fostering a well-designed and safe built environment'*. It also states that *'access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities'*.
- 9.1.2. The Framework further outlines that the planning system should aim to achieve healthy, inclusive and safe places that are designed to promote social interactions, are safe and accessible and enable and support healthy lifestyles.
- 9.1.3. Fair Society, Healthy Lives (**'The Marmot Review'**)⁴⁰ (2011) investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is: *'overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities'*.
- 9.1.4. The Government's **'A Green Future: Our 25 Year Plan to Improve the Environment'** (2018) sets out a series of goals for improving the environment and how they will work with communities and businesses over the next 25 years to achieve them. Relevant proposals include connecting people with the environment to improve health and wellbeing by:
- Using green spaces including through mental health services.
 - Encouraging children to be close to nature, in and out of school, with particular focus on disadvantaged areas.
 - Greening our towns and cities by creating green infrastructure and planting one million urban trees.
 - Making 2019 a year of action for the environment, working with Step Up To Serve and other partners to help children and young people from all backgrounds to engage with nature and improve the environment.
- 9.1.5. The **Leicestershire Joint Health and Wellbeing Strategy**⁴¹ (2017) identifies the main health and wellbeing challenges across the county and sets out 5 priorities to address the challenges. The priorities seek to enable locals to take control of their health and wellbeing; reduce disparities in health between people and places; ensure children can achieve their full health potential; help people identify health issues and to long term plan for their health; and promote mental health awareness and treatment.
- 9.1.6. The **Hinckley and Bosworth Borough Core Strategy** (2009) sets out a spatial objective to *'develop healthier and stronger communities by improving access to, and the provision of, community, sports and cultural facilities, green infrastructure and walking and cycling routes integrated with local public transport'*. The Plan further contains several policies that directly relate to health and wellbeing. The emerging Local Plan will also seek to address health and wellbeing.

⁴⁰ The Marmot Review (2011) The Marmot Review: Implications for Spatial Planning [online] available at: <http://www.nice.org.uk/nicemedia/live/12111/53895/53895.pdf>

⁴¹ Leicestershire County Council (2017) Leicestershire Joint Health and Wellbeing Strategy [online] available at: <https://www.leicestershire.gov.uk/sites/default/files/field/pdf/2016/10/11/Leics%20JHWS%202017-22v2.pdf>

9.2 Baseline Summary

Summary of current baseline

Health indicators

- 9.2.1. According to the Hinckley and Bosworth Health Profile 2018⁴², the health of people in the Borough is varied compared with the England average.
- The life expectancy for both males and females and the under 75 mortality rates is significantly better in the Borough than the regional and England averages.
 - In contrast, hip fractures in older people and breastfeeding initiation are worse than the England average.
 - People in Hinckley and Bosworth Borough are significantly less likely to self-harm or commit suicide than those across England and slightly less likely to be overweight.
- 9.2.2. The closest hospital, Glenfield Hospital in Leicester, is approximately located 6.4 miles from Desford. The closest hospital with A&E departments is Leicester Royal Infirmary located approximately 8.2 miles from Desford.
- 9.2.3. There is also a medical centre, Desford Medical Centre, located in the Neighbourhood Plan area. Health and wellbeing facilities within the Neighbourhood Plan area and beyond are illustrated in Figure 9.1 below.
- 9.2.4. Access to open space and green infrastructure is widely recognised to have a positive effect on health by encouraging and facilitating outdoor activity. Desford and its vicinity include several playing fields, an allotment and a local wildlife site. However, the Neighbourhood Plan area has inadequate access to parks and accessible green spaces.
- 9.2.5. Figure 9.2 illustrates the extent and location of green infrastructure and recreation facilities in the Desford area. Though there are wider areas of countryside, these are not formal open space.

⁴² Public Health England (2018) Hinckley and Bosworth Local Authority Health Profile 2018 [online] available at: <https://fingertips.phe.org.uk/profile/health-profiles>

Figure 9.1: Health facilities, Community Infrastructure and Green Space

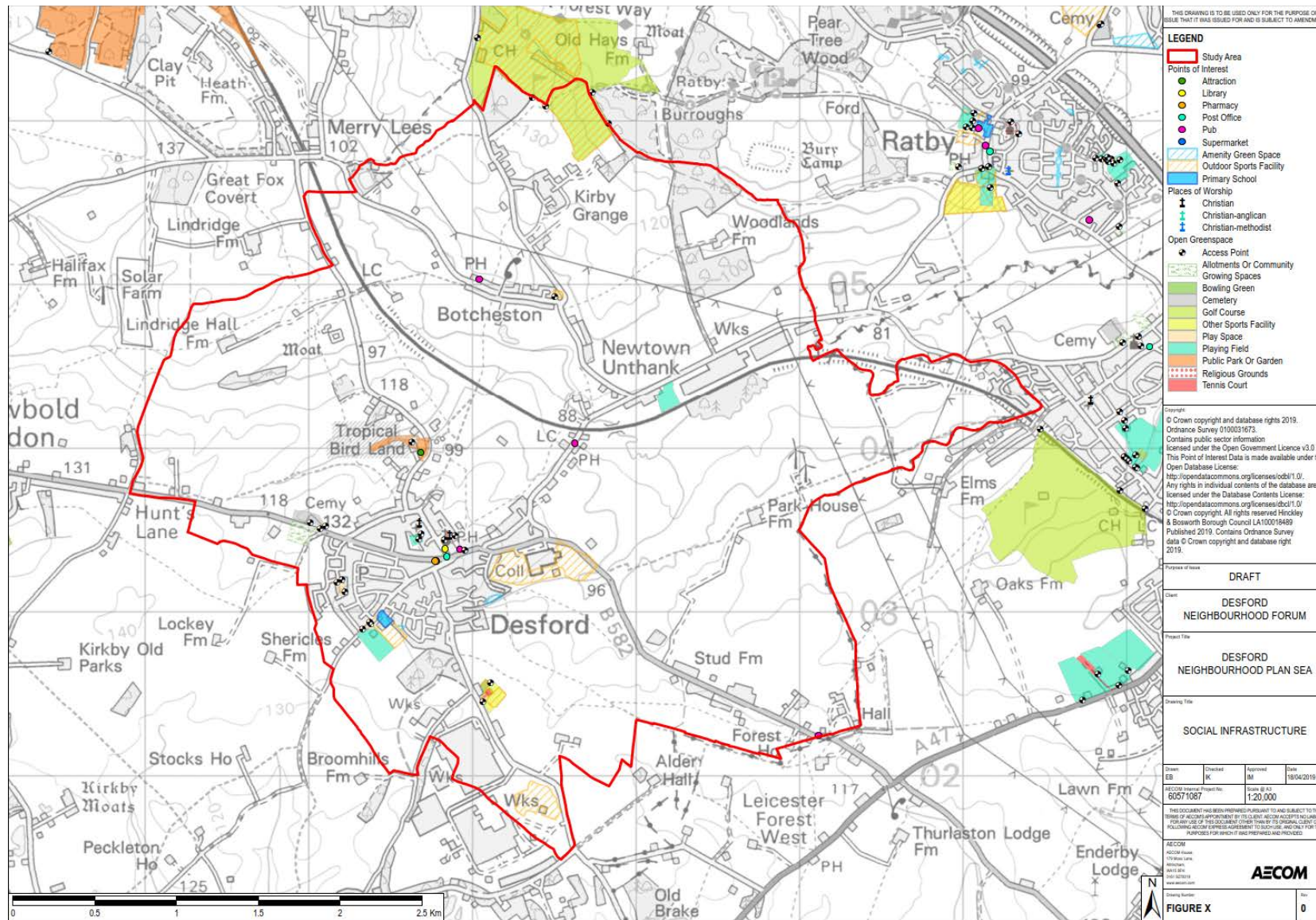
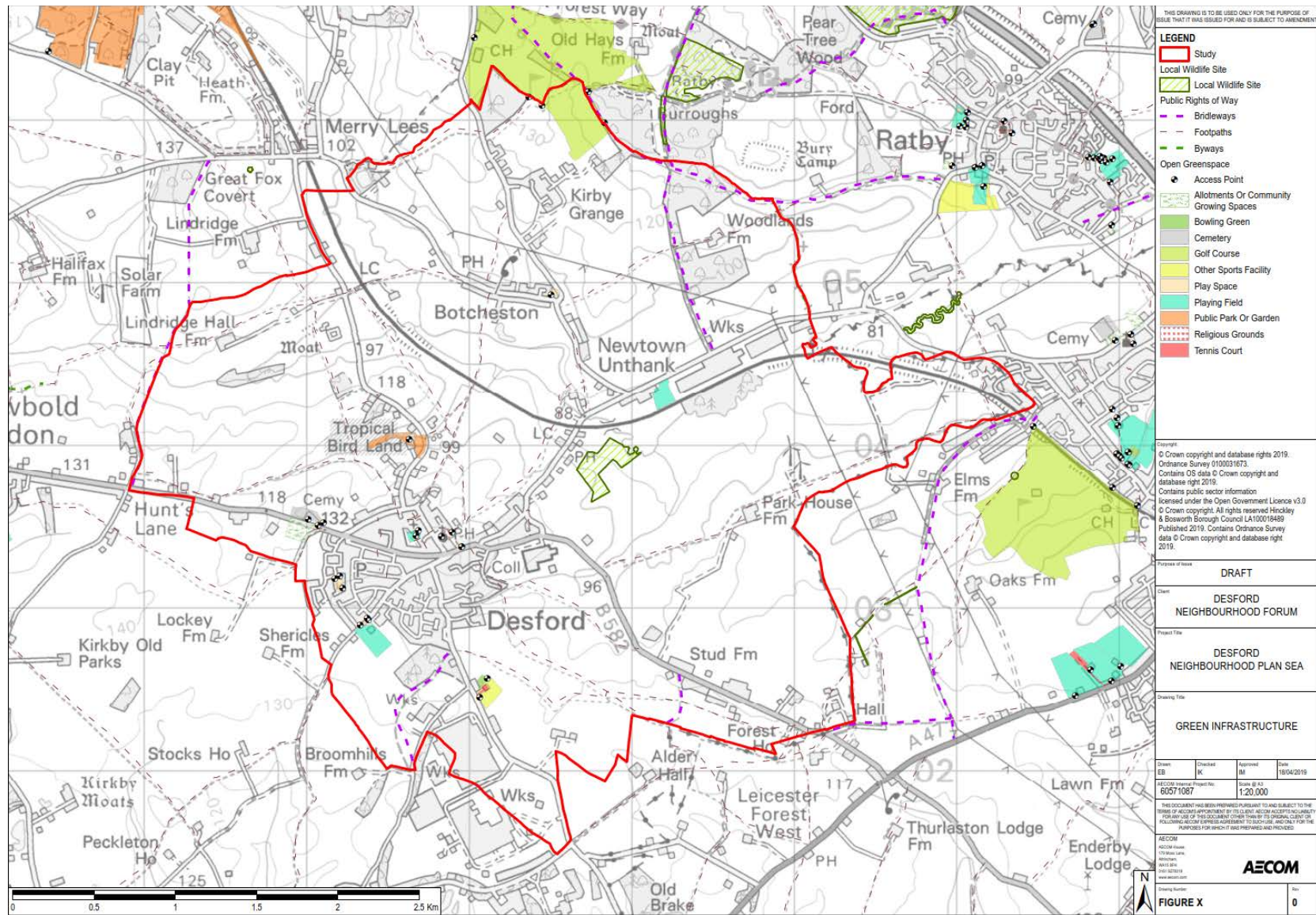


Figure 9.2: Green Infrastructure, Sports and Lesiure facilities



Deprivation

9.2.6. The Index of Multiple Deprivation 2015 (IMD) is an overall relative measure of deprivation constructed by combining seven domains of deprivation according to their respective weights, as described below. The seven deprivation domains are as follows:

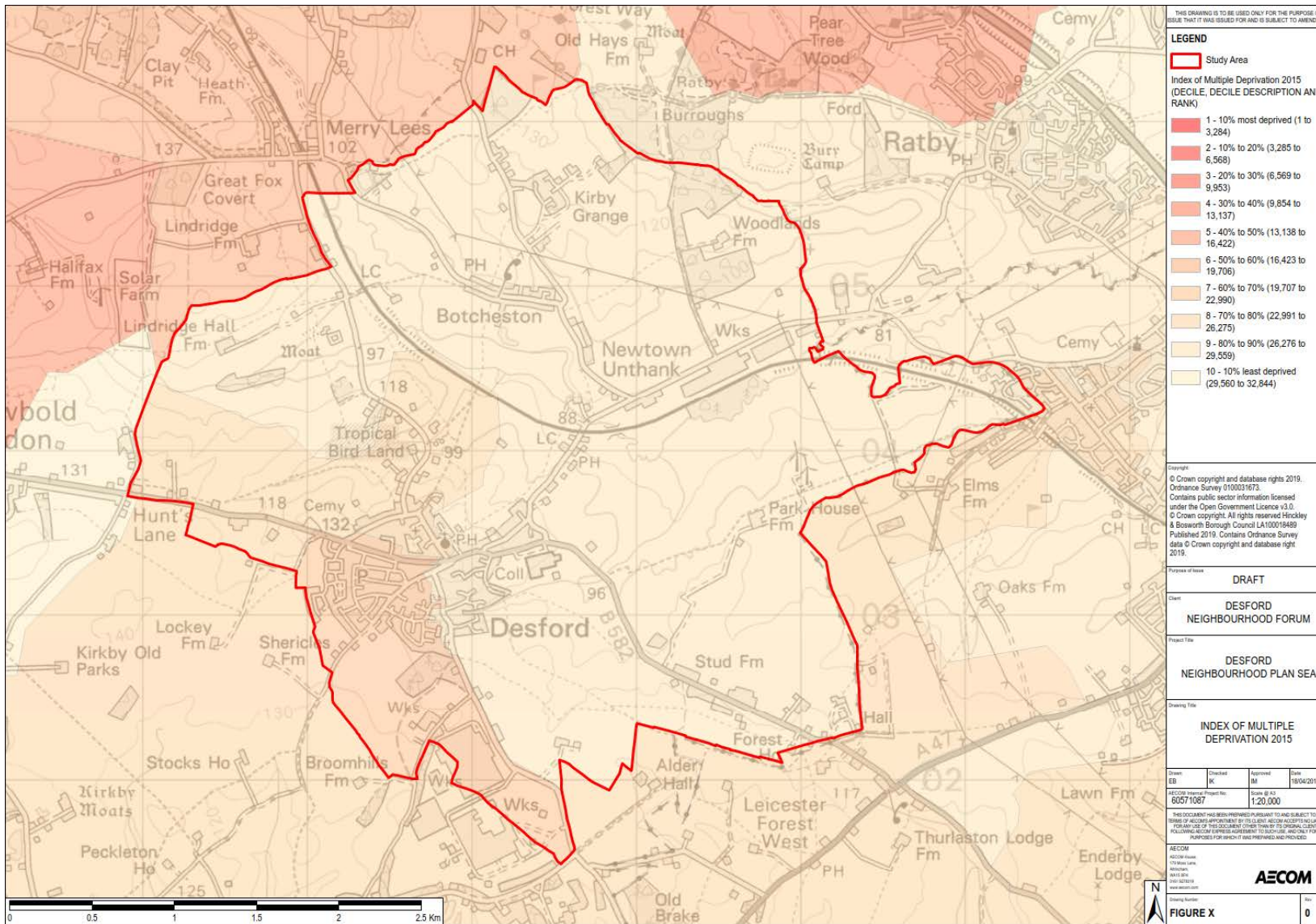
- **Income:** The proportion of the population experiencing deprivation relating to low income, including those individuals that are out-of-work and those that are in work.
- **Employment:** The proportion of the working-age population in an area involuntarily excluded from the labour market, including those who would like to work but are unable to do so due to unemployment, sickness / disability, or caring responsibilities.
- **Education, Skills and Training:** The lack of attainment and skills in the population.
- **Health Deprivation and Disability:** The risk of premature death and the impairment of quality of life through poor physical or mental health. Morbidity, disability and premature mortality are also considered.
- **Crime:** The risk of personal and material victimisation at local level.
- **Barriers to Housing and Services:** The physical and financial accessibility of housing and local services.
- **Living Environment:** The quality of the local environment, including the quality of housing stock, air quality and road traffic incidents.

Two indices, subsets of the Income deprivation domain, are also included:

- **Income Deprivation Affecting Children Index:** The proportion of all children aged 0 to 15 living in income deprived families.
- **Income Deprivation Affecting Older People Index:** The proportion of all those aged 60 or over who experience income deprivation.

