



Harborough Local Plan: Proposed Submission Draft Local Plan

Sustainability Appraisal - Appendices A-B

Harborough District Council

Final report

Prepared by LUC

February 2025

Version	Status	Prepared	Checked	Approved	Date
1	Draft Sustainability Appraisal Report for the Proposed Submission Draft Local Plan	H. Naylor L. Haddad H. Ennis	K. Nicholls	K. Nicholls	08.11.2024
2.	Final Sustainability Appraisal Report for the Proposed Submission Draft Local Plan	H. Naylor L. Haddad H. Ennis	K. Nicholls	K. Nicholls	04.02.2025



Land Use Consultants Limited

Registered in England. Registered number 2549296. Registered office: 250 Waterloo Road, London SE1 8RD. Printed on 100% recycled paper

Contents

Appendix A	4
Consultation Comments	
SA Scoping Report	
Issues and Options SA Report	
Appendix B	113
Review of Relevant Plans, Policies and Programmes	
References	180

Appendix A

Consultation Comments

SA Scoping Report

A.1 Consultation on the SA Scoping Report for the Harborough Local Plan took place between 25th August to 29th September 2023. Set out below is a summary of consultee comments received on the SA Scoping Report and the SA team's response to these comments. This summary was originally presented in the Issues and Options SA Report; therefore any references to 'this report' or to chapter/appendix numbers refer to the Issues and Options SA Report.

Natural England

- Natural England consider the scope of the SA to be appropriate.
- The list of relevant plans, policies and programmes in Appendix 1 is comprehensive. Natural England are pleased to see mention of the Environment Act 2021, and specifically the mention of the Local Nature Recovery Strategies this act has mandated. Although the Leicestershire and Rutland LNRS is not complete, the Harborough local Plan should consider the emerging objectives of the LNRS, and both documents should be developed in collaboration to ensure the Local Plan complements the delivery of the LNRS and Nature Recovery network.
 - Noted.
- Natural England have no specific comment to make on the baseline information, but would refer you to Annex B for our generic advice on sources of local plan evidence on the natural environment.
 - Noted. When updating the baseline information for the current iteration of the SA Report reference has been made to Annex B.

Appendix A Consultation Comments

- Natural England consider the Key Sustainability issues listed to be suitable and have no additional issues to add. We welcome the inclusion of access to nature, biodiversity (including opportunities to enhance, restore and connect, not simply prevent adverse effects) air quality, water quality, agricultural land quality and local deprivation (which can be linked to low access to nature; [Natural England's Green Infrastructure Mapping](#) can be a useful tool in assessing correlation between the Index of Multiple deprivation, and access to Nature).
- Noted.
- Generally, Natural England consider the objectives and questions set out in the SA framework to be appropriate; we have a few recommendations below:
 - SA2 includes: 'Will it have a detrimental impact on the presence or condition of local biodiversity/geodiversity?'. Natural England welcome this but would encourage the inclusion of consideration of any enhancement of local biodiversity/geodiversity, as is the case with specific ecological assets in the question prior. We welcome the inclusion of consideration of the LNRS in this objective.
 - SA3 includes: 'Will it avoid development on higher quality agricultural land?'. Natural England welcome this, but would recommend inclusion of reference to Best and Most Versatile Land.
 - SA7 includes: 'Will it integrate new neighbourhoods with existing neighbourhoods allowing for higher levels of pedestrian activity/outdoor interaction?'. Natural England would welcome inclusion of specific reference to access to nature, and equal opportunities not only for outdoor access, but to high quality green spaces.
 - SA12 includes questions around the use of SuDS to deliver flood resilient design, and protection/improvement of water quality, which are both welcomed. Natural England recommend that reference to SuDS could be made in relation to water quality, as well as flood resilience, as SuDS can play a key role in improving quality as well as reducing flood risk.

Appendix A Consultation Comments

- Noted. The appraisal questions for SA2, 3, 7 and 12 have been updated in line with the recommendations.
- The distances used in B.4 are welcomed to promote sustainable and active travel – Natural England recommend that distances could be included to green space/access to nature – which would be in keeping with the governments ambition to ensure everyone lives within 15 minutes' walk of nature. This could also be included in the criteria for assessment for sites under SA8.
 - Within the site assessment assumptions, a walking distance to greenspace/access to nature is already included. SA6 considers the distance of each housing or employment site option to open space. A walking distance of 720m is used.
- B.9 uses percentages to consider impacts to high quality agricultural land. Natural England note that this approach may not be appropriate, as a large site could impact less than 25% of the high quality land, but still result in an impact on a significant area. I.e. 25% of a 1000ha site would be 250ha of high quality land. Natural England are a statutory consultee on developments not in accordance with a local plan, that could lead to the loss of over 20ha of BMV land.
 - The point regarding agricultural land loss is noted. The majority of Harborough is covered by Grade 3 agricultural land which will result in most of the sites being identified as having significant negative effects. In this SA report, where sites were not found to have a significant negative effect, a manual check has been done to identify any sites where there may be significant loss of high quality agricultural land, despite this comprising less than 25% of the site area (where a site is particularly large).
- Monitoring of the Plan – Chapter 1 of the SA Scoping report notes that the requirement for a description of the measures envisaged concerning monitoring in accordance with regulation 17 of the SEA regulations will be met at a later stage in the SA process. Natural England have no comments to make at this stage, but consider this to be a key element of the SA.
 - Noted.

Historic England

- Plans, Policies and Programmes (PPP) – Paragraph 2.32 – We welcome the potential scope for designated and non-designated heritage assets although the use of the word ‘conservation’ instead of ‘protection’ may provide flexibility for maintaining a heritage asset, or managing its change, and any enhancement as envisaged by the NPPF glossary definition of ‘conservation’ whilst meeting any legislative requirements.
 - Noted.
- Plans, Policies and Programmes (PPP) – Climate Change paragraph 2.39 – We recommend you consider inclusion of HE’s advice paper on retrofit and energy efficiency in historic buildings in the PPP list. Please note that a draft HE Advice Note on Climate Change is due for consultation soon and we will advise further on this in due course as it would be relevant to considerations for the plan where SA topic areas overlap.
 - Historic England’s advice paper on retrofit and energy efficiency in historic buildings has been included within the relevant plans and programmes section of the current iteration of the SA Report.
- Plans, Policies and Programmes (PPP) - Paragraph 2.43 - We recommend you consider including HE’s Heritage Counts publication on heritage as society in the PPP list. Further information on links between health and wellbeing and the historic environment can be found on [HE’s website](#).
 - Historic England’s Heritage Counts publication on heritage as society has been included within the relevant plans and programmes section of the current iteration of the SA Report.
- Plans, Policies and Programmes (PPP) – Paragraph 2.45 – We recommend that the scope of the SA is extended to include opportunity for the Local Plan to consider how elements of the historic environment, whether green space or urban fabric, can contribute to health and well-being through appreciation and enjoyment of one’s surroundings.
 - Reference to the fact that elements of the historic environment can contribute to health and well-being is now reflected within the current

Appendix A Consultation Comments

SA Report. An additional appraisal question has been added to SA Objective 6: “Will it improve access to cultural activities?”.

- Plans, Policies and Programmes (PPP) – Paragraph 2.53 – We note the proposed PPP for this topic and recommend that the following Good Practice Advice and Historic Environment Advice Notes in particular are included in the list:
 - [Historic England \(2015\) The Historic Environment in Local Plans](#)
 - [Historic England \(2015\) Managing Significance in Decision-Taking in the Historic Environment](#)
 - [Historic England \(2017\) The Setting of Heritage Assets](#)
 - [Historic England \(2015\) The Historic Environment and Site Allocations in Local Plans](#)
 - We also recommend that the [Historic Landscape Characterisation](#) information is used as part of the evidence base for the Plan.
 - The Historic England publications has been added to the review of plans, policies and programmes in the current iteration of the SA report.
- Plans, Policies and Programmes (PPP) – Paragraph 2.58 – We would recommend inclusion of [HE’s Heritage Counts](#) data within the PPP list. Opportunities for heritage led regeneration can often attract additional funding streams especially where projects are community led.
 - The Historic England Heritage and Economy 2020 and The heritage sector in England and its impact on the economy (2020) have been added to the review of plans, policies and programmes in the current iteration of the SA report.
- Appendix B – SA4 Historic Environment Development Site Options – B13 sets out uncertain effects which is accepted at this stage. However, in order to demonstrate a positive approach to the historic environment in the Plan process we would expect any uncertainties to be addressed through further work as the Plan progresses to clearly set out whether there could be positive or negative effects on heritage assets, or setting, as sites come forward for consideration. For site assessment work we recommend use of

the five steps set out in [HE's The Historic Environment and Site Allocations in Local Plans](#). We look forward to working with you as the SA and Plan progress. Please do not hesitate to get in touch if you wish to discuss any matters further ahead of the next iteration of the Plan and associated SA.

- Noted. When it comes available, the SA will make use of a RAG style rating through the Strategic Housing and Economic Land Availability Assessment to undertake the site assessment against SA4.

Environment Agency

- Plans, policies or programmes – A general observation we wish to make is on the separating of Environment (biodiversity/geodiversity, landscape and soils) (Section 2.48) and Water and Air (Section 2.55). All of these disciplines are interrelated and most of the Plans, Policies and Programmes are relevant to both lists.
- Within the plans, policies or programmes section in the main report and the appendices, biodiversity/geodiversity, landscape and soils and Water and Air have now been combined under one heading: 'Environment'.
- Plans, policies or programmes Paragraph 2.2 – We welcome reference to measurable net gains for biodiversity has been included. We would suggest and support this term being used throughout the document. We would also suggest that where green infrastructure is mentioned this is accompanied by 'blue' infrastructure. [Nature Recovery Network](#) should be added in this section.
- Reference to blue infrastructure is included alongside green infrastructure where applicable.
- Paragraph 2.50 – Request amended to: Measurable net gain biodiversity.
- Paragraph 2.51 – Request amended to: New blue and green infrastructure...

Appendix A Consultation Comments

- Paragraph 2.52 – Request amended to include: ‘Protection and enhancement of watercourses’ and ‘blue and green infrastructure’.
 - The mentioned amendments have been made to the equivalent parts of the current SA report to paragraphs 2.50, 2.51 and 2.52.
- Water and Air Section 2.55 – [Climate Change Allowances 2022](#) should be added to this section.
- We recommend the Land Drainage Act 1991 is added to this section.
- We recommend Environmental Permitting Regulations (2016) is amended to read ‘Environmental Permitting (England and Wales) Regulations 2016’. This should also be listed in section 2.48.
- A reference to the Environment Agency policy against the culverting of watercourses should be included in this section.
- Sub National 2.64 – Section 2.64 has only listed the Humber River Basin District Flood Risk Management Plan 2021 to 2027. For Harborough District Council the list also should include: Anglian River Basin District Flood Risk Management Plan 2021 to 2027 & Severn River Basin District Flood Risk Management Plan 2021 to 2027.
- Appendix A has referenced these documents, so no further reference required here. Guiding Principles in Land Contamination 2 should be included in this section. Land contamination risk management should be included in this section.
 - Under the water and air plans and sub-national plans section within the main report and appendices, these plans have been included.
- Updates to SFRA required.
- Section 3.79 and 3.80 – These sections reference the Harborough Level 1 SFRA (2009) and the Leicestershire and Leicester City Level 1 SFRA (2017). Whilst these remain the latest SFRA documents for Harborough District Council, there have been significant planning policy changes over the past 6 years, particularly relating to calculating the risk of flooding as a result of climate change:

Appendix A Consultation Comments

- The current SFRA include details which are no longer consistent with the requirements set out in [Planning Practice Guidance](#) and [Environment Agency SFRA Guidance](#), including updates to [Climate Change Allowances](#). This could have a significant influence on the alternatives for development.
- We would therefore request of the Council when, as is stated at 3.79, the Level 1 SFRA is due to be updated. We would welcome early engagement on the SFRA update.
- The updated SFRA will need to be informed by the latest models the Environment Agency has for the District. For the Wellend catchment of the District the Agency's model was completed in 2016 and published in 2018.
- Figure 3.6 – It would be useful to distinguish between 'Main River' and 'ordinary' watercourses.
- Figure 3.7 – It would be useful if this map distinguished between Flood zone 3a and Flood zone 3b (functional floodplain). This distinction will be key when making site allocation decisions.
- Open space – We suggest that data regarding the community's access to waterways and blue infrastructure would be a useful addition here.
- Table 3.11 Open space provision in Harborough District (2021) – If quantifiable, consideration should be given to adding a line for 'Waterways'.
- Paragraph 3.75 – Regarding "The River Welland has been categorised as being in 'Bad' or 'Poor' conditions", it would be useful context if reference to the Water Framework Directive (WFD) is made here.
- Protection of controlled waters – The geographical area covered by the Plan is predominantly located on Secondary Aquifers. Secondary aquifers are permeable layers capable of supporting water supplies at a local rather than strategic scale, and in some cases forming an important source of base flow to rivers.
- The consideration of land contamination, protection and enhancement of controlled waters via the planning regime is a key consideration. Groundwater is a regional, rather than a local resource and a holistic

Appendix A Consultation Comments

approach to its protection is more effective at a strategic planning stage. The proactive protection of groundwater resources is key to providing improvements to the aquatic environment and protecting water resources for future use.

- The development of brownfield sites is encouraged as it provides an opportunity to remove areas of contamination that would otherwise continue to present a risk to our environment, controlled waters and human health. It is important that adequate site investigation and remediation is carried out and groundwater issues are considered.
- According to information held by the Environment Agency there are potentially several historic landfill sites with the area covered by the local plan. We recommend that any developer contact the local council, as lead regulator for these sites, for further information.
- Historic landfills have the potential to contain contamination which may currently be impacting 'Controlled Waters' receptors. Furthermore, there is potential for re-mobilisation of any contaminants during site development.
 - Noted. Where possible, the main river has been labelled within Figure C.6.
 - GIS data are not available to differentiate between Flood Zones 3a and 3b – this has been identified as a data limitation in this SA report.
 - Where available, additional information have been included on community access to waterways and blue infrastructure.
 - Reference to the Water Framework Directive has been included within the water section of the baseline information.
- We support the identification of the issue regarding water quality in Harborough District Council's watercourses.
- We support the identification of the issue regarding the threat to biodiversity in District as a result of development. We encourage the implementation of measurable Biodiversity Net Gain. This point should also include the need for developments to be set back from watercourses (at least 8 m) creating an undeveloped, unlit, and undisturbed buffer zone for biodiversity. These buffers along watercourses also improves/

Appendix A Consultation Comments

maintains connectivity between watercourses. The Environment Agency have a policy against culverting watercourses and that should also be reflected here. Conversely, developments should be encouraged to improve the condition and biodiversity within watercourses and this may include daylighting (removing) culverts.

- Within the key sustainability issues and likely evolution without the plan for biodiversity, the following have been included:
 - The plan should ensure the implementation of measurable Biodiversity Net Gain.
 - The plan should ensure the need for developments to be set back from watercourses (at least 8 m) creating an undeveloped, unlit, and undisturbed buffer zone for biodiversity.
 - There will be no culverting watercourses.
 - Developments will be encouraged to improve the condition and biodiversity within watercourses and this may include daylighting (removing) culverts.
- Paragraph 4.5: As well as hotter, drier summers it is also expected that we will experience warmer and wetter winters with more frequent and intense weather extremes.

The second sentence should be extended to include "...particularly in the location of and in the design of...". And also "whole developments and blue and green infrastructure".

- The mentioned sentence in the first paragraph has been extended as recommended.
- 7th paragraph: Whilst this paragraph rightly identifies regular flooding events as an issue, it does not state how the Local Plan can seek to address this, i.e. through taking a flooding sequential approach to locating new development. Conversely, and rightly, the paragraph has explicitly mentioned this approach with regards to water quality.

The 1st sentence should cross-reference "moderate status" with the Water Framework Directive (WFD).

Appendix A Consultation Comments

- The seventh paragraph now states that the Local Plan will seek to address flooding. Reference to the Water Framework Directive has been included.
- From the perspective of the remit of the Environment Agency we particularly welcome the Appraisal Questions attached to SA1, 2, 3, 5 and 11.
- SA12 – This objective to manage and reduce flood risk from all sources and to protect the quality and quantity of water resources is welcomed.

Regarding the 1st Appraisal Question under this Objective, the Environment Agency will not support any development that is not compatible with flood zone based on the NPPF or any development that increases flood risk elsewhere.

The report explains that the majority of the District is within Flood Zone 1; on this basis if the (flooding) Sequential Test was applied we consider that development in high flood risk areas can and should be avoided. The early application of the Sequential and where applicable Exception Tests are essential in in this regard.

- Reasonable alternatives – Paragraphs 5.13, 5.14 and 5.15 provides commentary on the topic of Reasonable Alternatives. However, the report does not appear to provide details of any Reasonable Alternatives, how they have been come by, assessed and discounted. In this sense the report doesn't evidence that Reasonable Alternatives have been considered.
 - At the time of drafting the SA Scoping Report, strategic options and reasonable alternatives were not available and so were not subject to SA. Strategic and site options have now been appraised in Chapters 4 and 5 of this SA report.
- Cumulative effects assessment of the impacts of multiple developments – The report does not appear to have examined the potential cumulative effects of the impacts of multiple developments. This should be included as part of the SA process.

Appendix A Consultation Comments

- Due to the high-level nature of the Issues and Options Consultation, cumulative effects are not yet able to be addressed but will be considered in future iterations of this SA Report.
- We are comfortable with the proposed site assessment criteria with the following exception:

Appendix B Site Assessment Criteria and Assumptions: SA12

We are unclear on the meaning of the words 'significant negative, minor negative, and negligible' as they are used in this section.

We consider that for the flood risk aspect of Objective 12, it may be more prudent to refer to NPPF Table 1 (flood zones), table 2 (Flood risk vulnerability and incompatibility) and Annex 3 (vulnerability classification) as these clearly set out what type of development is appropriate for each location.

For example, under the current wording, if a site is brought forward which falls within flood zone 3 (significant negative effect), what is it telling us? It is not clear what type of developments can be brought forward and which cannot for the location. As currently worded it is unclear what the position would be is there is a mixture of significant and minor negative impacts. Would only part of the site be allocated for built development?

- Noted.
- The scoring is used to help inform Harborough District Council of the site options that could have the most impact on flood risk. Sites that fall mainly within Flood Zone 3 perform least well in the SA as they are more likely to increase flooding as a result of developing these sites.
- The site assessment criteria are designed to enable numerous site options to be appraised consistently, so are based on spatial data. The assumptions recognise that factors such design will also affect the achievement of this objective, but these cannot be assessed spatially. The appraisal of site options is provided to the Council to help inform their decision on which sites to allocate.

Issues and Options SA Report

A.2 Consultation on the Issues and options Consultation Document for the Harborough Local Plan took place between 16th January and 27th February 2024. Set out below is a summary of consultee comments received on the SA Report that accompanied the Issues and options Consultation Document and the SA team's response to these comments.

A.3 Note that some of the consultee comments have been abridged or summarised where appropriate, due to their length.

AFD Ltd

- AFD Ltd acknowledges the SA is an interim document reflecting the current position reached in the plan-making process. It is important to regularly review and update this document in response to representations made and where additional information and/or new site opportunities have been submitted to the Council. For example, where there are new site opportunities identified, such as the option to consider an alternative use of Land at Airfield Farm/Wellington Business Park (2019 Local Plan allocation MH4) arising from the Council's HENA conclusions that there is a surplus of employment land allocated to date. This particular site benefits from outline planning permission for commercial development and is within the urban area of Market Harborough. Accordingly, it would perform strongly against all the SA criterion and would help deliver an urban focused spatial strategy in isolation, or in conjunction with the adjacent land being promoted by HLM and William Davis on the former showground site (Site reference 21/8234).
- The SA report has been updated to reflect the Draft Local Plan, taking into account any updated evidence base and representations made at Issues and Options Consultation Stage.
- Any sites submitted through the Call for Sites as part of the Issues and options Consultation have been assessed against the SA Objectives in

this SA report, including site 21/8234. As recorded in Appendix E, site 21/8234 has not been selected by the Council for allocation in the new Local Plan because the southern part of the site lies within the Lubenham Area of Separation.

Anglian Water Services Ltd

- AWS's supports in principle the SA objectives and specifically SA1. AWS disagrees with 5.3 and the decision that SA1 is scoped out of the appraisal of residential, mixed use and employment site options. The location of development will affect the achievement of this objective as locating development in locations which have existing infrastructure capacity would utilise that embedded (capital) carbon in accordance with the sustainability hierarchy. Locating growth in water recycling catchments which don't have headroom capacity would necessitate the construction of additional infrastructure with its attendant greenhouse gas emissions. To not utilise existing infrastructure capacity in the selection of spatial options would be contrary to SA3, 10, 11, and 12 and not support the principles set out at 3.13 of the SA. Paragraph 3.73 sets out the requirement through the SEA Regulations for the Plan to consider the future environment including more severe weather events. The Scoping out of SA1 may also be contrary to NPPF paragraphs 8, 11 and 20. Recent work by AWS identifies that for each new home which requires new capacity to be constructed at the water recycling centre it connects to will produce on average 0.22t CO₂e. A spatial pattern of growth therefore needs to consider SA1 and the capital (embedded) carbon in that distribution of growth as well as the operational carbon associated, for example, with transport.
- Noted. While climate change is a cross cutting objective and sites have been appraised in relation to related topics such as likely travel distances and proximity to flood risk, the location of individual development sites will not itself determine the effects on climate change more generally and it is considered appropriate to scope out the objective for the appraisal of site options. This is proportionate for the SA of a Local Plan. For example, through the SA, it is not possible to measure the levels of embedded carbon within existing infrastructure

and understand the capacity of nearby existing infrastructure. However, SA13 considers the distance of a site option to modes of sustainable transport. Therefore, site options that are in close proximity to public transport perform more positively as they are likely to encourage the use of sustainable modes of transport and reduce reliance on the private car.

- Separate to the SA, the Local Plan is informed by the latest evidence base which includes consideration of the infrastructure requirements within Harborough District.

Pegasus Group on behalf of Ashfield Land (Land east of A5 and Land at Gibbet Lane)

- The purpose of the SA is to assess the sustainable development Ashfield Land support the SA Framework: it is considered that the objectives address all relevant subject areas which need to be covered within the new Harborough Local Plan. At this stage in the plan-making process, the SA provides only a strategic overview of the options for development as set out in the Issues and Options consultation against the SA framework objectives. It is acknowledged that the SA will evolve further over time and include site specific considerations. It is important that the SA has full regard for and reflects up-to-date evidence when undertaking those revisions and that the SA informs the evolution of the Local Plan itself.
- Noted. The SA Report has been updated to reflect the content of Draft Local Plan and takes into account any updated evidence base where available.

Besh Ltd, John Littlejohn Designer Homes Limited, Marrons (Land North of

A47, Houghton on the Hill), Miller Homes

- We are generally supportive of the SA's overall approach to testing the options identified. It is welcome that the various spatial options are tested in tandem with different growth scenarios and that different growth scenarios have been considered and presented. Thorough and consistent testing of growth options in terms of both scale and distribution at an early stage in plan preparation, and developing these iteratively over the course of plan preparation will be critical to demonstrating that the New Local Plan (NLP) is justified.
 - Noted.
- We broadly agree with the Key Sustainability Issues. In particular, we welcome the recognition that the affordability of housing and the delivery of affordable homes is a key sustainability issue within the Plan Area, along with increasing demand for housing generally as the population increases. We also welcome the identification of the District's ageing population as a key sustainability issue, although we observe this has implications for the level and type of housing provision required through the NLP, which has not been expressly recognised within the key sustainability issues or elsewhere in the SA and will only be delivered alongside a sufficient quantity of overall housing growth.
 - Noted. The key sustainability issues have been reviewed as part of the preparation of this SA Report for the Proposed Submission Draft Local Plan. The implications of the ageing population in terms of the requirement for specialist housing is recognised in the key sustainability issues.
- We feel there is limited explanation as to how the various growth and distribution options have been formulated. In relation to the conceptualisation of distribution options, the Settlement Hierarchy Assessment (October 2023) has been referred to in the SA. There is, however, no explanation as to how this has shaped the options tested and why these have been selected as "reasonable" alternatives. There is less explanation in respect of the three growth level options presented. The

“low growth” scenario simply reflects the District’s own Local Housing Need (LHN) calculated using the Standard Methodology. The PPG is clear that the LHN is the minimum starting point for calculating the number of homes needed. The LHN is not a housing requirement figure and there are numerous reasons why the latter could be higher than the LHN. In Harborough’s case, plan preparation is proceeding on the basis of providing a contribution to meeting unmet need from Leicester. Not to do so would clearly fall afoul of the Duty to Cooperate (DtC) and for these reasons, it is considered that meeting the LHN for Harborough alone is not a reasonable alternative. In this respect, the “medium growth” scenario should in fact be treated as the minimum or lower growth option.

- The six options have now been further refined into three alternative options which have also been subject to SA. Further details has been included in Chapters 2, 4 and 5 of this SA Report on how the various growth and distribution options have been formulated.
- For the reasons set out below, we do not consider that the emerging plans housing needs evidence adequately tests all these matters. As such, they will require detailed consideration in order to facilitate the formulation of a sound and robust housing requirement, which should then be subject to SA as appropriate. That said, we welcome the consideration of a “high growth” scenario which reflects LHN plus 246 dwellings per year, but there is little explanation as to how this number has been arrived at.
- We have considered the testing of the various growth and distribution options presented from page 73 onwards and would make the following observations:
- The medium and high options are generally associated with negative effects against SA2. A number of specific ecological site designations are identified that could be affected by higher levels of growth, but the potential impact pathways are not identified. It is acknowledged elsewhere within the SA (page 58) that Harborough generally has low biodiversity value owing to most of the countryside being in agricultural use. Yet the SA testing in relation to this matter seems overly focused on the subject of land-take, when practically all forms of development will be required to demonstrate a minimum of 10% Biodiversity Net Gain, which will demonstrably improve the baseline low BNG value. Higher growth options

Appendix A Consultation Comments

cannot therefore be confidently associated with negative effects on biodiversity purely on land-take alone, because of the role new development will play in nature recovery.