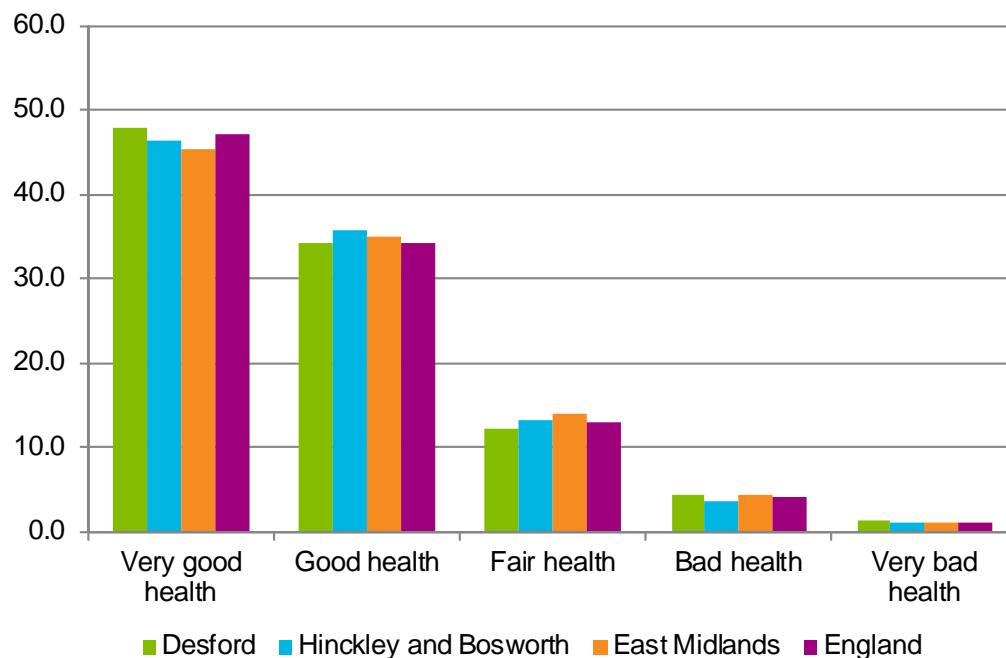
9.2.7. As illustrated in Figure 9.3 below, most of the Neighbourhood Plan area falls within the 20% least deprived areas in England, with a slightly higher level of deprivation recorded to the south west of the Plan area. As there is a strong correlation between deprivation and health, this corroborates the findings of the Health Profiles and suggests a higher than average level of health and wellbeing.

Figure 9.3: Indices of Multiple Deprivation 2015 in the area within and in the vicinity of the Neighbourhood Plan area



- 9.2.8. A self-assessment of health by residents in the Neighbourhood Plan area indicates that most residents in Desford consider themselves to be in very good health (47.8%), followed by good health (34.2%), and that only 5.8% of residents consider their health to be bad or very bad.
- 9.2.9. These trends are similar to regional and national patterns with the exception being that Desford has a smaller proportion of residents that consider themselves to have fair health (12.3%) compared to the Borough (13.3%), regional (14%) and national (13.1%) averages, and that the difference is broadly spread between either the very good or the very bad health options.

Figure 9.4: Residents General Health (Census 2011: KS301EW)



Summary of future baseline

- 9.2.10. It is likely that with increased population growth there will be a higher demand for health, fitness and leisure facilities within Desford. This could support additional facilities but could equally add further strain to existing facilities in the local area.

9.3 Key headline issues

9.3.1. The key issues are as follows:

- Hinckley and Bosworth Borough has a broadly healthy population with higher than national average life expectancy.
- The Neighbourhood Plan area has lower than average levels of deprivation when compared to areas nationally and also across the borough.
- There are several health and recreational facilities within the Neighbourhood Plan area but there is inadequate access to accessible green space and parks.
- Increased population growth will require additional provision for health and recreational facilities. Additional provision could be delivered through developer contributions.

9.4 Scoping outcome

9.4.1. The SEA topic 'Health and Wellbeing' has been **SCOPED IN** to the SEA as the Plan has the potential to help tackle inequalities in access to quality green space and recreational facilities. There will also be a need to address future healthcare infrastructure.

9.5 What are the SEA objectives and appraisal questions for the Health and Wellbeing SEA theme?

9.5.1. The SEA topic 'Health and Wellbeing' has been scoped in to the SEA. Table 9.1 presents the SEA objective and appraisal questions that will be used to assess the plan in relation to this theme.

Table 9.1: SEA Framework of objectives and assessment questions: Health and Wellbeing

SEA Objective	Supporting Questions
Protect and improve the health and wellbeing of residents by enhancing the quality and accessibility of open space, facilities for recreation and health.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Promote accessibility and availability to a range of leisure, health and community facilities, for all community groups? • Provide and enhance the provision of community access to green infrastructure, in accordance with Accessible Natural Greenspace Standards? • Promote healthy and active lifestyles?

10. Transportation

Focus of theme:

- Transportation infrastructure;
- Accessibility; and
- Travel to work.

10.1 Policy Context

- 10.1.1. The **NPPF** (2019) requires that '*transport issues should be considered from the earliest stages of plan-making*'. The scale, location and density of development should reflect '*opportunities from existing or proposed transport infrastructure*'. To help reduce congestion and emissions, and improve air quality and public health the planning system should focus significant development '*on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes*'. The Framework also requires that planning policies support an appropriate mix of uses across an area to further help reduce the need to travel as well as the provision of high quality walking and cycling network.
- 10.1.2. The **Leicestershire Local Transport Plan 3**⁴³ (2011) sets out the council's priorities, plans and strategies for managing, maintaining and improving all aspects of the local transport system over the 15 year period. The objectives of the LTP include supporting economic growth, improve road and transport safety, improving access to services, managing adverse impacts of transport on the environment and promoting healthier travel opportunities.
- 10.1.3. The **Hinckley and Bosworth Core Strategy** (2009) aims to integrate development and transport provision and locate development where it is accessible to key services and facilities and a range of transport modes. It also encourages public transport, walking and cycle routes provision.
- 10.1.4. The **Hinckley and Bosworth Local Plan Review: Scope, Issues and Options Consultation**⁴⁴ (2018) aims to direct development in locations where services and jobs are most accessible. It further states that existing road infrastructure in the Borough is good but the borough has poor access to public transport and invites people to comment on how transport infrastructure issues can be addressed.

10.2 Baseline Summary

Summary of current baseline

- 10.1.5. The Neighbourhood Plan area is well served by the national highway network, with the B589 running through Desford Village and connecting to the A47 Hinckley Road towards Leicester. The Plan area is also within reasonable distance to the M1.
- 10.1.6. The Neighbourhood Plan area is not served by rail links and the closest station is Narborough to the south east. Narborough station is frequently served by trains to Birmingham New Street and Leicester. The closest station with national services, Leicester Train station, is 11.4 miles east of Desford Village.
- 10.1.7. A limited bus service, route 152/153, provides an hourly service to Leicester and Market Bosworth from Desford village. Bus 26 further provides an hourly connection to Leicester from Markfield Lane, Botcheston. Bus stops along the A47 to the south east of the Neighbourhood Plan area provide frequent (including express) services to Nuneaton and

⁴³ Leicestershire County Council (2011) Leicestershire Local Transport Plan 2011-2026 [online] available at: https://www.leicestershire.gov.uk/sites/default/files/field/pdf/2017/1/9/Local_transport_plan.pdf

⁴⁴ Hinckley and Bosworth Borough Council (2018) Local Plan Review: Scope, Issues and Options Consultation [online] available at: https://www.hinckley-bosworth.gov.uk/info/1004/planning_policy_and_the_local_plan/1315/local_plan_review/3

Leicester. The spatial distribution of bus stops throughout the Neighbourhood Plan area is illustrated in Figure 10.1.

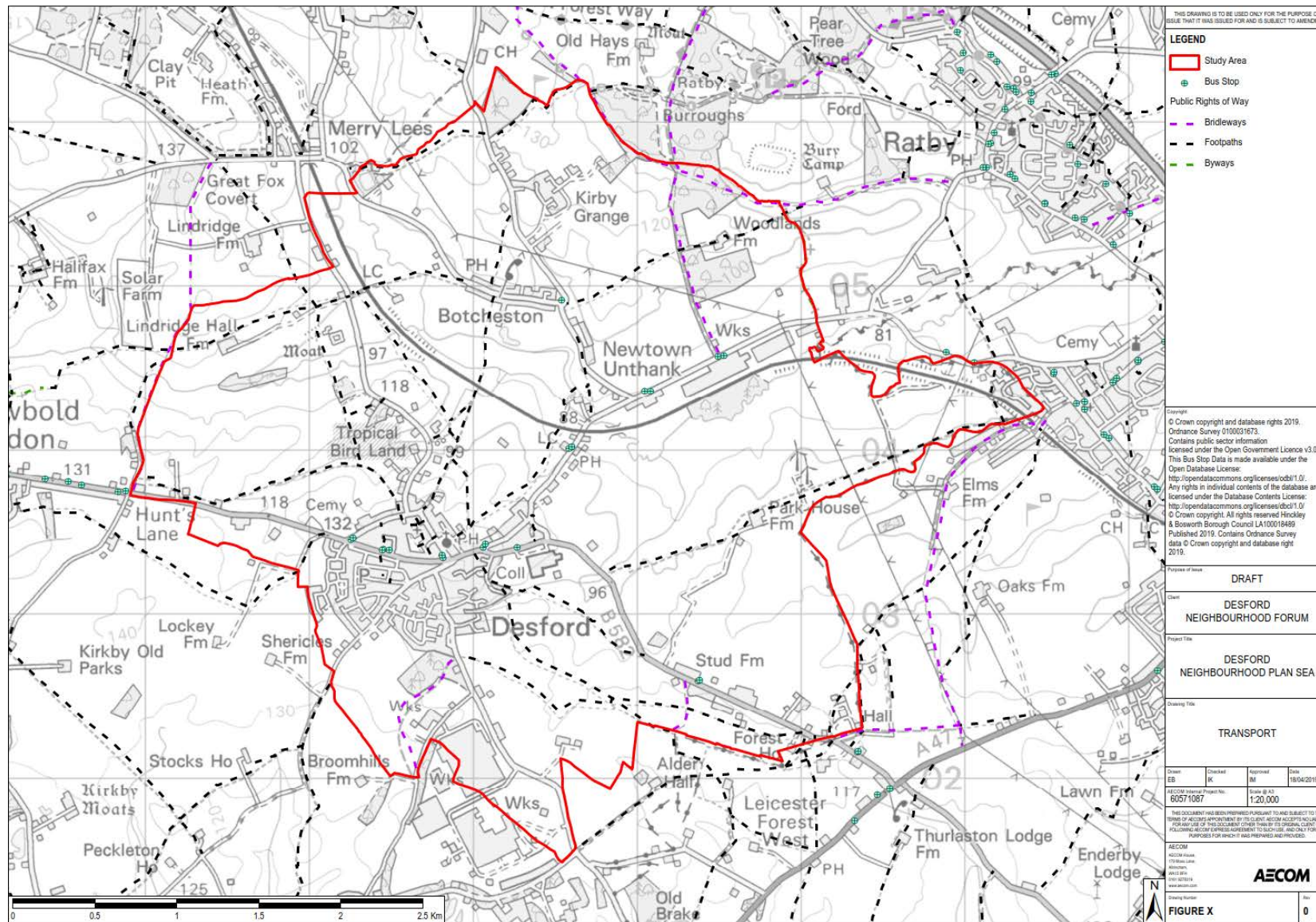
- 10.1.8. There are several Public Right of Ways (PRoWs) surrounding and connecting within the Neighbourhood Plan area (see Figure 10.1). These broadly extend outwards from Desford village towards the outer settlements.
- 10.1.9. According to Census data, local residents in the Neighbourhood Plan area are less likely to travel to work by sustainable modes of transport such as public transport (see Table 11.2) when compared with the national average. A greater proportion of people tend to work from home, which can be considered to be highly sustainable in that it avoids the need for transportation. However, this also highlights the poor local transport access to employment.

Table 11.2: Methods of travel to work (Census 2011)

	Desford	England and Wales	Difference
Work mainly from home	6.5%	5.4%	+1.5%
Underground, metro, light rail or tram	0.1%	3.9%	-3.8%
Train	0.4%	5.2%	-4.8%
Bus, minibus or coach	2.9%	7.3%	-4.4%
Taxi	0.05%	0.5%	-0.44%
Motocycle, scooter or moped	0.7%	0.8%	-0.1%
Driving a car or a van	78.6%	57.5%	+21.1%
Passenger in a car or a van	3.2%	5.1%	-1.9%
Bicycle	1.5%	2.9%	-1.4%
On foot	5.2%	10.7%	-5.5%
Other	0.9%	0.7%	+0.2%

- 10.1.10. Due to the rural nature of the Neighbourhood Plan area and its vicinity, car parking and cycle infrastructure is minimal with the exception of facilities at key public hotspots, such as the local library.

Figure 10.1: Public Transport Connectivity and Public Rights of Ways



Summary of future baseline

10.1.11. New development is likely to result in higher amounts of traffic and congestion, principally along the B589 that runs through Desford village and connects it to other main roads. However, a greater local population and subsequent demand for public transport could provide opportunities to increase bus provision. In the absence of a Neighbourhood Plan, the scale of growth is unlikely to lead to major increases in traffic, but it is possible that development could occur in locations that are more detached from the main settlement area.

10.3 Key headline issues

10.1.12. The key issues are as follows:

- The Neighbourhood Plan area is well served by the highway network but does not have rail connectivity and has limited bus connectivity.
- Local residents in the Neighbourhood Plan area are significantly more likely to travel by car than people nationally.
- New development is likely to increase traffic and congestion but could also make public transport improvements viable.

10.4 Scoping outcome

10.1.13. The SEA topic 'Transportation' has been **SCOPED IN** to the SEA, as policies and proposals in the Plan should seek to enhance accessibility and ensure that impacts upon traffic are minimised.

10.5 What are the SEA objectives and appraisal questions for the Transportation SEA theme?

10.1.14. The SEA topic 'Transportation' has been scoped in to the SEA. Table 10.3 presents the SEA objective and appraisal questions that will be used to assess the plan in relation to this theme.

Table 10.3: SEA Framework of objectives and assessment questions: Transportation

SEA Objective	Supporting Questions
Support modal shift to active and sustainable modes of travel whilst reducing the need to travel.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Increase the range, availability and affordability of sustainable travel choices i.e. public transport, walking, cycling? • Improve road safety? • Promote sustainable patterns of land use and development that reduce the need to travel and reliance on the private car?

11. The SEA Framework and Methodologies

11.1 The SEA Framework

- 11.1.1. The SEA framework has been established through the identification of key issues and environmental objectives as part of the scoping exercise. This draws upon the baseline position and policy context that has been prepared for a range of SEA topics (as set out in Chapters 2-10).
- 11.1.2. The framework consists of a set of headline objectives and ancillary questions, which will be used to appraise the environmental effects of the draft Development Plan Document (and any reasonable alternatives).
- 11.1.3. Table 11.1 below outlines the full SEA Framework, which brings together the objectives and questions that have been set out at the end of each SEA topic chapter. The Framework focuses on those issues that have been identified as the most important to consider in the preparation of the Plan; but acknowledging the limited influence that the Plan can have in some areas.

Table 11.1: The SEA Framework

SEA Objective	Supporting Questions (Will the option/proposal help to:)
Protect and enhance the function and connectivity of biodiversity habitats and species	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Support connections between habitats in the Plan area? • Avoid any impacts on the Bocheston Bog SSSI? • Support continued improvements to the designated sites in the Neighbourhood Plan area? • Achieve a net gain in biodiversity? • Support access to, interpretation and understanding of biodiversity? • Increase the resilience of biodiversity in the Neighbourhood Plan area to the effects of climate change?
Support the resilience of the Desford Neighbourhood Plan area to the potential effects on climate change including flooding	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Improve green infrastructure networks in the plan area to support adaptation to the potential effects of climate change? • Sustainably manage surface water run-off, ensuring that the risk of flooding is not increased (either within the plan area or downstream) and where possible reduce flood risk? • Ensure the potential risks associated with climate change are considered through new development in the plan area?
Protect, enhance and manage the distinctive character and setting of heritage assets and the built environment	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Conserve, better reveal the significance and enhance heritage assets, their setting and the wider historic environment? • Contribute to better management of heritage assets? • Identify and protect / enhance features of local importance? • Support access to, interpretation and understanding of the historic environment?
Protect, enhance and manage the distinctive character and appearance of landscapes.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Conserve, better reveal the significance and enhance landscape assets? • Contribute to better management of landscape assets? • Identify and protect/enhance features of local importance? • Support access to, interpretation and understanding of the surrounding landscape? • Improve linkages to open space and the countryside?

Provide everyone with the opportunity to live in good quality, affordable housing which meets the needs of occupiers throughout their life.