- The benefits of higher growth options in respect of addressing SA7 and SA8 are understated. Meeting only the LHN for Harborough will not address housing-related deprivation because the LHN on its own only provides a need figure based on demographic projections with an affordability uplift. It does not consider the specific needs for affordable housing or other specialist housing types which (as demonstrated below) will not be delivered purely by planning for LHN alone. Conversely, the provision of the high growth option will provide a greater amount of opportunities to address affordability and specialist housing needs which will promote social inclusion and diversity. That same broadly applies to SA8 in respect of the provision of services and facilities in that options which deliver higher growth offer the potential for greater infrastructure and service provision.
- It is surprising that the provision of higher housing growth is generally associated with more negative effects in respect of SA10. This has been adjudged on the basis that higher housing growth scenarios could result in too much housing and insufficient employment opportunities, which is a one dimensional way of looking at the issue. Firstly, it is well established that new housing development has wide-ranging economic benefits. Secondly, as with housing, the SA tests a variety of employment growth options in respect of scale including the provision of additional land for development to maintain a flexible supply and planning for an even greater level of growth to address economic aspirations and regeneration priorities.
 - The HLP will need to demonstrate an aligned approach to new homes and jobs and so employment provision and housing should not be looked at by the SA in isolation. A high growth option is more likely to result in the take up of significant areas of land and the loss of greenspace and therefore performs negatively in the SA. Each of the three growth options were considered in relation to each of the six distribution option. The distribution options also considered the presence of Local Wildlife Sites and Local Nature Reserves, which

there is a high density of around Market Harborough, Lutterworth and Broughton Astley. The initial options appraisal is high level and is not able to take into consideration site specific requirements such as biodiversity net gain. In addition, as the exact site locations were unknown in the context of the high level options appraisal, it isn't possible to consider the potential impact pathways with Local Wildlife Sites and Local Nature Reserves. The approach taken within the SA is proportionate for this strategic level assessment.

- In relation to SA7, the options appraisal concluded that the low growth option is unlikely to provide enough growth to support social inclusion and reduce levels of deprivation across Harborough District.
- In relation to SA8, the high growth option has performed positively under all the distribution options. However, a higher level of growth could impact on the availability of services and result in services becoming overstretched. Option 4 is the only distribution option that considers the development of strategic sites and therefore, it is not possible for the SA to take into consideration at this early stage whether other sites will deliver new infrastructure as part of development.
- The options appraisal undertaken at Issues and Options stage is a high level appraisal and therefore a high level judgement is made on how housing and employment growth will align. The initial options appraisal has helped the Council to refine the housing and employment options with the refined options appraised in this updated SA report.

Bloor Homes Limited

- The SA has tested three growth options across six broad spatial strategy options. In light of the Council's commitments in relation to LCC's unmet need, it is clear that Growth Option A would be unacceptable both from a planning and political perspective, and likewise simply settling for Option B would not deliver a sufficient quantum of housing (including affordable housing) to begin to address the existing affordability issues in the District. Therefore, the Council should strongly consider opportunities to deliver a

scale of growth that aligns as closely as possible with Growth Option C. BHL welcomes the recognition within the I&O document that the preferred spatial strategy “may be a hybrid containing elements from different options.” That reflects the nature of SAs and their role in a plan’s evidence base. They are simply high-level assessments that might guide plan-making, but are ultimately not a precise tool that should be determinative in their own right. Indeed, it would not be possible nor appropriate for an SA to consider every possible quantum of growth / spatial strategy distribution, and therefore there are clearly levels of growth between Growth Options B (657dpa) and C (780dpa); and it is for the Council to consider what an appropriate balance between the options is, with the above evidence pointing towards a figure closer to Option C. Moreover, SA analysis can often overlook contextual considerations that are not so easily measured by the methodology used in an SA. For example, BHL consider that the assessment of Growth Option A (the lower growth option) has not necessarily captured the significant adverse impacts that a lower level of growth would bring. Whilst the more obvious impacts in relation to the stock and affordability of housing have perhaps been reflected, the SA does not fully reflect the negative effects from an economic perspective, in terms of limiting growth. Nor does it fully recognise the environmental impacts in terms of the entrenchment of unsustainable patterns of development, whereby workers accessing jobs in Leicester and Harborough would live further away from their places of work and therefore be likely to depend on less sustainable modes of transport. Moreover, the SA perhaps does not reflect the significant positive impacts of the higher growth option (Option C) from a socio-economic perspective, in terms of the benefits of addressing affordability issues, and the manner in which that would also support a higher level of inward investment and economic activity.

- As a result of the natural rigidity of the spatial options that SAs consider and their high-level focus, they also do not fully reflect that positive effects can be maximised and negative effects can be moderated through a carefully considered spatial strategy. For example, whilst the majority of SAs note that, generally, increased levels of growth will maximise socio-economic benefits but may result in additional negative environmental effects, effective site selection, implementation of policy requirements, and

Appendix A Consultation Comments

sensitive masterplanning can moderate or entirely avoid such negative effects. Moreover, development of an increased scale, where carefully planned, can facilitate the delivery of key infrastructure that can support local communities and realise more sustainable lifestyles. That, too, is not as easily captured by the high-level approach that SAs take. Those matters should be taken into account in setting the housing requirement and finalising the spatial strategy in response to that, and in that regard BHL welcome HDC's recognition that the formulation of a spatial strategy is an iterative process that takes account of, but is not directly informed by, the SA.

- BHL would welcome the preparation of an updated HNA that considers the level of uplift that is required above the base LHN in order to address affordability issues, and consider that a scale of growth that is closely aligned with Option C would be most appropriate in that regard. That should also be accompanied by further SA testing of the housing requirement targets, which should consider the maximum level of growth that is achievable between the current Growth Option B and C (recognising that negative effects can be moderated through careful plan-making), pushing towards the higher growth option. That would maximise the delivery of market and affordable housing to remedy affordability issues, and also provide a healthy buffer should the contribution towards LCC's unmet housing needs increase in the post-2036 period.
- In that regard, the consideration of some spatial options with no additional development within the larger villages (i.e. the 'Strategic Sites Focus' and 'Market Town Focus' options) is particularly concerning. In addition, whilst BHL recognise the relative merits of those options, they are also concerned that their comparatively favourable outcomes within the SA may have over-simplified the assessment of these options and overlooked the importance of delivering a sufficient amount of new development within larger villages.
- Indeed, whilst the I&O document (in providing a summary of the SA) is correct to identify that a positive of the 'Strategic Sites Focus' option is that Leicester's unmet housing need can be met close to where it is arises, any option that would fail to identify any further development in the other settlements would conversely fail to meet the District's own need for

Appendix A Consultation Comments

housing; a large proportion of which will relate to a desire to live in the towns and larger villages within the District. Failing to meet those specific needs by only focusing growth on sites adjacent to Leicester could potentially result in out-migration from the District, as those who wish to live in the villages rather than on the fringes of Leicester might choose to relocate to more rural settlements in adjacent local authority areas. For those who work within Leicester city, that could potentially result in less sustainable travel to work patterns, which itself could give rise to significant environmental impacts.

- Likewise, delivering an insufficient quantum of development within more sustainable large villages would fail to support their vitality, and the ongoing viability of key services and facilities (NPPF paragraph 83). Given the reasonably rural nature of parts of the District and the manner in which residents depend on the services and facilities within larger villages such as Kibworth and Great Glen (as set out above), such an outcome would have very significant negative effects. Socially, that could result in the isolation of rural communities, economically it would likely be a barrier to investment in such areas, and from an environmental perspective it could potentially promote private car use due to rural communities needing to drive further to access services and facilities. It does not appear that this has fully been taken into consideration in assessing options with no additional development in large villages.
- SAs are ultimately tools to guide, but not directly inform, plan-making, and overlook practical elements of plan-making. For example, the SA does not consider the practicalities of delivering strategic sites, which often have lengthy lead-in periods ahead of delivery given their complexity and the scale of the infrastructure required to support them. This means that they are not able to deliver early on in the plan period, whereas small and medium sites are able to “make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly” (NPPF paragraph 70). That is a particularly significant consideration in demonstrating a five year supply of housing in the early stages of the plan period in particular, and for that reason the NPPF suggests that local plans should “promote the development of a good mix of sites.”

Appendix A Consultation Comments

- Noted. Generally, options for the level and distribution of growth tend to be quite high level and therefore, the options appraisal is quite high level. The options have now been refined into three potential options which has been subject to SA. This appraisal is contained within Chapter 5 within this SA Report. As part of the Proposed Submission Draft stage, a spatial strategy has been developed within the Draft Local Plan which has been subject to SA within Chapter 7 of this SA Report.
- Harborough District Council has identified that they currently have enough employment land upto 2041. Therefore, the low growth option would not be limiting growth as there is currently enough allocations for employment development that still supports growth within the District. In relation to the level of residents potentially commuting and environmental impacts, this is more likely to relate to the location of growth rather than the level of growth. Therefore, options (Option 6) that locate growth further from the market towns and Leicester have therefore performed negatively in relation to this point. Options that propose the majority of growth towards the Market Towns and South and East of Leicester have performed more positively as growth will likely be located closer to employment opportunities and sustainable transport modes.
- All of the growth options are expected to deliver the housing need required within the District. In relation to the high growth option, it is likely to have a significant positive effect when considered in relation to each of the spatial options as the options appraisal identifies that the high growth option would deliver the largest variety in housing. It is agreed that a higher level of inward investment could be as a result of a higher level of growth, however, a higher level of growth can result in strains on services and infrastructure within the District. Both of these have been identified within the options appraisal.

Bloor Homes, Clowes Developments, Parker Strategic Land and Wilson Enterprises

- Any conclusions in the Issues and Options SA should only be seen in the context of the current plan-making stage. The completion of evidence to support the Local Plan is highly likely to provide a greater range of information to inform assessments, and greater certainty that the assessment is robust.
 - This SA Report for the Proposed Submission Draft stage has been updated and updated evidence base has been taken into account.
- The assessment of option 4 for the location of new homes (Strategic Sites Focus) explains that “The approach through Option 4 would concentrate new development in areas that are already more densely populated”. In our view that is the wrong conclusion as Option 4 is premised on the basis that it may include new settlements.
 - The Issues and options Consultation Document states that “these large strategic sites are generally located around the South and East of Leicester”. Therefore, the appraisal of Option 4 has taken into consideration that the majority of strategic sites will be located near populated areas close to Leicester City.
- Chapter 5 of the Issues and Options SA presents ‘SA for the Site Options’ and considers each against the fourteen sustainability appraisal objectives. At this stage, we note that it is unclear how the authors of the report have considered the potential site options in the absence of detailed/topic based evidence, and we note that the document does not present any explanation as how each ‘score’ is achieved. The Consortium will look to provide the Council with sufficient evidence regarding the proposals at South Whetstone to undertake a detailed assessment."
 - The appraisal of the site options is undertaken using a distance based approach. Appendix D of the SA report contains the site assessment

criteria which details the assumptions used in relation to each SA Objective.

Caister Castle Trust

- We note the SA provides an assessment of the various growth options for housing identified as Options 1 to 6. However, the Issues and Options document, along with the SA, contains little detail on how proposals in Leicester and Leicestershire Strategic Growth Plan (2018) are to be addressed, despite being identified as a 'key matter' in the Duty to Cooperate Engagement document (December 2023) and confirmed by the Council as something the local authorities will need to take "into account when developing their Local Plans". Clearly the Strategic Growth Plan includes ambitious proposals to support the long-term growth and prosperity across the sub-region. Three of these directly affect Harborough District. Notably growth Option 4 of the Issues and Options document is identified as being "most aligned with the Strategic Growth Plan" (Table 10). It is not clear, following the scrapping of the A46 'expressway' bypass, what elements of this option would be aligned with Growth Plan that are still to be progressed, but it is of note that there are still items deemed "critical" to the sub regional strategy. Clarification on this matter would be welcome.
- If the proposals contained in Strategic Growth Plan are to be delivered by the new Local Plan, then it is vital to understand the infrastructure required to support this, and importantly the levels of growth required to assist their delivery, as it is highly likely to be excess of the levels currently proposed. Consequently, the sustainability of the proposals contained in the Strategic Growth Plan should be considered in more detail and presented as an 'alternative option' when reviewing the SA in the future. This will help support the Council's decisions on whether to take forward the Growth Plan proposals.
- Chapter 4 of the SA considers the Strategic Growth Options outlined in the Issues and Options paper and assesses the three options for housing growth that are set out in Table 1 of the consultation document. These consist of low, medium and high growth scenarios. Each growth option is

Appendix A Consultation Comments

then assessed against fourteen Sustainability Appraisal Objectives, referenced SA1 to SA14. A colour coding system is then applied to score the effects of the various growth scenarios and development options. This approach is clear and easy to follow. Table 4.7 provides a summary of the effects on various grow Sustainability Appraisal objectives.

- Option 4 scores better than Option 3 on a number of criteria particularly SA8, SA10 and SA13. The reason for this appears to be that the assessment is based on assumption that Option 3 will not deliver sites of more than 1,500 homes. This is despite the Issues and Options proposing 4,267 homes for the 'Adjoining Leicester Urban Area' (Scraptoft, Bushby and Thurnby) under Option 3.
- As discussed previously, the Caister Castle Trist is working with a consortium of landowners to promote a Sustainable Urban Extension to the east of Scraptoft. It is anticipated this could deliver approximately 1,800 new homes. This would provide a new neighbourhood within the highest tier settlement within the Districts proposed settlement hierarchy and would deliver the necessary infrastructure and facilities required to achieve a sustainable development. The Issues and Options document acknowledges larger sites have a critical mass that enables delivery of strategic and local infrastructure, including schools, community and healthcare facilities, along with open space sustainable travel solutions. If the SA is based on Option 3, then the assessment has been carried out on the assumption of smaller sites (under 1,500 homes) that are potentially less effective in delivering key infrastructure to support sustainable growth. We therefore consider it necessary for an additional Growth Option to be considered (an Option 3a), which assumes that housing allocations are of a scale capable of delivering the required infrastructure, and for this to be assessed as an alternative when further SA is undertaken.
- Further detail on how the Leicester and Leicestershire Strategic Growth Plan has informed the options has been included within the SA report.
 - The options within the Issues and options Consultation Document have been further refined into three potential options for growth (see Chapter 5)

- Option 3 within the Issues and Options Document states that this option will not result in the development of sites of more than 1,500 homes and therefore, the appraisal has been undertaken in line with the Issues and Options Document.

Castlethorpe Homes

- For the purpose of this set of representations the Housing Options have been the focus due to the nature of our Client's site at Swinford.
- The approach to define housing growth across the District as per the SA, was through use of The Leicester and Leicestershire Housing and Economic Needs Assessment (HENA) (2022) and The Leicester and Leicestershire HENA Housing Distribution Paper (Housing Distribution Paper) (2022).
- As per the HENA, Harborough has been recognised as having the highest house prices within the Housing Market Area (HMA), which is 30% above the average. In addition, the Housing Distribution Paper defines the Standard Method used for calculating the District's Local Housing Need (LHN) as well as the additional dwellings per annum (dpa) required to accommodate Leicester City's unmet need. This paper considers the functional and commuter relationships between the surrounding authorities and Leicester City, with Harborough scoring 4th highest overall. The HENA and Housing Distribution Paper were then used to define six broad distribution and growth options within the SA.
- Of these options the SA assessed that Option 3 and secondly Option 4 scored most highly in terms of the positive impact for the District. Although these score highly these options do not allow for a proportionate amount/spread of growth across the District which in turn limits the delivery of other key SA objectives. Although these Options ranked highly against the SA criteria, we consider that there are a number of advantages to delivering housing under Options 1 and 2 and that the scoring weight could have been applied higher to the housing category for this option.
- Each of these Distribution Options were then considered against varying levels of growth, that being low, medium and high. In respect of the three

levels of growth for assessing the SA against the housing distribution options we consider the 'High' growth option should be used. This option factors in the increase in the amount of housing required by using the Standard Method and the uplift in housing needed in relation to Leicester City's unmet need, as well as allowing for an adequate buffer. The low growth option does not allow for a higher enough provision to meet the required housing target and therefore the plan would not be found sound if this was brought forward. The medium option would meet HDC's LHN and contribute towards meeting Leicester's unmet need, however there would not potentially be sufficient homes delivered to ensure sufficient choice in the market and boost the delivery of housing.

- Noted.

Caulmert Limited

- Caulmert on behalf of PNNH have undertaken their own analysis of the Site against the SA objectives and the findings are presented below. The Issues and Options SA report identifies the Site in Table 5.1 as 'Land off Manor Road' (Site ID 21/8219) with the assessment findings summarised as follows:
- SA1: The enclosed Call for Sites Layout (Drawing no. 1661-10) (Appendix 1) indicates where opportunities for enhancement could be located. At this stage it is not possible to provide accurate information regarding potential environmental impacts. - Ranking 0 – Negligible effect likely.
- SA2: The site is not located within 250m of a Local Wildlife Site nor is it located within 1km of a SSSI (closest SSSI is Miserton Marshes located some 1.7km). In terms of the IRZ map prepared by Natural England, the site is not located within the relevant IRZ of the Miserton Marshes SSSI. – Ranking - 0.
- SA3: As per Natural England's Agricultural Land Classification Map East Midlands Region (ALC005), the area is identified as being Grade 3 agricultural land. The site does not fall within a Minerals Safeguarding Area. Ranking --?/ 0.

Appendix A Consultation Comments

- SA4: The site is located within the Bitteswell Conservation Area, and approximately 30m from The Olde Royal Oak Public House (Grade II Listed - HER List Entry No. 1210158). Ranking --?.
- SA5: The site is not located within 100m of the AQMA. - Ranking 0.
- SA6: The site is located within walking distance (720m) of areas of open space, and a footpath/cycle path. Ranking +.
- SA7: No assessment required. Ranking 0.
- SA8: The site is within 720m of the built-up area of Lutterworth. The site is within 600m St Marys C of E Primary School, and approximately 610m from Lutterworth College. Ranking +?.
- SA9: The site is proposed to deliver 13 dwellings including an element of tenure blind affordable housing to policy requirements. Ranking +.
- SA10: The site is located within walking distance (600m) of public transport links (bus stops located to the northwest of the site along Ashby Lane) but not a Key or General employment area. Ranking +.
- SA11: No assessment required. Ranking 0.
- SA12: The site is, in its entirety, within Flood Zone 1 (0), and does not contain a water body or watercourse or does it fall within a Source Protection Zone. Ranking 0.
- SA13: The site is located within 450m of a bus stop (bus stops located to the northwest of the site along Ashby Lane. Ranking +.
- SA14: The small site (less than 500 dwellings) is greenfield land within the countryside. Ranking --?.
 - Justification is provided below in relation to the appraisal of Land off Manor Road (Site ID 21/8219) where different effects are proposed. SA2: The site is located within 250m of the Bitteswell Brook and hedge to west of Lutterworth LWS. All other effects aligns with how the site option was assessed in Chapter 5 of the SA report.

Claybrooke Magna Parish Council

- Too much jargon, very complex. An appraisal does not warrant comments, it is an overview of the method
 - A Non-Technical Summary has been prepared alongside the SA of the Draft Local Plan at Proposed Submission Draft stage. The Non-Technical Summary provides a concise summary of the full SA Report, including a description of the SEA/SA process and the SA appraisal findings.
- Yes we think the approach appropriate.
 - Noted.

CPRE Leicestershire

- The SA refers to some historic documents which have been overtaken by events. These include:
 - The Strategic Growth Plan 2018 (SGP). The vision of an A46 Expressway around the south and east of Leicester was a key concept of the SGP. The cost, problems and difficulties of achieving this project were ignored and the SGP failed to consider climate change. The Expressway was shown to be undeliverable in 2021.
 - Local Transport Plan 3 (LTP). Published in 2011 it was the last LTP to be produced. Its role in bidding for transport funding was short-lived. New LTP guidance has been promised for over a year.
 - Leicester and Leicestershire Rail Strategy. HS2 through Leicestershire has now been abandoned and the protection of safeguarded land is due to end this year. The Midland Main Line through Harborough has had electrification wiring installed.
- The SA is weak with regard to considering the location of development and the need to reduce travel, to minimise congestion and contribute to the mitigation of climate change. The locational impact of development, especially on the need and modes of travel, does not appear to feature as

Appendix A Consultation Comments

a consideration in the questions for SA Objective 1 regarding managed responses to effects of climate change or SA Objective 13 on Sustainable Transport.

- Option 4 appears to assume that an orbital road around the east and south of Leicester would still be provided. This is no longer tenable and as such the SA analysis is over-optimistic and unrealistic. It plays up the extent to which such development would reduce the need for travel, the availability of viable sustainable travel options (the infrastructure of which would need to be developed) and is dismissive (in 4.55) of the impact of an orbital road link and (in 4.57) “of higher levels of congestion within the towns and towards Leicester”, which will affect the SA1 Climatic Factors score.
- In 4.57, it is suggested that “there could be enhancements to the public transport network and active travel routes through strategic development”. This would only happen if the needed infrastructure is planned from the start of the plan-making process and not an afterthought as is so often the case currently. The delivery of effective public transport and active travel for large strategic sites elsewhere, including those in Leicestershire, has proved to be extremely difficult, even non-existent.
- Future SAs should include an analysis of Car Ownership and Mode Share from the 2011 and 2021 Censuses. The 2011 Census also includes data showing the mode share and origin and destination of work journeys. The SA should consider data about the bus use in connection with potential development locations, especially regarding proximity, frequency, destinations, hours of operation.
 - The relevant programs and plans section has been updated within this SA Report.
 - The options were appraised against SA13 in relation to whether growth would be located within close proximity to sustainable transport options. Therefore, the availability of bus routes and railway stations was considered. The sites which are now proposed to be allocated have had a more detailed appraisal in terms of distances to specific transport links and site specific policy requirements. Similarly, each of the growth options are considered in relation to their distance to sustainable transport links and whether they would likely increase use

of the car under SA1. Therefore, growth options that would reduce reliance on the private car perform more positively as these growth options are likely to be more sustainable and have a lower impact on greenhouse gas emissions.

- The options appraisal undertaken as part of the SA focussed on information provided within the Issues and Options Consultation. Once the options were refined, these options were also appraised (see Chapter 5). The decision on the orbital road around the east and south of Leicester is outside of the scope of the SA.
- Any strategic sites that have come forward as policies in the Proposed Submission Draft Local Plan have been appraised in this SA report, taking into consideration any infrastructure enhancement proposals.
- Census 2021 data on car ownership and Travel to work has been referred to within this SA report. The appraisal of the site options can only consider the distance to bus stops. However, any allocated sites taken forward into policies within the Local Plan have been considered further in terms of the availability of public transport options available

Davidsons Development Ltd

- We feel there is limited explanation as to how the various growth and distribution options have been formulated.
- In relation to the conceptualisation of distribution options, the Settlement Hierarchy Assessment (October 2023) has been referred to in the SA. There is, however, no explanation as to how this has shaped the options tested and why these have been selected as “reasonable” alternatives. There is less explanation in respect of the three growth level options presented.
- The “low growth” scenario simply reflects the District’s own Local Housing Need (LHN) calculated using the Standard Methodology. As set out further in our response below, the PPG is clear that the LHN is the minimum starting point for calculating the number of homes needed. The LHN is not

Appendix A Consultation Comments

a housing requirement figure and there are numerous reasons why the latter could be higher than the LHN.

- In Harborough's case, plan preparation is proceeding on the basis of providing a contribution to meeting unmet need from Leicester. Not to do so would clearly fall afoul of the Duty to Cooperate (DtC) and for these reasons, it is considered that meeting the LHN for Harborough alone is not a reasonable alternative. In this respect, the "medium growth" scenario should in fact be treated as the minimum or lower growth option.
- For the reasons set out below, we do not consider that the emerging plan's housing needs evidence adequately tests all these matters. As such, they will require detailed consideration in order to facilitate the formulation of a sound and robust housing requirement, which should then be subject to SA as appropriate. That said, we welcome the consideration of a "high growth" scenario which reflects LHN plus 246 dwellings per year, but there is little explanation as to how this number has been calculated.
- We have considered the testing of the various growth and distribution options presented from page 73 onwards and would make the following observations:
 - The medium and high options are generally associated with negative effects against SA2. A number of specific ecological site designations are identified that could be affected by higher levels of growth, but the potential impact pathways are not identified. It is acknowledged elsewhere within the SA (page 58) that Harborough generally has low biodiversity value owing to most of the countryside being in agricultural use. Yet the SA testing in relation to this matter seems overly focused on the subject of land-take, when practically all forms of development will be required to demonstrate a minimum of 10% Biodiversity Net Gain, which will demonstrably improve the baseline low BNG value. Higher growth options cannot therefore be confidently associated with negative effects on biodiversity purely on land-take alone, because of the role new development will play in nature recovery.
 - The benefits of higher growth options in respect of addressing SA7 and SA8 are understated. Meeting only the LHN for Harborough will not address housing-related deprivation because the LHN on its own only

provides a need figure based on demographic projections with an affordability uplift. It does not consider the specific needs for affordable housing or other specialist housing types which (as demonstrated below) will not be delivered purely by planning for LHN alone. Conversely, the provision of the high growth option will provide a greater amount of opportunities to address affordability and specialist housing needs which will promote social inclusion and diversity. That same broadly applies to SA8 in respect of the provision of services and facilities, in that options which deliver higher growth offer the potential for greater infrastructure and service provision.

- It is surprising that the provision of higher housing growth is generally associated with more negative effects in respect of SA10 (Economy). This has been adjudged on the basis that higher housing growth scenarios could result in too much housing and insufficient employment opportunities, which is a one dimensional way of looking at the issue. Firstly, it is well established that new housing development has wide-ranging economic benefits.² Secondly, as with housing, the SA tests a variety of employment growth options in respect of scale including the provision of additional land for development to maintain a flexible supply and planning for an even greater level of growth to address economic aspirations and regeneration priorities. The NLP will need to demonstrate an aligned approach to new homes and jobs and so employment provision and housing should not be looked at by the SA in isolation.
- We support and encourage the Council to choose the 'High Growth' option (Council's LHN plus an additional 246 homes per year) in order to ensure a robust supply of homes over the plan period. This can be twintracked with Option C 'High Growth' for employment land provision to achieve a thriving economy in the District and attract the economic growth that comes with a higher provision of much needed homes."
 - The Leicester and Leicestershire Housing and Economic Needs Assessment (2022) was used to inform the level of housing growth required within Harborough District. The Settlement Hierarchy Assessment identified the most sustainable settlements in Harborough District and therefore, the most growth was directed to these areas. The least sustainable settlements received the least growth through the

Appendix A Consultation Comments

alternative options. Further detail has been provided within the SA Report (Chapter 2) on how the growth and distributed options were formulated.

- The six options have been further refined into three alternative options which have been subject to SA (see Chapter 5).
- A high growth option is more likely to result in the take up of significant areas of land and the loss of greenspace and therefore performed negatively. Each of the three growth options were considered in relation to each of the six distribution option. The distribution options also considered the presence of Local Wildlife Sites and Local Nature Reserves, of which there is a high density around Market Harborough, Lutterworth and Broughton Astley. The options appraisal is high level and is not able to take into consideration site specific requirements such as biodiversity net gain. In addition, as the exact site locations were unknown it was not possible to consider the potential impact pathways with Local Wildlife Sites and Local Nature Reserves.
- SA7: the options appraisal concluded that the low growth option is unlikely to provide enough growth to support social inclusion and reduce levels of deprivation across Harborough District.
- SA8: the high growth option has performed positively for all the distribution options. However, higher growth could impact on the availability of services and result in services becoming overstretched. Option 4 is the only distribution option that considers the development of strategic sites and therefore, it was not possible to take into consideration at this early stage whether other sites will deliver new infrastructure as part of development.
- The options appraisal undertaken at Issues and Options stage is a high level appraisal and therefore a high level judgement was made on how housing and employment growth will align. The initial options appraisal has helped the Council to refine the housing and employment options.

Davidsons Development Ltd, Westernrange Ltd and Jelson Ltd

- We are generally supportive of the SA's overall approach to testing the options identified. It is welcome that the various spatial options are tested in tandem with different growth scenarios and that different growth scenarios have been considered and presented. Thorough and consistent testing of growth options in terms of both scale and distribution at an early stage in plan preparation, and developing these iteratively over the course of plan preparation will be critical to demonstrating that the New Local Plan (NLP) is justified.
- We feel there is limited explanation as to how the various growth and distribution options have been formulated.
- In relation to the conceptualisation of distribution options, the Settlement Hierarchy Assessment (October 2023) has been referred to in the SA. There is, however, no explanation as to how this has shaped the options tested and why these have been selected as "reasonable" alternatives. There is less explanation in respect of the three growth level options presented.
- The "low growth" scenario simply reflects the District's own Local Housing Need (LHN) calculated using the Standard Methodology. As set out further in our response below, the PPG is clear that the LHN is the minimum starting point for calculating the number of homes needed. The LHN is not a housing requirement figure and there are numerous reasons why the latter could be higher than the LHN.
- In Harborough's case, plan preparation is proceeding on the basis of providing a contribution to meeting unmet need from Leicester. Not to do so would clearly fall afoul of the Duty to Cooperate (DtC) and for these reasons, it is considered that meeting the LHN for Harborough alone is not a reasonable alternative. In this respect, the "medium growth" scenario should in fact be treated as the minimum or lower growth option. There are numerous other factors apart from accommodating unmet needs elsewhere which may point to the need for a higher housing requirement.

Appendix A Consultation Comments

- For the reasons set out below, we do not consider that the emerging plan's housing needs evidence adequately tests all these matters. As such, they will require detailed consideration in order to facilitate the formulation of a sound and robust housing requirement, which should then be subject to SA as appropriate. That said, we welcome the consideration of a "high growth" scenario which reflects LHN plus 246 dwellings per year, but there is little explanation as to how this number has been calculated.
- We have considered the testing of the various growth and distribution options presented from page 73 onwards and would make the following observations:
- The medium and high options are generally associated with negative effects against SA2. A number of specific ecological site designations are identified that could be affected by higher levels of growth, but the potential impact pathways are not identified. It is acknowledged elsewhere within the SA (page 58) that Harborough generally has low biodiversity value owing to most of the countryside being in agricultural use. Yet the SA testing in relation to this matter seems overly focused on the subject of land-take, when practically all forms of development will be required to demonstrate a minimum of 10% Biodiversity Net Gain, which will demonstrably improve the baseline low BNG value. Higher growth options cannot therefore be confidently associated with negative effects on biodiversity purely on land-take alone, because of the role new development will play in nature recovery.
- The benefits of higher growth options in respect of addressing SA7 and SA8 are understated. Meeting only the LHN for Harborough will not address housing-related deprivation because the LHN on its own only provides a need figure based on demographic projections with an affordability uplift. It does not consider the specific needs for affordable housing or other specialist housing types which (as demonstrated below) will not be delivered purely by planning for LHN alone. Conversely, the provision of the high growth option will provide a greater amount of opportunities to address affordability and specialist housing needs which will promote social inclusion and diversity. That same broadly applies to SA8 in respect of the provision of services and facilities in that options

Appendix A Consultation Comments

which deliver higher growth offer the potential for greater infrastructure and service provision.

- It is surprising that the provision of higher housing growth is generally associated with more negative effects in respect of SA10. This has been adjudged on the basis that higher housing growth scenarios could result in too much housing and insufficient employment opportunities, which is a one dimensional way of looking at the issue. Firstly, it is well established that new housing development has wide-ranging economic benefits. Secondly, as with housing, the SA tests a variety of employment growth options in respect of scale including the provision of additional land for development to maintain a flexible supply and planning for an even greater level of growth to address economic aspirations and regeneration priorities. The NLP will need to demonstrate an aligned approach to new homes and jobs and so employment provision and housing should not be looked at by the SA in isolation.
- We support and encourage the Council to choose the 'High Growth' option (Council's LHN plus an additional 246 homes per year) in order to ensure a robust supply of homes over the plan period. This can be twin tracked with Option C 'High Growth' for employment land provision to achieve a thriving economy in the District and attract the economic growth that comes with a higher provision of much needed homes."
 - The Leicester and Leicestershire Housing and Economic Needs Assessment (2022) was used to inform the level of housing growth required within Harborough District. The Settlement Hierarchy Assessment identified the most sustainable settlements in Harborough District and therefore, the most growth was directed to these areas. The least sustainable settlements received the least growth through the alternative options. Further detail has been provided within the SA Report (Chapter 2) on how the growth and distributed options were formulated.
 - The six options have been further refined into three alternative options which have been subject to SA.
 - A high growth option is more likely to result in the take up of significant areas of land and the loss of greenspace and therefore was scored

negatively. Each of the three growth options were considered in relation to each of the six distribution option. The distribution options also considered the presence of Local Wildlife Sites and Local Nature Reserves, which there is a high density of sites and reserves around Market Harborough, Lutterworth and Broughton Astley. The options appraisal is high level and is not able to take into consideration site specific requirements such as biodiversity net gain. In addition, as the exact site locations are unknown it is not possible consider the potential impact pathways with Local Wildlife Sites and Local Nature Reserves.

- In relation to SA7, the options appraisal concluded that the low growth option is unlikely to provide enough growth to support social inclusion and reduce levels of deprivation across Harborough District.
- In relation to SA8, the high growth option has scored positively for all the distribution options. However, a higher growth could impact on the availability of services and result in services becoming overstretched. Option 4 is the only distribution option that considers the development of strategic sites and therefore, it is not possible for the SA to take into consideration at this early stage whether other sites will deliver new infrastructure as part of development.
- The options appraisal undertaken at Issues and Options stage is a high level appraisal and therefore a high level judgement is made on how housing and employment growth will align. The initial options appraisal has helped the Council to refine the housing and employment options.

Davidsons Homes

- Davidsons are generally supportive of the SA's overall approach to testing the options identified. Various spatial options are tested alongside different growth scenarios, and different growth scenarios have been considered and presented. This is welcome. Appropriate testing of the growth options in terms of both scale and distribution at an early stage in plan preparation is crucial to ensure that the emerging Local Plan is justified. This is key in the context of the NPPF (paragraph 35(b)).

- We do not agree with the 'Low Growth' Scenario given that this only aims to meet the Authority's Local Housing Need (LHN) (which is calculated using the standard methodology) with no additional growth or buffer applied beyond this. The LHN should be the minimum starting point for calculating housing need (as set out in the NPPF), therefore the Council should be planning for a higher level of growth. It is vital that the Council meet some of the unmet needs from Leicester and consider other factors that may result in the need for a higher housing figure such as the need to deliver key infrastructure, affordable housing, or aligning the provision of employment growth with a sufficient number of homes.
- The emerging Local Plan will need to demonstrate an aligned approach to new homes and jobs and so employment provision and housing should not be looked at by the SA in isolation. The two are interlinked.
- We support and encourage the Council to choose the 'High Growth' option (comprising of the Council's LHN plus an additional 246 homes per year) in order to ensure a robust supply of homes over the plan period. This can be twin-tracked with Option C 'High Growth' for employment land provision to achieve a thriving economy in the District and attract the economic growth that comes with a higher provision of much needed homes. A buffer of at least 20% should be applied to the housing need figure for robustness."
 - Noted.

Dean Lewis Estates Ltd.

- The SA should ensure that Reasonable Alternatives fully consider the options to deliver the most sustainable patterns of growth for the District when having regard to accommodate the unmet needs of neighbouring Leicester City. Development of areas such as Scraptoft, Thurnby, Bushby, and other related locations should be encouraged but with the caveat that necessary and appropriate community infrastructure should be delivered alongside the new housing growth.
 - Throughout the options appraisal of the distribution options, the options that supported growth within the most sustainable locations such as

Market Harborough, Lutterworth and around South and East Leicester scored positively. These settlements were included high up within the settlement hierarchy and are considered the most sustainable settlements for growth. Option 4 included the development of strategic sites which would include associated infrastructure to support development. This option was scored positively against a number of SA objectives to take account of this.

Environment Agency

- Overall we consider the approach is appropriate and have no adverse comments to make on the findings of the report. Chp 5, SA Obj 12, para 5.39: It would be useful to use the terms fluvial and pluvial to differentiate between flooding from rivers and surface waters. A sequential approach to development should be taken for both, indeed all sources of flooding. Para 5.41: There is not much commentary on water quality, although we appreciate this topic is covered elsewhere within the report. We welcome and support the Appraisal questions set out within the SA Framework section of the report.
- Where possible, the terms pluvial and fluvial have been used to differentiate between flooding from rivers and surface water in relation to SA12 within Chapter 5. Additional text has been included in relation to water quality under SA12.

Gladman Developments

- In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to SA. Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives. The Council should ensure that the results of the SA process clearly justify its policy choices. In meeting

the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Harborough Local Plan's decision-making and scoring should be robust, justified, and transparent.

- The findings of the SA of the policies will be made available to the Council in advance of finalising the Proposed Submission Draft Local Plan. In addition, where any negative effects could arise, suitable mitigation will be recommended to reduce the potential for negative effects as a result of the policy.

Hallam Land Management Limited

- Hallam Land Management would support further assessment of Land at M1 Junction 20 (site reference 21/8104), based on these representations to reassess the site's suitability. Hallam Land Management do not support the Council's assessment of the site against SA4, SA8 and SA14.
- Land at M1 Junction 20 received an uncertain minor negative effect likely against Objective SA4. There are no heritage designations identified on this site, and there would be no impact on the setting of any nearby heritage assets. In the SA, the Council used a distance-based approach to assess a sites impact on heritage assets, which has resulted with Land at M1 Junction 20 to be assessed negatively against SA4, due to its straight-line proximity to Lutterworth Conservation Area. However, this approach lacks consideration for the built form and landscape factors between heritage assets and potential development sites. In this instance, it fails to account for the presence of open green space, St John's Business Park, and crucially, the A4303, which separates the site from the Lutterworth Conservation Area. It was also confirmed in the determination of the previous planning application (18/00678/OUT) that there was no conflict with heritage policies. This effect should therefore be reviewed.
- The site received an uncertain mixed minor effect likely against SA8, which Hallam Land Management disagree with. Land at M1 Junction 20 will be within walking and cycling distance of the services and facilities

Appendix A Consultation Comments

located north of the site in Lutterworth town centre. Notably, immediately north of the site lies an Aldi supermarket, with the town centre approximately 1km from the site, health services at 1.3km, and education facilities at 1.4km. Further, the site can safely access the town centre via the existing pedestrian/cycle crossing facility. In addition, the area is planned to benefit from a significant increase in services and facilities arising from the Lutterworth East development to the north east of the site. This effect should be reviewed.

- SA14: Hallam Land Management do not support the Council's negative assessment in terms of landscape impact. The site is in effect bound on three sides by built development. This is the A4303 and employment area to the north, the M1 to the east, and the residential development to the west. The extent to which there will be a significant negative effect on the landscape to the south is limited by topography and the defined edge created by Swinford Road. Additionally, the presence of existing hedgerows, embankments, and natural separations to the north, east, and west further minimises the visibility of any development from the surrounding area. It was confirmed in the determination of the previous planning application (18/00678/OUT) that there was no conflict with landscape policies. This effect should therefore be reviewed."
- Due to the high number of site options to appraise as part of the SA, a consistent approach is adopted across all the site options using GIS to allow us to appraise the number of site options.
- Land at M1 Junction is located within 1km of Lutterworth Conservation Area which contains a number of Listed buildings and therefore scored minor negative effect with uncertainty in relation to SA4. A distance based approach was used in the absence of a Heritage Impact Assessment.
- As part of the site assessment, it was not possible to take into consideration surrounding potential development. or services and facilities that may come forward. However, if the site is allocated, we the SA will appraise any site allocation policy and take into consideration any mitigation and the wider context of the area.

- The site option scored negatively against SA14 as the site falls within an area defined as the countryside and greenfield land. If the site is allocated, any site allocation policy will be appraised taking into account mitigation proposed through the policy.

Hinckley & Bosworth Borough Council

- It is recognised that the SA report has been prepared at an early stage in the plan making process. There is the potential for it to be informed by other evidence prepared by other planning authorities and stakeholders beyond the administrative boundary. For SA3, for example, this could include the emerging Joint Water Cycle Study, the Water Resource Management Plans prepared by Severn Trent Water and Anglian Water, Regional Plans produced by Water Resources East and West and by Minerals and Waste Plans. In the absence of a Regional Plan for the East Midlands, strategic policies relating to the management and enhancement of natural resources should be carefully coordinated. Since the Adoption of the current Local Plan in 2019, the area covered by Severn Trent has been determined by the Environment Agency to be an Area of Serious Water Stress. The area covered by Anglian Water for the East continues to be seriously water stressed. The resilience of strategic infrastructure networks and plant to withstand the challenges brought about by growth, both planned and unplanned, and by climate change is a shared risk.
- The Proposed Submission Draft SA report takes into account any updated evidence base.
- Noted. SA12 covers the protection of water resources including water quantity and quality. Where available, information will be drawn from the emerging Joint Water Cycle Study, the Water Resource Management Plans prepared by Severn Trent Water and Anglian Water, Regional Plans produced by Water Resources East and West and by Minerals and Waste Plans. The Anglian Water's and Severn Estuaries Draft Water Resources Management Plan 2024 is referred to within Appendix C: baseline Information.

Historic England

- Historic England welcomes the information set out in PPP for the historic environment. However, we would suggest the following information is included as part of the baseline information:
 - Heritage at Risk Register - Harborough assets; and, Historic England's Heritage Counts information
<https://historicengland.org.uk/research/heritage-counts/>
- We note there is only one appraisal question for the historic environment and the heritage counts information may assist with any further development of monitoring indicators and appraisal questions as the Plan progresses. The information covers a wide range of topics that the draft Plan seeks to encompass especially links with the economy, wellbeing, and climate change. An additional question, for example, could focus around any opportunities to better reveal, experience and understand the historic environment which would help explore the synergy cultural heritage/historic environment issues have with other SA and draft Plan objectives such as wellbeing, climate change, economy (town and village centres and tourism), design, natural/built/historic environments, green and blue infrastructure, landscape, connectivity/transport/infrastructure etc.
- We note that HE's advice note on Sustainability Appraisal work, which may be of use at this time, is included in the PPP list at paragraph 3.49 of the SA.
- In terms of the various options put forward, the uncertain outcomes in respect of the historic environment indicated at present for strategic and growth options highlight the need for further assessment work to be undertaken as the Plan progresses. We agree with the current conclusion of paragraph 4.87 that sets out an overall negative effect for the historic environment, and the same for landscape (paragraph 4.97).
- We do not have capacity to consider all sites put forward in the SHELAA but would recommend that more detailed assessment work separate to the SA is undertaken in respect of any sites that may be taken forward which would have the potential to harm a heritage asset or its setting to ensure any site is developable and deliverable in the way the Council anticipates.

We recommend our 5 step approach to assessing allocation sites in Local Plans: <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

- In terms of monitoring we recommend the one criteria for SA Objective 4 historic environment is reworded to ‘The change in the number of xxxx’ as this would take into account any assets removed from or added to the Heritage at Risk register. We note the information refers to listed buildings and conservation areas only but Harborough has a scheduled monument on the current HAR which links in with landscape objectives of the draft Plan too.
 - Noted. Additional baseline information in relation to the Heritage at Risk Register has been included within Appendix C: Baseline Information.
 - The monitoring indicators contained within Chapter 7 of the SA Report have been further developed at Proposed Submission Draft Stage. The following monitoring indicator has been reworded within the monitoring framework under SA Objective 4: “The change in the number of Listed Buildings, Conservation Areas and Scheduled Monuments on ‘At Risk’ Registers.
 - The following appraisal question has been included under SA Objective 4: “Will it offer opportunities to better reveal, experience and understand the historic environment”.
 - Historic England’s recommendations on the approach to heritage assessment as part of the SA of site options are noted. A Heritage Impact Assessment was not available at the time of undertaking the SA of the site options and therefore a distance based approach has been used.

Home Builders Federation

- The SA considers each of the six spatial options against a high, medium and low growth scenario. HBF agree with the outcomes of SA9, but the Plan and SA should recognise the role that new open-market housing plays. HBF agree that it will be important for the Plan to meet all local

housing needs, including delivering an appropriate mix of housing and specialist housing. We agree that it will be important to improve access to affordable housing. It will be important for the Plan to make housing available to people in need taking into account requirements of location, size, type and affordability and it will be important to improve the quality of housing stock and makes homes more liveable. However, the policy ask must be considered in the round to ensure development remains viable. It is also important to recognise that new open market housing has a role to play in delivering these objectives.

- Noted.

Jelson Homes Limited

- We are generally supportive of the SA's overall approach to testing the options identified. It is welcome that the various spatial options are tested in tandem with different growth scenarios and that different growth scenarios have been considered and presented. Thorough and consistent testing of growth options in terms of both scale and distribution at an early stage in plan preparation, and developing these iteratively over the course of plan preparation will be critical to demonstrating that the New Local Plan (NLP) is justified. For the purposes of the SA, we feel there is limited explanation as to how the various growth and distribution options have been formulated.
- Paragraph 35 of the NPPF is clear that for a Local Plan to be considered 'sound' it must be positively prepared, justified, effective and consistent with national policy. For a Local Plan to be considered justified it must be based on "an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence".
- In relation to the conceptualisation of distribution options, the Settlement Hierarchy Assessment (October 2023) has been referred to in the SA. There is, however, no explanation as to how this has shaped the options tested and why these have been selected as "reasonable" alternatives.
- There is less explanation in respect of the three growth level options presented. The "low growth" scenario simply reflects the District's own

Appendix A Consultation Comments

Local Housing Need (LHN) calculated using the Standard Methodology. As set out further in our response below, the PPG is clear that the LHN is the minimum starting point for calculating the number of homes needed. The LHN is not a housing requirement figure and there are numerous reasons why the latter could be higher than the LHN.

- In Harborough's case, plan preparation is proceeding on the basis of providing a contribution to meeting unmet need from Leicester. Not to do so would clearly fall afoul of the Duty to Cooperate (DtC) and for these reasons, it is considered that meeting the LHN for Harborough alone is not a reasonable alternative. In this respect, the "medium growth" scenario should in fact be treated as the minimum or lower growth option. There are numerous other factors apart from accommodating unmet needs elsewhere which may point to the need for a higher housing requirement. These are:
 - Delivery of infrastructure;
 - Aligning provision homes and jobs;
 - Meeting affordable housing and other specialist housing needs; and
 - Previous assessments of housing need
- For the reasons set out below, we do not consider that the emerging plan's housing needs evidence adequately tests all these matters. As such, they will require detailed consideration in order to facilitate the formulation of a sound and robust housing requirement, which should then be subject to SA as appropriate. That said, we welcome the consideration of a "high growth" scenario which reflects LHN plus 246 dwellings per year, but there is little explanation as to how this number has been calculated.
- We have considered the testing of the various growth and distribution options presented from page 73 onwards and would make the following observations:
 - The medium and high options are generally associated with negative effects against SA2. A number of specific ecological site designations are identified that could be affected by higher levels of growth, but the potential impact pathways are not identified. It is acknowledged elsewhere within the SA (page 58) that Harborough generally has low biodiversity

value owing to most of the countryside being in agricultural use. Yet the SA testing in relation to this matter seems overly focused on the subject of land-take, when practically all forms of development will be required to demonstrate a minimum of 10% Biodiversity Net Gain, which will demonstrably improve the baseline low BNG value. Higher growth options cannot therefore be confidently associated with negative effects on biodiversity purely on land-take alone, because of the role new development will play in nature recovery.

- The benefits of higher growth options in respect of addressing SA7 and SA8 are understated. Meeting only the LHN for Harborough will not address housing-related deprivation because the LHN on its own only provides a need figure based on demographic projections with an affordability uplift. It does not consider the specific needs for affordable housing or other specialist housing types which (as demonstrated below) will not be delivered purely by planning for LHN alone. Conversely, the provision of the high growth option will provide a greater amount of opportunities to address affordability and specialist housing needs which will promote social inclusion and diversity. That same broadly applies to SA8 in respect of the provision of services and facilities in that options which deliver higher growth offer the potential for greater infrastructure and service provision.
- It is surprising that the provision of higher housing growth is generally associated with more negative effects in respect of SA10. This has been adjudged on the basis that higher housing growth scenarios could result in too much housing and insufficient employment opportunities, which is a one dimensional way of looking at the issue. Firstly, it is well established that new housing development has wide-ranging economic benefits. Secondly, as with housing, the SA tests a variety of employment growth options in respect of scale including the provision of additional land for development to maintain a flexible supply and planning for an even greater level of growth to address economic aspirations and regeneration priorities. The NLP will need to demonstrate an aligned approach to new homes and jobs and so employment provision and housing should not be looked at by the SA in isolation.

Appendix A Consultation Comments

- We support and encourage the Council to choose the 'High Growth' option (Council's LHN plus an additional 246 homes per year) in order to ensure a robust supply of homes over the plan period. This can be twin tracked with Option C 'High Growth' for employment land provision to achieve a thriving economy in the District and attract the economic growth that comes with a higher provision of much needed homes.
- The Leicester and Leicestershire Housing and Economic Needs Assessment (2022) was used to inform the level of housing growth required within Harborough District. The Settlement Hierarchy Assessment identified the most sustainable settlements in Harborough District and therefore, the most growth was directed to these areas. The least sustainable settlements received the least growth through the alternative options. Further detail has been provided within the SA Report (Chapter 2) on how the growth and distributed options were formulated.
- The six options have been further refined into three alternative options which have been subject to SA.
- A high growth option is more likely to result in the take up of significant areas of land and the loss of greenspace and therefore was scored negatively. Each of the three growth options were considered in relation to each of the six distribution option. The distribution options also considered the presence of Local Wildlife Sites and Local Nature Reserves, which there is a high density of sites and reserves around Market Harborough, Lutterworth and Broughton Astley. The options appraisal is high level and is not able to take into consideration site specific requirements such as biodiversity net gain. In addition, as the exact site locations are unknown we can't consider the potential impact pathways with Local Wildlife Sites and Local Nature Reserves.
- In relation to SA7, the options appraisal concluded that the low growth option is unlikely to provide enough growth to support social inclusion and reduce levels of deprivation across Harborough District.
- In relation to SA8, the high growth option has scored positively for all the distribution options. However, a higher growth could impact on the availability of services and result in services becoming overstretched.

Option 4 is the only distribution option that considers the development of strategic sites and therefore, it is not possible the SA to take into consideration at this early stage whether other sites will deliver new infrastructure as part of development.

- The options appraisal undertaken at Issues and Options stage is a high level appraisal and therefore a high level judgement is made on how housing and employment growth will align. The initial options appraisal has helped the Council to refine the housing and employment options.