Will the option/proposal help to:

- Support the provision of a responsive range of house types and sizes to meet identified needs?
 - Provide quality and flexible homes that meet people's needs throughout their lives?
 - Create sustainable new communities with good access to a range of local services and facilities?
 - Enhance housing provision in existing communities?
-

Protect and improve the health and wellbeing of residents by enhancing the quality and accessibility of open space, facilities for recreation and health.

Will the option/proposal help to:

- Promote accessibility and availability to a range of leisure, health and community facilities, for all community groups?
 - Provide and enhance the provision of community access to green infrastructure, in accordance with Accessible Natural Greenspace Standards?
 - Promote healthy and active lifestyles?
-

Support modal shift to active and sustainable modes of travel whilst reducing the need to travel.

Will the option/proposal help to:

- Increase the range, availability and affordability of sustainable travel choices i.e. public transport, walking, cycling?
 - Improve road safety?
 - Promote sustainable patterns of land use and development that reduce the need to travel and reliance on the private car?
-

12. Next Steps

12.1 Subsequent stages for the SEA process

12.1.1. Scoping (the current stage) is the second stage in a six-stage SEA process:

- Screening (NPPG Stage A)
- Scoping (NPPG Stage B)
- Assess reasonable alternatives, with a view to informing preparation of the draft plan (NPPG Stage C)
- Assess the draft plan and prepare the Environmental Report with a view to informing consultation and plan finalisation (NPPG Stage D/E)
- Publish a 'statement' at the time of plan adoption in order to 'tell the story' of plan-making/SEA (and present 'measures decided concerning monitoring') (NPPG Stage F)

12.1.2. The next stage will involve appraising reasonable alternatives for the Plan. This will consider alternative policy approaches for the Plan. The findings of the appraisal of these alternatives will be fed back so that they can be considered when preparing the draft plan.

12.2 Consultation on the Scoping Report

12.2.1. Public involvement through consultation is a key element of the SEA process. At this scoping stage, the SEA Regulations require consultation with statutory consultation bodies but not full consultation with the public. The statutory consultation bodies are the Environment Agency, Historic England and Natural England. The Scoping Report has been released to these three statutory consultees.

12.2.2. Consultees are invited to comment on the content of this Scoping Report, in particular the evidence base for the SEA, the identified key issues and the proposed SEA Framework.

12.2.3. Comments on the Scoping Report should be sent to:

Ian McCluskey, Principal Sustainability Consultant, *AECOM Ltd, 4th Floor, Bridgewater House, Manchester, M1 6LT*

Email address: ian.mccluskey@aecom.com

12.2.4. All comments received on the Scoping Report will be reviewed and will influence the development of the SEA where appropriate.

13. Glossary

Agricultural Land - Agricultural land is classified into five grades. Grade one is best quality and grade five is poorest quality. A number of consistent criteria are used for assessment which include climate (temperature, rainfall, aspect, exposure, frost risk), site (gradient, micro-relief, flood risk) and soil (depth, texture, stoniness).

Index of Multiple Deprivation (IMD) – This is a measure of deprivation in England, for every local authority and super output area seven domains of deprivation are measured: (Income, Employment, Health deprivation and Disability, Education Skills and Training, Barriers to Housing and Services, Crime the Living Environment). This allows all 32,482 SOAs to be ranked according to how deprived they are relative to each other. This information is then brought together into one overall Index of Multiple Deprivation 2004.

LNR – Local Nature Reserves (LNRs) are for both people and wildlife. They are places with wildlife or geological features that are of special interest locally. They offer people special opportunities to study or learn about nature or simply to enjoy it.

NNR - Many of the finest sites in England for wildlife and geology are National Nature Reserves (NNR). There are currently 224 across the country and almost all are accessible and provide great opportunities for people to experience nature.

Objective – A statement of what is intended, specifying the desired direction of change in trends Option For the purposes of this guidance option is synonymous with ‘alternative’ in the SEA Directive Plan For the purposes of the SEA Directive this is used to refer to all of the documents to which this guidance applies, including Development Plan Documents. Supplementary Planning Documents are not part of the statutory Development Plan but are required to have a sustainability appraisal.

RAMSAR – Ramsar sites are wetlands of international importance designated under the Ramsar Convention.

Locally Important Geological Sites – LIGs are designated by locally developed criteria and are currently the most important designated sites for geology and geomorphology outside statutorily protected areas such as SSSIs.

SAC – Special Areas of Conservation (SACs) are strictly protected sites designated under the EC Habitats Directive. Article 3 of the Habitats Directive requires the establishment of a European network of important high-quality conservation sites that will make a significant contribution to conserving the 189 habitat types and 788 species identified in Annexes I and II of the Directive

Scheduled Monument - A ‘nationally important’ archaeological site or historic building, which is given protection against unauthorised change.

Scoping – The process of deciding the scope and level of detail of a Sustainability Appraisal.

Screening – The process of deciding whether a document requires a SA.

SEA Directive – European Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment

SEA Regulations – The Environmental Assessment of Plans and Programmes Regulations 2004 (which transposed the SEA Directive into law).

SPA – Special Protection Areas (SPAs) are strictly protected sites classified in accordance with Article 4 of the EC Birds Directive, which came into force in April 1979. They are classified for rare and vulnerable birds (as listed on Annex I of the Directive), and for regularly occurring migratory species.

SSSI – SSSIs are the country's very best wildlife and geological sites. They include some of our most spectacular and beautiful habitats - large wetlands teeming with waders and waterfowl, winding chalk

rivers, gorse and heather-clad heathlands, flower-rich meadows, windswept shingle beaches and remote uplands moorland and peat bog.

Super Output Area (SOA) – SOAs are a new geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. Three layer of SOA have been devised: Lower Layer - Minimum population 1000; mean 1500. Built from groups of SOAs (typically 4 to 6) and constrained by the boundaries of the Standard Table (ST) wards used for 2001 Census outputs. Middle Layer - Minimum population 5000; mean 7200. Built from groups of Lower Layer SOAs and constrained by the 2003 local authority boundaries used for 2001 Census outputs. Upper Layer - To be determined; minimum size c.25, 000.

Strategic Environmental Assessment (SEA) – Generic term used internationally to describe environmental assessment as applied to policies, plans and programmes. In the UK, SEA is increasingly used to refer to an environmental assessment in compliance with the ‘SEA Directive’

Sustainability Appraisal (SA) – Generic term used to describe a form of assessment which considers the economic, social and environmental effects of an initiative. SA, as applied to Local Development Documents, incorporates the requirements of the SEA Directive.

Sustainability Issues – The full cross-section of sustainability issues, including social, environmental and economic factors.

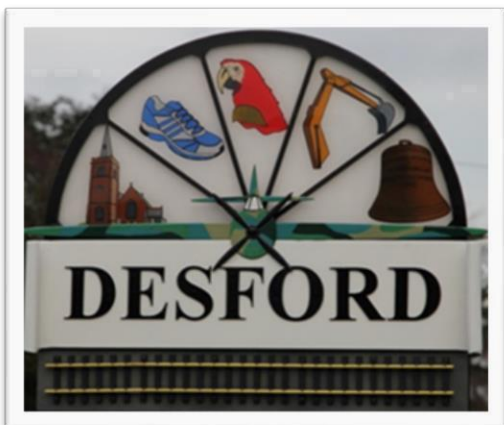


**DES福德 NEIGHBOURHOOD PLAN
CONSULTATION STATEMENT
APPENDIX 6 SEA Improvements
adopted by DPC, 17/12/19**

SEA RECOMMENDATIONS IN MITIGATION
DPNPWG RECOMMENDATIONS TO DESFOR PARISH COUNCIL
SUBJECT TO REPOSSES FROM REULATION 13 CONSULTATION

SEA MITIGATION	PROPOSDE RECOMMENDATION TO DPC
<ul style="list-style-type: none"> • Policy H1 currently seeks to exclude small scale leisure or tourism activities and other forms of commercial/employment appropriate to the countryside outside or adjacent to the settlement boundary which is inconsistent with the provisions as set in Policy E2. 	<p>Agree and amend Policy H1 accordingly</p>
<ul style="list-style-type: none"> • Policy H2 could seek to encourage some mix of uses on site in response to identified local needs while still seek to provide the level and nature of residential growth outlined. As a site specific policy it is recommended that the policy makes it clear that proposals for the site are subject to other relevant policies of the plan in particular Policy H6 including matters relating to landscape character and biodiversity <p>. It is recommended for Policy H2 criteria (I) <i>Other financial contributions</i> ...Delete <i>at full planning application stage</i> as financial contributions requirements are not limited to full planning applications</p>	<p>Noted: include in narrative, as some examiners have excluded such wording in the policies themselves.</p> <p>Agreed: the words will be deleted.</p>
<ul style="list-style-type: none"> • Consider the inclusion of policy which seeks to encourage renewable energy infrastructure 	<p>No sites came forward in the call-for-sites exercise and it is difficult to see such sites arising in Desford, but a statement of support for any suitable site will be included in the narrative.</p>

<ul style="list-style-type: none"> • Policy H5/supporting text - It is recommended that it may be beneficial to identify the likely amount of anticipated windfall development that is anticipated to come forward during the plan period. 	<p>Agreed: we will make such a statement in the supporting narrative.</p>
<ul style="list-style-type: none"> • Policy ENV 5: Consider an amendment that replaces <i>building or structure</i> to heritage asset in recognition that such assets can include landscape. 	<p>Agreed: the change will be made</p>
<ul style="list-style-type: none"> • For clarity the table of heritages assets provided at page 40 could identify those assets which are designated heritage assets and those which are non-designated heritage assts. • Policy ENV 6: Consider the inclusion of the following <i>development shall be designed to sustain significant views that contribute to the character and appearance of the area.</i> 	<p>Every listed asset is a non-designated heritage asset</p> <p>Agreed. The recommended change will be made.</p>
<ul style="list-style-type: none"> • Policy ENV 7: For Wind Turbine and Large-scale solar energy generation development developments seek to clarify that such proposals are subject to considerations of the rest of ENV 7 and other relevant policies in the plan. 	<p>We will address this in the supporting narrative, because of previous experience of examinations and Examiners’ decisions</p>
<ul style="list-style-type: none"> • Policy ENV 3: Consider the inclusion of <i>Work constructively with other organisations to seek to consider the possibility of installing major solar facilities.</i> 	<p>This is more of a community Action than a policy, and we will address it in the supporting narrative.</p>
<ul style="list-style-type: none"> • Policy E2: Consider the inclusion of <i>or on areas of previously developed land in sustainable locations.</i> 	<p>Agreed. The recommended change will be made.</p>



**DES福德 NEIGHBOURHOOD PLAN
CONSULTATION STATEMENT
APPENDIX 7 Reg 13 Consultations,
Repsponses, Comments, Actions**

Desford NP SEA consultation responses November 2019

Consultee	Comment	Response	NP amendment
Pegasus Group SEA comments	<p>This representation is made by Pegasus Group, on behalf of Davidsons Developments Ltd (hereafter referred to as 'Davidsons'), to respond to the Desford Neighbourhood Development Plan Strategic Environmental Assessment consultation (hereafter referred to as 'the NDP' and the 'SEA' respectively). This representation is made in relation to Land off Kirkby Road (Ashfield Farm), Desford (see Site Location Plan / Illustrative Masterplan at Appendix 1). The site is referred to as Site Reference AS210 & AS211 in the NDP, which reflects the SHLAA referencing. It should also be noted that a planning application has now been submitted requesting outline permission for up to 120 homes.</p> <p>The Regulation 14 (Pre-Submission) consultation was undertaken early 2019. This was followed by a consultation undertaken in May 2019 (Supplementary Strategic Sites) which focused upon seven further sites which were introduced to the processes as a result of the Regulation 14 consultation.</p> <p>Davidsons made representations in respect of the NDP in relation to the Regulation 14 (Pre-Submission) stage, and again to the supplementary consultation and this representation should be read in conjunction with the previous responses, the comments for which still apply.</p>	Noted.	None
	<p>1. INTRODUCTION</p> <p>Before comments on the SEA itself are made, it is important that the background is understood in terms of how this site has been considered so far through the NDP process.</p>	Noted	None

Desford NP SEA consultation responses November 2019

	<p>site assessment scoring, which has correctly taken both sites AS210 and AS211 together (referencing them as 'Desford Site 4'). The letter advises that the site has been dismissed.</p> <p>Again, however, it appears that earlier comments and concerns with the process have, overall, not been taken on board. The assessment shows serious inconsistencies and in many cases the site has been downgraded from earlier scorings when assessed against certain criteria. Appendix 2 contains a table which shows how inconsistently and unfairly the process has been applied at each stage: the final column contains commentary from Davidsons setting out the inconsistencies, illustrates where 'new' criteria have been introduced resulting in the site being downgraded, and providing a revised scoring.</p> <p>It is not possible to compare the revised scorings with the process applied to other sites as this information does not appear to be publicly available. The process is therefore not clear or transparent: a point which has been raised by Davidsons previously.</p> <p>This background is important as it provides the context within which the SEA has been prepared. The SEA should be iterative and based on clear and accurate information.</p> <p>Lack of transparency and clarity has also raised another issue which has become evident through preparing these representations. It is our understanding from a chance conversation with the planning policy team at Hinckley and Bosworth Borough Council on 15th November 2019 that the Neighbourhood Plan itself is now being consulted on at the same time although this is not obvious either from the consultation email received from the Parish Council (Appendix 3) nor from the wording of the Parish Council's website (Appendix 4). Separate representations have therefore had to be</p>	<p>The concerns raised were considered but not agreed. The process undertaken was comprehensive, inclusive and transparent. The site failed to achieve sufficient scores to merit an allocation.</p> <p>The information is publicly available.</p> <p>Consultation on the Plan WAS in the letter sent and in other publicity.</p>	
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Desford NP SEA consultation responses November 2019

	<p>prepared in some haste on this matter to meet an unreasonably short deadline as set out in the next section.</p>		
	<p>3. THE STRATEGIC ENVIRONMENTAL ASSESSMENT</p> <p>Firstly, the consultation deadline for the SEA is extremely short given that this is a public consultation. The email publicising the consultation was received on Sunday 3rd November 2019, with the deadline being 23rd November 2019 (a Saturday). This is less than three weeks. The Environmental Assessment of Plans and Programmes Regulations 2004 states under section 13c (Consultation procedures) that ‘The period referred to in paragraph (2)(d)1 must be of such length as will ensure that the consultation bodies and the public consultees are given an effective opportunity to express their opinion on the relevant documents’. This is not considered an adequate period of time to enable meaningful response from a wide range of interested parties on a statutory document.</p> <p>Chapter 3 contains the SEA framework which ‘provides a methodological framework for the appraisal of likely significant effects on the baseline’.</p>	<p>4 – 23 November is three working weeks ... SEA legislation does not specify a timescale and three weeks was considered appropriate given the minor comments made in the SEA report.</p> <p>The range of parties involved is not a reason to extend the timescale. Each has the same period and it is considered appropriate given the small number of minor issues raised in the SEA report.</p> <p>Noted</p>	<p>None</p> <p>None</p> <p>None</p>

Desford NP SEA consultation responses November 2019

	<p>Chapter 4 explains the process for undertaking the SEA for Desford Neighbourhood Plan, stating in paragraph 4.2 that the first stage of the process was a scoping report which was published for consultation in May 2019. Again this process has not been transparent: Davidsons do not recall this consultation nor is there any record of this on the Parish Council’s website.</p> <p>Section 4.3 of the document states that the following sections ‘describe how the SEA process to date has informed the development strategy for the neighbourhood plan area’. How can it have done? This is the first stage of a process which should be iterative and objective. Instead, it is based on the assumption that the work done on the Neighbourhood Plan to date is robust, whereas the SEA should have undertaken its own objective assessment.</p> <p>This is particularly evident in the appraisal of the potential site allocations. The SEA contains a scoring matrix (Table 4.1) which shows how the different potential site allocations have performed against a range of criteria. The SEA advises that this has been drawn from the aforementioned site assessment process undertaken to inform the Regulation 14 consultation which, as already stated and illustrated in some detail in Appendix 2, is deeply flawed.</p> <p>1 invite the consultation bodies and the public consultees to express their opinion on the relevant documents, specifying the address to which, and the period within which, opinions must be sent.</p>	<p>The Scoping report was made available to the Consultation Bodies as per legislative requirements – these are the Environment Agency; Natural England and Historic England.</p> <p>The SEA was conducted by AECOM in line with legislative requirements.</p> <p>This is a personal opinion from an organisation whose land failed to achieve an allocation and is not accepted by the Qualifying Body. The process is comprehensive and has been successfully</p>	<p>None</p> <p>None</p> <p>None</p>
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Desford NP SEA consultation responses November 2019