L&Q Estates

- L&Q Estates generally supports the approach that has been taken within the Issues and Options SA. In relation to the 'Housing Options', it will be important to reflect the role that settlements across the hierarchy will need to play in achieving sustainable development. In this regard, the planned distribution of a proportion of growth to medium villages should feature across a range of the growth options that will be tested.
- Noted.
- The approach to the Issues and Options SA is generally supported. In relation to the 'Housing Options', it will be important to reflect the role that settlements across the hierarchy will need to play in achieving sustainable development. In this regard, the planned distribution of a proportion of growth to medium villages should feature across a range of the growth options that will be tested.
- The site assessment considers the five strategic site options identified in the consultation document including our client's site, Newton Croft, north of Newton Harcourt. This includes all the sites capable of accommodating more than 1,500 homes. It finds that the five sites perform the same across all but three of the SA objectives, which are considered below.
- SA3: The first difference between the strategic sites relates to SA3 and the difference appears to relate to whether sites fall within a Mineral Safeguarding Area. Paragraph 5.12 explains that sites located within a Mineral Safeguarding Area (MSA) are expected to have a minor negative

Appendix A Consultation Comments

effect due to the potential to sterilise minerals resources. All other sites are expected to have negligible effects with regards to minerals as the sites do not fall within a MSA.

- Our client's site at Newton Croft is one of three of the strategic sites identified as being within a MSA and therefore identified as having a minor negative effect. Our clients have, however, commissioned Wardell Armstrong to undertake a Mineral Resource Assessment for the site (Appendix E) and this finds that the MSA covering the site is a continuation of the 200m buffer zone for the deposit of alluvium that is located to the south of the site boundary. The report concludes that there is no safeguarded mineral resource on the site. There are small deposit of colluvium and silty clayey sand and gravel present, however, these have no commercial value.
- Whilst it will be important to avoid the unnecessary sterilisation of mineral resources, this should not be identified as a potential minor negative effect for our client's site. This assessment should be reconsidered in light of the attached Minerals Resource Assessment and shouldn't be a determining factor in assessing the relative performance of strategic sites at the next stage of the process without a more detailed consideration of the potential for resource sterilization.
- SA6: The second difference between the strategic sites relates to SA6. All of the strategic sites, with the exception of the Farmcare Estate, Stoughton site, are identified as having minor positive effects against this objective. This part of the appraisal is not supported and is challenged in the context that all strategic sites have the potential to deliver new health care facilities, open spaces and walking and cycling infrastructure and should therefore be identified as having a significant positive effect. The Integrated Care Board (ICB) are increasing interested in providing new facilities as part of large developments.
- The appraisal should be updated to reflect that the distance to existing facilities is not relevant in the context of developing a strategic site. It is also not relevant if the edge of one strategic site is less distance from a health facility than others as in all cases that distance will increase from locations elsewhere in the site. The appraisal of these sites against this objective should be reviewed for consistency on this basis. It is suggested

Appendix A Consultation Comments

that consideration should be given to the potential for Newton Croft to deliver new facilities and therefore have significant positive effects against this objective. The delivery of services and facilities is integral to the vision for this strategic site.

- SA8: Finally, the third difference between the strategic sites relates to SA8 which assesses access to existing services and facilities in existing urban areas. This approach is not supported for strategic sites. The SA needs to take account of the potential for new services and facilities to be delivered as part of strategic sites. In the case of Newton Croft this could include a new secondary school, two primary schools, pre-school provision, community facilities, public transport provision, shops, library, employment and health care facilities, as well as flexible space for mobile facilities ensuring the provision of facilities can adapt and evolve with the needs of the community. These facilities would be the equivalent of homes being located close to settlement such as Broughton Astley and should therefore see Newton Croft identified as likely to have minor positive effects against this objective. It is not appropriate to assess large scale sites on the basis of how far the edge of the site is from existing settlements or facilities when the aim will be to create sustainable neighbourhoods within the site.
- SA2, SA4, SA12 & SA14: There are a number of Objectives where the appraisal findings are not supported because the opportunity presented by strategic sites has not been taken into account in appraising the likely effects. This includes the remaining objectives where strategic sites were appraised as likely to have significant negative effects. SA2, SA4 and SA14. The SA states that significant negative effects are identified because sites contain or are in close proximity to designated sites or areas. However, the scale of strategic sites makes proximity to designated sites and areas much more likely but means there is the space available to dedicate land to protecting and enhancing biodiversity or protecting the local historic environment or reducing landscape impacts and this doesn't appear to have been taken into account.
- The significant negative effects of sites in relation to flood risk, identified in the Sustainability Appraisal, relate primarily to the presence of surface water flooding. Whilst the need to take account of surface water is understood, it is important to consider that surface water flooding can be

Appendix A Consultation Comments

addressed as part of a development's sustainable drainage systems and as such does not create a constraint to development or have the potential to create significant negative effects.

- Noted.
- The site at Newton Croft also scored negatively against SA3 as more than 25% of the site fell within Grade 3 Agricultural land. Only a small portion of the southern part of the site fell within the Mineral Safeguarding Area. However, as a GIS based approach was undertaken the small overlap resulted in the site scoring negatively against this SA objective. If the site is allocated, any mitigation within the site allocation policy will be taken into consideration during the appraisal.
- The site appraisal work is a high level distance based approach due to the number of site options that require appraisal. The site appraisal work is not able to take into consideration any mitigation proposed through the development of a site such as the proposal of new infrastructure. This will be considered through a site allocation policy.
- As stated above, the further details in relation to the site are not able to be taken into consideration in the appraisal of site options. A high level approach to identify the most sustainable sites with the least environmental impacts is used. This site assessment work will inform the Council's decision making in helping them to choose the most appropriate sites to allocate within the Local Plan. A future iteration of the SA will then appraise any site allocation policies taking into account any mitigation proposed through these policies, such as the provision of new services and facilities. Therefore, any scores given during the site assessment work will be reviewed if the site is allocated through the Local Plan.
- If a site is allocated, any mitigation proposed such as BNG, landscape enhancements and sustainable urban drainage will be taken into consideration within the appraisal of the site.

Leire Parish Council

- It's difficult for anybody to comment on a 356-page document. The content is over whelming and to expect residents to respond to this consultation would be confusing and unfair. We would agree with most of the findings however we believe that some comments in the approach are not appropriate or correct.
- A Non-Technical Summary has been prepared alongside the SA of the Proposed Submission Draft Local Plan. The Non-Technical Summary provides a concise summary of the full SA Report, including a description of the SEA/SA process and the SA appraisal findings.

Logan Neighbourhood Forum

- The SA Objectives set out the intention to minimise significant affect on the District's environment and where possible protect and improve environmental conditions. However there is concern that the SA ignores the option of reducing/ceasing growth, but does not explain why.
- More significantly, there is the general consensus of Logan Neighbourhood Forum Members that the evidence of recent development is that infrastructure (transport, water/drainage, healthcare etc) is not always delivered to accommodate the scale of growth. This has resulted in increased traffic congestion, over-stretched healthcare provision adversely affecting health and well-being of existing residents, and degradation of the environment. The SA assumes that infrastructure will be provided to accommodate new development, which is not the proven case.
- The SA overlooks the potential impact of the of the new prison development at Gartree on the District, and should be considered at the very least as context.
 - A low option is considered which covers limited growth. The option of reducing growth is not possible. The option to cease growth would not be considered a reasonable option and therefore is not considered appropriate to appraise. The option to cease growth would result in

Harborough District not meeting its housing and employment need over the plan period.

- The SA now appraise any policies within the Proposed Submission Draft Local Plan which includes policies relating to infrastructure requirements. Any site taken forward could form a site allocation policy which may include requirements for required infrastructure to support the site. Where the policy could result in significant negative effects, the SA suggests appropriate mitigation to be included within the policy.
- HMP Gartree received outline planning consent in November 2023. Therefore, this site is not appraised through the SA as the development as already received permission.

Lubenhams 1 Limited, Phoebe Conway (Marrons), Mr Alasdair Thorne (Marrons),

- Our client is generally supportive of the SA overall approach to testing the options identified. We consider that the SA would benefit from greater explanation as to how the various growth and distribution options have been formulated.
- Whilst the Settlement Hierarchy Assessment (October 2023) has been referred to in the SA, there is no explanation as to how this has shaped the options tested and why these have been selected as “reasonable” alternatives. There is less explanation in respect of the three growth level options presented.
- The “low growth” scenario simply reflects the District’s own Local Housing Need (LHN) calculated using the Standard Methodology. As set out further in our response below, the PPG is clear that the LHN is the minimum starting point for calculating the number of homes needed. The LHN is not a housing requirement figure and there are numerous reasons why the latter could be higher than the LHN.

Appendix A Consultation Comments

- In Harborough's case, plan preparation is proceeding on the basis of providing a contribution to meeting unmet need from Leicester. Not to do so would clearly fall afoul of the Duty to Cooperate (DtC) and for these reasons, it is considered that meeting the LHN for Harborough alone is not a reasonable alternative. In this respect, the "medium growth" scenario should in fact be treated as the minimum or lower growth option.
- There are numerous other factors apart from accommodating unmet needs elsewhere which may point to the need for a higher housing requirement.
- For the reasons set out below, we do not consider that the emerging plan's housing needs evidence adequately tests all these matters. As such, they will require detailed consideration in order to facilitate the formulation of a sound and robust housing requirement, which should then be subject to SA as appropriate. That said, we welcome the consideration of a "high growth" scenario which reflects LHN plus 246 dwellings per year, but there is little explanation as to how this number has been arrived at.
- We have considered the testing of the various growth and distribution options presented from page 73 onwards and would make the following observations:
- The medium and high options are generally associated with negative effects against SA2. A number of specific ecological site designations are identified that could be affected by higher levels of growth, but the potential impact pathways are not identified. It is acknowledged elsewhere within the SA (page 58) that Harborough generally has low biodiversity value owing to most of the countryside being in agricultural use. Yet the SA testing in relation to this matter seems overly focused on the subject of land-take, when practically all forms of development will be required to demonstrate a minimum of 10% Biodiversity Net Gain, which will demonstrably improve the baseline low BNG value. Higher growth options cannot therefore be confidently associated with negative effects on biodiversity purely on land-take alone, because of the role new development will play in nature recovery.
- The benefits of higher growth options in respect of addressing SA7 and SA8 are understated. Meeting only the LHN for Harborough will not

Appendix A Consultation Comments

address housing-related deprivation because the LHN on its own only provides a need figure based on demographic projections with an affordability uplift. It does not consider the specific needs for affordable housing or other specialist housing types which (as demonstrated below) will not be delivered purely by planning for LHN alone. Conversely, the provision of the high growth option will provide a greater amount of opportunities to address affordability and specialist housing needs which will promote social inclusion and diversity. That same broadly applies to SA8 in respect of the provision of services and facilities in that options which deliver higher growth offer the potential for greater infrastructure and service provision.

- It is surprising that the provision of higher housing growth is generally associated with more negative effects in respect of SA10. This has been adjudged on the basis that higher housing growth scenarios could result in too much housing and insufficient employment opportunities, which is a one dimensional way of looking at the issue. Firstly, it is well established that new housing development has wide-ranging economic benefits.² Secondly, as with housing, the SA tests a variety of employment growth options in respect of scale including the provision of additional land for development to maintain a flexible supply and planning for an even greater level of growth to address economic aspirations and regeneration priorities. The NLP will need to demonstrate an aligned approach to new homes and jobs and so employment provision and housing should not be looked at by the SA in isolation.
- The Leicester and Leicestershire Housing and Economic Needs Assessment (2022) was used to inform the level of housing growth required within Harborough District. The Settlement Hierarchy Assessment identified the most sustainable settlements in Harborough District and therefore, the most growth was directed to these areas. The least sustainable settlements received the least growth through the alternative options. Further detail has been provided within the SA Report (Chapter 2) on how the growth and distributed options were formulated.
- The six options have been further refined into three alternative options which have been subject to SA.

- A high growth option is more likely to result in the take up of significant areas of land and the loss of greenspace and therefore was scored negatively. Each of the three growth options were considered in relation to each of the six distribution option. The distribution options also considered the presence of Local Wildlife Sites and Local Nature Reserves, which there is a high density of sites and reserves around Market Harborough, Lutterworth and Broughton Astley. The options appraisal is high level and is not able to take into consideration site specific requirements such as biodiversity net gain. In addition, as the exact site locations are unknown we can't consider the potential impact pathways with Local Wildlife Sites and Local Nature Reserves.
- In relation to SA7, the options appraisal concluded that the low growth option is unlikely to provide enough growth to support social inclusion and reduce levels of deprivation across Harborough District.
- In relation to SA8, the high growth option has scored positively for all the distribution options. However, a higher growth could impact on the availability of services and result in services becoming overstretched. Option 4 is the only distribution option that considers the development of strategic sites and therefore, it is not possible for the SA to take into consideration at this early stage whether other sites will deliver new infrastructure as part of development.
- The options appraisal undertaken at Issues and Options stage is a high level appraisal and therefore a high level judgement is made on how housing and employment growth will align. The initial options appraisal has helped the Council to refine the housing and employment options.

Hallam Land Management and William Davis

- Hallam Land Management and William Davis support the broad methodology used in the SA and its implementation in terms of assessing suitable development sites and determining potential growth options. Whilst the scope of the Sustainability Appraisal is appropriate, there are

Appendix A Consultation Comments

several limitations and assumptions which hinder the level of detail in which the sites are assessed. Due to the limitations outlined by the SA Report itself, Hallam Land Management and William Davis would support further assessment of Land at Airfield Farm (site reference 21/8234), based on these representations to reassess the site's suitability.

- Hallam Land Management and William Davis do not support the Council's assessment of the site against SA2, SA4, SA8, SA12 and SA14.
- Land at Airfield Farm received an uncertain significant negative effect likely on SA2, which is not reflective of the sites ecological value or context. A Technical Note: Ecology has been submitted with these representations which confirms there are no statutory ecological designations that affect the site, the habitats within and around the site do not pose a constraint on its development, and any impact on protected species found within the site can be mitigated for through on site provision of green infrastructure. In fact, it concludes that development has the potential to have a significant positive effect in terms of habitat creation. Hallam Land Management and William Davis are therefore confident it can deliver at least 10% BNG on this site and will actively manage the site with the aim of encouraging the development of new biodiversity assets and linkages to existing habitats. This will ensure a significant positive effect.
- The site received an uncertain significant negative effect likely against SA4. A Heritage Assessment and Archaeological Desk Based Assessment have been submitted with these representations which confirms there are no heritage designations identified on this site, and there would be no harm caused to the setting of any nearby heritage assets. Further, there is no evidence to suggest the site has the potential to contain archaeological remains of sufficient importance to constrain development. There is therefore no uncertain significant effect and this effect should therefore be reviewed.
- The site received an uncertain minor negative effect likely against SA8. However, as illustrated within the Planning and Design Statement submitted with these representations, Land at Airfield Farm will be within walking distance of the services and facilities (including primary school and local centre) being delivered as part of the Wellington Place development to the immediate south and east. Further, employment uses

Appendix A Consultation Comments

exist and are committed on land to the east. A wide range of facilities are also available within the town to the south which are all within reasonable cycling distance or by public transport. Given the scale of the potential development, the illustrative masterplan for the site shows how a new primary school, community hub (including potential shop), and community space could be accommodated. This effect is therefore not likely to be negative and should be reviewed.

- Against SA12, the site received uncertain significant negative effect likely. As evidenced within the Drainage Technical Note submitted with the representations, the site is wholly within Flood Risk Zone 1 and development on the site can deliver improved drainage outcomes through the implementation of SUDs and support the efficient use of water through carefully designed homes. This effect is not likely to be negative and should be reviewed.
- Against SA14, Hallam Land Management and William Davis do not support the Council's negative assessment in terms of landscape impact. As illustrated in the Landscape Technical Note submitted with these representations, the site is characterised by large scale arable fields with few landscape features as a result of its previous use and is not bound by any landscape designations. It is bound on two sides by built development with the employment area to the east and the residential area to the south and east. Further, the prison development to the west (both existing and committed) is a further detractor in the landscape. Previous landscape assessments for the Council have concluded the land being of moderate-low sensitivity and having medium capacity for development. The extent to which there will be a significant negative effect on the landscape and views to the north is limited by topography and the defined edge created by Gallow Field Road.
- Reference is made to the Area of Separation at Lubenham being at risk, and this could have a detrimental effect on the landscape (paragraph 4.70), however the intervening topography (Mill Hill) between the site and Lubenham means that development would not be visible from Lubenham. Further, there would still be a significant area of separation between the site and the existing settlement. This effect is therefore not a significant negative effect and should therefore be reviewed.

Appendix A Consultation Comments

- The site scored an uncertain significant negative effect due to the site falling within 250m of a Local Wildlife Site. This score does not reflect the sites own ecological value. However, any future proposals as part of the site in relation to biodiversity net gain will be considered if the site is allocated through a site allocation policy.
- The site is located within 250m of Grand Union Canal Conservation Area.
- The site is located beyond 720m from a settlement, which is considered a reasonable walking distance to local services and facilities. If the site is allocated through a site allocation policy then any new infrastructure delivered as part of the proposal will be taken into consideration.
- SA12 considers surface and groundwater flooding as well as if the site is located within a Flood Zone. The majority of the site is at risk of groundwater flooding. If the site is allocated, then any mitigation within the site allocation policy in relation to sustainable urban drainage will be taken into consideration.
- The site is a large greenfield site that falls within the countryside and therefore, the site scored a significant negative effect on the landscape.
- The site proposals are not able to be taken into consideration in the appraisal of site options. A high level approach to identify the most sustainable sites with the least environmental impacts is used. This site assessment work will inform the Council's decision making in helping to choose the most appropriate sites to allocate within the Local Plan. This updated SA then appraises any site allocation policies taking into account any mitigation proposed through these policies, such as the provision of new services and facilities. Therefore, any scores given during the site assessment work are reviewed if the site is allocated through the Local Plan.
- As part of the Local Plan preparation, an Area of Separation Study is currently being undertaken as part of the evidence base. This study will consider the Areas of Separation around Lubenham.

Marrons (Land North West of Manor Farm Walk, Tilton on the Hill)

- Our Client has no specific commentary to make in respect of the Council's SA.
 - Noted.

Mintringe Strategic Land

- The approach to the SA is generally supported. The SA assesses 8no. housing sites alongside 4no. mixed use sites in Kibworth, however, the site put forward as part of these representations has not been assessed as it has not been submitted to the previous Call for Sites.
- The wider site under reference 21/8042 has been considered, which is one of the best performing housing sites in Kibworth with significant positive effects on SA6 and SA10. It is also identified as likely to have minor positive/negligible effects on SA8 and SA9. The site is only identified to have potentially three significant negative effects, one is applied to almost all sites as they would require the development of agricultural land; SA3. The other two are also identified to be the case for most other sites in Kibworth and relate to SA12 and SA14.
- It is acknowledged that the SA will evolve further over time to provide a more detailed site assessment and draw further conclusions with regard to the most appropriate locations for future growth and development over the plan period. However, it should be noted that the site put forward with these representations is smaller and therefore is likely to have much less significant effects particularly, for example, as the potential effects on flood risk can be addressed by avoiding development of the area at risk of flooding and through use of sustainable drainage systems.
- In terms of landscape, the site is located in the Welland Valley Landscape Character Area with medium-high capacity for development as defined by The Harborough District Council Rural Centres Landscape Character Assessment and Landscape Capacity Study (2007). The potential

landscape impact was assessed by an independent consultant (on behalf of 5 Harborough District) during a previous application on the site (planning reference 15/01398/OUT) and it was concluded that there would only be localised impacts. In addition, the proposed built form would be seen in the context of the existing development within Kibworth. The impact is likely to be even less significant given the proposals include bungalows.

- Accordingly, the smaller site is likely to be the best performing housing site in Kibworth when you take these points into consideration. The SA findings for 21/8042 should reflect the potential SA score for the smaller site at Land at Wentworth Close. The findings for SA12 and SA14 should be updated to show a negligible effect and uncertain minor negative effect.
 - Noted.
 - The Council undertook a further Call for Sites as part of the Issues and Options Consultation. The sites submitted through this Call for Sites have been assessed against the 14 SA objectives with the appraisal findings contained within Chapter 5 of this SA Report.
 - The assessment of the site options is a high level appraisal which considers a large number of potential site options and therefore is not able to take into consideration mitigation within the site and detailed design as this is not known.

Mr Charles John Halford Brooks

- It is considered that the Issues and Options SA covers a wide array of options which are appropriate to be considered at this stage of the Local Plan process. We consider, the stages which define the SA to be robust in nature and ensure that the fundamental areas in relation to the plan making process have been considered.
- Of the 6 options, the SA assessed that Option 3 and secondly Option 4 scored most highly in terms of the positive impact for the District. Although these score highly these options do not allow for a proportionate amount/spread of growth across the District which in turn limits the delivery

of other key SA objectives. Although these Options ranked highly against the SA criteria, we consider that there are a number of advantages to delivering housing under Options 1 and 2 and that the scoring weight could have been applied higher to the housing category for this option.

- In respect of the three levels of growth for assessing the SA against the housing distribution options we consider the 'High' growth option should be used. This option factors in the increase in the amount of housing required by using the Standard Method and the uplift in housing needed in relation to Leicester City's unmet need, as well as allowing for an adequate buffer. The low growth option does not allow for a higher enough provision to meet the required housing target and therefore the plan would not be found sound if this was brought forward. The medium option would meet HDC's LHN and contribute towards meeting Leicester's unmet need, however there would not potentially be sufficient homes delivered to ensure sufficient choice in the market and boost the delivery of housing.
- Options 3 and 4 proposes growth towards the most sustainable locations within the District. Options 1 and 2 scored the same as Option 3 as each of the options provided a level of growth to each of the settlement levels. Albeit, Option 1 and 2 provides a larger spread of growth to the lower level settlements within the settlement hierarchy. It was identified that Option 4 resulted in the least spread of growth resulting in a mixed effects in relation to SA9: Housing.

Natural England

- We note that our comments made at the scoping stage of the SA report have been considered and noted.
- We are pleased to see that Natural England's Green Infrastructure Framework has been referenced with the report. We suggest that there are other references to Climate Change Adaptation which may be useful:
 - NE, EA and FC shared vision to use nature-based solutions to tackle the climate emergency (2020)
 - NE and RSPB Climate Change Adaptation Manual (2020)

Appendix A Consultation Comments

- Natural England's climate change risk assessment and adaptation plan (2021)
- Natural England generally agree that the information within the section on Baseline Information (Appendix C) is correct, relevant, and suitable for the plan. We would suggest the following additional points for consideration:
- Air quality - We acknowledge air quality has been covered in terms of emissions but has not covered air quality impacts from agriculture. 88% of ammonia emissions come from agriculture; ammonia can lead to significant environmental impacts via contributing to nitrogen deposition and eutrophication. In addition, the emphasis appears to be on human health and we consider that they should be greater coverage of the impact of air pollution on the natural environment.
- Climate Change - Natural England emphasises the need to promote nature-based solutions for climate change, particularly through the implementation of local plan policies. These measures include the installation of green roofs and walls in new buildings; the provision of Sustainable Urban Drainage Systems (SuDs) and wetlands; planting of street trees; habitat creation and enhancement to providing increased connectivity between fragmented areas of habitat to build up resilience to climate change and contribute to the Nature Recovery Network.
- Reference to the below documents has been included within the Policies, Plans and Programmes in Chapter 3 and Appendix B of this updated SA report: NE, EA and FC shared vision to use nature-based solutions to tackle the climate emergency (2020), NE and RSPB Climate Change Adaptation Manual (2020) and Natural England's climate change risk assessment and adaptation plan (2021)
- The suggested additions in relation to air quality and climate change baseline have been included within Appendix C.

North Kilworth Parish Council

- It's difficult for anybody to comment on a 356-page document. The content is over-whelming and expecting residents to respond to this is confusing

and unfair. We agree with most of the findings however we believe that some comments in the approach are not appropriate or correct. The suggestion that 'made' Neighbourhood Plans are currently considered is concerning given the level of development that has taken place in settlements with 'made' Neighbourhood Plans that have exceeded the Neighbourhood Plan and Local Plan figures. We would strongly urge that 'made' Neighbourhood Plans are given more weight in the new Local Plan.

- A Non-Technical Summary has been prepared alongside the SA of the Proposed Submission Draft Local Plan. The Non-Technical Summary provides a concise summary of the full SA Report, including a description of the SEA/SA process and the SA findings.

Scraptoft Parish Council

- Yes we do support the approach and agree with the findings.
- Noted.

Mrs Carol Parker

- Agree with most of findings however some comments in approach are not appropriate or correct. The Harborough Local Plan is not prepared in isolation and must be in conformity with a range of international and national plans and programmes as show in Figure 3.1 overleaf. In addition, the Local Plan for Harborough comprises any 'made' Neighbourhood Plans within the District and is supported by other documents such as the Statement of Community Involvement, Local Development Scheme, Authority Monitoring Report and Supplementary Planning Documents. Suggestion that the Neighbourhood plan is currently considered is concerning considering the level of planning within Swinford that has contravened the agreed and signed off neighbourhood plan. Will Village plans form more of a basis (not ignored) going forward?
- Noted.