	<p>The SEA shows that Land at Ashfield Farm has been appraised as two separate sites rather than as a whole, which impacts on its scoring and is extremely misleading. This only serves to illustrate that the representations to the earlier consultations have not been taken into account, that the process has not been iterative, and that it has been based on inaccurate information.</p> <p>Furthermore, the role of an SEA is to objectively consider 'reasonable alternatives'. Therefore it should be considering all potential allocations objectively, not taking the existing assessment 'as read'. Instead, its starting point is from the assumption that the proposed allocation is the right one, and appears to conclude that no further allocations are necessary, therefore it has not properly considered the 'reasonable alternatives' in a fair, clear nor transparent manner.</p> <p>This approach will have implications for the ability of the Plan to comply with the Basic Conditions as the process has not been properly carried out in accordance with the requirements of the SEA Directive and associate regulations.</p>	<p>deployed in numerous other NPs</p> <p>The revised site was reassessed and the enlarged boundary taken into account. We assesses what we were given by HBBC and the larger site assessed when HBBC sent it through.</p> <p>The decision about 'further allocations' is not one for the SEA to make – it is a matter for the Qualifying Body. The SEA is required only to 'focus on what is needed to assess the likely significant effects of the neighbourhood plan' (PPG para 030)</p> <p>The SEA was prepared by the agency engaged by Locality</p>	<p>None</p> <p>None</p> <p>None</p>
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Desford NP SEA consultation responses November 2019

	<p>In terms of the scorings for SEA Objective 1: Biodiversity, the assessment concludes that housing policies H1 – H6 will have a positive effect on biodiversity. It concludes this because development is not supported outside the settlement boundary, saying that it will ‘reduce sprawl into open countryside / areas which may contain biodiversity habitats’. Yet surely if the status-quo is to be maintained, at best this should be a neutral scoring. Furthermore it is submitted that carefully planned developments need to deliver net gains for biodiversity as required by the NPPF, so the conclusions of this section do not appear to be reasonable.</p> <p>SEA objective 4: Landscape only assesses Policy H1 (settlement boundary) stating that it will have a minor positive effect as it restricts development to within the boundary and also to the site allocation. No mention of a negative impact is made as a result of the site allocation itself which, when looked at in conjunction with Policy 6 of the Neighbourhood Plan is in an area containing significant views. This suggests that the appraisal of certain policies might be being treated as retrofitting to suit a pre-determined strategy rather than being a proper objective assessment of reasonable alternatives as required by the regulations.</p>	<p>(the Government’s agency for supporting neighbourhood plans) and they followed the process that has applied to all SEAs that they have prepared on behalf of Qualifying Bodies.</p> <p>This is not accepted. If development delivers net gains to biodiversity, then this will have a greater impact within the settlement boundary than outside, where the opportunity to achieve a net gain is harder to achieve.</p> <p>The Company preparing the SEA is independent of the Qualifying Body and assessed the NP in line with SEA requirements. The</p>	<p>None</p> <p>None</p>
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Desford NP SEA consultation responses November 2019

	<p>SEA Objective 5: Population and Community concludes that in terms of the delivery of affordable housing the allocation of one site for housing (Barns Way) the effects ‘whilst positive.....are not considered to be significant’. This would suggest that a reasonable alternative should be to consider additional growth to ensure that cumulative significant positive impacts upon the delivery of affordable housing can be achieved. The SEA should therefore be considering this in the light of additional allocations.</p> <p>Under this same objective the SEA draws its final conclusion that ‘overall the plan is predicted to have a significant positive effect on population and community’. This is not understood. Objective 5 considers a range of themes, drawing the following conclusions for each:</p> <ul style="list-style-type: none"> • Policy H1 -minor positive • Policy H2 – significant positive • Policy ENV 1 – 7 minor positive • Policy F1 – minor positive 	<p>suggestion of retrofitting is refuted.</p> <p>It is not for the SEA to propose additional allocations, merely to address the potential environmental impacts of the Plan as written. Clearly the respondents purpose is to promote as much development as possible to achieve an allocation for their site.</p> <p>The conclusion appears to be sound – several minor positives add up to an overall significant impact</p>	<p>None</p> <p>None</p>
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Desford NP SEA consultation responses November 2019

	<ul style="list-style-type: none"> • Policy T1 – minor positive • Policy E1 – minor positive <p>Therefore five out of the six themes are minor positives with only one being major positive. How can the overall conclusion be major positive? This needs correcting.</p>		
	<p>4. CONCLUSIONS</p> <p>The SEA has not objectively nor fairly carried out an assessment of the Neighbourhood Plan, and has not properly assessed reasonable alternatives. Instead it has used existing inaccurate information to form its judgements which leads to deeply flawed conclusions. This relates to site by site assessments, but also appraisal of the policies. It suggests a process of retrofitting to suit previously determined conclusions, which is not iterative, not objective and not compliant with SEA legislation. Additionally the consultation period has been wholly inadequate, not in line with the Environmental Assessment of Plans and Programmes Regulations 2004. Davidsons therefore object in the strongest possible terms to the way in which this process has been undertaken, and consider that as matters stand the Basic Conditions have not been met.</p>	<p>This conclusion is not shared for the reasons stated above.</p>	<p>None.</p>
<p>Jelson Homes</p>	<p>Dear Mr Broomhead,</p> <p>DESford NEIGHBOURHOOD PLAN 2018-2036 STRATEGIC ENVIRONMENTAL ASSESSMENT AND ENVIRONMENTAL REPORT REPRESENTATIONS ON BEHALF OF JELSON HOMES</p> <p>Avison Young is town planning advisor to Jelson Homes ('Jelson') and is instructed to make representations on its behalf, in respect of the Environmental Report which forms part of the Strategic Environmental Assessment (SEA) of the proposed Desford Neighbourhood Plan (DNP).</p>	<p>Noted</p>	<p>None</p>

Desford NP SEA consultation responses November 2019

	<p>Jelson is an interested landowner in Desford and has previously made representations to the draft DNP, and met with members of the Parish Council and DNP Working Group (DNPWG), to discuss the development of its landholding at Hunts Lane, with approximately 80-100 new homes.</p>	Noted	None
	<p>A Neighbourhood Plan requires a SEA where it is likely to have significant environmental effects. It is understood that the DNP has been 'screened- in' as requiring a SEA as a result of the proposal to allocate land for housing development.</p>	Noted	None
	<p>The SEA has been carried out by AECOM Ltd, and is to inform the preparation of the DNP and assess its proposals against a set of sustainability / environmental objectives. The intention is to ensure that the Plan avoids adverse environmental and socio-economic effects and identifies opportunities to improve the environmental quality of the designated area, and the quality of life of residents. The SEA process is a tool in the plan-making stage which assesses the likely effects of the plan, when judged against reasonable alternatives, so that the most appropriate policies and provisions are incorporated.</p>	Noted	None
	<p>In the following sections, we:</p> <ul style="list-style-type: none"> • provide a summary of the SEA process to date, and the findings of the Environmental Report; and • summarise our interpretation of the Environmental Report findings and make a series of relevant observations. 	Noted	None
	<p>The SEA process to date has comprised the preparation of a scoping report, dated May 2019, which established the key issues that the appraisal should focus on. The scoping report was issued to the three statutory consultation bodies for England, for a five week period. During that time, only the Environmental Agency responded and</p>	Noted	None

Desford NP SEA consultation responses November 2019

	<p>confirmed it had no comments to make. No response was provided by Natural England or Historic England. The key sustainability / environmental issues which form the focus of the SEA, and therefore the SEA Framework, are those which were ‘scoped in’ through AECOM’s scoping exercise. These comprise:</p> <ul style="list-style-type: none"> • Biodiversity; • Climate change; • Historic Environment; • Landscape; • Population and Housing; • Health and Wellbeing; and • Transportation. <p>As noted above, a key part of the SEA process is the assessment of reasonable alternatives for the plan. In the context of the DNP, the reasonable alternatives appear to relate to delivering the housing strategy. The basis for this is understood to have been informed by the revised housing need figures for the Borough, which were derived through the standard methodology. The Environmental Report therefore concludes that the scale of growth is considered to be appropriate and justified. We do not agree that the housing need figure specified in the DNP is sound and will address this more fully during an examination.</p> <p>In order to address the housing strategy, the Report suggests that the Parish first considered potential reasonable alternatives to be (i) accommodating need in Botcheston as opposed to Desford, and (ii) delivering the housing need on a large site to the south of Desford village that was put forward in the Hinckley and Bosworth SHELAA 2018. Consideration of these alternatives concluded that they were unreasonable. The housing strategy was therefore determined through a comparison of reasonable site allocation options.</p>	<p>Noted. The housing figure was agreed with the local planning authority which the NP is required to do, therefore this aspect of the NP meets the Basic Conditions.</p> <p>The SSA approach considered all available sites, not only the ones suggested here.</p>	<p>None</p> <p>None</p>
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Desford NP SEA consultation responses November 2019

	<p>The identification of potential site allocations / alternatives appeared to rely upon landowners or interested parties promoting sites either to Hinckley and Bosworth Borough Council, through its call for sites exercise(s), or direct to the Parish Council through its Regulation 14 consultation on the draft Neighbourhood Plan (rather than the DNP conducting its own assessment of potentially suitable sites). The process identified some 15 sites initially, which were considered in the preparation of a pre-submission version of the Plan, and then a further 7 sites, which were subject to a supplementary strategic site assessment consultation in April 2019.</p> <p>It is understood that all of the sites identified were subject to a site appraisal, which attributed a Green, Amber, or Red score against a number of different criteria. The Neighbourhood Plan Working Group used this process to identify the highest scoring sites which it then considered to represent the least environmentally damaging and most sustainable locations for residential development.</p> <p>The Environmental Report confirms that the decision relating to the allocation of the preferred site (i.e. Barns Way extension) is based primarily on the outputs from the site assessment exercise, as according to the DNPWGs assessment, it performs best overall. It notes that whilst some discounted sites perform better in respect of certain assessment criteria, the Parish Council considered the preferred site to perform better 'in the round'.</p> <p>The Environmental Report does not evaluate the likely effects of each of the alternative sites in turn. Rather, it assesses the likely effects of the preferred allocation and then the draft provisions of the Plan, against the SEA objectives / topics.</p> <p>The extent of effect is determined by considering whether the proposed allocation, or draft policies, will have a positive or negative effect on the key objectives when</p>	<p>This is incorrect. There was a call for sites in addition to the SHELAA sites identified by HBBC. However – it is not an essential requirement for the NP to undertake its own call for sites, especially when the Borough Council undertake this exercise on an annual basis.</p> <p>Noted. This is not the case. The best scoring site was the site allocated.</p> <p>Noted. This is the purpose of the SEA.</p> <p>Noted</p>	<p>None</p> <p>None</p> <p>None</p> <p>None</p>
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Desford NP SEA consultation responses November 2019

	<p>The appraisal of the draft Plan against the SEA topics suggests that the DNP could have some significant positive effects. However, it is clear from the concluding comments that the main benefits arise from the delivery of new homes and, in the case of Barns Way, these are homes that have the benefit of planning permission and so, if delivered, will not be delivered because of the proposed DNP allocation. They will instead be delivered on the back of a planning permission.</p> <p>Accordingly, the benefits being attributed to that allocation should be stripped out of the SEA and additional site allocations made so as to get the Plan back to a 'positive' state in SEA terms. If in doing so, the DNPWG reverts to its sites assessment it shall take care to ensure that it modifies the approach to reflect the representations made by Jelson by way of a letter dated 22 July 2019, and during a meeting with members of the DNPWG and Parish Council on 26 July 2019.</p> <p>As we noted, our principal concern lies with the inconsistencies applied by the Group when attributing red, amber, or green ratings against the different criteria for sites.</p> <p>By way of comparison, we have prepared a table which summarises the ratings identified for Jelson's landholding in relation to each of the strategic site assessment criteria by: (i) the Parish in its original assessment; (ii) our assessment when adopting the same rating definitions; (iii) the Parish's revised assessment; and (iv) our comments to the changes and in particular, noting the inconsistencies with ratings for different sites. A copy of the table is appended to this letter.</p>	<p>Noted. However, it is appropriate to allocate a site in a NP that has secured a planning approval.</p> <p>This is a flawed argument. As the housing target has been met, removing the allocated site would not release more sites for development as no others are required.</p> <p>Noted – we disagree with this assessment as the process that was followed was applied consistently.</p> <p>Noted. Undertaking an assessment of a site in isolation without applying the same approach to all other sites renders</p>	<p>None</p> <p>None</p> <p>None</p> <p>None</p>
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Desford NP SEA consultation responses November 2019

	<p>There are a number of inconsistencies in the way sites are scored against the same criteria and our analysis notes this to be the case when just comparing two sites (Jelson’s landholding at Hunts Lane, and the preferred allocation at Barns Way). This raises concerns around further inconsistencies that might be realised when comparing all of the assessed sites.</p> <p>When considering the ranking order of the sites assessed by the Parish and as referenced in the Environmental Report at table 4.1, we note the order from highest scoring to lowest as being as follows:</p> <ol style="list-style-type: none"> 1) Desford - Barns Way Extension 2) Botcheston – Rear of Snowdene main Street, and Botcheston – Hinds Quarters, Main Street 3) Desford – Meadow Way Extension 4) Desford – South of Hunts Lane [Jelson’s land] 5) Desford – Hunts Lane Extension Site 6) Botcheston – Rear of 38 Main Street 7) Desford – Sewage Treatment Plant 8) Desford – Ashfield Farm Extension 9) Desford – Kirkby Road Extension 10) Botcheston – New Botcheston North of Main Street, and Lyndale boarding cattery 11) Desford – New Desford South Expansion, and Desford – Neovia New Desford Expansion. 	<p>the exercise inappropriate.</p> <p>There are inevitably elements of judgement and interpretation, but the exercise was independently overseen and the outcome robust.</p> <p>The narrative here is noted but each landowner/agent has been given the opportunity to comment and scores reassessed as a consequence. It is not appropriate to continue to seek representations as they have already been taken into account.</p>	<p>None</p> <p>None</p>
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Desford NP SEA consultation responses November 2019

	<p>The above ranking applies the Parish's latest site assessment scoring and places Jelson's land as 4th, or 5th when considering there are two equal scoring sites at position 2. We consider the top four in turn.</p> <p>As noted above, it is not necessary to allocate Barns Way by virtue of its extant planning permission and as the Plan would achieve little by doing so.</p> <p>The two sites scoring second place are located in Botcheston and the Parish concluded that allocations in this settlement would be "unreasonable" due to its lower ranking in the settlement hierarchy, as defined by Hinckley and Bosworth Borough Council in its adopted Core Strategy.</p> <p>Outline planning permission for residential development on land at Peckleton Lane, otherwise referred to a 'Meadow Way Extension' by the Parish, was recently refused by Hinckley and Bosworth Borough Council. The reason for refusal was that the development would result in an adverse impact to the intrinsic value, beauty and open character of the countryside.</p> <p>With the above in mind, we conclude that Jelson's land at Hunts Lane actually ranks highest and that it does so despite the inconsistencies in ratings across sites. When addressing the inconsistencies, we believe that Jelson's land scores significantly greater and indeed highest of all sites, including that for Barns Way. The appended table demonstrates that when applying the Parish's assessment criteria and when informed by technical assessments, Jelson's land scores Green 14.</p> <p>We hope that the above clearly sets out our representations to the SEA process and emerging DNP to date. However should you require any further information, or wish to discuss our representations, please contact Emily Hill of this office</p>		
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Desford NP SEA consultation responses November 2019

	(emily.hill@avisonyoung.com). We would be grateful if you could please confirm receipt of this letter and thereafter keep us informed on the progress of the DNP.		
Cerda	<p>Strategic Environmental Assessment and Draft Neighbourhood Development Plan Consultation Comments on behalf of Glenalmond Developments Ltd</p> <p>1. Introduction</p> <p>1.1. This submission has been prepared on behalf of Glenalmond Developments Ltd in response to the consultation on the Strategic Environmental Assessment (SEA) and Draft Neighbourhood Development Plan (NDP). The consultation follows previous discussions and meetings with the Neighbourhood Plan Group (NPG) including a written response to the Strategic Sustainability Appraisal for site ref: AS201, and a written response to the Reg 14 Pre-Submission consultation undertaken from 9th November 2018 to 11th January 2019.</p> <p>1.2. The comments set out below comprise observations in relation to the content and assessment made in the SEA, the draft NDP. and re-iterate concerns raised in the previous representations. These comments are provided to seek to ensure that the evidence base supporting the NP is robust and will deliver the most sustainable development for the residents of Desford. However, at present, we consider that the draft NDP and supporting SEA do not meet the basic conditions.</p> <p>1.3. Only a draft neighbourhood Plan or Order that meets each of a set of basic conditions can be put to a referendum and be made. The basic conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. The basic conditions are:</p> <p>a. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order</p>	<p>Noted</p> <p>Noted. We disagree that the draft NP now having gone through a detailed SEA process does not meet the Basic Conditions.</p> <p>Noted</p>	<p>None</p> <p>None</p> <p>None</p>