The Ginns Family, Collier and Forrester families and Halls Family

- We are pleased to see that the Issues and Options document is accompanied by a detailed SA by professional consultants and that the Council will update at each stage, as the Local Plan progresses. This provides a robust basis for the new Local Plan's preparation.
- We do however wish to make a few comments. Firstly we note the SA provides an assessment of the various growth options for housing identified as Options 1 to 6. However, the Issues and Options document, along with the SA, contains little detail on how proposals in Leicester and Leicestershire Strategic Growth Plan (2018) are to be addressed, despite being identified as a 'key matter' in the Duty to Cooperate Engagement document (December 2023) and confirmed by the Council as something the local authorities will need to take "into account when developing their Local Plans".
- Clearly the Strategic Growth Plan includes ambitious proposals to support the long-term growth and prosperity across the sub-region. Three of these directly affect Harborough District.
- Notably growth Option 4 of the Issues and Options document is identified as being "most aligned with the Strategic Growth Plan" (Table 10). It is not clear, following the scrapping of the A46 'expressway' bypass, what elements of this option would be aligned with Growth Plan that are still to be progressed, but it is of note that there are still items deemed "critical" to the sub regional strategy. Clarification on this matter would be welcome.
- If the proposals contained in Strategic Growth Plan are to be delivered by the new Local Plan, then it is vital to understand the infrastructure required to support this, and importantly the levels of growth required to assist their delivery, as it is highly likely to be excess of the levels currently proposed. Consequently, the sustainability of the proposals contained in the Strategic Growth Plan should be considered in more detail and presented as an 'alternative option' when reviewing the Sustainability Appraisal in the future. This will help support the Council's decisions on whether to take forward the Growth Plan proposals.

Appendix A Consultation Comments

- With regards to the growth options proposed in the Issues and Options document, Chapter 4 of the SA considers the Strategic Growth Options outlined in the Issues and Options paper and assesses the three options for housing growth that are set out in Table 1 of the consultation document. These consist of low, medium and high growth scenarios. Each growth option is then assessed against fourteen SA Objectives, referenced SA1 to SA14. A colour coding system is then applied to score the effects of the various growth scenarios and development options. This approach is clear and easy to follow.
- Table 4.7 provides a summary of the effects on various grow Sustainability Appraisal objectives. We note from this Option 4 scores better than Option 3 on a number of criteria particularly SA8, SA10 and SA13. The reason for this appears to be that the assessment is based on assumption that Option 3 will not deliver sites of more than 1,500 homes. This is despite the Issues and Options proposing 4,267 homes for the 'Adjoining Leicester Urban Area' (Scraptoft, Bushby and Thurnby) under Option 3.
- As discussed previously, the family is working with a consortium of landowners to promote a Sustainable Urban Extension to the east of Scraptoft. It is anticipated this could deliver over 1,500 new homes. This would provide a new neighbourhood within the highest tier settlement within the Districts proposed settlement hierarchy and would deliver the necessary infrastructure and facilities required to achieve a sustainable development. The Issues and Options document acknowledges larger sites have a critical mass that enables delivery of strategic and local infrastructure, including schools, community and healthcare facilities, along with open space sustainable travel solutions. If the Sustainability Appraisal is based on Option 3, then the assessment has been carried out on the assumption of smaller sites (under 1,500 homes) that are potentially less effective in delivering key infrastructure to support sustainable growth. We therefore consider it necessary for an additional Growth Option to be considered (an Option 3a), which assumes that housing allocations are of a scale capable of delivering the required infrastructure, and for this to be assessed as an alternative when further SA is undertaken.

- The SA provides a comprehensive assessment of the Options proposed in the Issues and Options consultation document. However, we consider there are reasonable alternatives that require consideration. A high growth scenario to meet the proposals contained in the Leicester and Leicestershire Strategic Growth Plan, including options for new strategic road infrastructure as a possible alternative to the Leicester A46 ‘Expressway’ bypass proposal. An assessment of Option 3 to include sites capable of accommodating more than 1,500 homes, allowing a critical mass to deliver strategic and local infrastructure.
- The Issues and Options consultation was a high-level consultation. The Local Plan at Proposed Submission Draft stage will include further detail in relation to the Leicester and Leicestershire Strategic Growth Plan. This will be reflected within the SA Report at Proposed Submission Draft stage.
- Noted. As stated within the Issues and Options Consultation Document, Option 3 did not include sites accommodating more than 1,500 homes. As the options are high level, the appraisal did not consider the potential individual sites but did assume that no strategic sites would be delivered. Therefore, Option 4 scored more highly in relation to SA8, SA10 and SA13 as strategic sites will likely deliver associated infrastructure. However, Option 3 did score positively in relation to SA8, SA10 and SA13 due to the close proximity to Leicester.
- Further refined options have been subject to SA and the findings of their appraisal are set out within this SA report.

Mr R Shield

- Firstly we note the SA provides an assessment of the various growth options for housing identified as Options 1 to 6. However, the Issues and Options document, along with the SA, contains little detail on how proposals in Leicester and Leicestershire Strategic Growth Plan (2018) are to be addressed, despite being identified as a ‘key matter’ in the Duty to Cooperate Engagement document (December 2023) and confirmed by the

Appendix A Consultation Comments

Council as something the local authorities will need to take “into account when developing their Local Plans”.

- Clearly the Strategic Growth Plan includes ambitious proposals to support the long-term growth and prosperity across the sub-region. Three of these directly affect Harborough District.
- Notably growth Option 4 of the Issues and Options document is identified as being “most aligned with the Strategic Growth Plan” (Table 10). It is not clear, following the scrapping of the A46 'expressway' bypass, what elements of this option would be aligned with Growth Plan that are still to be progressed, but it is of note that there are still items deemed “critical” to the sub regional strategy. Clarification on this matter would be welcome.
- If the proposals contained in Strategic Growth Plan are to be delivered by the new Local Plan, then it is vital to understand the infrastructure required to support this, and importantly the levels of growth required to assist their delivery, as it is highly likely to be excess of the levels currently proposed. Consequently, the sustainability of the proposals contained in the Strategic Growth Plan should be considered in more detail and presented as an ‘alternative option’ when reviewing the SA in the future. This will help support the Council’s decisions on whether to take forward the Growth Plan proposals.
- With regards to the growth options proposed in the Issues and Options document, Chapter 4 of the SA considers the Strategic Growth Options outlined in the Issues and Options paper and assesses the three options for housing growth that are set out in Table 1 of the consultation document. These consist of low, medium and high growth scenarios. Each growth option is then assessed against fourteen SA Objectives, referenced SA1 to SA14. A colour coding system is then applied to score the effects of the various growth scenarios and development options. This approach is clear and easy to follow.
- Table 4.7 provides a summary of the effects on various grow Sustainability Appraisal objectives. We note from this Option 4 scores better than Option 3 on a number of criteria particularly SA8, SA10 and SA13. The reason for this appears to be that the assessment is based on assumption that Option 3 will not deliver sites of more than 1,500 homes. This is despite

Appendix A Consultation Comments

the Issues and Options proposing 4,267 homes for the 'Adjoining Leicester Urban Area' (Scraptoft, Bushby and Thurnby) under Option 3.

- The Issues and Options document acknowledges larger sites have a critical mass that enables delivery of strategic and local infrastructure, including schools, community and healthcare facilities, along with open space sustainable travel solutions. If the Sustainability Appraisal is based on Option 3, then the assessment has been carried out on the assumption of smaller sites (under 1,500 homes) that are potentially less effective in delivering key infrastructure to support sustainable growth. We therefore consider it necessary for an additional Growth Option to be considered (an Option 3a), which assumes that housing allocations are of a scale capable of delivering the required infrastructure, and for this to be assessed as an alternative when further Sustainability Appraisal is undertaken.
- The SA provides a comprehensive assessment of the Options proposed in the Issues and Options consultation document. However, we consider there are reasonable alternatives that require consideration. A high growth scenario to meet the proposals contained in the Leicester and Leicestershire Strategic Growth Plan, including options for new strategic road infrastructure as a possible alternative to the Leicester A46 'Expressway' bypass proposal. An assessment of Option 3 (Urban Area Focus) to include sites capable of accommodating more than 1,500 homes, allowing a critical mass to deliver strategic and local infrastructure.
 - The Issues and Options consultation was a high level consultation. The Local Plan at Proposed Submission Draft stage will include further detail in relation to the Leicester and Leicestershire Strategic Growth Plan. This will be reflected within the SA Report at Proposed Submission Draft stage.
 - Noted. As stated within the Issues and Options Consultation Document, Option 3 did not include sites accommodating more than 1,500 homes. As the options are high level, the appraisal did not consider the potential individual sites but did assume that no strategic sites would be delivered. Therefore, Option 4 scored more highly in relation to SA8, SA10 and SA13 as strategic sites will likely deliver associated infrastructure. However, Option 3 did score positively in relation to SA8, SA10 and SA13 due to the close proximity to Leicester.

- Further refined options have been subject to SA and the findings of their appraisal are set out within this SA report

Mrs Linda Moss

- The consultation period is short given the complexity of the subject. The language and tone of the document is geared towards “planning officers and professionals” rather than being an easily understandable user friendly document .The option to answer almost sixty questions is lengthy and laborious and seems geared to dissuade ordinary members of the public from responding at all. Most people would agree that there is a need to provide affordable, quality, sustainable housing that provides options and opportunities for all demographics and the ability to access services and employment opportunities in the local area.
- A Non-Technical Summary has been prepared alongside the SA of the Proposed Submission Draft Local Plan. The Non-Technical Summary provides a concise summary of the full SA Report, including a description of the SEA/SA process and the SA appraisal findings.

Joanna Harling

- This is a comment on the process rather than the report itself that this has not been easy to understand and read through the documentation and terminology for a layperson. The report would really benefit from a simple summary that can be understood by a wider audience and is more accessible and understandable. This could include using other medium for those who struggle to read lengthy documents, if the Council does want a diverse range of views through the consultation.
- A Non-Technical Summary has been prepared alongside the SA of the Proposed Submission Draft Local Plan. The Non-Technical Summary provides a concise summary of the full SA Report, including a description of the SEA/SA process and the SA appraisal findings.

Parker Strategic Land

- The Issues and Options document is supported by a SA, prepared by Land Use Consultants Limited. The purpose of the SA is to assess the sustainable development implications of the proposals presented in the Issues and Options consultation document, where the SA outputs will help the authority to identify sustainable development options. NPPF paragraph 32 identifies that local plans should be informed throughout their preparation by an SA which meets the relevant legal requirements, and which should demonstrate how the Plan has addressed relevant economic, social, and environmental objectives.
- To support the Issue and Options consultation the SA has considered different locational options. These include the 6 no. proposed spatial distribution options for the plan period which have been considered in the context of three different growth options, taking into account the Authority's Local Housing Need (LHN) through low, medium, and high growth options. The latter two growth options also address the provision of Leicester City's unmet housing needs.
- The quantum of the unmet need has in principle been agreed within the Leicester & Leicestershire Strategic Growth Plan 2023 - Statement of Common Ground (SoCG) Relating to Housing and Employment Land Needs (13th May 2022). The SoCG identified that Harborough will need to provide an average annual Leicester City unmet housing need contribution from 2020 to 2036 of 123 dwellings per annum. Harborough District Council formally agreed to sign the SoCG at its Full Council meeting held on the 18th December 2023. The low growth option, which does not address the Leicester City unmet need, should be discounted for this reason alone.
- The SA has used the SA Framework to evaluate how the different reasonable alternatives perform against objectives outlined in Chapter 5 of the SA.
- The significance of effects is assessed in accordance with Table 2.1 in the SA. The site assessments undertaken within Chapter 4 of the SA assess the three proposed growth options. It is acknowledged that these areas will

Appendix A Consultation Comments

evolve into more defined spatial areas through the plan-making process which will allow for more detailed assessments of the sites to take place. Parkers support the SA Framework which has evolved from the fourteen SA objectives and its associated decision-making criteria. It is considered that the objectives address all relevant subject areas which need to be covered within the new Harborough Local Plan.

- Chapter 5 of the SA provides a summary table showing the findings of specific residential site options within Harborough, including an assessment of the northern parcel of land forming Houghton East under Site ID 21/895. Within the initial appraisal findings of site 21/895 scored lower for the following SA objectives, minor negative effect likely for SA2 and significant negative effect likely/negligible effect likely for SA12. Technical evidence to support the proposed allocation at Houghton East (subject to live planning application references: 23/01499/OUT, 23/01810/OUT, and 24/00175/OUT) has already been prepared in the form of an Ecological Appraisal, Biodiversity Technical Note and a Flood Risk Assessment (FRA) which are provided within this submission as Appendix 3 and Appendix 4 respectively.
- With regards to biodiversity, the Ecological Report concludes that subject to defined mitigation measures and enhancements, then the proposed development can avoid significant ecological impacts and can demonstrate a minimum 10% biodiversity net gain onsite, which would provide an opportunity to have a positive impact and enhance biodiversity in alignment with SA2.
- With regards to flood risk the FRA produced for the development site confirms that the proposed development does not pose any increased flood risk to the Site itself or adjacent development and is not susceptible to flooding and is sited within Flood Zone 1. The proposed uses are classified as 'less vulnerable' (NPPF Annex 3: Flood Risk vulnerability classification), where the proposed uses are generally considered acceptable within Flood Zone 1. To mitigate the development impact on the current runoff regime, it is proposed to incorporate surface water attenuation and storage as part of the development utilizing sustainable drainage systems ("SuDS") which can be incorporated within the design.

Appendix A Consultation Comments

- Future mitigation measures and provisions can address the potential issues identified by the SA, yet have not been taken into consideration within its wider assessment. It is considered that the overall scoring and assessment within the SA should be updated to reflect this evidence and provide further clarity and consistency with respect to the overall assessment. It is important that the SA reflects the up-to-date information that is available such that decisions made are based upon the latest evidence available.
- At this stage in the plan-making process, the SA provides only a strategic overview of the assessed sites against the SA framework objectives. It is acknowledged that the SA will evolve further over time to provide a more detailed site assessment and draw further conclusions with regard to the most appropriate locations for future growth and development over the plan period. It is important that the SA has full regard for and reflects up-to-date evidence when undertaking those revisions. Failure to do so would undermine the credibility of the SA process. Full technical evidence supporting the viability and delivery of Parkers site is accessible at 23/01499/OUT – key documents which challenge the published SA objectives are attached to this submission for completeness.
 - Noted.
 - The site (21/8195) falls within an area at risk of groundwater flooding. In relation to biodiversity, the site is located approximately 29m from the Hungarton, Ingarsby Lane Pond Local Wildlife Site.
 - The initial scores through the site assessment work will be used as a starting point in undertaking a further detailed appraisal of the site if it is allocated within the Local Plan. Any mitigation contained within the site allocation policy will be taken into consideration during the appraisal of the site. This has the potential to reduce any negative effects identified within the initial site assessment work.

Paul Newman New Homes Ltd

- Caulmert on behalf of PNNH have undertaken their own analysis of Land off Manor Road' (Site ID 21/8219) against the SA objectives and the finding are presented below.
- SA1: The enclosed Call for Sites Layout (Drawing no. 1661-10) (Appendix 1) indicates where opportunities for enhancement could be located. At this stage it is not possible to provide accurate information regarding potential environmental impacts. Ranking 0.
- SA2: The site is not located within 250m of a Local Wildlife Site nor is it located within 1km of a SSSI (closest SSSI is Misterton Marshes located some 1.7km). In terms of the IRZ map prepared by Natural England, the site is not located within the relevant IRZ of the Misterton Marshes SSSI. Ranking 0.
- SA3: As per Natural England's Agricultural Land Classification Map East Midlands Region (ALC005), the area is identified as being Grade 3 agricultural land. The site does not fall within a Minerals Safeguarding Area. Ranking --?/ 0.
- SA4: The site is located within the Bitteswell Conservation Area, and approximately 30m from The Olde Royal Oak Public House (Grade II Listed - HER List Entry No. 1210158). Ranking --?.
- SA5: The site is not located within 100m of the AQMA. Ranking 0.
- SA6: The site is located within walking distance (720m) of areas of open space, and a footpath/cycle path. Ranking +.
- SA7: No assessment required. Ranking 0.
- SA8: The site is within 720m of the built-up area of Lutterworth. The site is within 600m St Marys C of E Primary School, and approximately 610m from Lutterworth College. Ranking +?.
- SA9: The site is proposed to deliver 13 dwellings including an element of tenure blind affordable housing to policy requirements. Ranking +.

Appendix A Consultation Comments

- SA10: The site is located within walking distance (600m) of public transport links (bus stops located to the northwest of the site along Ashby Lane) but not a Key or General employment area. Ranking +.
- SA11: No assessment required. Ranking 0.
- SA12: The site is, in its entirety, within Flood Zone 1 (0), and does not contain a water body or watercourse or does it fall within a Source Protection Zone. Ranking 0.
- SA13: The site is located within 450m of a bus stop (bus stops located to the northwest of the site along Ashby Lane. Ranking +.
- SA14: The small site (less than 500 dwellings) is greenfield land within the countryside. Ranking --?.
 - Justification is provided below in relation to the appraisal of Land off Manor Road (Site ID 21/8219) where different effects are proposed:
SA2: The site is located within 250m of the Bitteswell Brook and hedge to west of Lutterworth LWS.
 - All other scoring aligns with how the site option was assessed in Chapter 6 of the SA Report.

Richborough

- It is considered that the Issues and Options SA covers a wide array of options which are appropriate to be considered at this stage of the Local Plan process. The SA helps to understand the social, economic and environmental baseline for the plan area and the distribution of growth across the District. It helps to guide development and assess the impacts upon sustainability.
- We consider, the stages which define the SA to be robust in nature and ensure that the fundamental areas in relation to the plan making process have been considered. For the purpose of this set of representations the Housing Options have been the focus due to the nature of our client's site at Dunton Bassett.

Appendix A Consultation Comments

- The approach to define housing growth across the District as per the SA, was through use of The Leicester and Leicestershire Housing and Economic Needs Assessment (HENA) (2022) and The Leicester and Leicestershire HENA Housing Distribution Paper (Housing Distribution Paper) (2022).
- As per the HENA, Harborough has been recognised as having the highest house prices within the Housing Market Area (HMA), which is 30% above the average. In addition, the Housing Distribution Paper defines the Standard Method used for calculating the District's Local Housing Need (LHN) as well as the additional dwellings per annum (dpa) required to accommodate Leicester City's unmet need. This paper also considers the functional and commuter relationships between the surrounding authorities and Leicester City, with Harborough scoring 4th highest overall.
- The HENA and Housing Distribution Paper were then used to define six broad distribution and growth options within the SA.
- Of these options the SA assessed that Option 3 and secondly Option 4 scored most highly in terms of the positive impact for the District. Although these score highly these options do not allow for a proportionate amount/spread of growth across the District which in turn limits the delivery of other key SA objectives.
- Although these Options ranked highly against the SA criteria, we consider that there are a number of advantages to delivering housing under Options 1 and 2 and that the scoring weight could have been applied higher to the housing category for this option. The conclusions reached in relation to these options are further discussed in relation to Question 11 and 12 below.
- Each of these Distribution Options were then considered against varying levels of growth, that being low, medium and high.
- In respect of the three levels of growth for assessing the SA against the housing distribution options we consider the 'High' growth option should be used. This option factors in the increase in the amount of housing required by using the Standard Method and the uplift in housing needed in relation to Leicester City's unmet need, as well as allowing for an adequate buffer. The low growth option does not allow for a higher enough provision to

meet the required housing target and therefore the plan would not be found sound if this was brought forward. The medium option would meet HDC's LHN and contribute towards meeting Leicester's unmet need, however there would not potentially be sufficient homes delivered to ensure sufficient choice in the market and boost the delivery of housing..

- Noted.

Stantec UK Ltd

- In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to SA. For these documents it is also necessary to conduct an environmental assessment in accordance with the requirements of the SEA Directive (European Directive 2001/42/EC), as transposed into law in England by the SEA Regulations and which remains in force despite the UK exiting the European Union in January 2020.
- It is understood that this report is the first stage of the SA and will be updated at each stage as the Local Plan progresses. SA paragraph 8.2 states that "At the next stage of the SA, detailed policies and site allocations will be subject to appraisal and consideration will be given to the likely cumulative effects on the SA objectives and on particular geographical areas within Harborough".
- Ahead of the next stage of the Local Plan process, it is important that the cumulative effects are fully considered and thoroughly tested through the SA process to ensure that proposals support balanced growth and do not individually or cumulatively lead to harmful impacts. IM Land reserves the right comment on the outputs of the SA that accompany subsequent versions of the Plan, once the preferred growth options and site allocations have been considered.
- At this stage of the Local Plan process, the SA has taken a broad brush approach to the appraisal of options at this Issues and Options Stage where six different options have been considered. It is recognised that all six spatial options will involve the take up of significant areas of greenfield land on the outskirts of the main settlements in Harborough District. It is

Appendix A Consultation Comments

noted that “all growth options represent a significant level of housing development. Therefore, the delivery of housing would be likely to result in the loss of greenfield land to new development”. IM Land support this recognition that housing delivery is likely to be on greenfield land. However, we disagree with the conclusion that Option 4 is the most sustainable option. The main focus of development in this option would be strategic sites only, however this accounts for no new development in other tiers of the settlement hierarchy. This has scored the highest on an assessment of sustainability, however this is largely due to the fact these are new settlements with all services, facilities, open space etc will be provided for as part of development, reducing reliance on private vehicles. The SA needs to take a holistic view and look at the growth options in comparison, considering mitigation and wider benefits. A reliance on strategic sites only could result in delays or uncertainty about how much development is deliverable within the plan period. It does not support the vitality and viability of existing settlements, not does it meet their localized housing needs. IM Land consider that the Council will need to take a combined approach with the growth options.

- Chapter 5 of the SA summarises the SA findings for the reasonable alternative site options that are being considered for allocation in the Harborough Local Plan. A total of 169 residential sites, 33 mixed use sites, 12 employment site options and two renewable energy generation site options have been appraised. The likely effects of each site option are presented in Table 5.1 of the SA.
- IM Land wishes to raise that the likely effects have been assessed on a collective basis as opposed to an individual site basis, so it is difficult to comment on this early stage of the process. Notwithstanding, ‘Land off Frolesworth Road’ (Site ID 21/8154) is the Site that is subject of these representations.
- IM Land support SA9 being scored as a significant positive effect (++). As set out in the Vision Document, the development will deliver up to approximately 400 high-quality new homes of a range of types, tenures and sizes to suit local needs and expand the existing residential community. This will include a fully policy compliant level affordable homes

Appendix A Consultation Comments

to meet the local requirement which will be of an equal design quality to the market dwellings.

- SA2: paragraph 4.85 states that “development proposed through all the growth options will likely result in the development of greenfield land which could negatively impact local biodiversity and geodiversity”. The Site is considered to have a likely ‘minor negative effect’; however, this is considered a blanket approach to biodiversity which does not consider any potential mitigation and biodiversity net gain to be provided as part of the proposed scheme. In accordance with the Environment Act 2021, Developers must now deliver a BNG of 10%. This means a development will result in more or better-quality natural habitat than there was before development. For this reason, we consider that the score should be ‘negligible’. Future planning applications would be supported by relevant technical evidence to address this requirement.
- SA3: paragraph 5.10 states that the majority of land in Harborough is Grade 3 agricultural land, with smaller areas of both Grade 2 and Grade 4 land. From review of Natural England’s Agricultural Land Classification Map East Midlands Region (ALC005), our Site is classified as Grade 3 (Good to Moderate).
- Paragraph 5.11 states that due to the rural nature of Harborough District, 163 residential site options are expected to have significant negative effects on this SA objective as they are greenfield land and contain a significant proportion ($\geq 25\%$) of Grade 1, 2 and/or 3 agricultural land. As such, rather than reviewing the Sites as a collective impact, it would be prudent to assess each site option individually in comparison with other sites to assess the level of effect. There is a recognised local housing need in the District (plus an additional requirement towards Leicester’s unmet housing need). As such, it will not be possible to avoid building on agricultural land if this level of housing need is to be met. This is recognised by the Council at paragraph 5.13 who conclude that “given the nature of Harborough and the lack of brownfield site options, significant effects on this objective may be unable to be avoided”. Indeed, the Settlement Hierarchy Paper (December 2023) specifically notes that brownfield land opportunities in Broughton Astley are very limited. For this reason, the score should be changed from ‘significant negative effect

Appendix A Consultation Comments

likely/negligible (-?/0)' to 'minor negative effect likely/negligible (-?/0) in the next stage of the SA.

- SA4: paragraph 5.14 states that “all of the residential, mixed use, employment and renewable energy generation site options are expected to have negative effects on SA objective 4 (minor or significant) due to being within at least 1km of a heritage asset”. SA para 5.16 notes that “the potential negative effects on this SA objective are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development and nearby assets”.
- The Site is not the subject of any statutory heritage designations. There are a number of listed buildings with Broughton Astley to the north east of the Site however these are sufficiently detached from the Site that they will not be impacted by development. The nearest designated heritage asset is located approximately 260 metres to the east of the Site (Church of St Mary, Grade II* Listed Building); however, this is already separated by residential dwellings.
- As detailed in the Vision Document, there are no recorded archaeological assets or features on the Site however there is evidence of potential ridge and furrow both on the site and in the surrounding fields. This is not a constraint to development and there are examples of this locally. Additionally, the site is located to the south west of the historic medieval core of Primethorpe and as such there is potential that the Site could contain further unidentified medieval agricultural features. Any features would be assessed fully at a future planning application stage through an agreed programme of archaeological assessments. There are isolated historic features in proximity to the site but no designated archaeological assets nearby with the closest scheduled monument over 3km to the south west. As per normal application procedure, investigation and mitigation can ensure any heritage assets are suitably incorporated into a sensitive design. Overall, there are no constraints on the Site from a heritage perspective which cannot be mitigated against and overcome as part of the proposals. The SA recognises that this will depend on the design of the development. For this reason, we do not consider that SA4 should be

Appendix A Consultation Comments

scored as a potential 'minor negative effect likely' and instead this should be reassessed as 'negligible' in the next stage of the SA.