Desford NP SEA consultation responses November 2019

	<p>d. the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development</p> <p>e. the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).</p> <p>f. the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.</p> <p>g. prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order</p> <p>1.4. Why the NDP is not considered to meet the basic conditions is set out as follows.</p> <p>2. Consultation on the SEA and NDP</p> <p>2.1. This section of the consultation response identifies concerns in relation to the consultation of the SEA and NDP.</p> <p>2.2. In relation to the consultation of a SEA, The Environmental Assessment of Plans and Programmes Regulations 2004 require under regulation 13 that:</p> <p>(2) As soon as reasonably practicable after the preparation of the relevant documents, the responsible authority shall...</p> <p>(d)invite the consultation bodies and the public consultees to express their opinion on the relevant documents, specifying the address to which, and the period within which, opinions must be sent.</p>	<p>Noted</p> <p>The legislative position is noted.</p> <p>In relation to the timescale, the legislative requirements are that the consultees have</p>	<p>None</p> <p>None</p> <p>None</p>
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Desford NP SEA consultation responses November 2019

	<p>(3) The period referred to in paragraph (2)(d) must be of such length as will ensure that the consultation bodies and the public consultees are given an effective opportunity to express their opinion on the relevant documents. (my emphasis)</p> <p>2.3. The Planning Practice Guidance re-iterates the above requirements at Paragraph: 040 Reference ID: 11-040-20140306 whereby it states:</p> <p>'The consultation bodies and the interested parties should have an opportunity to express their opinion and be given sufficient time to do so. These procedures can be incorporated into the pre-submission publicity and consultation process for the neighbourhood plan. (my emphasis)'</p> <p>2.4. The PPG sets out the process for preparing a SEA alongside a NDP at Paragraph: 033 Reference ID: 11-033-20150209, and is illustrated through a flowchart. The flowchart identifies that consultation on the environmental report should be undertaken concurrently with pre- submission publicity and consultation on the draft NDP.</p> <p>2.5. The SEA is a fundamental part of the evidence base underpinning the NDP to establish the environmental effects and consider reasonable alternatives. The current consultation only lasts for a period of 21 days. It is considered that 21 days is not an effective opportunity for public consultees to express their opinion on the relevant documents as is required by the legislation and is contrary to the recommendations of the PPG recommending consultation concurrent to the Reg 14 consultation allowing for a minimum six-week period. The limited timeframe in which the SEA can be considered, prejudices the public's ability to fully consider all matters and respond.</p> <p>2.6. Further to the above requirement for consultation on the SEA, Regulation 14 of The Neighbourhood Planning (General) Regulations 2012 requires that a qualifying body must publicise details of the proposals for a neighbourhood development plan for</p>	<p>an 'effective opportunity' to comment. No specific time frame is set. Had the requirement been to consult through a further Regulation 14 consultation, then the timeframe would be specified as a minimum of 6 weeks. It is considered that 3 weeks is sufficient for this purpose.</p> <p>Undertaking a further SEA is not an essential requirement so this</p>	<p>None</p>
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Desford NP SEA consultation responses November 2019

	<p>no less than six weeks. As noted above, the SEA is a fundamental part of the evidence base underpinning the NDP and therefore is critical for consideration by consultees when making representations on the NDP. As this evidence base was not available when the previous consultation was concluded in January 2019, it is necessary for the NPG to undertake a Regulation 14 consultation prior to submitting the plan to the local planning authority under Regulation 15.</p> <p>2.7. Further to the above, the SEA states in the non-technical summary that:</p> <p>‘A draft NDP, dated May 2019, which will become the version for submission (my emphasis) to the LPA under Regulation 15 of the Neighbourhood Plan Regulations 2012, has been appraised...’</p> <p>2.8. The SEA acknowledges that the submission version of the NDP was prepared in May 2019, after the previous consultation. In light of this, it should be considered that Regulation 14 has not been complied with and a minimum of six-week consultation on the submission version of the plan should be undertaken.</p> <p>3. Consideration of Reasonable Alternatives</p> <p>3.1. This section of the response identifies concerns in relation to the consideration of reasonable alternatives.</p> <p>3.2. Paragraph 2 of Regulation 12 of The Environmental Assessment of Plans and Programmes Regulations 2004 requires that when preparing an environmental report:</p> <p>‘(2) The report shall identify, describe and evaluate the likely significant effects on the environment of—</p> <p>(a) implementing the plan or programme; and</p>	<p>comparison is not relevant.</p> <p>The SEA has not proposed any significant amendments therefore the implications of the reports recommendations do not make a significant change to the NP.</p> <p>This is not accepted. The Submission NP will incorporate amendments made following Regulation 14 representations and agreed amendments following this further consultation on the SEA and the draft Plan.</p>	<p>None</p> <p>None</p>
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Desford NP SEA consultation responses November 2019

	<p>(b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.'</p> <p>3.3. Paragraph 4.3.1 of the SEA seeks to consider the Housing Strategy and whether there are any other reasonable alternatives identifying that with regards to the scale of growth, the target was established using the standard methodology. Whilst the SEA acknowledges that this is the case, there is no evidence to support this. Therefore, the 'preferred' approach is unjustified.</p> <p>3.4. Of concern with the NDP at present is the lack of transparency which has been used to calculate the minimum number of 163 units to be provided between 2016 and 2036. The NDP does not provide detail of how this number has been reached other than stating that it is an indicative figure based on the standard methodology provided by the local planning authority; no evidence of any calculations has been provided. Without detail/justification of the housing need, environmental effects of allocations cannot be justified and the NDP cannot be certain that it will meet the housing requirements for the plan period.</p> <p>3.5. Further to the above, it is not at all clear how the residual figure of 90 additional units has been calculated. Whilst it is acknowledged that 73 net units have been completed since 2016, it is not clear whether these should only be attributed to the need between 2016 and 2036. Of the units completed, a significant proportion of the</p>	<p>The housing target was agreed with the local planning authority therefore this requirement has been met. It is not for the NP to justify the target we are required to meet.</p> <p>There is no requirement on the NP to 'prove' the figure provided to it by the local planning authority. Indeed – offering an alternative target below the HBBC requirement – however justified – would fail the Basic Conditions.</p> <p>The figure is not disputed by the local planning authority and therefore is the</p>	<p>None</p> <p>None</p> <p>None</p>
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Desford NP SEA consultation responses November 2019

	<p>units are from the Bellway development to the west of the settlement. These dwellings were approved to meet the minimum needs of Desford between 2006 and 2026 as set out in the Core Strategy. By attributing the completions to the period between 2016 and 2036, it is unclear if this results in a shortfall of dwellings provided between 2006 and 2016. Any shortfall in dwellings provided between 2006 and 2016 must be carried forward to the housing need between 2016 and 2036. There is concern due to the lack of clarity at present whether the identified housing need is therefore sufficient to meet the needs of the residents of Desford and whether there is a greater residual requirement than that specified.</p> <p>3.6. In addition to the 80 units to be provided on the preferred site, the NDP is reliant on an existing commitment adjoining Kirby Muxloe which is significantly separated from the settlements which comprise the Parish. The housing would not meet the housing requirements of the parish due to the separation and therefore should not be relied upon and further allocations should be made to meet the housing need.</p> <p>3.7. Further to the above, the consultation response from Hinckley and Bosworth Borough Council Planning Policy team for the recent planning application on site ref: AS201 (application ref: 18/01252/OUT), a copy of which can be found at Appendix 1, identified that the draft figure of the NDP was 'heavily caveated as a draft indicative figure' and also that 'the Borough Council have advised the NPG to include reserve sites within the NDP which was not done within the pre-submission version'.</p> <p>3.8. The NDP states that:</p>	<p>figure which must be used in the NP.</p> <p>If there is a later increase in housing need that is unmet by the NP then it will be subject to a review and a revised approach to meeting the new target implemented.</p> <p>The development is within the Parish and therefore counts towards the Parish's housing target.</p> <p>The NP has relied – as it must – on the latest evidence of housing need as supplied by the local planning authority. If in time housing need increases and the NP needs to be reviewed then this will happen.</p>	<p>None</p> <p>None</p> <p>None</p>
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Desford NP SEA consultation responses November 2019

	<p>'It is acknowledged that this is a draft figure at this time and the full scale of housing requirement which may need to be accommodated in the area covered by the Desford NDP over the period 2016-2036 will only be fully established once the Hinckley and Bosworth Local Plan Review has reached a sufficiently advanced stage. In the meantime, a guide figure of a minimum of 163 dwellings will be used for the neighbourhood plan.'</p> <p>3.9. In light of the above, it is asserted that there is insufficient evidence to justify the approach to residential development and that reasonable alternatives must be considered in order to justify the approach taken, and for the NDP to comply with its legal obligations.</p>	<p>It is a matter for the future change in circumstances and does not impact on the meeting of the Basic Conditions now.</p> <p>Noted</p> <p>This is the best evidence currently available. NPPF para 66 states 'Where it is not possible to provide a requirement figure for a neighbourhood area, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body'. This is</p>	<p>None</p> <p>None</p> <p>None</p>
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Desford NP SEA consultation responses November 2019

	<p>3.10. The SEA identifies that there was no need to test a lower delivery of housing as it would not meet the objective of the NDP to support and influence sustainable growth. It also states that there is no specific evidence to support a higher target, and the plan does not seek to limit further growth and therefore it is unnecessary to appraise higher housing targets.</p> <p>3.11. The work undertaken so far by HBBC on their Local Plan Review confirmed the objectively assessed need for Hinckley and Bosworth over the emerging plan period. However, the New Directions for Growth (NDfG) consultation presently undertaken confirms that whilst the OAN for Hinckley and Bosworth alone has been calculated, the scale of any unmet need which may need to be accommodated in the borough and wider Leicestershire area has not been quantified, and the mechanism for apportioning this has yet to be agreed.</p> <p>3.12. The NDfG consultation goes on to note that from the responses to the previous consultation it is apparent that there are concerns over the continued focus of development on the urban area, the ability of the urban area to assimilate additional development, and upon the reliance of the urban areas to deliver the majority of new housing. Therefore, HBBC are revisiting the overarching spatial strategy for the borough, with particular emphasis on exploring potential options for growth away from the existing urban area.</p> <p>3.13. The above is evidence that there is a need consider a higher housing need as a reasonable alternative, contrary to the assertions in the SEA. Further to the most recent evidence identifying increasing housing needs, the local planning authority has suggested that the NPG use reserve sites to manage future growth if a higher housing requirement is applicable as a result of the Local Plan Review.</p>	<p>the figure that HBBC has provided</p> <p>Noted</p> <p>The figure provided in the NP is based on the latest evidence of need. If this changes over time the NP may be reviewed.</p> <p>This ongoing review is noted.</p> <p>The decision about the level of growth to include in the NP is a matter for the Qualifying Body – it is</p>	<p>None</p> <p>None</p> <p>None</p> <p>None</p>
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Desford NP SEA consultation responses November 2019

	<p>3.14. In light of the above, it is contended that consideration of the allocation of additional housing site, or the allocation of reserve sites would be a reasonable alternative to the preferred approach which has not been explored.</p> <p>3.15. The SEA goes onto state that: 'Several strategic alternatives were considered as part of the SEA process. However, these were ultimately found to be unreasonable.'</p> <p>3.16. The text goes onto identify that consideration was given to development In Botcheston or Land South of Desford for a large site but both of these alternatives were dismissed. It is not clear if these are included in the several strategic alternatives that were unreasonable or if these are purported to be the reasonable alternatives considered but not preferred. However, these do not represent reasonable alternatives as they are fundamentally different strategies to the preferred approach and notwithstanding this, no assessment of them has been made sufficiently to satisfy that reasonable alternatives have been duly considered as required by the legislation.</p> <p>3.17. The SEA states that:</p>	<p>not something that can be determined by a third party and 'over providing' is not an issue that impacts on the Basic Conditions.</p> <p>The Qualifying Body has considered allocating additional housing as part of the evolution of the NP and has clearly determined not to do so.</p> <p>Noted</p> <p>The SEA was undertaken by an experienced body whose approach followed tried and tested practice.</p>	<p>None</p> <p>None</p> <p>None</p> <p>None</p>
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Desford NP SEA consultation responses November 2019

	<p>‘the housing strategy was therefore essentially determined through a comparison of reasonable site options.’</p> <p>3.18. The comparison of reasonable sites was undertaken through Strategic Sustainability Appraisals which do not form part of the Environmental Report. Therefore, it cannot be reasonably considered that the SEA considers any reasonable alternatives, as is required by law.</p> <p>4. Reliance on Strategic Sustainability Appraisals</p> <p>4.1. Whilst it is identified in the above section that the SSAs do not form part of the SEA, it is considered necessary to re-iterate, as per previous consultation responses, that SSAs do not appropriately assess the sustainability of the submitted sites. In this section, our approach is to consider whether the Site Sustainability Assessments accurately reflect whether a site could be developed, and is not necessarily concerned with whether a site should be developed. In considering whether a site could be developed it is important to have regard to the positive benefits and enhancements that a site could offer as well as reviewing the negative effects.</p> <p>4.2. It should be noted that a RAG assessment is a useful part of an evidence base. However, it cannot be relied upon to be determine a suitable allocation as it falls short of a sustainability appraisal in that it inevitably does not fully explore some of the detailed issues when comparing one site to another. Rather, it provides a high-level view.</p> <p>4.3. The use of a RAG methodology provides all criteria with an equal amount of weight. In reality, residents, law and planning policy, attribute a greater level of importance towards some of the criteria than others. An example of this is the great weight that is given to preserving designated heritage assts planning policy and</p>	<p>Noted</p> <p>The SEA considered a number of alternatives as indicated in the report and its conclusions.</p> <p>We disagree with this assessment of the SSA process.</p> <p>The process followed was considerably more detailed than has been followed in many neighbourhood plans and has been robust, comprehensive and transparent.</p> <p>There is inevitably an element of subjectivity, but this has been moderated by the involvement of an independent</p>	<p>None</p> <p>None</p>
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Desford NP SEA consultation responses November 2019

	<p>legislation which cannot be considered to have the same level of harm as not adhering to a walking distance to a specific facility in the village for example.</p> <p>4.4. Insofar as the criteria used to assess sites, these are extensive and cover a range of planning and other considerations to be tested through the SSA. However, there is concern that some of the criteria are not appropriate to assess the suitability and deliverability of a site in this instance. Details of these criteria have been iterated in previous representations, a concentrated summary of which can be found at Appendix 2.</p> <p>4.5. The SEA identifies how the preferred site was selected stating ‘ ‘The decision relating to the allocation of the preferred site is based primarily on the outputs from the site assessment exercises. Though some of the discounted sites perform better in respect of certain assessment criteria (for example, several sites are less constrained by the potential for impacts on heritage assets), the Parish Council consider that the chosen site performs better ‘in the round’ (my emphasis).’</p> <p>4.6. There is no evidence in the SEA or NDP to clarify the assessment undertaken by the Parish Council to conclude that the preferred site is the best ‘in the round’ and the use of such language in undertaking sustainability assessments demonstrates the shortcomings of the site selection process.</p> <p>4.7. It is considered that the site selectin process in the NDP is not sufficiently robust to ensure that the most sustainable site is selected and evidenced.</p> <p>5. Meeting Basic Conditions</p>	<p>housing and development professional who has overseen the process. The same process has been followed successfully in a large number of other neighbourhood plans which have been Made.</p> <p>We have received representations from a number of landowners and developers all criticising the process and explaining how if it had been followed accurately, their site would be the most favourable. This demonstrates how hard it is to undertake the process and why the subjectivity that has been applied here is necessary, although we do understand</p>	
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Desford NP SEA consultation responses November 2019

	<p>5.1. Only a draft neighbourhood Plan or Order that meets each of a set of basic conditions can be put to a referendum and be made. The basic conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004.</p> <p>5.2. Having regard to the sections above, there is concern that the NP does not meet, or there is a lack of evidence at present to demonstrate it does meet, basic conditions a, d, e and f.</p> <p>5.3. The NP does not meet condition a by virtue of the inconsistencies with national policy and guidance in relation to the housing need. There is insufficient evidence within the NP and supporting evidence do demonstrate how the housing need has been calculated having regard to the need for the local area between the period of 2016-2036, nor are the dwellings identified that have been completed being taken into account to provide a residual need and whether this creates a shortfall of provision from the previous plan period.</p> <p>5.4. The NP identifies that HBBC provided an indicative figure using the standard method for calculating objectively assessed need as required by paragraph 60 of the NPPF. However, there is no evidence to support this assertion.</p>	<p>why the outcome is disappointing to those landowners and developers whose site has not been selected for allocation.</p> <p>This is agreed.</p> <p>This is not accepted.</p> <p>The housing target has been agreed with the local planning authority. This is the only evidence required to demonstrate compliance with Basic Condition a).</p>	<p>None</p> <p>None</p> <p>None</p>
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Desford NP SEA consultation responses November 2019