- SA12: paragraph 5.39 confirms that the majority of Harborough District falls within Flood Zone 1. There are some areas of Flood Zone 2 and 3 which are mainly associated with the watercourses in the District. The Government's Flood Map for Planning indicates the Site largely falls entirely in Flood Zone 1 Low Probability (land having a less than 1 in 1,000 annual probability of flooding from rivers and sea) with a low surface water risk noted in part of the Site. This has been considered in the design and all ditches will be retained as part of the development proposals. Indeed, surface water will be accommodated within attenuation basins and swale systems provided across the development area utilising sustainable drainage principles. This will provide amenity and biodiversity improvements as well as mitigate against any pollution risk from development generated surface water entering the existing water course systems. No other sources of flood risk are identified at the Site. As such, we consider that the next SA should change the scoring from a potential 'significant negative effect likely' to a 'negligible' effect. The Site is therefore considered to be suitable for residential development from a flood risk perspective.
- SA14: paragraph 5.44 states that "the likely effects of the options on the landscape have been assessed based on whether the site options fall within the countryside and are on greenfield land". Given our Site is on greenfield land in the countryside, we agree that there will be an effect on the landscape, by virtue of change. However, change does not automatically amount to a negative impact and the development will be designed to minimize impacts on the surrounding landscape. As set out in the Vision Document, as part of the proposals, the existing landscape and hedgerows on Site will be retained wherever possible to inform new public open space and green corridors. Additionally new landscaping will be introduced to enhance public open space and create new landscaped buffers along key site boundaries. The development will create approximately 23.8ha of new high quality public open space, over half of the site, enhanced by new and retained landscaping. Additionally new landscaping will be introduced to create and enhance landscaped buffers along key site boundaries. A new attenuation pond will also be created,

Appendix A Consultation Comments

providing a new recreational feature at the edge of the village. In our view, the Site is not particularly sensitive in landscape terms and further evidence can be provided to demonstrate this. As such, on the basis of the work completed so far IM Land consider that the score in the next SA should be a changed from a potential 'significant' to 'minor' negative effect likely.

- An assessment of the cumulative effects is contained within Chapter 8 of this SA Report.
- As part of a SA, site options are appraised against the SEA topics to considers the most sustainable options. The summary of the growth and spatial options is provided within Chapter 5 of this SA Report. The pros and cons of each spatial option was provided within the Issues and Options Consultation Document and reflected in the SA. The potential issues with strategic sites was identified during the appraisal of Option 4. Option 4 was scored negatively in relation to SA9 due to the limited spread of growth and long lead in times for strategic sites through this Option.
- If the site at Land off Frolesworth Road is allocated through a policy in the Local Plan, any mitigation within the policy will be taken into consideration during the appraisal of the policy. This could reduce the number of negative effects and the significance of he negative effects scored against each of the SA objectives for the site. In addition to the site being located on greenfield land, the site is also within 250m of Mill Farm Hedge Local Wildlife Site. In relation to SA3, the significant negative effect still stands as development on Grade 3 agricultural land will result in the loss of good quality soils even if this is inevitable given that Harborough is a rural District. Based on the available evidence base at the time of undertaking the site assessment work, a distance based approach was used for the appraisal of site options against SA4. For SA12, the site option falls within an area at risk of groundwater flooding. Parts of the southern eastern portion of the site is at risk of surface water flooding (1 in 30 year event and 1 in 100 year event). As detailed above, any mitigation proposed through a site allocation policy will be taken into consideration if the site is allocated within the Local Plan.

Stoughton Parish Council

- Generally support this.
 - Noted.

Swinford Parish Council

- It's difficult for anybody to comment on a 356-page document. The content is over whelming and to expect residents to respond to this consultation would be confusing and unfair. We would agree with most of the findings however we believe that some comments in the approach are not appropriate or correct. The suggestion that 'made' Neighbourhood Plans are currently considered is concerning given the level of development that has taken place in settlements with 'made' Neighbourhood Plans that have exceeded the Neighbourhood Plan and Local Plan figures. We would strongly urge that 'made' Neighbourhood Plans are given more weight in the new Local Plan.
 - Noted. A Non-Technical Summary has been prepared alongside the SA of the Proposed Submission Draft Local Plan. The Non-Technical Summary provides a concise summary of the full SA Report, including a description of the SEA/SA process and the SA findings.

Thurnby and Bushby Parish Council

- The issues are District wide. Thurnby & Bushby PC feels that its remit is limited to issues directly related to the Parish.
 - Noted.

Ullesthorpe Parish Council

- It's difficult for anybody to comment on a 356-page document. The content is over whelming and to expect residents to respond to this consultation

would be confusing and unfair. We would agree with most of the findings however we believe that some comments in the approach are not appropriate or correct. The suggestion that 'made' Neighbourhood Plans are currently considered is concerning given the level of development that has taken place in settlements with 'made' Neighbourhood Plans that have exceeded the Neighbourhood Plan and Local Plan figures. We would strongly urge that 'made' Neighbourhood Plans are given more weight in the new Local Plan.

- Noted. A Non-Technical Summary has been prepared alongside the SA of the Proposed Submission Draft Local Plan. The Non-Technical Summary provides a concise summary of the full SA Report, including a description of the SEA/SA process and the SA findings.

Vistry Group

- The approach to the Issues and Options SA is generally supported.
- The site assessment considers our client's site, Land at Witham Villa, Broughton Road, Broughton Astley (21/8220) and it is shown to be the best performing option in Broughton Astley across the range of sustainability criteria. The site is identified as likely to have significant positive effects on SA6, 8 and 10. It is identified as likely to have minor positive effects on SA9. This strong performance in the SA reflects the accessibility of this site to everything residents need on a day to day basis including employment and a range of services and facilities. The site is only identified to have three significant negative effects, one is applied to almost all sites as they would require the development of agricultural land (SA3). The other two are identified to be the case for all sites in Broughton Astley and relate to flood risk and landscape.
- The potential significant negative effects on flood risk can be addressed by avoiding development of the area at risk of flooding and through use of sustainable drainage systems. ADC Infrastructure Limited have already been commissioned by Vistry Group to provide flood risk and drainage advice for this site and have concluded that the site is not at any direct flood risk from flooding associated with fluvial, sewer or groundwater

Appendix A Consultation Comments

sources. In relation to the surface water flow paths that follow natural gradient of the site down to the south-west, it is concluded that these can be mitigated by an appropriate surface water strategy and through general design considerations. The ADC report sets out a strategy to achieve this and calculates the anticipated discharge rates and attenuation volumes and this has informed the design of a basin sited in the southwest corner of the masterplan. ADC conclude that the development can proceed without being at any significant flood risk and without increasing flood risk elsewhere. The current significant negative effects identified are therefore challenged based on this evidence which we would be happy to share.

- It is the case the significant negative effects on landscape will be mitigated through appropriate design, but this score for our client's site at Witham Villa is not understood as the summary states that any options that contain fewer than 500 dwellings in the countryside on greenfield land, which would include our client's site, are likely to have minor negative effects not significant ones. This score is therefore challenged.
- The site Land at Witham Villa, Broughton Astley falls within an area at risk of groundwater flooding and areas to the eastern part of the site are at risk of surface water flooding (1 in 30 year event and 1 in 100 year event). If the site is allocated through a site allocation policy within the Local Plan, any mitigation proposed through the policy and any details of site design will be taken into consideration when appraising the site. this could remove any negative effects or reduce their significance depending on design.
- As detailed above, any mitigation proposed through a site allocation policy will be taken into consideration if the site is allocated within the Local Plan.

WSP

- William Davis Homes broadly agree with the approach of the SA but believe the summary of the assessment of site options does not highlight the overall positive conclusion for their site at Land off Leicester Road, Lutterworth (ref: 21/8167). The SA highlights that the site performs

Appendix A Consultation Comments

positively against SA6, 8, 9, 10 and 13. This reflects the site's sustainable location, with good access to services, facilities and education, near key employment sites, and with modes of sustainable transport. Furthermore, the site would help contribute towards delivering a supply of affordable, sustainable and good quality housing. Residential sites were not assessed against SA1, 7 and 11. Whilst the site did not perform positively against other objectives, the SA recognises that potential negative effects are uncertain at this stage, and will be dependent on factors such as development design. For example, against SA4 on the historic environment, lines of sight between sites and nearby heritage assets haven't been assessed at this stage, yet the SA concludes there may be a negative impact as a result of developing the site. This cannot be concluded at this stage, and should not reflect negatively upon sites being assessed.

- Further, with regard to SA2, there is the clear ability to minimise the impact of the site on biodiversity and ensure enhancements through the protection and enhancement of the area of separation. The objective recognises that often impacts can be mitigated and therefore further consideration is required here when it comes to detailed design.
- Finally, when considering the impact on the landscape, while it is recognised that there will be an impact on landscape due to the greenfield nature of the site, the SA recognises (SA15) that the District lacks an ability to provide housing on brownfield sites (due to lack of availability). Greenfield land is therefore required for housing and the landscape should therefore be considered in the context of the site. The fact it adjoins the existing built form of Lutterworth means that it will have a reduced impact on the landscape and will form a logical extension of the existing built form, reducing the landscape impact compared to an isolated site in the countryside. Overall, the findings of the assessment of site options should be stated more clearly, instead of providing a brief summary of some of the best and worst performing sites. At present, the document does not reflect the potential positive contribution of some sites, such as of site 21/8167 towards health and wellbeing, and affordable, sustainable, and good quality housing, nor its sustainable location.

Appendix A Consultation Comments

- Having regard of the above we recommend that the SA is updated once all relevant assessments have been undertaken so that a complete assessment of all sites can be presented, reviewed and consulted on. This is required to ensure that the Plan is justified and based on appropriate evidence (NPPF Para 35). A sound assessment of the sites cannot currently be made owing to the lack of evidence on several key matters.
- The site assessment work takes into consideration the contribution that the residential site option would make towards delivering housing and the distance of the site to services and facilities including open space. The appraisal of the site options is a high level appraisal and the affordable housing split is not known at that stage. Where a site is located close to services and facilities, the site will perform positively against the relevant SA objective.

William Davis Ltd & Hallam Land Management Ltd

- The approach to the SA is generally supported although certain matters and findings for site reference 21/8122 (hereinafter referred to as 'the site') are discussed in more detail below. The SA assesses 10 no. residential sites and 8no. mixed use sites adjoining and near to the settlement of Market Harborough. There are only 2no. residential sites and 4no. mixed use sites providing over 500 dwellings, including Market Harborough north, east of Harborough Road (site reference 21/8122), and all are recorded as having significant positive effects against SA Objective 9.
- SA2, SA3, SA4, SA12 & SA14: The site is only identified to have potentially five significant negative effects, four (SA2, 3, 12 and 14) are applied to all mixed-use sites and the other significant negative effect relating to site 21/8122 is in relation to SA Objective 4 due to the proximity to the Grand Union Canal and a Grade II listed building.
- The scale of large sites like Market Harborough north, east of Harborough Road make proximity to designated sites and areas much more likely but means there is the space available to dedicate land to protecting and

Appendix A Consultation Comments

enhancing biodiversity or protecting the local historic environment or reducing landscape impacts. As shown by the concept masterplan, significant buffers have been provided to Grand Union Canal and nearby listed building. It is acknowledged that the SA will evolve further over time to provide a more detailed site assessment and draw further conclusions with regard to the most appropriate locations for future growth and development over the plan period. However, it should be noted that the potential significant effects on ecology, agricultural land, heritage, flood risk and water quality, and landscape can be addressed by robust master-planning and use of design/technical solutions, for example, sustainable drainage systems.

- The significant negative effects of sites in relation to flood risk identified in the SA relate primarily to the presence of surface water flooding. Whilst the need to take account of surface water is understood, it is important to consider the judgement on R (Substation Action Save East Suffolk v Secretary of State (Court of Appeal, 17 January 2024), in which the Court determined that the sequential test in relation to flood risk does not apply to the risk of flooding from surface water.
- SA8: The site is evaluated as having a minor negative effect against proximity to larger towns and villages in respect of services and facilities. However, the SA needs to take account of the potential for new services and facilities to be delivered as part of the site and any services and facilities that are within close proximity to the site, for example, at Airfield Farm (North West Market Harborough SDA). These facilities and services would be the equivalent of homes being located close to a settlement such as Kibworth or Broughton Astley, which score a negligible or minor positive effects, respectively, against this objective.
- SA10: The SA findings score the site as having a minor positive effect but this is uncertain.
- The site is adjacent to Airfield Business Park, which is identified as a Key Employment Area within the current adopted Local Plan. Policies BE1 and MH5 seek to extend Airfield Business Park with additional employment land of approximately 6 hectares for a mixture of uses including office B1(a) and (b), industrial B1(c) (now Class E), B2, and B8. An application within the Policy MH5 allocation for 3no. buildings for

Appendix A Consultation Comments

7,464m² (GIA) of B1a/B2/B8 has been approved by Leicestershire County Council (ref: 2018/Reg3Ma/0016/LCC) and has been constructed. In addition, a full application for the remainder of the Policy MH5 allocation is currently being determined under reference 2024/Reg3Ma/0015/LCC, which includes the construction of 5 no. new E(b)/E(g)(iii) / B2 / B8 use class buildings with ancillary office. 2 no of the new buildings will be drive thru units. To the north of Airfield Business Park, further employment land (approximately 13 hectares) is allocated under Policy MH4: Land at Airfield Farm. An outline application under reference 21/00545/OUT has been approved on Land at Airfield Farm for the demolition of all existing farm buildings and construction of a Business Park comprising up to 35,001 sqm Class E (g)(iii)/B2/B8 floorspace, up to 5,992 sqm Class E (g)(i) and 250 sqm mixed Class E(a/b), means of access from Harborough Road, service yards, lorry parking, car parking, plant areas, strategic landscaping and associated service infrastructure.

- There is also a bus stop outside Airfield Business Park with regular bus services (X3, X7, 44) to Market Harborough, Leicester and Northampton. Both the bus stop and Key Employment Area are within walking and cycling distance of the majority of the site as shown by the Sustainable Connectivity Plan. The site could provide small-scale employment as part of the proposals if there is a need and therefore the findings associated with SA10 need to be updated to show significant positive effects.
- Accordingly, the findings associated with SA8 and SA10 for site 21/8122 should be updated.
 - If the site is allocated through a policy within the Local Plan, any mitigation contained within the policy will be taken into consideration within the appraisal of the site against the SA objectives.
 - In relation to the assessment of the site against SA8, it is not possible to take into consideration any services and facilities that may be delivered through North West Market Harborough SDA as there is not guarantee that these services and facilities will be delivered and there could be additional external impacts that may effect the delivery of services and facilities. If the site is allocated then any further details on the delivery of infrastructure within the policy will be considered within the appraisal.

Appendix A Consultation Comments

- The site under site reference 21/8122 was appraised as a mixed use site option under SA10. Therefore, the following site assessment criteria was used:
- “All of the mixed use site options are expected to have positive effects on the element of this objective relating to the growth of the Harborough’s economy, as it is assumed that all mixed use site options will incorporate some element of employment generating uses. Therefore, a minor positive (+?) effect is therefore recorded for mixed use site options. However the positive effect will be uncertain depending on how much of the site is used for residential development as opposed to other uses.

Mr Stewart Robbins

- Seems appropriate and reasonable. No additional comments.
- Noted.

Ms Lucy Tankard

- I do not have the time to wade through a 356 page document to be able to answer this question. In the interests of resident participation a summary document should be made available.
- A Non-Technical Summary has been prepared alongside the SA of the Proposed Submission Draft Local Plan. The Non-Technical Summary provides a concise summary of the full SA Report, including a description of the SEA/SA process and the SA findings.

Ms Judy Burrage

- Using this as the basis for the Local Plan is a good idea, as long as you stick to it!
- Noted.

Mr John Fannon

- A very thorough assessment and I agree with most of the findings.
 - Noted.

Adam Holmes

- The document is far from accessible to the layman, and could use an executive summary of the findings.
 - A Non-Technical Summary has been prepared alongside the SA of the Proposed Submission Draft Local Plan. The Non-Technical Summary provides a concise summary of the full SA Report, including a description of the SEA/SA process and the SA findings.

Mrs Judith Kockelbergh

- Social and economic factors important to promote growth and quality of life.
 - Noted.

Mr Dennis Taylor

- The SA Report is overly complicated and too time consuming for the vast majority of the working Harborough population to take on board. The approach should be taken out of the hands of the District Council and given instead to the local and parish councils. It should not be the councils prerogative to predetermine the Proposed Settlement Hierarchy - that should be the undertaking of the populace by way of the consultation process.
 - A Non-Technical Summary has been prepared alongside the SA of the Proposed Submission Draft Local Plan. The Non-Technical Summary

provides a concise summary of the full SA Report, including a description of the SEA/SA process and the SA findings.

Mr Don Munro

- Whilst recognising the amount of work required I do find the documents to be overly complex for members of the public to fully take in and respond to. A summary is needed. Therefore I OBJECT to the document.
- A Non-Technical Summary has been prepared alongside the SA of the Proposed Submission Draft Local Plan. The Non-Technical Summary provides a concise summary of the full SA Report, including a description of the SEA/SA process and the SA findings.

Mr David Campbell-Kelly

- Yes, we have comments around the findings relating to Option 4 Strategic Sites. We do not agree that there is a “minor positive” for Climatic Factors. The location of major development away from proven sustainable locations will lead to unsustainable travel which will in turn lead to additional climatic pressures and cannot be considered to be positive in any way.
- The impact on Biodiversity and Geodiversity cannot be only “mixed minor” for Option 4. Large scale greenfield development will have a significant negative impact on both and exacerbated by the loss of agricultural land. This has to be significant negative.
- “Mixed significant” for Services and Facilities for Option 4 is only possible if those facilities are actually delivered and at the right time. If Option 4 is to be considered, the assessment of the impact of development on existing “Services and Facilities” has to be wide ranging and thorough and additional provision associated with that development provided in an holistic manner, at an early date.
- We have serious concerns that “Significant positive” for Sustainable travel for Option 4 is correct. If it is to be positive at all, then that travel facility

Appendix A Consultation Comments

has to be delivered at the development's outset and in a way to be more attractive than the car alternative. We believe that the public will continue to choose to use their own private cars no matter what, in any event.

- There is much reference in the Issues and Options document to Strategic Sites being located to the South and East of Leicester. This is as identified in The County wide Strategic Growth Plan. There has been no public consultation or interrogation on this Spatial Strategy. In our opinion this cannot provide the most sustainable location for major development even with significant additional infrastructure. Therefore, its sustainability and deliverability have to be questioned. We reject the Strategic Sites option and set out the case for a focus on Options 3 and 5.
- WWRA has been, for a number of years, highlighting an Alternative County wide Growth Strategy to the west of the City, as a Sustainable Urban Extension to New Lubbesthorpe. This has never been commented upon, nor, as far as we know, been tested by any Authority in the County.
- With regard to results of specific sites contained in the SA, it is recorded that Whetstone Pastures Garden Village (21/8217) as having five Negative effects (SA2,3,4,12,14) and yet, for some reason, it is not listed as such a site in the narrative in paragraph 5.47 of the SA, which surely is an error. There is an argument that SA5 and SA7 could be added to the list of negative assessments, making Whetstone Pastures Garden Village's appropriateness even more questionable.
 - Option 4 proposes growth to the south and east of Leicester where there is a good availability of sustainable transport links, services and facilities and employment opportunities. This could reduce the reliance on private cars and therefore minimise associated greenhouse gas emissions. Therefore, Option 4 was found to have minor positive effects.
 - In relation to SA2, all growth options could result in a significant negative effect. However, the development of strategic sites through Option 4 could lead to the delivery of BNG and other environmental enhancements that could have a positive effect on wildlife and biodiversity.

Appendix A Consultation Comments

- The options appraisal is high level and at this point it is not possible to consider the timing of the delivery of services and facilities through SA8.
- The assessment under SA13 considers the availability of sustainable transport options within the south and east of Leicester. The SA is not able to take into consideration personal preferences in relation to how people choose to travel and can only consider the distance and availability of public transport links.
- There were a large number of residential, mixed use and employment site options which scored significant negative effect across five or more SA objectives. The summary has only included the residential site options. However, the summary has been updated to include the residential, mixed use and employment site options.

Mr Steven Hare

- I agree it is necessary to review and update a local plan based on the needs and expectations of local government.
 - Noted.

Mr David Tull

- Appropriate
 - Noted.

Mr Jonathan Ward-Langman

- The Appraisal Report is inadequate because it:
 - ignores the option of reducing/ceasing growth.
 - assumes that infrastructure (transport, water/drainage, healthcare) will keep pace with growth. The evidence of the last twenty years is that it

does not and the result has been increased traffic congestion, over-stretched healthcare provision adversely affecting health and well-being, and degradation of the environment.

- does not consider the effects of the new prison development at Gartree which will have a massive impact on the District and should be considered at the very least as context.
- The option of ceasing growth is not reasonable and so is not appraised in the SA. A low option is considered which covers limited growth. The option of reducing growth is not possible. The option to cease growth would not be considered a reasonable option and therefore is not considered appropriate to appraise. The option to cease growth would result in Harborough District not meeting its housing and employment need over the plan period.
- The SA has now appraised any policies within the Proposed Submission Draft Local Plan which includes policies relating to infrastructure requirements. Any site taken forward could form a site allocation policy which may include requirements for required infrastructure to support the site. Where a policy could result in significant negative effects, appropriate mitigation to be included within the policy is suggested.
- HMP Gartree received outline planning consent in November 2023. Therefore, this site has not been appraised through the SA as the development as already received permission.

Mr Roger Kimberley

A.4 The approach is elitist, complex, jargon ridden it was not initially clear it was about the approach not the actual appraisal. Needs a lot of background information, not easy to access or use, needs presenting rather than the public wall board approach, if not computer literate hard to comment, appears to be a done deal looking for a rubber stamp, very hard to edit once moved from question and no instructions on how to complete and appears impossible to print and retain a copy of submission

Appendix A Consultation Comments

- A Non-Technical Summary has been prepared alongside the SA of the Proposed Submission Draft Local Plan. The Non-Technical Summary provides a concise summary of the full SA Report, including a description of the SEA/SA process and the SA findings.

Mrs Sam Holmes

- Less a comment on the report itself, rather a comment on the process that this has not been easy to understand and navigate the documentation and terminology for a layperson. The report would really benefit from a simple summary that can be understood by a wider audience and is more accessible and understandable. This could include using other medium for those who struggle to read lengthy documents, if the Council does want a diverse range of views through the consultation.
- A Non-Technical Summary has been prepared alongside the SA of the Proposed Submission Draft Local Plan. The Non-Technical Summary provides a concise summary of the full SA Report, including a description of the SEA/SA process and the SA findings.

Mr Roy Saint

- It is difficult to express a simple support or object to a 350 page document.
- A Non-Technical Summary has been prepared alongside the SA of the Proposed Submission Draft Local Plan. The Non-Technical Summary provides a concise summary of the full SA Report, including a description of the SEA/SA process and the SA findings.

Tim Claydon

- Having read the consultation document and the Sustainability Appraisal Report, it is encouraging to see that sustainability outcomes have been made central to the planning process. However, the evaluation of the different options outlined in the Consultation Document and the SA Report

reveals that judging the effects of development on sustainability objectives involves considerable uncertainty and the decisions that are taken will depend on how different outcomes are prioritised. Nevertheless, the evaluation of options concerning the spatial distribution of housing development makes it clear that Option 4 performs best across the broadest range of criteria and especially across those with which we are most concerned. We note that the long-term nature of this option may mean that additional housing need is not met in the short and medium term. Nevertheless, the longer-term gains associated with Option 4 seem to us to outweigh any short-term disadvantages. Developing new, consciously designed settlements is in line with the Leicester and Leicestershire Strategic Growth Plan and allows for a more considered approach to the design of housing developments in line with the Design Code and Guidance. This will create more sustainable communities and contribute more effectively to net zero objectives. It will also permit a more proactive and strategic approach to the protection and enhancement of biodiversity, as noted in the SA Report. As such it is the approach that is most consistent with HDC's commitment to Leicestershire County Council's Climate and Nature Pact, to which it is a signatory.

- Noted.

Charlotte Cook

- It is understood that this report is the first stage of the SA and will be updated at each stage as the Local Plan progresses. SA paragraph 8.2 states that "At the next stage of the SA, detailed policies and site allocations will be subject to appraisal and consideration will be given to the likely cumulative effects on the SA objectives and on particular geographical areas within Harborough". Ahead of the next stage of the Local Plan process, it is important that the cumulative effects are fully considered and thoroughly tested through the SA process to ensure that proposals support balanced growth and do not individually or cumulatively lead to harmful impacts. The Crane Estate reserves the right comment on the outputs of the Sustainability Appraisal that accompany subsequent

Appendix A Consultation Comments

versions of the Plan, once the preferred growth options and site allocations have been considered.