	<p>5.5. The NP does not meet condition d by virtue of the site selection process which would not result in the achievement of sustainable development and would prioritize the allocation of a sub- optimal site. Appendix 2 summarising previous representations in relation to the SSAs identify various criteria which could be amended to better reflect and meet the needs of the community.</p> <p>5.6. It is positive that the NPG are pro-actively seeking to plan for the area going-forwards prior to the emergence of the local plan being prepared as part of the local plan review. However, there are significant concerns that the emerging plan will create a differing direction of growth to that at present. The latest consultation undertaken by HBBC, which is currently on-going, seeks to review opportunities for greater dispersal of development towards the rural area. If this direction of growth is adopted it is likely that the NP would be inconsistent with the plan and immediately out-of-date or in the event of a delay in the examination of the NP, would not meet condition e.</p>	<p>This is not agreed. NPs do not have to allocate sites to conform to basic condition e. The SEA report confirms that the Desford NP contributes to sustainable development and the positively prepared policies in the NP reinforce this</p> <p>If the Local Plan review does create a 'different direction of growth' then consideration will be given for a review of the NP. The NP has to meet existing legislative requirements and not second guess future policy direction.</p>	<p>None</p> <p>None</p> <p>None</p>
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Desford NP SEA consultation responses November 2019

	<p>5.7. The NDP does not meet condition f, by virtue of the requirement for a SEA not having been in accordance with the relevant legislation. The consultation on the SEA is insufficient to allow full consideration of the appropriateness of the content and the implications for the NDP. Furthermore, the SEA does not consider any reasonable alternatives to the preferred approach to the housing strategy. That approach is unlawful, and we would welcome the opportunity to explore these matters further at a hearing in the NDP and would hope to assist the examiner with legal submission on the matter; the reason for that is, unless the issues are explored fully and are remedied, the NDP will be exposed to legal challenge when it is made.</p> <p>5.8. In addition to the above, due to the fundamental importance of an SEA as part of the evidence base in supporting the NDP, and the submission version of the NDP not having been drafted until May 2019, it is considered that the NDP has not been subject to a Regulation 14 consultation as required by The Neighbourhood Planning (General) Regulations 2012.</p> <p>6. Concluding Remarks</p> <p>6.1. This submission has been prepared on behalf of Glenalmond Developments Ltd in response to the consultation on the Strategic Environmental Assessment (SEA) and Draft Neighbourhood Development Plan (NDP).</p>	<p>The SEA meets legislative requirements as explained above.</p> <p>The SEA itself has been prepared according to relevant legislation – any requirement to increase the level of housing allocations would have been resisted by the Qualifying Body in any event as previously stated, so a recommendation along these lines would not have been followed and would not be required to be followed as residential allocations are a right not a statutory requirement.</p> <p>All submission NPs are submitted after</p>	<p>None</p> <p>None</p>
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Desford NP SEA consultation responses November 2019

	<p>6.2. The comments set out comprise observations in relation to the content and assessment made in the SEA, the draft NDP and re-iterate concerns raised in the previous representations. Having regard to the sections above, there is concern that the NP does not meet, or there is a lack of evidence at present to demonstrate it does meet, basic conditions a, d, e and f, and is unlawful.</p> <p>6.3. It is concluded that at present the NDP should not progress to a Regulation 15 submission without further work and a Regulation 14 consultation.</p>	<p>Regulation 14, as is the case here.</p> <p>Noted</p>	<p>None</p>
Coal Authority	<p>Thank you for the notification of the 3 November 2019 consulting The Coal Authority on the above NDP.</p> <p>The Coal Authority is a non-departmental public body which works to protect the public and the environment in coal mining areas. Our statutory role in the planning system is to provide advice about new development in the coalfield areas and also protect coal resources from unnecessary sterilisation by encouraging their extraction, where practical, prior to the permanent surface development commencing.</p> <p>I can confirm that we have no specific comments to make on the Strategic Environmental Assessment Report.</p>	<p>Noted</p>	<p>None</p>
Severn Trent	<p>Thank you for the opportunity to comment on your consultation. The Strategic Environmental Assessment (SEA) for Desford Neighbourhood Plan identifies that:</p> <ul style="list-style-type: none"> • Land, Soil and Water resources – Water Quality, Land and Soil • Land, Soil and Water resources – Waste and Recycling are both scoped out of the SEA therefore we do not have any specific comment to make regarding the SEA. <p>Please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice.</p> <p>For your information we have set out some general guidelines that may be useful to you.</p>	<p>Noted</p>	<p>None</p>

Desford NP SEA consultation responses November 2019

	<p>Position Statement</p> <p>As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments of the impacts of future developments. For outline proposals we are able to provide general comments. Once detailed developments and site specific locations are confirmed by local councils, we are able to provide more specific comments and modelling of the network if required. For most developments we do not foresee any particular issues. Where we consider there may be an issue we would discuss in further detail with the Local Planning Authority. We will complete any necessary improvements to provide additional capacity once we have sufficient confidence that a development will go ahead. We do this to avoid making investments on speculative developments to minimise customer bills.</p> <p>Sewage Strategy</p> <p>Once detailed plans are available and we have modelled the additional capacity, in areas where sufficient capacity is not currently available and we have sufficient confidence that developments will be built, we will complete necessary improvements to provide the capacity. We will ensure that our assets have no adverse effect on the environment and that we provide appropriate levels of treatment at each of our sewage treatment works.</p> <p>Surface Water and Sewer Flooding</p> <p>We expect surface water to be managed in line with the Government's Water Strategy, Future Water. The strategy sets out a vision for more effective management of surface water to deal with the dual pressures of climate change and housing development. Surface water needs to be managed sustainably. For new developments we would not expect surface water to be conveyed to our foul or combined sewage system and, where practicable, we support the removal of surface water already connected to foul or combined sewer.</p>		
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Desford NP SEA consultation responses November 2019

	<p>We believe that greater emphasis needs to be paid to consequences of extreme rainfall. In the past, even outside of the flood plain, some properties have been built in natural drainage paths. We request that developers providing sewers on new developments should safely accommodate floods which exceed the design capacity of the sewers.</p> <p>To encourage developers to consider sustainable drainage, Severn Trent currently offer a 100% discount on the sewerage infrastructure charge if there is no surface water connection and a 75% discount if there is a surface water connection via a sustainable drainage system. More details can be found on our website https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/</p> <p>Water Quality</p> <p>Good quality river water and groundwater is vital for provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that water quality of supplies are not impacted by our or others operations. The Environment Agency’s Source Protection Zone (SPZ) and Safe Guarding Zone policy should provide guidance on development. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan for the Severn River basin unit as prepared by the Environment Agency.</p> <p>Water Supply</p> <p>When specific detail of planned development location and sizes are available a site specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts.</p> <p>We would not anticipate capacity problems within the urban areas of our network, any issues can be addressed through reinforcing our network. However, the ability to support significant development in the rural areas is likely to have a greater impact and require greater reinforcement to accommodate greater demands.</p> <p>Water Efficiency</p>		
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Desford NP SEA consultation responses November 2019

	<p>Part G of Building Regulations specify that new homes must consume no more than 125 litres of water per person per day. We recommend that you consider taking an approach of installing specifically designed water efficient fittings in all areas of the property rather than focus on the overall consumption of the property. This should help to achieve a lower overall consumption than the maximum volume specified in the Building Regulations.</p> <p>We recommend that in all cases you consider:</p> <ul style="list-style-type: none"> • Single flush siphon toilet cistern and those with a flush volume of 4 litres. • Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute. • Hand wash basin taps with low flow rates of 4 litres or less. • Water butts for external use in properties with gardens. <p>To further encourage developers to act sustainably Severn Trent currently offer a 100% discount on the clean water infrastructure charge if properties are built so consumption per person is 110 litres per person per day or less. More details can be found on our website https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/</p> <p>We would encourage you to impose the expectation on developers that properties are built to the optional requirement in Building Regulations of 110 litres of water per person per day.</p> <p>We hope this information has been useful to you and we look forward in hearing from you in the near future.</p>		
Pegasus Group Reg 14 comments	<p>1. INTRODUCTION</p> <p>This representation is made by Pegasus Group, on behalf of Davidsons Developments Ltd (hereafter referred to as 'Davidsons'), to respond to the Desford Neighbourhood Development Plan Regulation 14 Version 2 consultation¹. This representation is made</p>	Noted	None

Desford NP SEA consultation responses November 2019

	<p>in relation to Land off Kirkby Road (Ashfield Farm), Desford (see Site Location Plan / Illustrative Masterplan at Appendix 1). The site is referred to as Site Reference AS210 & AS211 in the NDP, which reflects the SHLAA referencing. It should also be noted that a planning application has now been submitted requesting outline consent for up to 120 homes.</p> <p>The Regulation 14 (Pre-Submission) consultation was undertaken early 2019. This was followed by a consultation undertaken in May 2019 (Supplementary Strategic Sites) which focused upon seven further sites which were introduced to the processes as a result of the first Regulation 14 consultation.</p> <p>Davidsons made representations in respect of the NDP in relation to the initial Regulation 14 (Pre-Submission) stage, and again to the supplementary consultation and this representation should be read in conjunction with the previous responses, the comments for which still apply.</p> <p>As will be detailed further on in these representations, Davidsons were not initially aware that the Neighbourhood Plan is again currently being consulted on, as the invitation to respond to the consultation only referenced the Strategic Environmental Assessment (SEA). Separate representations have been made in this regard. These representations relate specifically to the Neighbourhood Plan itself. Both sets of representations should, however, be read together.</p> <p>Before comments on the latest iteration of the Neighbourhood Plan itself are made, it is important that the background is understood in terms of how this site has been considered so far through the NDP process.</p> <p>1 This is actually published on the Parish Council's Website as the Desford Neighbourhood Plan 2018-2036 Submission Version, May 2019. On behalf of Davidsons, Pegasus Group queried the current status of the Neighbourhood Plan with</p>	<p>Noted</p> <p>Noted. We refer you to responses to the Regulation 14 comments.</p> <p>Noted</p> <p>Noted</p> <p>The NP had been amended following Regulation 14</p>	<p>None</p> <p>None</p> <p>None</p> <p>None</p> <p>Change to be made as indicated.</p>
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Desford NP SEA consultation responses November 2019

	<p>the Borough Council, who confirmed it was being consulted on under Regulation 14 (to accompany the SEA consultation), but as it was another iteration of a plan that had previously been consulted on under this Regulation, it should be referred to as a Regulation 14 (2) consultation.</p> <p>2. BACKGROUND</p> <p>In terms of the initial Regulation 14 consultation (January 2019) Davidsons made representations on several issues. These included the need for the Neighbourhood Plan to address housing issues (including quantum) in a way which addresses need and aligns to the emerging Local Plan and the need for the settlement boundary to be redrawn to reflect site allocations.</p> <p>The representations to the first Regulation 14 consultation also raised significant concerns with the site selection assessment (SSA) and the methodology which had been utilised.</p> <p>On 12th March 2019, a letter was received from Hinckley and Bosworth Borough Council containing an enclosure from the Parish Council which advised that a further seven potential sites were to be assessed following the closure of the Regulation 14 Consultation in January 2019.</p> <p>This included an attachment of ‘the draft sustainable assessment for your land’ and the letter concluded that ‘as your site has not been ranked highly enough to merit further consideration at the present time, we will not progress a potential allocation in the Neighbourhood Plan’.</p> <p>The ‘sustainable site assessment’ referred to above only assessed SHLAA site AS211, the process had omitted to assess AS2010 and had failed to consider both sites together as a whole. Davidsons therefore submitted representations to this</p>	<p>consultation in readiness for submission to HBBC. We are happy for this pre-submission draft to be referred to as such.</p> <p>Noted. The housing requirement is based on the best current evidence of need.</p> <p>Noted. The revised site with the larger boundary was duly assessed.</p>	<p>None</p> <p>None</p>
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Desford NP SEA consultation responses November 2019

	<p>supplementary consultation in May 2019, again objecting to the unfair and inaccurate process and the conclusions reached which led to the promoted site again being dismissed.</p> <p>Since the supplementary consultation, further correspondence has been received from Desford Parish Council dated 20th October 2019. Appended to the letter is a revised site assessment scoring, which has correctly taken both sites AS210 and AS211 together (referencing them as 'Desford Site 4'). The letter advises that the site has been dismissed.</p> <p>Again, however, it appears that earlier comments and concerns with the process have, overall, not been taken on board. The assessment shows serious inconsistencies and in many cases the site has been downgraded from earlier scorings when assessed against certain criteria. Appendix 2 contains a table which shows how inconsistently and unfairly the process has been applied at each stage: the final column contains commentary from Davidsons setting out the inconsistencies, illustrates where 'new' criteria have been introduced resulting in the site being downgraded, and providing a revised scoring.</p> <p>It is not possible to compare the revised scorings with the process applied to other sites as this information does not appear to be publicly available. The process is therefore not clear or transparent: a point which has been raised by Davidsons previously.</p> <p>This background is important as it provides the context within which the latest iteration of the Neighbourhood Plan and accompanying SEA has been prepared. The process should be iterative and based on clear and accurate information.</p> <p>Lack of transparency and clarity has been a recurrent theme throughout the preparation of the plan. It was only as a result of a chance conversation with the planning policy team at Hinckley and Bosworth Borough Council on 15th November</p>	<p>All comments were considered, but not necessarily agreed with.</p> <p>We are aware of concerns raised by landowners and developers in relation to their sites that they believe should be allocated in preference to the preferred site that is in the NP.</p> <p>The community, with independent professional support, has undertaken the</p>	<p>None</p>
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Desford NP SEA consultation responses November 2019

	<p>2019 that it became clear that the Neighbourhood Plan was being consulted on at the same time as the SEA (hence these representations). This was not obvious either from the consultation email received from the Parish Council (Appendix 3) nor from the wording of the Parish Council’s website (Appendix 4). Representations to the latest Neighbourhood Plan consultation have therefore had to be prepared in some haste on this matter to meet an unreasonably short deadline, which is not legally compliant, as set out in the next section.</p> <p>3. THE NEIGHBOURHOOD PLAN REGULATION 14 (2) CONSULTATION</p> <p>Firstly, the consultation deadline is extremely short. The email publicising the consultation was received on Sunday 3rd November 2019, with the deadline being 23rd November 2019 (a Saturday). This is less than three weeks. This is not an adequate period of time to enable meaningful response from a wide range of interested parties.</p> <p>Regulation 14 (iv) of the Neighbourhood Planning General Regulations 2012 (as amended) requires a consultation period of ‘not less than six weeks from the date on which the draft proposal is first publicised’. This consultation period falls well short of this requirement and is therefore not compliant with legal procedure.</p>	<p>process in good faith and this has resulted in an allocation that meets the housing requirements as agreed by HBBC and is favoured by the community.</p> <p>4 – 23 November is three working weeks SEA legislation does not specify a timescale and three weeks was considered appropriate given the minor comments made in the SEA report. HBBC suggested the timescale as an option.</p> <p>Noted – but this is not a further Regulation 14 consultation. It is a consultation on the SEA where all relevant</p>	<p>None</p> <p>None</p>
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Desford NP SEA consultation responses November 2019

	<p>Furthermore, as set out in paragraph 2.10 of these representations, it was not at all clear that the Neighbourhood Plan was out for consultation alongside the SEA. This is unacceptable.</p> <p>Housing Need and Provision</p> <p>Chapter 4 focuses upon Housing and the Built Environment. The acknowledgement in the first paragraph that ‘there were (and are) no brownfield sites of any size within the parish and any future development would have to be outside the settlement boundary’ is supported and welcomed.</p> <p>The report sets out the need for Desford to provide for 163 units over the plan period (2026-2036). However, as set out in our earlier representations (January 2019) it is not clear how the indicative figure of 163 units has been derived. This figure was in the previous iteration of the Neighbourhood Plan and has not been updated to take account of the fact that since the last version of the plan, the Standard Methodology has been introduced, along with an updated National Planning Policy Framework (NPPF).</p> <p>For context, the Borough Council is currently reviewing its Local Plan, with a Draft Local Plan anticipated to be produced early 2020. In addition to the minimum housing requirement set by the standard method the plan will also have regard to local needs and cross boundary pressures and make important decisions on the spatial distribution of planned growth.</p>	<p>documents are also available.</p> <p>This is not accepted. Full information was provided.</p> <p>Noted</p> <p>The housing target has been proposed by HBBC. The NP is required to use this number in its Plan.</p> <p>The key word is review – the NP is best on the latest available evidence of current need Which is what it has done.</p>	<p>None</p> <p>None</p> <p>None</p> <p>None</p>
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Desford NP SEA consultation responses November 2019

	<p>Housing Allocation (Policy H2)</p> <p>It is noted that the Neighbourhood Plan is proposing allocating land at Barns Way for around 80 units, and Davidsons have already made clear their objections to the way in which site selection was undertaken. However, it is also noted that this site has recently received outline planning consent.</p> <p>Notwithstanding this however, this does not mean that the Neighbourhood Plan should not be considering further allocations to meet its own local needs and to assist with delivering a supply of sites for the Borough as a whole. Land at Ashfield Farm is being promoted as a sustainable and deliverable site, and it is submitted that it should be fairly and transparently considered through this process, using accurate information. Commentary on this, as highlighted earlier, is set out in Appendix 2.</p> <p>Affordable housing (Policy H3)</p>	<p>include this statement in each policy. If, on review, further housing is required it seems apparent that this will necessitate a review of the settlement boundary.</p> <p>The NP has considered further allocations in determining its allocation policy. It has decided that the level of housing provided is appropriate.</p> <p>Each site has been considered. The NP has included the site it prefers and is not required to allocate further sites.</p>	<p>None</p> <p>None</p>
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Desford NP SEA consultation responses November 2019

	<p>Policy 15 of the adopted Core Strategy concerns affordable housing, identifying a need of a minimum of 2,090 affordable homes between 2006 and 2026 (105 per annum). The Policy confirms that in ‘rural areas’, which includes Desford, 40% affordable housing will be sought on site as part of major residential developments. The Policy goes on to state that these figures will be kept up-to-date through an Affordable Housing Supplementary Planning Document. However, such a document has not been produced at the time of writing. It is important that the role of larger sites in delivering much needed local affordable homes is recognised and provided for in the Neighbourhood Plan.</p> <p>Housing mix (Policy H4)</p> <p>Policy H4 of the NDP sets out that housing development proposals should provide a mixture of housing types specifically to meet identified local needs. It goes on to state that the provision of dwellings of 1, 2 and 3 bedrooms and of homes suitable for older people including single level living and a supported living complex will be supported. It also requires ‘where possible’ all homes to be built to Building Regulations M2 (accessibility standard) with 10% built to M3 (wheelchair standard).</p> <p>Davidsons encourage the need for a mixture of housing types specifically to meet local needs, particularly the provision of smaller properties, accessible properties and single level living for older persons. However, Davidsons raise concern that such policy requirements may be somewhat onerous especially to small and medium sized developers, likely to result in small sites being unviable and remaining undeveloped over the long term. As such, this increases the risk of this much needed housing never coming forward. The policy should be worded flexibly to allow for individual site circumstances and should also recognise the role that larger developments can play in delivering a broader mix of housing to meet identified and evidenced local needs.</p> <p>Windfall Site Development (Policy H5)</p>	<p>The policy meets current need so there is no need for any further affordable housing report.</p> <p>Until such a report is produced, the existing situation will apply.</p> <p>Noted. The policy requires development to meet a locally identified need.</p> <p>This is an important consideration and we do not feel the need to alter the wording of the policy to allow smaller builders to build larger dwellings against the needs of the local community.</p>	<p>None</p> <p>None</p> <p>None</p> <p>None</p>
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Desford NP SEA consultation responses November 2019

	<p>The NDP includes a policy covering windfall site development. Policy H5 states that small residential proposals for infill and redevelopment sites will be supported, subject to it being within the settlement boundary amongst other criteria. Davidsons support the need to encourage the redevelopment of brownfield and derelict sites within the settlement boundary, however the NDP currently relies upon such sites to come forward in order to achieve the total housing need for the Parish.</p> <p>Davidsons object to this approach as it is not considered appropriate or best practice to make an allowance for windfall sites in the NDP supply as there is no certainty or guarantee that these sites will come forward. This is particularly an issue if the housing needs for Desford increase due to increased needs across the Borough. Furthermore, as mentioned previously the Neighbourhood Plan states clearly in Chapter 4 that ‘there were (and are) no brownfield sites of any size within the parish and any future development would have to be outside the settlement boundary’.</p> <p>A better and more positive approach would be to allocate more sustainable sites in Desford to meet all of the identified housing need (if the most sustainable site has the capacity to do so) and if any windfall sites do come forward this would only add to the supply of housing in the Parish and in HBBC, an approach encouraged in the NPPF where local authorities should be seeking to boost the supply of housing.</p>	<p>Noted.</p> <p>Noted – however national policy allows windfall provision to be counted within housing requirements. If the housing target increases in time, the NP will be reviewed.</p> <p>We disagree that this is an appropriate approach and prefer to undertake an allocation which, with windfall, exceeds the minimum requirement followed by a review of the NP over time if required.</p>	<p>None</p> <p>None</p> <p>None</p>
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Desford NP SEA consultation responses November 2019

	<p>4. CONCLUSIONS</p> <p>The Neighbourhood Plan has not been based upon an objective nor fair assessment of sites when considering the site allocations.</p> <p>The Neighbourhood Plan is not providing for sufficient development to enable it to meet the future needs of Desford, and of the Borough as a whole.</p> <p>The consultation period has been wholly inadequate, and not in compliance with Regulation 14 (iv) of the Neighbourhood Planning General Regulations 2012 (as amended).</p> <p>Davidsons therefore continue to object in the strongest possible terms to the way in which this process has been undertaken, and consider that as matters stand the Basic Conditions have not been met.</p> <p>Davidsons continue to promote Land at Ashfield Farm, Kirkby Road as an entirely logical and sustainable extension to the community, which can help Desford meet its future needs, through a development of up to 120 homes including 40% affordable provision.</p>	<p>We note these objections but disagree with them for the reasons stated above.</p>	<p>None</p>
<p>Leicestershire County Council</p>	<p>The Monitoring measures do not include Net Gain for Biodiversity-new development could have significant positive impact and therefore should be mentioned within the monitors alongside the landscape measures.</p> <p>The plan identifies the presence of a Local Wildlife Site, however within the mapping the document does not recognise the remaining ridge & furrow fields around the village that provide semi-natural grassland. Those fields remaining could be added to the 40 Locally Designated Assets. The description of a local wildlife sites is not given in the glossary. The Landscape Sensitivity Study and Green Infrastructure Study for Leicester & Leicestershire 2017 is not in the documents list of strategies. This document lists a number of opportunities. Soar River Corridor Restoration is a benefit</p>	<p>Noted. The NP policy ENV 3 supports enhancements to biodiversity. The R&F fields are mapped in figure 10 in the NP and are recognised as non-designated heritage assets there.</p>	

Desford NP SEA consultation responses November 2019

	<p>to water, biodiversity, landscape, and heritage. The project describes a requirement to reinstate grazing marsh and fens along the floodplain of Soar tributaries. The Soar tributaries could provide habitat connectivity to expand the size of habitat around Botcheston Bog. The document fails to address good design in development and guidance relating to this. Good design for Biodiversity could support the improvement of habitat permeability for species. Good design in development would also support biodiversity net gain and improve connectivity for example supporting linking grassland species from candidate wildlife site road verges and the Local Wildlife Site.</p>	<p>This study can be referenced in the text.</p> <p>Policy H6 in the NP addresses this, including the following:</p> <p>d) Development should be enhanced by fostering biodiversity and landscaping with existing trees and hedges preserved whenever possible;</p> <p>e) Where possible, enclosure of plots should be of native hedging, wooden fencing, or brick/stone wall with ground-level gaps that maintain connectivity of habitat for hedgehogs;</p> <p>f) Development should incorporate sustainable design and construction techniques to meet</p>	
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Desford NP SEA consultation responses November 2019

		<p>high standards for energy and water efficiency, including the use of renewable and low carbon energy technology, such as high levels of thermal efficiency, water butts, photovoltaic cells and ground heat source pumps as appropriate; ensuring running costs are manageable;</p> <p>g) Security lighting should be operated by intruder switching, not on constantly. Maximum light spillage onto bat foraging corridors should be 1 lux;</p> <p>h) Development should incorporate sustainable drainage systems with maintenance regimes to minimise vulnerability to</p>	
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Desford NP SEA consultation responses November 2019

		flooding and climate change; ensure appropriate provision for the storage of waste, recyclable materials and rain water for use in gardens. The Drainage Hierarchy (Planning Practice Guidance Paragraph 80) should be applied to ensure that where possible, surface water is directed towards infiltration or watercourses before considering the use of the sewerage system;	
Natural England	<p>Thank you for your consultation on the above document dated 03 November 2019 which was received by Natural England on 05 November 2019</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England has considered 'Strategic Environmental Assessment for the Desford Neighbourhood Plan – Environmental Report – October 2019'.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p>	<p>None</p> <p>None</p> <p>None</p>

Desford NP SEA consultation responses November 2019

	<p>We consider the report to be a good examination of the environmental issues and notes the commitment to the important concepts of sustainable development, net biodiversity gain and the provision of green infrastructure.</p> <p>Natural England has no specific comments to make, however we note that the draft Neighbourhood Plan puts forward an additional housing allocation to the Hinkley and Bosworth Local Plan, and that this has been granted outline planning permission.</p> <p>We would ask you to note that an assessment of potential impact on Botcheston Bog Site of Special Scientific Interest (SSSI) will be required for all housing applications of over 50 units in rural residential areas, and of 100 and over units in residential areas. This is because Desford falls within the Botcheston Bog SSSI Impact Risk Zone. Impact Risk Zones are a GIS tool developed by Natural England to make a rapid initial assessment of the potential risks posed by development proposals to protected sites, (including SSSIs) They define zones around each site which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts.</p> <p>Natural England would like to advise you that we formed part of a partnership that has produced a planning toolkit aimed at supporting neighbourhood planning groups developing neighbourhood plans which shape development and land use change in their community.</p> <p>The guide includes: opportunities to enhance the environment and how this can be achieved in plan-making; important issues to consider, including legislative requirements; where to find out more; good practice and real life examples and a checklist to use when developing a Neighbourhood Plan. The 'Neighbourhood Planning for the Environment' toolkit is available here.</p> <p>We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.</p>	<p>Noted. HBBC will ensure that this requirement is followed.</p>	<p>None</p>
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Desford NP SEA consultation responses November 2019

<p>Historic England</p>	<p>Thank you for consulting Historic England about your Neighbourhood Plan.</p> <p>The area covered by your Neighbourhood Plan includes a number of important designated heritage assets. In line with national planning policy, it will be important that the strategy for this area safeguards those elements which contribute to the significance of these assets so that they can be enjoyed by future generations of the area.</p> <p>If you have not already done so, we would recommend that you speak to the planning and conservation team at your local planning authority together with the staff at the county council archaeological advisory service who look after the Historic Environment Record. They should be able to provide details of the designated heritage assets in the area together with locally-important buildings, archaeological remains and landscapes. Some Historic Environment Records may also be available on-line via the Heritage Gateway (www.heritagegateway.org.uk <http://www.heritagegateway.org.uk>). It may also be useful to involve local voluntary groups such as the local Civic Society or local historic groups in the production of your Neighbourhood Plan.</p> <p>Historic England has produced advice which your community might find helpful in helping to identify what it is about your area which makes it distinctive and how you might go about ensuring that the character of the area is retained. These can be found at:-</p> <p><https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/></p> <p>You may also find the advice in “Planning for the Environment at the Neighbourhood Level” useful. This has been produced by Historic England, Natural England, the Environment Agency and the Forestry Commission. As well as giving ideas on how you</p>	<p>Noted</p>	<p>None</p>

Desford NP SEA consultation responses November 2019

	<p>might improve your local environment, it also contains some useful further sources of information. This can be downloaded from:</p> <p><http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf></p> <p>If you envisage including new housing allocations in your plan, we refer you to our published advice available on our website, "Housing Allocations in Local Plans" as this relates equally to neighbourhood planning. This can be found at</p> <p><https://content.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/heag074-he-and-site-allocation-local-plans.pdf/></p> <p>If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.</p>		
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**DES福德 NEIGHBOURHOOD PLAN
CONSULTATION STATEMENT
APPENDIX 8 HBBC Comments to
Regulation 13**



Hinckley & Bosworth
Borough Council

Hinckley and Bosworth Borough Council Consultation Response to the Desford Neighbourhood Plan Consultation, November 2019 as follows:



“DES福德 PARISH NEIGHBOURHOOD PLAN The Environmental Assessment of Plans and Programmes Regulations 2004, Regulation 13: Consultation following a Strategic Environmental Assessment”

Neighbourhood plans are not required to meet the tests of soundness which local plans and other development plan documents must meet. Instead, in order for them to be able to be put to referendum, they must meet the ‘basic conditions’ set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990. Those relevant to neighbourhood plans are as follows:

- (a). having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).
- (d). the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.
- (e). the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).
- (f). the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.
- (g). prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).

Points (f) and (g) above relate to certain obligations which plans must adhere to, primarily in relation to habitats and environmental impacts. Some plans require a Strategic Environmental Assessment and/or a Habitat Regulations Assessment.

These representations are on behalf of Hinckley & Bosworth Borough Council (HBBC) in direct response to the extra consultation being ran by Desford Parish Council, following the receipt of a Strategic Environmental Assessment (SEA) ‘Environmental Report’.

HBBC have previously submitted representations to Desford Neighbourhood Plan’s Regulation 14 consultation. These can be found at Appendix 1.

The Strategic Environmental Assessment Screening was undertaken in November 2018. In accordance with Regulation 9 of the SEA Regulations 2004, HBBC as the determining authority had to consider whether an environmental assessment of the emerging Desford Neighbourhood Development Plan was required. HBBC had regard to Desford’s SEA Screening Report, and completed a six week consultation with the three statutory consultation bodies; Environment Agency, Natural England and Historic England.

Following this consultation, and the responses received, HBBC as the determining body, had concluded that the Desford Neighbourhood Plan should complete a full SEA, the determination notice can be found at Appendix 2. Following this Desford Neighbourhood Plan group sought the help of Locality through the technical support funding package. AECOM were appointed to undertake the

22 November 2019

SEA, which included the production of a scoping report and full Environmental Report document. The full Environmental Report was received on 17 October 2019.

The SEA Environmental Report contains a set of recommendations “*to enhance the positive effects of the plan, and mitigate any negatives*”¹. These recommendations can be found in table 1 of the Environmental Report.

Due to the ‘focused nature’ of the consultation, and due to the consultation period being three weeks only, HBBC are going to focus these representations on the recommendations listed in the SEA document (and the associated policies), and the suggested amendments to the plan following those recommendations. The specific content and policy comments on the entire plan, including comments from other Development Services colleagues, have been given at Regulation 14 stage, and will be updated and enhanced at the Regulation 16 Submission Consultation. More general comments on the usability of the plan can be found in table 2.

Appended to these representations is also correspondence with Desford Neighbourhood Plan group, and Desford Parish Council, prior to this focused consultation, see Appendix 3. This letter, dated 31st July 2019, outlines HBBC’s concerns around consultation procedures for the SEA and the plan, and whether Desford NP was meeting the requirements of Regulation 13 of The Environmental Assessment of Plans and Programmes Regulations 2004 and Regulation 14 of The Neighbourhood Planning (General) Regulations 2004. This letter also had appended previous advice from the 22nd May 2019, and the 24th July 2019.

HBBC also sent a follow up advice note to Desford NDP group on 26th September 2019, see Appendix 4, which contained some ‘next steps’ guidance for the consultation. These comments should be considered by the Examiner, as they outline the progress of the neighbourhood plan and SEA throughout 2019. Therefore all official HBBC guidance/representations will be submitted at Submission stage, including:

- HBBC Regulation 14 Representations (Appendix 1)
- Advice/guidance provided in between the Regulation 14 consultation, and Submission
- These representations for the extra consultation following receipt of the SEA

Comments are intended to be guidance based on national and local policy and any legislation associated with neighbourhood plans. This advice aims to address whether the plan, in its final form, is contributing to sustainable development and has been prepared positively and in line with the regulations. Not only this, but it is key for HBBC to ensure that the policies in their final form are workable and can be implemented to their full effect in both planning applications and in the preparation of the Local Plan Review.

¹ Strategic Environmental Assessment for Desford Neighbourhood Plan – Environmental Report, October 2019

HBBC Comments on the proposed changes to the Desford Neighbourhood Plan following the receipt of the SEA Environmental Report

Desford Neighbourhood Plan group have produced a 'modifications table', which highlights the recommendations listed in paragraph 5.12. The group have suggested amendments to the plan following these recommendations, and these are the subject of HBBC's comments in Table 1 below.

Table 1: HBBC's comments on Desford's suggested amendments to the plan, following the SEA recommendations.