- At this stage of the Local Plan process, the SA has taken a broad brush approach to the appraisal of options at this Issues and Options Stage where six different options have been considered. It is recognised that all six spatial options will involve the take up of significant areas of greenfield land on the outskirts of the main settlements in Harborough District. It is noted Land South of Dunton Road, Broughton Astley 333100822/A3/CC/BDC 7 that “all growth options represent a significant level of housing development. Therefore, the delivery of housing would be likely to result in the loss of greenfield land to new development”.
- The Crane Estate support this recognition that housing delivery is likely to be on greenfield land. However, we disagree with the conclusion that Growth Option 4 is the most sustainable option. The main focus of development in this option would be strategic sites only, however this accounts for no new development in other tiers of the settlement hierarchy. This has scored the highest on an assessment of sustainability, however this is largely due to the fact these are new settlements with all services, facilities, open space etc will be provided for as part of development, reducing reliance on private vehicle’s. The SA needs to take a holistic view and look at the growth options in comparison, considering mitigation and wider benefits. A reliance on strategic sites only could result in delays or uncertainty about how much development is deliverable within the plan period. It also does not support the vitality and viability of existing settlements, nor does it meet their localised housing needs.
- We consider that the Council will need to take a combined approach with the growth options. Chapter 5 of the SA summarises the SA findings for the reasonable alternative site options that are being considered for allocation in the Harborough Local Plan. A total of 169 residential sites, 33 mixed use sites, 12 employment site options and two renewable energy generation site options have been appraised. The likely effects of each site option are presented in Table 5.1 of the SA for residential sites.
- The Crane Estate wishes to raise that the likely effects have been assessed on a collective basis as opposed to an individual site basis, so it is difficult to comment on this early stage of the process. Notwithstanding,

Appendix A Consultation Comments

'Land South of Dunton Road' (Site ID 21/8223) is the Site that is subject of these representations. For this Site we note the SA concludes the following:

- We support SA9 being scored as a minor positive effect (+). However, we would like further clarification on why this was not scored as a significant positive effect (++). As set out in the Vision Document, the development will provide sustainable housing development of up to 280 new homes, including a policy compliant level of affordable housing that meet the needs of local residents as well as helping to sustain and grow the services and facilities with a key sustainable settlement within the District, namely Broughton Astley
- SA2: paragraph 4.85 states that “development proposed through all the growth options will likely result in the development of greenfield land which could negatively impact local biodiversity and geodiversity”. The Site is considered to have a likely ‘minor negative effect’; however, this is considered a blanket approach to biodiversity which does not consider any potential mitigation and biodiversity net gain to be provided as part of the proposed scheme. In accordance with the Environment Act 2021, Developers must now deliver a BNG of 10%. This means a development will result in more or better-quality natural habitat than there was before development. The Site can deliver a minimum of 10% BNG. For this reason, we consider that the score should be ‘minor positive effect likely’. Future planning applications would be supported by relevant technical evidence to address this requirement.
- SA3: paragraph 5.10 states that the majority of land in Harborough is Grade 3 agricultural land, with smaller areas of both Grade 2 and Grade 4 land. From review of Natural England’s Agricultural Land Classification Map East Midlands Region (ALC005), our Site is classified as Grade 3 (Good to Moderate). Paragraph 5.11 states that due to the rural nature of Harborough District. 163 residential site options are expected to have significant negative effects on this SA objective as they are greenfield land and contain a significant proportion ($\geq 25\%$) of Grade 1, 2 and/or 3 agricultural land. As such, rather than reviewing the Sites as a collective impact, it would be prudent to assess each site option individually in comparison with other sites to assess the level of effect. There is a

recognised local housing need in the District (plus an additional 123 homes per year towards Leicester's unmet housing need). As such, it will not be possible to avoid building on agricultural land if this housing need is to be met. This is also recognised by the Council at paragraph 5.13 who conclude that that "given the nature of Harborough and the lack of brownfield site options, significant effects on this objective may be unable to be avoided". Indeed, the Settlement Hierarchy Paper (December 2023) specifically notes that brownfield land opportunities in Broughton Astley are very limited. For this reason, the score should be changed from 'significant negative effect likely/? (--?/-?)' to 'minor negative effect likely/negligible (-?/0) in the next stage of the SA.

- SA4: paragraph 5.14 states that "all of the residential, mixed use, employment and renewable energy generation site options are expected to have negative effects on SA4 (minor or significant) due to being within at least 1km of a heritage asset". Para 5.16 notes that "the potential negative effects on this SA objective are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development and nearby assets". The Site is not the subject of any statutory heritage designations. The nearest designated heritage asset is located approximately 240 metres to the south of the site (Stemborough Mill, Grade II Listed Building). The nearest Conservation Area is situated approximately 1.3 kilometres to the south, at Leire. As per normal application procedure, investigation and mitigation can ensure any heritage assets are suitably incorporated into a sensitive design. Overall, there are no constraints on the Site from a heritage perspective which cannot be mitigated against and overcome as part of the proposals. The SA recognises that this will depend on the design of the development. For this reason, we do not consider that SA4 should be scored as a potential 'significant negative effect likely' and instead this should be reassessed as a potential 'minor negative effect' or 'uncertain' in the next stage of the SA.
- SA12: paragraph 5.39 confirms that the majority of Harborough District falls within Flood Zone 1. There are some areas of Flood Zone 2 and 3 which are mainly associated with the watercourses in the District. The Government's Flood Map for Planning indicates the Site largely falls entirely in Flood Zone 1 Low Probability – land having a less than 1 in

Appendix A Consultation Comments

1,000 annual probability of flooding from rivers and sea). The Site is also at very low risk of surface water flooding. The Site is therefore considered to be suitable for residential development. The site's topography can be used to inform the location of attenuation areas as part of the drainage strategy for the proposals. As such, we consider that the next SA should change the scoring from a potential 'significant negative effect likely' to a negligible effect. The Site is therefore considered to be suitable for residential development from a flood risk perspective.

- SA14: paragraph 5.44 states that “the likely effects of the options on the landscape have been assessed based on whether the site options fall within the countryside and are on greenfield land”. Given our Site is on greenfield land in the countryside, we agree that there will be an effect on the landscape by virtue of change. However, change does not automatically amount to a negative impact. The development will be designed to minimize impacts on the surrounding landscape. This score should therefore be reviewed in the context of our below comments which account for scheme design.
- Given the extent of existing urbanising influences on the character of the Site and the surrounding area, notably the residential development to the north and north-east of the Site and the nature of the rolling landform and existing structural vegetation in the local and wider landscape, there is potential for development of the Site in landscape and visual terms, that would respond positively to local landscape character and to policy requirements. Further details of the proposed landscape strategy and how this informed the proposed scheme are included in the Vision Document.
- A Landscape and Visual Impact Assessment is submitted alongside these representations. Development of the Site will form a logical extension and provide a sympathetic settlement edge to the existing settlement of Broughton Astley. Development will be set back behind a landscape buffer along the edges of the Site that will be reinforced by additional native landscape planting. Consideration to the nature of the landscape and potential views means the Development has the potential to be locally characteristic with built form set within a robust multi-functional Green Infrastructure framework. Development of the Site has the potential to significantly increase and enhance hedgerow, tree and woodland cover

Appendix A Consultation Comments

within the Site, notably along historical field boundaries within and to the Site boundaries, in accordance with published character guidance and best practice. Further to this the proposed sustainable urban drainage proposals will introduce a series of waterbodies that will provide new and varied habits and increase the biodiversity of the Site. There is also potential for the built form to respond to the local vernacular which could provide reinforcement of sense of place and local identity. Overall, in landscape and visual terms there is potential for a sensitive and sympathetic development of the Site, that would be a logical extension of the existing settlement in relation to its distinctive topographic setting; would minimise harm to landscape character and views; and would provide potential for extensive locally characteristic and important multi-functional Green Infrastructure.

- An assessment of the cumulative effects is contained within Chapter 8 of this updated SA Report.
- As part of a SA, site options are appraised against the SEA topics to consider the most sustainable options. The summary of the growth and spatial options is provided within Chapter 5 of this SA Report. The pros and cons of each spatial option was provided within the Issues and Options Consultation Document and reflected in the SA. The potential issues with strategic sites were identified during the appraisal of Option 4. Option 4 was scored negatively in relation to SA9 due to the limited spread of growth and long lead in times for strategic sites through this Option.
- If the site Land South of Dunton Road is allocated through a policy in the Local Plan, any mitigation within the policy will be taken into consideration during the appraisal of the policy. This could reduce the number of negative effects and the significance of the negative effects scored against each of the SA objectives for the site. The site scored minor positive against SA9 as the site will deliver less than 500 dwellings. The 500 dwellings threshold was agreed with the Council as a suitable dwelling number. In addition to the site being located on greenfield land, the site is also within 250m of a disused railway hedge which is identified as a Local Wildlife Site. In relation to SA3, the significant negative effect still stands as development on Grade 3

agricultural land will result in the loss of good quality soils even if this is inevitable given that Harborough is a rural District.

- Based on the available evidence base at the time of undertaking the site assessment work, a distance based approach was used for the appraisal of site options against SA4.
- For SA12, the site option falls within an area at risk of groundwater flooding. Small parts of the site is at risk of surface water flooding (1 in 30 year event and 1 in 100 year event). As detailed above, any mitigation proposed through a site allocation policy will be taken into consideration if the site is allocated within the Local Plan. The Council have undertaken a RAG rating in relation to landscape sensitivity of each site option. This RAG rating has been used to inform the assessment of site options against SA14.

Maisie Colloby (on behalf of Storey Strategic Land Limited)

- The approach to the Issues and Options Sustainability Appraisal is generally supported.
- To support the Issues and Options consultation the SA has considered different locational options. These include the 6 proposed spatial distribution options for the plan period which have been considered in the context of three different growth options, taking into account the Authority's Local Housing Need (LHN) through low, medium, and high growth options. The latter two growth options also address the provision of Leicester City's unmet housing needs.
- The quantum of the unmet need has in principle been agreed within the Leicester & Leicestershire Strategic Growth Plan 2023 - Statement of Common Ground (SoCG) Relating to Housing and Employment Land Needs (13th May 2022). The SoCG identified that Harborough will need to provide an average annual Leicester City unmet housing need contribution from 2020 to 2036 of 123 dwellings per annum. Harborough District Council formally agreed to sign the SoCG at its Full Council meeting held

Appendix A Consultation Comments

on the 18th December 2023. The low growth option does not address the Leicester City unmet need, and should be discounted for this reason alone.

- The SA uses the SA Framework to evaluate how the different reasonable alternatives perform against objectives outlined in Chapter 5 of the SA. The site assessments undertaken within Chapter 4 of the SA assess the three proposed growth options. It is acknowledged that these areas will evolve into more defined spatial areas through the plan-making process which will allow for more detailed assessments of the sites to take place.
- At this stage in the plan-making process, the SA provides only a strategic overview of the assessed sites against the SA framework objectives. It is acknowledged that the SA will evolve further over time to provide a more detailed site assessment and draw further conclusions with regard to the most appropriate locations for future growth and development over the plan period. It is important that the SA has full regard for and reflects up-to-date evidence when undertaking those revisions. Failure to do so would undermine the credibility of the SA process.
- Paragraph 2.33 confirms that reasonable site options identified through the current Call for Sites will be subject to SA using the same methodology. This representation is made on behalf of Storey Strategic Land Limited in relation to land north of Gilmorton Road, Lutterworth and the opportunity to deliver approximately 200 new dwellings together with employment land. This land interest has not previously been submitted through the SHELAA and therefore is not considered within the SA or Issues and Options consultation document.
- The SA assesses 7 housing sites, 3 mixed use sites and 3 employment sites in Lutterworth. Appendix D of the SA sets out the Site Assessment Criteria. It is considered important that the initial findings of the assessment process are discussed with site promoters. The SA supporting the current consultation highlights the potential for key factors to be overlooked or misunderstood, when they can often be resolved through the submission of additional information.

Appendix A Consultation Comments

- The SA has now been updated to reflect the Proposed Submission Draft Local Plan, also taking into account any updated evidence base that has become available.
- A further Call for Sites was undertaken alongside the Issues and Options Consultation. The sites submitted through that Call for Sites have been appraised in Chapter 6 of this SA Report.
- It is not possible for the SA team to discuss the initial findings of site assessments as part of the SA with each developer as the SA is appraising over 200 site options and is a strategic level assessment. However, the initial findings of the SA are available as part of the consultation process. If a site option has been proposed to be taken forward as a site allocation through policies in the Proposed Submission Draft Local Plan, then any mitigation within the policy has been taken into consideration in this SA report.

Wendy Hague

- It is recognised that the SA report has been prepared at an early stage in the plan making process. There is the potential for it be informed by other evidence prepared by other planning authorities and stakeholders beyond the administrative boundary. For SA3, for example, this could include the emerging Joint Water Cycle Study, the Water Resource Management Plans prepared by Severn Trent Water and Anglian Water, Regional Plans produced by Water Resources East and West and by Minerals and Waste Plans. In the absence of a Regional Plan for the East Midlands, strategic policies relating to the management and enhancement of natural resources should be carefully coordinated. Since the Adoption of the current Local Plan in 2019, the area covered by Severn Trent has been determined by the Environment Agency to be an Area of Serious Water Stress. The area covered by Anglian Water for the East continues to be seriously water stressed. The resilience of strategic infrastructure networks and plant to withstand the challenges brought about by growth, both planned and unplanned, and by climate change is a shared risk.

Appendix A Consultation Comments

- Noted. SA12 covers the protection of water resources including water quantity and quality. Where available, information will be drawn from the emerging Joint Water Cycle Study, the Water Resource Management Plans prepared by Severn Trent Water and Anglian Water, Regional Plans produced by Water Resources East and West and by Minerals and Waste Plans. The Anglian Water's and Severn Estuaries Draft Water Resources Management Plan 2024 is referred to within Appendix C: baseline Information.

Appendix B

Review of Relevant Plans, Policies and Programmes

International Plans and Programmes of Most Relevance for the Local Plan

B.1 2022 Convention on Biological Diversity [See reference 1] – COP15 Kunming-Montreal adopted the “Kunming-Montreal Global Biodiversity Framework” (GBF), including four goals and 23 targets for achievement by 2030.

B.2 The Glasgow Pact (UN Framework Convention on Climate Change, 2021) - Nations adopted the Glasgow Climate Pact [See reference 2]. The package of decisions consists of a range of agreed items, including strengthened efforts to build resilience to climate change, to curb greenhouse gas emissions and to provide the necessary finance for both. Nations reaffirmed their duty to fulfil the pledge of providing \$100 billion annually from developed to developing countries. And they collectively agreed to work to reduce the gap between existing emission reduction plans and what is required to reduce emissions. They also agreed to phase down unabated coal power and inefficient subsidies for fossil fuels.

B.3 United Nations Declaration on Forests and Land Use (COP26 Declaration) (2021) [See reference 3]: international commitment to halt and reverse forest loss and land degradation by 2030 while delivering sustainable development and promoting an inclusive rural transformation.

B.4 The 2030 Agenda for Sustainable Development (2015) [See reference 4], adopted by all United Nations Member States, provides a shared blueprint for

Appendix B Review of Relevant Plans, Policies and Programmes

peace and prosperity for people and the planet and includes 17 Sustainable Development Goals (SDGs), designed to achieve a better and more sustainable future for all.

B.5 The United Nations Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (the 'Aarhus Convention') (1998) **[See reference 5]** establishes a number of rights of the public (individuals and their associations) with regard to the environment. The Parties to the Convention are required to make the necessary provisions so that public authorities (at national, regional or local level) will contribute to these rights to become effective.

B.6 The United Nations Declaration on Sustainable Development (Johannesburg Declaration) (2002) **[See reference 6]** sets a broad framework for international sustainable development, including building a humane, equitable and caring global society aware of the need for human dignity for all, renewable energy and energy efficiency, sustainable consumption and production and resource efficiency.

B.7 The United Nations Paris Climate Change Agreement (2015) **[See reference 7]** is an international agreement to keep global temperature rise this century well below 2 degrees Celsius above pre-industrial levels.

B.8 The International Convention on Wetlands (Ramsar Convention) (1976) **[See reference 8]** is an international agreement with the aim of conserving and managing the use of wetlands and their resources.

B.9 The European Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) (1979) **[See reference 9]** aims to ensure conservation and protection of wild plant and animal species and their natural habitats, to increase cooperation between contracting parties, and to regulate the exploitation of those species (including migratory species).

Appendix B Review of Relevant Plans, Policies and Programmes

B.10 The International Convention on Biological Diversity (1992) [See reference 10] is an international commitment to biodiversity conservation through national strategies and action plans.

B.11 The European Habitats Directive (1992) [See reference 11], together with the Birds Directive, sets the standard for nature conservation across the EU and enables all 27 Member States to work together within the same strong legislative framework in order to protect the most vulnerable species and habitat types across their entire natural range within the EU. It also established the Natura 2000 network.

B.12 The European Birds Directive (2009) [See reference 12] requires the maintenance of all species of naturally occurring birds in the wild state in the European territory at a level which corresponds in particular to ecological, scientific and cultural requirements, while taking account of economic and recreational requirements.

B.13 The United Nations Declaration on Forests (New York Declaration) (2014) [See reference 13] sets out international commitment to cut natural forest loss by 2020 and end loss by 2030.

B.14 The Valletta Treaty (1992) [See reference 14], formerly the European Convention on the Protection of the Archaeological Heritage (Revisited), aims to protect the European archaeological heritage “as a source of European collective memory and as an instrument for historical and scientific study”.

B.15 The United Nations (UNESCO) World Heritage Convention (1972) [See reference 15] promotes co-operation among nations to protect heritage around the world that is of such outstanding universal value that its conservation is important for current and future generations.

B.16 The European Convention for the Protection of the Architectural Heritage of Europe (1985) [See reference 16] defines ‘architectural heritage’ and requires that the signatories maintain an inventory of it and take statutory measures to ensure its protection. Conservation policies are also required to be

integrated into planning systems and other spheres of government influence as per the text of the convention.

B.17 The European Landscape Convention (2002) [\[See reference 17\]](#) promotes landscape protection, management and planning. The Convention is aimed at the protection, management and planning of all landscapes and raising awareness of the value of a living landscape.

National Plans and Programmes (beyond the NPPF) of Most Relevance for the Local Plan

Climate Change Adaptation and Mitigation

B.18 The Third National Adaptation Programme (NAP3) [\[See reference 18\]](#) focuses on building climate resilience across key sectors in the UK. Its key aims include strengthening preparedness for climate risks, enhancing infrastructure resilience, protecting natural ecosystems, and integrating adaptation into planning and policies across government and society. It promotes a whole-society approach to adapt to climate risks like flooding and heatwaves. The Fourth strategy for Climate Adaptation Reporting, alongside NAP3 aims to increase accountability by requiring organisations to report on their preparedness for climate impacts, focusing on critical infrastructure and supporting national climate goals

B.19 The Biomass Strategy 2023 [\[See reference 19\]](#) builds on the 2021 Biomass policy statement and the Powering up Britain strategy which emphasised the important role that biomass will play in Britain's fully decarbonised power system by 2035, subject to security of supply. It sets out steps government intends to take to strengthen biomass sustainability and the

Appendix B Review of Relevant Plans, Policies and Programmes

opportunities for the use of sustainable biomass across multiple sectors of the economy in support of achieving the UK's net zero target.

B.20 The government aims to focus on implementing a cross-sectoral common sustainability framework, which will be subject to consultation. It states it committed to monitoring the levels of biomass supply to ensure the UK can secure necessary levels for increased biomass use across the economy. It has also committed to ensuring that biomass supply – given its risks and uncertainties – is not hindered at any stage; however, biomass demand is expected to increase. The government also aims for a "priority use" of biomass based on guiding principles that address sustainability, air quality, the net-zero and circular economy, and resource efficiency. This encompasses the deployment of bioenergy with carbon capture and storage (BECCS), the engineered greenhouse-gas removal technology, which captures and stores CO₂ from biomass while producing low-carbon energy.

B.21 The Carbon Budget Delivery Plan (2023) [\[See reference 20\]](#) explains how the government intends to meet its legally-binding climate goals, setting out a package of quantified and unquantified proposals and policies, and associated timescales and delivery risks this also includes:

- wider matters in connection with carbon budgets
- the contribution of these proposals and policies to sustainable development
- the impact the package has on sectors of the economy

B.22 Powering up Britain (2023) [\[See reference 21\]](#) sets out the department's approach to energy security and net zero, and acts as an introduction to Powering Up Britain: Energy Security Plan, and Powering Up Britain: Net Zero Growth Plan.

B.23 The Energy Security Plan (2023) [\[See reference 22\]](#) sets out the steps that the government is taking to improve the UK's energy system resilience, particularly in the current geopolitical context. Key commitments include:

Appendix B Review of Relevant Plans, Policies and Programmes

- Looking at the role gas storage and other sources of flexibility can play in gas security.
- Delivery of energy efficiency upgrades through the Great British Insulation Scheme.
- Extension of the Boiler Upgrade Scheme to 2028.
- Setting up Great British Nuclear to lead delivery of the new nuclear programme.
- Launching a competitive process to select the best Small Modular Reactor technologies.
- Launching the Floating Offshore Wind Manufacturing Investment Scheme, to provide up to £160 million investment in port infrastructure projects.
- Publishing action plans on reducing the development time for transmission network projects and on accelerating electricity network connections.
- Announcing the Track-1 negotiation project list of carbon capture usage and storage (CCUS) projects; launching a process to expand Track-1 clusters; and establishing two further (Track-2) CCUS clusters.
- Announcing a shortlist of projects for the first electrolytic hydrogen production allocation round.
- Announcing successful applicants of the first competition window for Strands 1 and 2 of the Net Zero Hydrogen Fund (development and capital co-funding) and launching a second competition window.
- Consulting on revised energy National Policy Statements which underline the national need for new energy infrastructure with the intention of expediting planning processes.

B.24 The Net Zero Growth Plan (2023) [\[See reference 23\]](#) outlines the Government's plans to reach net zero and unlock the financial benefits that this can bring. Key commitments include:

- Publishing an addendum to the Resources and Waste Strategy which will focus on net zero and include a plan to achieve the near elimination of biodegradable municipal waste going to landfill.

Appendix B Review of Relevant Plans, Policies and Programmes

- Responding to the consultation on a revised Waste Prevention Programme for England alongside the new programme 'Maximising Resources, Minimising Waste'.
- Providing up to £20 billion of funding for early deployment of CCUS to unlock private investment and jobs.
- Consulting on an ambitious Zero Emission Vehicle mandate; publishing the Low Carbon Fuels Strategy in 2023; and legislating to include recycled carbon and nuclear derived fuels in renewables transport fuel schemes.
- Consulting on transition planning disclosure requirements for the UK's largest companies and the UK Green Taxonomy, as well as on steps and interventions needed to support the growth of high integrity voluntary markets and to protect against greenwashing.
- Introducing a regulatory framework for heat networks; beginning the implementation of heat network zoning by 2025; and confirming funding of £15 million for the 2023/24 Home Decarbonisation Skills Competition and the £5 million Heat Training Grant for heat pump and heat network skills. Growth and decarbonisation of the UK heat network market will continue through the Green Heat Network Fund and the Heat Network Efficiency Scheme, including £220 million for the Heat Network Transformation Programme over 2025/6 and 2026/7.
- Considering options for integrating greenhouse gas removals in the UK Emissions Trading Scheme.
- Publishing the Biomass Strategy in 2023, which will outline the role that bioenergy with carbon capture and storage (BECCS) can play in reducing carbon emissions.
- Taking forward the next steps in the Review of Electricity Market Arrangements.

B.25 The Environment Improvement Plan 2023 [\[See reference 24\]](#) for England is the first revision of the 25YEP. It builds on the 25YEP vision with a new plan setting out how we will work with landowners, communities and businesses to deliver each of our goals for improving the environment, matched with interim

Appendix B Review of Relevant Plans, Policies and Programmes

targets to measure progress. Taking these actions will help us restore nature, reduce environmental pollution, and increase the prosperity of our country.

B.26 UK Climate Change Risk Assessment 2022 [See reference 25] outlines the UK government and devolved administrations' position on the key climate change risks and opportunities that the UK faces today. The risk assessment considers sixty-one UK-wide climate risks and opportunities cutting across multiple sectors of the economy and prioritises the following eight risk areas for action in the next two years:

- risks to the viability and diversity of terrestrial and freshwater habitats and species from multiple hazards
- risks to soil health from increased flooding and drought
- risks to natural carbon stores and sequestration from multiple hazards
- risks to crops, livestock and commercial trees from multiple climate hazards
- risks to supply of food, goods and vital services due to climate-related collapse of supply chains and distribution networks
- risks to people and the economy from climate-related failure of the power system
- risks to human health, wellbeing and productivity from increased exposure to heat in homes and other buildings
- multiple risks to the UK from climate change impacts overseas

B.27 The British Energy Security Strategy (2022) [See reference 26] sets out how the UK will enhance its energy security, setting out plans for future deployment of wind, new nuclear, solar and hydrogen, and for supporting the production of domestic oil and gas in the nearer term. The strategy builds on the Prime Minister's 'Ten point plan for a green industrial revolution', and the 'Net zero strategy'. Key aims and commitments include:

- New commitments to supercharge clean energy and accelerate deployment, which could see 95% of Great Britain's electricity set to be low carbon by 2030.

Appendix B Review of Relevant Plans, Policies and Programmes

- Supporting over 40,000 more jobs in clean industries, totalling 480,000 jobs by 2030.
- Accelerated expansion of nuclear, wind, solar, hydrogen, oil and gas, including delivering the equivalent to one nuclear reactor a year instead of one a decade.
- Offshore wind – Aim of providing up to 50GW by 2030, of which 5GW is planned to be from floating offshore wind in deeper seas. This is aimed to be underpinned by new planning reforms to cut the approval times for new offshore wind farms from 4 years to 1 year and an overall streamlining which will aim to reduce the time it takes for new projects to reach construction stages while improving the environment.
- Oil and gas – A licensing round for new North Sea oil and gas projects is planned to launch in Autumn, with a new taskforce providing bespoke support to new developments.
- Onshore wind – The Government plans to consult on developing partnerships with a limited number of supportive communities who wish to host new onshore wind infrastructure in return for guaranteed lower energy bills.
- Heat pump manufacturing – The Government aim to run a Heat Pump Investment Accelerator Competition in 2022 worth up to £30 million to make British heat pumps, with hopes to reduce demand for gas.

B.28 The Environment Act 2021 [\[See reference 27\]](#) sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. The Environment Act will deliver:

- Long-term targets to improve air quality biodiversity, water, and waste reduction and resource efficiency.
- A target on ambient PM_{2.5} concentrations.
- A target to halt the decline of nature by 2030.
- Environmental Improvement Plans, including interim targets.

Appendix B Review of Relevant Plans, Policies and Programmes

- A cycle of environmental monitoring and reporting.
- Environmental Principles embedded in domestic policy making.
- Office for Environmental Protection to uphold environmental law.