SEA mitigation	Proposed Recommendation to DPC	HBBC Comments November 2019
<p>Policy H1 currently seeks to exclude small scale leisure or tourism activities and other forms of commercial/employment appropriate to the countryside outside or adjacent to the settlement boundary which is inconsistent with the provisions as set in Policy E2.</p>	<p>Agree and amend Policy H1 accordingly</p>	<p>Without knowing fully what the amendments will entail, HBBC does support the re-evaluation of Policy H1.</p> <p>Any comments still outstanding from HBBC's Regulation 14 comments still apply.</p> <p>HBBC will support consistency between the two policies.</p> <p>Will the amendments to Policy H1 mean that small scale leisure or tourism activities will be supported outside the settlement boundary? Or will the amendments be made to E2 to remove reference to small scale leisure or tourism activities.</p> <p>HBBC will encourage Policy H1 to be consistent with the Site Allocations and Development Management Policies (2016), Policy DM4, in which it states: "Development in the Countryside will be considered sustainable where:</p> <p style="padding-left: 40px;">a) It is for outdoor sport or recreation purposes (including ancillary buildings) and it can be demonstrated that the proposed scheme cannot be provided within or adjacent to settlement boundaries..."</p> <p>Once full wording has been provided in the final Submission Version of the plan HBBC will provide full comments if applicable.</p>

SEA mitigation	Proposed Recommendation to DPC	HBBC Comments November 2019
<p>Policy H2 could seek to encourage some mix of uses on site in response to identified local needs while still seek to provide the level and nature of residential growth outlined. As a site specific policy it is recommended that the policy makes it clear that proposals for the site are subject to other relevant policies of the plan in particular Policy H6 including matters relating to landscape character and biodiversity</p> <p>It is recommended for Policy H2 criteria (I) <i>Other financial contributions</i>Delete at full planning application stage as financial contributions requirements are not limited to full planning applications.</p>	<p>Noted: include in narrative, as some examiners have excluded such wording in the policies themselves.</p> <p>Agreed: the words will be deleted.</p>	<p>HBBC would like to see it made clear in the plan, that provision is partly determined by local need. Agreed, with regards to the housing allocation policy section, it needs to be clear that proposals for the site are subject to other relevant policies of the plan.</p> <p>HBBC would encourage the deletion of “at full planning application stage”, as agreed, financial contributions are not limited to Full Applications.</p> <p>Once full wording has been provided in the final Submission Version of the plan HBBC will provide full comments if applicable.</p>
<p>Consider the inclusion of policy which seeks to encourage renewable energy infrastructure</p>	<p>No sites came forward in the call-for-sites exercise and it is difficult to see such sites arising in Desford, but a statement of support for any suitable site will be included in the narrative.</p>	<p>From the lack of evidence on renewable energy provided with the plan, I'm not sure how accurate it is to state that <i>“it is difficult to see such sites arising in Desford”</i>.</p> <p>Did the call for sites ask for sites for renewable energy infrastructure? I believe Desford didn't undertake their own call for sites, and used the sites submitted through HBBC's three call for sites between 2014 and 2018. HBBC's call for sites form does not ask for these types of sites, and therefore you cannot expect submissions for renewable energy sites.</p> <p>HBBC would encourage the inclusion of a renewable energy policy as long as it is in line with any applicable local and national policy.</p> <p>Once full wording has been provided in the final Submission Version of the plan HBBC will provide full comments if applicable.</p>
<p>Policy H5/supporting text - It is recommended that it may be beneficial to identify the likely amount of anticipated windfall development</p>	<p>Agreed: we will make such a statement in the supporting narrative.</p>	<p>Agreed, this will show an indicative projection over the course of the plan period, and how many windfall dwellings you could expect to see come forward. Of course future delivery is subject to many external considerations,</p>

SEA mitigation	Proposed Recommendation to DPC	HBBC Comments November 2019
that is anticipated to come forward during the plan period.		<p>including the market.</p> <p>You have some text on application approvals and the subsequent dwelling numbers on page 17. You have also referenced Historical Land Registry data on page 16, where you state 5 dwellings per annum have been provided by windfall sites. Is this data local and accurate? From HBBC numbers you should be able to work out windfall from 2016 to now, and project forward.</p> <p>The NPPF para 70 gives guidance on windfall assessments: <i>'Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area'</i></p> <p>Its also important that in assuming that windfalls will continue to come forward based on past trends, there are no policies in the plan which would impact/restrict those sites coming forward in the future. If there are the windfall rate should be reassessed accordingly.</p> <p>Once full wording has been provided in the final Submission Version of the plan HBBC will provide full comments if applicable.</p>
Policy ENV 5: Consider an amendment that replaces <i>building or structure</i> to heritage asset in recognition that such assets can include landscape.	Agreed: the change will be made	<p>Agree to the change of 'building or structure' to 'heritage asset'.</p> <p>Once full wording has been provided in the final Submission Version of the plan HBBC will provide full comments if applicable.</p>
For clarity the table of heritages assets provided at page 40 could identify those assets which are designated heritage assets and those which are non-designated heritage assets.	Every listed asset is a non-designated heritage asset	<p>From reviewing the list, it appears that the NDP states that it lists designated heritage assets, but it doesn't actually seem to do so.</p> <p>Therefore agree with SEA recommendation. For clarity, you could add the designated assets to the table as well, and add another column to identify if it is nationally/locally recognised and a designated asset, or whether it has been identified through the Neighbourhood Plan process as a non-designated asset.</p>

SEA mitigation	Proposed Recommendation to DPC	HBBC Comments November 2019
		<p>Once full wording has been provided in the final Submission Version of the plan HBBC will provide full comments if applicable.</p>
<p>Policy ENV 6: Consider the inclusion of the following: development shall be designed to sustain significant views that contribute to the character and appearance of the area.</p>	<p>Agreed. The recommended change will be made.</p>	<p>Agree to the suggested changes. Our previous comments at Regulation 14 still apply however, as below:</p> <p><i>“Figure 12 on page 42 – the symbols could be misleading, for example the extent of the symbols reaching out only so far could mean the important view stops where the symbol stops. Are the views looking inwards to the village, or are they looking outwards towards the countryside? This map could be interpreted in a very different way than intended, explain the map and symbols. Or you could change the symbols or reflect the extent of the view in a clearer way, just be wary of the way a developer could interpret this map.”</i></p> <p>From Figure 12 which accompanies the policy, it is difficult to interpret what the significant views actually include, and what the ‘character and appearance of the area’ consists of.</p> <p>Once full wording has been provided in the final Submission Version of the plan HBBC will provide full comments if applicable.</p>
<p>Policy ENV 7: For Wind Turbine and Large-scale solar energy generation developments seek to clarify that such proposals are subject to considerations of the rest of ENV 7 and other relevant policies in the plan.</p>	<p>We will address this in the supporting narrative, because of previous experience of examinations and Examiners’ decisions</p>	<p>Agree, the second half of the policy relating to proposals for wind turbines and large scale solar should also have to comply with criteria a-d in the first half of the policy.</p> <p>Many of our comments from Regulation 14 still apply, as below:</p> <p><i>“Criteria a states “adverse impact on... wellbeing...” What do you mean by wellbeing? Very subjective and different for everyone.</i></p> <p><i>Second para beginning “Developers will be responsible for...” can’t be asked for in policy, and should be removed, or moved to the supporting text.</i></p> <p><i>Third para highlights that wind turbine development proposals will be generally acceptable if the turbine tip height is less than 50 metres, and the proposal is for no more than one turbine. Why? Why these criteria?</i></p>

SEA mitigation	Proposed Recommendation to DPC	HBBC Comments November 2019
		<p><i>The policy also lists “The land is also used for other purposes” – this is not always possible, remove or amend. “Low-level noise generated does not interfere with residential homes” – again this is repetition throughout the document of impacts on amenity Please review.</i></p> <p><i>The policy states “Large scale solar energy generation development proposals will...” How big is large scale? Subjective term.”</i></p> <p>Once full wording has been provided in the final Submission Version of the plan HBBC will provide full comments if applicable.</p>
<p>Policy ENV 3: Consider the inclusion of: Work constructively with other organisations to seek to consider the possibility of installing major solar facilities.</p>	<p>This is more of a Community Action than a policy, and we will address it in the supporting narrative.</p>	<p>I presume this recommendation in the SEA is referring to Policy ENV7, and Community Action ENV3? If so, agree to the inclusion of this as a Community Action, possibly included within Community Action ENV3. Ensure that all Community Actions are monitored as you would with actual Policies so that you can report on their progress and efficiency for Parish Council use, and for future reviews of the plan.</p> <p>Once full wording has been provided in the final Submission Version of the plan HBBC will provide full comments if applicable.</p>
<p>Policy E2: Consider the inclusion of: or on areas of previously developed land in sustainable locations.</p>	<p>Agreed. The recommended change will be made.</p>	<p>Agree the inclusion of sustainable ‘brownfield land’ in this policy</p> <p>Once full wording has been provided in the final Submission Version of the plan HBBC will provide full comments if applicable..</p>

Comments on the plan and general observations

Following on from the comments regarding the SEA's recommendations and Desford's response, it is pertinent to offer some overall comments regarding the plan, and some of the changes that have been made since the Regulation 14 stage. At this stage, the Council will refrain on commenting on every policy and it's supporting text, however below are some general comments on the practicalities of using the plan, and some key elements that will help the plan become more usable.

Table 2: General comments relating to the plan at this stage.

Page Number/Policy Number/Topic	Comments November 2019	
General comment	Ensure the whole plan and it's policies complies with the National Planning Policy Framework 2019 , of which the newest version is February 2019. There have also been various amendments to the National Planning Practice Guidance, of which you can cross-reference to your plan.	
Pages 7, 8, 9	Again comment still stands from Regulation 14, as follows: <i>"Cut down the information on the census, and only leave in the essential information needed for context and for the policies in this plan. Potentially put into a tabular format for easy reading. Any extra information not vital to the plan can be placed in a topic paper or briefing note in the additional information/appendices."</i>	
Page 18 & 19 – Settlement Boundary	Again comment still stands from Regulation 14, as follows: <i>"Expand on how you've extended the settlement boundary. As highlighted by a neighbourhood plan examiner in recent examinations, Neighbourhood Plans must clearly set out where settlement boundaries have changed and how. Perhaps highlighting what methodology was used to determine the new boundary. See HBBC's Settlement Boundary Revision Topic Paper as an example methodology"</i>	
Page 19 – Figure 2	Again, figure 2 Settlement Boundary map – would be useful having this as a full page landscape map to see intricacies of the settlement boundary. Alternatively you can include a A4 landscape map as part of the appendices potentially. Or a high resolution version available on the website.	
Page 19 – Housing allocations	Please ensure that the text reflects what sites have been included as part of the assessment, and which have been excluded. The table below shows this accurately, as agreed with a member of the group, and can be inserted into the plan itself, or incorporated into the current supporting text. The table is clear in that sites submitted to HBBC during 2019 (and not submitted directly to the group) won't be available until the Council's updated SHELAA review is made available later in 2019. Therefore these sites won't be included in this version of the Neighbourhood Plan, but will be looked at as part of any future review of the plan. <table border="1" data-bbox="483 1337 1122 1367"> <tr> <td data-bbox="483 1337 1122 1367">Sites Included</td> </tr> </table>	Sites Included
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Page 19, SSA and methodology	<p>Last para of page 18 states that the completion of the SSA process meant you are allocating Barns Way for resi development. This process also allowed you to have a list of ‘reserve sites’ or other alternative sites for if the Barns Way site wasn’t to come forward for any reason.</p> <p>Reserve sites also allow you to have a say in what sites may be allocated in the future if a larger housing need is determined. Reserve sites give the Local Authority a good idea of what sites the NDP have assessed as good alternative sites, and this would come into consideration when/if allocating through the Local Plan process if a higher need is determined. What are your thoughts on identifying reserve sites to help cater for potential future growth, and help in the instance of a future review of the NDP.</p>	<p>Make clear what the SSA process actually is. Is it a Sustainability Appraisal, or is it a SHLAA, or is it neither?</p> <p>My colleague Helen Nightingale provided comments on the SSA methodology at Regulation 14.</p> <p>Of particular importance to the SSA, is the following comment:</p> <p><i>“In your methodology you need to show in an appendix or footnote on how you have scored against each category as you would have needed a consistent approach from all site assessors (a crib sheet), assuming you didn’t just use one assessor. By showing your workings and evidence also removes the probability of challenges from developers, particularly regarding those criterion relating to heritage assets, protected species, highway matters, landscape issues, drainage and contamination, by demonstrating it’s a local evaluation rather than a professional assessment.”</i></p>					
Page 21 – Figure 3	Zoomed in site location map would be useful here, as village map has been provided earlier in the form of the Settlement Boundary map.						
Page 31 – Local Green Spaces	Table with Local Green Space info and scoring could be turned landscape to fit on the page better. This way you could also include the photograph next to the info rather than below, or you could include the photographs separate to the table.						

Page 33 – Figure 7	<p>Comment still applies from Regulation 14 as follows:</p> <p><i>“BAP Species locations have been identified on Figure 7. Check with Leicestershire County Council Ecology Department that this map does not breach data confidentiality as some BAP species are protected and their locations should not be disclosed to the public. From recent advice I believe that rough locations of Badger setts and birds is reasonable to disclose, however it is always worth checking before the final plan is prepared.”</i></p> <p>Figure 7 is also quite a small zoomed out map, and it is difficult to interpret details from it. You could have this map as a full A4 landscape map in the plan, and/or have a high resolution version available on the website, and/or as an appendix.</p>
Page 60 – Monitoring	<p>Again, this section needs to be clear and concise, especially with the government’s increased pressure on the Housing Delivery Test the 5 year supply, and the continual review of plans. The monitoring and review of the plan is especially important as the Local Plan Review is advancing through the process.</p>
General comments on the consultation process	<p>Firstly, HBBC have concerns over Desford calling this consultation a ‘Regulation 13’ consultation. I believe they are calling this a Reg 13 consultation on a public notice, although this hasn’t been made available on the website. Previous advice on this to Desford (Appendix 4) was as follows:</p> <p><i>“The consultation you’ll be running at this stage is, for want of a better phrase, a Regulation 14 Part Two, as generally you’ll be consulting on the draft plan as you did back in January 2019, but this time with the added SEA report and extra site assessments. I would steer clear of calling it a Regulation 13 consultation, as ‘Reg 13’ refers to a different set of regulations i.e. the Environmental Assessment of Plans and Programmes 2004, separate to the Neighbourhood Planning (General) Regulations 2012.</i></p> <p><i>Running this consultation including consulting on the SEA Environmental Report shows how you plan to meet Regulation 13 of the Environmental Assessment of Plans and Programmes 2004 regulations.</i></p> <p><i>With this being said, we would recommend the Parish Council/Neighbourhood Plan Group runs this consultation the same as the Reg 14 consultation in January 2019, including consulting the same people.”</i></p> <p>Secondly, it is apparent throughout various pieces of guidance that the reason why the SEA Environmental Report is required to be consulted on at Regulation 14 (rather than Regulation 16 Submission), is that there is a need to demonstrate that the SEA has influenced the plan’s development, and the plan and it’s policies have been amended in line with the SEA’s recommendations. The version of the plan published alongside the SEA for this consultation has not been amended to reflect the changes recommended in the SEA report.</p> <p>However as a compromise, Desford have published a mitigation/modifications table at the request of HBBC, to ensure the public and stakeholders have a chance to see, to a certain extent, how the production of this SEA will affect the plan before submission. You can clearly see which policies will be changing as a result of the SEA outcomes, however with the lack of specifics in Desford’s responses, it’s difficult to determine whether this is sufficient to show how and to what extent they plan to meet these outcomes in</p>

the SEA. Until a fully amended plan is available at Submission, HBBC cannot submit appropriate detailed comments on the amended policies.

It is also worth noting, and as can be seen throughout our previous advice to Desford in the various appendices, there were a few other outstanding issues that needed to be addressed by holding another consultation in particular the extra/amended site assessments. Therefore the Borough Council believed it would be beneficial and appropriate to run the consultation as a second Regulation 14 consultation, asking for comments on the whole suite of documents (i.e. the amended draft plan, the SEA report, the updated site assessment information, and all associated appendices and supporting documents). If consulting on numerous documents it would be appropriate for the time period for comments to be six weeks, as is required at Regulation 14. The full extent of HBBC's advice to Desford prior to this consultation can be found at Appendices 1, 3 and 4.

As the SEA recommendations are limited, the SEA process has now concluded, and this part of the process is ran by the Qualifying Body, the Local Planning Authority the Local Planning Authority advised that it was for the group to determine how and what they were going to consult on at this stage. Going forward it is for the Qualifying Body to state in their Consultation Statement how they have followed consultation procedure, and the public and stakeholders have been given sufficient time to comment on the plans progression at each stage.