B.29 The Net Zero Strategy: Build Back Greener (2021) [\[See reference 28\]](#) sets out policies and proposals for decarbonising all sectors of the UK economy to meet net zero targets by 2050. It sets out strategies to keep the UK on track with carbon budgets, outlines the National Determined Contribution (NDC) and sets out the vision for a decarbonised economy in 2050. Its focus includes:

- Policies and proposals for reducing emissions across the economy in key sectors (power, fuel supply and hydrogen, industry, heat and buildings, transport, natural gas and waste).
- Policies and proposals for supporting transition across the economy through innovation, green investment, green jobs, embedding net-zero in government, local climate action, empowering people and businesses, and international leadership and collaboration.

B.30 The Industrial Decarbonisation Strategy (2021) [\[See reference 29\]](#) aims to support existing industry to decarbonise and encourage the growth of new, low carbon industries to protect and create skilled jobs and businesses in the UK encouraging long-term investment in home-grown decarbonisation technology. The strategy builds in the Prime Minister's 10 Point Plan for a Green Industrial Revolution and sets out the government's vision for building a competitive, greener future for the manufacturing and construction sector and is part of the government's path to net zero by 2050. The strategy aims to reduce emissions by two-thirds in just 15 years and support up to 80,000 jobs over the next thirty years and includes measures to produce 20 terawatt hours of the UK industry's energy supply from low carbon alternatives by 2030. It also aims to introduce new rules on measuring the energy and carbon performance of the UK's largest commercial and industrial buildings, providing potential savings to businesses of around £2 billion per year in energy costs in 2030 and aiming to reduce annual carbon emissions by over 2 million tonnes - approximately 10% of their current emissions. Other key commitments within the Strategy include:

Appendix B Review of Relevant Plans, Policies and Programmes

- The use of carbon pricing to drive changes in industry to focus on emissions in business and investment decisions.
- To establish a policy framework to accelerate the switch from fossil fuels to low carbon alternatives such as hydrogen, electricity, or biomass.
- New product standards, enabling manufacturers to clearly distinguish their products from high carbon competitors.
- To ensure the land planning regime is fit for building low carbon infrastructure.
- Support the skills transition so that the UK workforce benefits from the creation of new green jobs.
- An expectation that at least 3 megatons of CO₂ is captured within industry per year by 2030.
- That by 2050, there will be zero avoidable waste of materials across heavy industries.

B.31 The Heat and Buildings Strategy (2021) [See reference 30] sets out the government's plan to significantly cut carbon emissions from the UK's 30 million homes and workplaces. This strategy aims to provide a clear direction of travel for the 2020s, set out the strategic decisions that need to be taken this decade, and demonstrate how the UK plans to meet its carbon targets and remain on track for net zero by 2050. Key aims of the strategy include:

- Reduce direct emissions from public sector buildings by 75% against a 2017 baseline by the end of carbon budget 6.
- Significantly reduce energy consumption of commercial, and industrial buildings by 2030.
- Phase out the installation of new natural gas boilers beyond 2035.
- Significantly grow the supply chain for heat pumps to 2028: from installing around 35,000 hydronic heat pumps a year to a minimum market capacity of 600,000 per year by 2028.

Appendix B Review of Relevant Plans, Policies and Programmes

- Reduce the costs of installing a heat pump by at least 25-50% by 2025 and to ensure heat pumps are no more expensive to buy and run than gas boilers by 2030.
- Achieve 30-fold increase in heat pumps manufactured and sold within the UK by the end of the decade.
- Grow the market for heat pumps notably via a £450 million Boiler Upgrade Scheme to support households who want to switch with £5,000 grants.
- Improve heat pump appeal by continuing to invest in research and innovation, with the £60 million Net Zero Innovation Portfolio 'Heat Pump Ready' Programme supporting the development of innovation across the sector.
- Ensure all new buildings in England are ready for Net Zero from 2025. To enable this, new standards will be introduced through legislation to ensure new homes and buildings will be fitted with low-carbon heating and high levels of energy efficiency.
- Establish large-scale trials of hydrogen for heating, including a neighbourhood trial by 2023.
- Ensure as many fuel poor homes in England, as reasonably practicable, achieve a minimum energy efficiency rating of band C by the end of 2030.
- Support social housing, low income and fuel poor households via boosting funding for the Social Housing Decarbonisation Fund and Home Upgrade Grant, which aim to improve the energy performance of low income households' homes, support low carbon heat installations and build the green retrofitting sector to benefit all homeowners.
- Scale up low-carbon heat network deployment and to enable local areas to deploy heat network zoning- Heat Network Transformation Programme of £338 million (over 2022/23 to 2024/25).

B.32 The UK Hydrogen Strategy (2021) [See reference 31] sets out the approach to developing a substantial low carbon hydrogen sector in the UK and to meet the ambition for 5GW of low carbon hydrogen production capacity by 2030. The Strategy outlines the role of hydrogen in meeting net zero targets,

the existing opportunity within the UK, a strategic framework, a roadmap for the economy, and the UK Government's commitments for a hydrogen economy. The Energy Performance of Buildings Regulations (2021).

B.33 The Energy Performance of Buildings Regulations (2021) [See reference 32] seek to improve the energy efficiency of buildings, reducing their carbon emissions and lessening the impact of climate change. The Regulations require the adoption of a standard methodology for calculating energy performance and minimum requirements for energy performance, reported through Energy Performance Certificates and Display Energy Certificates.

B.34 Natural England's Climate Change Risk Assessment and Adaptation Plan (2021) [See reference 33] is the third adaptation report covering climate change adaptation and covers the following themes in developing Natural England's response to the biodiversity and climate crisis:

- We will plan climate change adaptation with the aim of restoring ecological process at a landscape scale as part of nature recovery to enhance resilience and accommodate inevitable change.
- Our work on adaptation can deliver multiple benefits, including integrating climate change mitigation, biodiversity and enhancing the quality of life for people.
- We recognise the benefits of local level adaptation and our Area Teams have a key role to play in delivering adaptation in a place-based way.
- Using a natural capital and ecosystem approach to account for the multiple benefits that nature provides to society
- Developing adaptive management that takes account of change in the natural world both in the policy advice and delivery space.
- We will ensure our different work programmes have a joined-up approach to adaptation.
- Developing the evidence base to support practical adaptation, including monitoring and evaluation of adaptation actions.

Appendix B Review of Relevant Plans, Policies and Programmes

- Developing a joined-up approach to Nature-based Solutions which deliver mitigation and adaptation with measurable benefits for nature and people.

B.35 The risk assessment updates the overarching risks of climate change to our aims and objectives, which are outlined in our Building Partnerships for Nature Action Plan.

B.36 Climate Change Adaptation Manual: Evidence to support Nature Conservation in a Changing Climate (2020) [See reference 34] is a resource to support practical and pragmatic decision-making in relation to climate change adaptation, by bringing together recent science, experience and case studies, and is intended to be an accessible entry point to a range of available resources and tools.

B.37 Environment Agency, Forestry Commission, and Natural England outline a shared vision to use nature-based solutions to tackle the Climate Emergency (2020) [See reference 35] outlines a shared vision and practical actions to tackle the climate and biodiversity emergencies. As such, the Environment Agency, Forestry Commission and Natural England commit to collaborating their responses to the climate and biodiversity emergencies by:

- Delivering large-scale woodland creation.
- Protecting and restoring peatlands.
- Supporting farmers towards net zero.
- Working with nature to manage flood risk.
- Taking a strategic approach to land use.
- Encouraging alternatives to carbon intensive materials.
- Pushing for action across the UK and abroad.

B.38 The Energy white paper: Powering our net zero future (2020) [See reference 36] builds on the Prime Minister's Ten point plan for a green industrial revolution. The white paper addresses the transformation of the UK's energy system, promoting high-skilled jobs and clean, resilient economic growth

Appendix B Review of Relevant Plans, Policies and Programmes

during its transition to net-zero emissions by 2050. Key aims of the paper include:

- Supporting green jobs – The government aims to support up to 220,000 jobs in the next 10 years.
- Transforming the energy system – To transform its electricity grid for net-zero, the white paper highlights how this will involve changing the way the country heats its homes, how people travel, doubling the electricity use, and harnessing renewable energy supplies.
- Keeping bills affordable – The government aims to do this by making the energy retail market “truly competitive”. This will include offering people a method of switching to a cheaper energy tariff and testing automatically switching consumers to fairer deals to tackle “loyalty penalties”.
- Generating emission-free electricity by 2050 – The government aims to have “overwhelmingly decarbonised power” in the 2030s in order to generate emission-free electricity by 2050.
- Establishing UK Emissions Trading Scheme – The government aims to establish a UK Emissions Trading Scheme (UK ETS) from 1 January 2021 to replace the current EU ETS at the end of the Brexit Transition Period.
- Exploring new nuclear financing options – The government is continuing to explore a range of financing options for new nuclear with developers including the Regulated Asset Base (RAB) funding model.
- Further commitments to offshore wind – The white paper lays out plans to scale up its offshore wind fleet to 40 gigawatts (GW) by 2030, including 1GW of floating wind, enough to power every home in the country.
- Carbon capture and storage investments – Including £1bn worth of investments in state-of-the-art CCS in four industrial clusters by 2030. With four low-carbon clusters set up by 2030, and at least one fully net-zero cluster by 2040.
- Kick-starting the hydrogen economy – The government plans to work with industry to aim for 5GW of production by 2030, backed up by a new £240m net-zero Hydrogen Fund for low-carbon hydrogen production.

Appendix B Review of Relevant Plans, Policies and Programmes

- Investing in electric vehicle charge points – The government plans to invest £1.3bn to accelerate the rollout of charge points for electric vehicles as well as up to £1bn to support the electrification of cars.
- Supporting the lowest paid with their bills – The government aims to support those with lower incomes through a £6.7bn package of measures that could save families in old inefficient homes up to £400.
- Moving away from fossil fuel boilers – The government aims, by the mid-2030s, for all newly installed heating systems to be low-carbon or to be appliances that it is confident can be converted to a clean fuel supply.
- Supporting North Sea oil and gas transition – The white paper notes the importance of supporting the North Sea oil and gas transition for the people and communities most affected by the move away from fossil fuels. The government aims to achieve this by ensuring that the expertise of the oil and gas sector be drawn on in developing CCS and hydrogen production to provide new green jobs for the future.

B.39 National Infrastructure Strategy: Fairer, faster greener (2020) [See reference 37] sets out plans to transform UK infrastructure in order to level up the country, strengthen the Union and achieve net zero emissions by 2050. This will be enabled by clear support for private investment and through a comprehensive set of reforms to the way infrastructure is delivered.

B.40 The Sixth Carbon Budget report (2020) [See reference 38] is based on an extensive programme of analysis, consultation and consideration by the Committee and its staff, building on the evidence published last year for our Net Zero advice. Our recommended pathway requires a 78% reduction in UK territorial emissions between 1990 and 2035. In effect, bringing forward the UK's previous 80% target by nearly 15 years.

B.41 Decarbonising Transport: Setting the Challenge (2020) [See reference 39] sets out the strategic priorities for the new Transport Decarbonisation Plan (TDP), published in July 2021. It sets out in detail what government, business and society will need to do to deliver the significant emissions reduction needed across all modes of transport, putting us on a pathway to achieving carbon

budgets and net zero emissions across every single mode of transport by 2050. This document acknowledges that while there have been recently published strategies to reduce greenhouse gas emissions in individual transport modes, transport as a whole sector needs to go further and more quickly, therefore the TDP takes a coordinated, cross-modal approach to deliver the transport sector's contribution to both carbon budgets and net zero.

B.42 Flood and Coastal Erosion Risk Management: Policy Statement (2020) [See reference 40] sets out the government's long-term ambition to create a nation more resilient to future flood and coastal erosion risk, and in doing so, reduce the risk of harm to people, the environment and the economy. The Policy Statement sets out five policy areas which will drive this ambition:

- Upgrading and expanding our national flood defences and infrastructure;
- Managing the flow of water more effectively;
- Harnessing the power of nature to reduce flood and coastal erosion risk and achieve multiple benefits;
- Better preparing our communities; and
- Enabling more resilient places through a catchment-based approach.

B.43 Net Zero – The UK's contribution to stopping global warming (Climate Change Committee, 2019) [See reference 41] responds to a request from the Governments of the UK, Wales and Scotland, asking the Committee to reassess the UK's long-term emissions targets. Our new emissions scenarios draw on ten new research projects, three expert advisory groups, and reviews of the work of the IPCC and others. The report's key findings are that:

- The Committee on Climate Change recommends a new emissions target for the UK: net-zero greenhouse gases by 2050.
- In Scotland, we recommend a net-zero date of 2045, reflecting Scotland's greater relative capacity to remove emissions than the UK as a whole.
- In Wales, we recommend a 95% reduction in greenhouse gases by 2050.

B.44 Energy Efficiency and Historic Buildings: How to Improve Energy Efficiency (2018) [See reference 42] provides guidance for anyone who wishes to improve energy efficiency in an historic building.

B.45 The Promotion of the Use of Energy from Renewables Sources Regulations 2011 [See reference 43] required the government to ensure that renewable energy comprised 15% of the UK's total energy mix by 2020. The Renewable Energy Directive has now been superseded by Directive (EU) 2018/2001 (RED II). Although the UK has now been released from the renewable energy targets under RED II following Brexit, the UK-EU Trade and Cooperation Agreement includes a commitment to promote energy efficiency and the use of energy from renewable sources and reaffirmation of the EU's 2030 "targets" and the UK's 2030 "ambitions" for renewable energy and energy efficiency.

B.46 The National Flood and Coastal Erosion Risk Management Strategy for England 2011 [See reference 44] sets out the national framework for managing the risk of flooding and coastal erosion. It sets out the roles for risk management authorities and communities to help them understand their responsibilities. The strategic aims and objectives of the Strategy are to:

- Manage the risk to people and their property;
- Facilitate decision-making and action at the appropriate level – individual, community or Local Authority, river catchment, coastal cell or national; and
- Achieve environmental, social and economic benefits, consistent with the principles of sustainable development.

B.47 The Flood and Water Management Act 2010 [See reference 45] and The Flood and Water Regulations 2019 [See reference 46] sets out measures to ensure that risk from all sources of flooding is managed more effectively. This includes incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; rolling back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

B.48 The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate [See reference 47] sets out visions for the following sectors:

- People and the Built Environment – “to promote the development of a healthy, equitable and resilient population, well placed to reduce the harmful health impacts of climate change...buildings and places (including built heritage) and the people who live and work in them are resilient and organisations in the built environment sector have an increased capacity to address the risks and make the most of the opportunities of a changing climate.”
- Infrastructure – “an infrastructure network that is resilient to today’s natural hazards and prepared for the future changing climate.”
- Natural Environment – “the natural environment, with diverse and healthy ecosystems, is resilient to climate change, able to accommodate change and valued for the adaptation services it provides.”
- Business and Industry – “UK businesses are resilient to extreme weather and prepared for future risks and opportunities from climate change.”
- Local Government – “Local Government plays a central role in leading and supporting local places to become more resilient to a range of future risks and to be prepared for the opportunities from a changing climate.”

B.49 Our Waste, Our Resources: A strategy for England (2018) [See reference 48] aims to increase resource productivity and eliminate avoidable waste by 2050. The Strategy sets out key targets which include: a 50% recycling rate for household waste by 2020, a 75% recycling rate for packaging by 2030, 65% recycling rate for municipal solid waste by 2035 and municipal waste to landfill 10% or less by 2035.

B.50 The Clean Growth Strategy (2017) [See reference 49] sets out the approach of the government to secure growth of the national income while cutting greenhouse gas emissions. The key policies and proposals of the Strategy sit below a number of overarching principles: acceleration of clean growth including through recommendations for private and public investment to meet carbon budgets; providing support to improve business and industry

Appendix B Review of Relevant Plans, Policies and Programmes

energy efficiency; improving energy efficiency in the housing stock including through low carbon heating; accelerating the shift to low carbon transport; delivering clean, smart, flexible power; enhancing the benefits and value of our natural resources; leading in the public sector to meet emissions targets; and ensure Government leadership to drive clean growth.

B.51 The National Planning Policy for Waste (NPPW) (2014) [\[See reference 50\]](#) identifies key planning objectives, requiring planning Authorities to:

- Help deliver sustainable development through driving waste management up the waste hierarchy;
- Ensure waste management is considered alongside other spatial planning concerns;
- Provide a framework in which communities take more responsibility for their own waste;
- Help secure the recovery or disposal of waste without endangering human health and without harming the environment; and
- Ensure the design and layout of new development supports sustainable waste management.

B.52 The Waste Management Plan for England (2013) [\[See reference 51\]](#) sets out the measures for England to work towards a zero waste economy.

B.53 The Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK 2012 [\[See reference 52\]](#) aims to realise the wider energy efficiency potential that is available in the UK economy by maximising the potential of existing dwellings by implementing 21st century energy management initiatives on 19th century homes.

B.54 The UK Low Carbon Transition Plan: National Strategy for Climate and Energy (2009) [\[See reference 53\]](#) sets out a five-point plan to tackle climate change. The points are as follows: protecting the public from immediate risk, preparing for the future, limiting the severity of future climate change through a

Appendix B Review of Relevant Plans, Policies and Programmes

new international climate agreement, building a low carbon UK and supporting individuals, communities and businesses to play their part.

B.55 The UK Renewable Energy Strategy (2009) [See reference 54] sets out the ways in which we will tackle climate change by reducing our CO2 emissions through the generation of a renewable electricity, heat and transport technologies.

B.56 The Climate Change Act 2008 [See reference 55] sets targets for UK greenhouse gas emission reductions of at least 100% by 2050, against a 1990 baseline (this was previously 80% but was updated to a net zero target in June 2019).

B.57 The Planning and Energy Act (2008) [See reference 56] enables local planning authorities to set requirements for carbon reduction and renewable energy provision. It should be noted that while the Housing Standards Review proposed to repeal some of these provisions, at the time of writing there have been no amendments to the Planning and Energy Act.

B.58 The Waste (Circular Economy) (Amendment) Regulations [See reference 57] seek to prevent waste generation and to monitor and assess the implementation of measures included in waste prevention programmes. They set out requirements to justify not separating waste streams close to source for re-use, recycling or other recovery operations, prohibit incineration and landfilling of waste unless such treatment process represent the best environmental outcome in accordance with the waste hierarchy. The Regulations set out when waste management plans and in waste prevention programmes are required. The Regulations focus on the circular economy as a means for businesses to maximise the value of waste and waste treatment.

Health and Well-being

B.59 The Levelling-up and Regeneration Act [See reference 58], published by DLUHC in 2023 sets out the direction for planning and makes provisions to

support the levelling-up agenda. It seeks to streamline the planning process whilst attaching greater weight to development plans. It also aims to improve infrastructure delivery with a new levy system, improve alignment between plans to address cross-boundary issues, and will introduce added protection for heritage assets. The Bill also states that existing EU-generated systems of SEA, HRA and EIA will eventually be replaced by a simpler process known as 'Environmental Outcomes Reports'.

B.60 The White Paper Levelling Up the United Kingdom (2022) [See reference 59] sets out how the UK Government will spread opportunity more equally across the UK. It comprises 12 UK-wide missions to achieve by 2030. Missions which relate to population, health and wellbeing state that by 2030:

- The gap in Healthy Life Expectancy (HLE) between local areas where it is highest and lowest will have narrowed, and by 2035 HLE will rise by five years.
- Well-being will have improved in every area of the UK, with the gap between top performing and other areas closing.
- Homicide, serious violence, and neighbourhood crime will have fallen, focused on the worst-affected areas.
- Pride in place, such as people's satisfaction with their town centre and engagement in local culture and community, will have risen in every area of the UK, with the gap between the top performing and other areas closing.
- The number of primary school children achieving the expected standard in reading, writing and maths will have significantly increased. In England, this will mean 90% of children will achieve the expected standard, and the percentage of children meeting the expected standard in the worst performing areas will have increased by over a third.
- Renters will have a secure path to ownership with the number of first-time buyers increasing in all areas; and the Government's ambition is for the number of non-decent rented homes to have fallen by 50%, with the biggest improvements in the lowest performing areas.

Appendix B Review of Relevant Plans, Policies and Programmes

B.61 A fairer private rented sector White Paper (2022) [\[See reference 60\]](#) aims to build upon the vision of the Levelling Up White Paper and reform the Private Rented Sector and improve housing quality. It outlines that everyone deserves a secure and decent home and outlines measures to improve the experience of renters in the Private Rented Sector.

B.62 The State of the Environment: Health, People and the Environment (2021) [\[See reference 61\]](#) focuses on the relationship between human health and people's access to and connection with a clean, high quality natural environment. It presents information on England's environment, and people's exposure to environmental pollutants, flooding and climate change in relation to human health. It highlights environmental inequalities that contribute to differences in health outcomes for people in England.

B.63 The National Design Guide (2021) [\[See reference 62\]](#) sets out the Government's priorities for well-designed places in the form of ten characteristics: context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources and lifespan.

B.64 Build Back Better: Our Plan for Health and Social Care (2021) [\[See reference 63\]](#) sets out the government's new plan for health and social care. It provides an overview of how this plan will tackle the elective backlog in the NHS and put the NHS on a sustainable footing. It sets out details of the plan for adult social care in England, including a cap on social care costs and how financial assistance will work for those without substantial assets. It covers wider support that the government will provide for the social care system, and how the government will improve the integration of health and social care. It explains the government's plan to introduce a new Health and Social Care Levy.

B.65 The COVID-19 Mental Health and Wellbeing Recovery Action Plan (2021) [\[See reference 64\]](#) sets out the Government's plan to prevent, mitigate and respond to the mental health impacts of the pandemic during 2021 and 2022. Its main objectives are to support the general population to take action and look after their own mental wellbeing; to take action to address factors which play a

crucial role in shaping mental health and wellbeing outcomes; and, to support services to meet the need for specialist support.

B.66 The Charter for Social Housing Residents: Social Housing White Paper (2020) [See reference 65] sets out the Government's actions to ensure residents in social housing are safe, listened to, live in good quality homes and have access to redress when things go wrong.

B.67 Using the planning system to promote healthy weight environments (2020), Addendum (2021) [See reference 66] provides a framework and starting point for local authorities to clearly set out in local planning guidance how best to achieve healthy weight environments based on local evidence and needs, by focusing on environments that enable healthier eating and help promote more physical activity as the default. The Addendum provides updates on the implications for planning for a healthier food environment, specifically on the hot food takeaways retail uses, and sets out recommended actions in light of changes to the Use Class Order (UCO) in England from 1 September 2020.

B.68 Heritage and Society (2020) [See reference 67] presents evidence about the value of heritage to society, individuals and community groups across England. The evidence is gathered from a wide range of reliable sources including major household panel surveys, systematic literature reviews, bespoke evaluation studies and public opinion surveys. This year, exceptionally, the report includes a section presenting evidence about how the COVID-19 pandemic has impacted our social lives including our access to and engagement with our precious heritage. The key findings include:

- Like most parts of society and the economy, the heritage sector suffered a heavy blow as a result of lockdown due to COVID-19
- Outdoor heritage sites are places people feel most comfortable visiting
- Virtual visits and digital engagement with heritage has helped people cope during lockdown
- Our local neighbourhoods have demonstrated their value during lockdown by helping us to cope

Appendix B Review of Relevant Plans, Policies and Programmes

- Heritage volunteering, an important source of community resilience, was challenged during lockdown
- Volunteering to support COVID-19 related causes has seen an increase which supports a spirit of collective care for our communities and places
- The heritage sector has an important role to play in our individual mental wellbeing in the future
- Visiting heritage can ease the challenges associated with dementia and Alzheimer's
- Online heritage resources support more equal access to digital learning for children

B.69 The Public Health England, PHE Strategy 2020-25 (2019) [See reference 68] identifies PHE's priorities upon which to focus over this five-year period to protect people and help people to live longer in good health.

B.70 The Homes England Strategic Plan 2018 to 2023 [See reference 69] sets out a vision to ensure more homes are built in areas of greatest need, to improve affordability, and make a more resilient and diverse housing market.

B.71 The Housing White Paper 2017 (Fixing our broken housing market) [See reference 70] sets out ways to address the shortfall in affordable homes and boost housing supply. The White Paper focuses on the following:

- Planning for the right homes in the right places – Higher densities in appropriate areas, protecting the Green Belt while making more land available for housing by maximising the contribution from brownfield and surplus public land, regenerating estates, releasing more small and medium-sized sites, allowing rural communities to grow and making it easier to build new settlements.
- Building homes faster – Improved speed of planning cases, ensuring infrastructure is provided and supporting developers to build out more quickly.

Appendix B Review of Relevant Plans, Policies and Programmes

- Diversifying the Market – Backing small and medium-sized house builders, custom-build, institutional investors, new contractors, housing associations.
- Helping people now – supporting home ownership and providing affordable housing for all types of people, including the most vulnerable.

B.72 The Planning Policy for Traveller Sites 2015 [See reference 71] sets out the Government’s planning policy for traveller sites, replacing the older version published in March 2012. The Government’s overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.

B.73 The Technical Housing Standards – Nationally Described Space Standard (2015) [See reference 72] sets out the Government’s new nationally described space standard. The standard deals with internal space within new dwellings and sets out requirements for the Gross Internal (floor) Area of new dwellings at a defined level of occupancy, as well as floor areas and dimensions for key parts of the home.

B.74 The Select Committee on Public Service and Demographic Change Report Ready for Ageing? (2013) [See reference 73] warns that society is underprepared for the ageing population. The report states “longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises”. The report highlights the under provision of specialist housing for older people and the need to plan for the housing needs of the older population as well as younger people.

B.75 Fair Society, Healthy Lives (2011) [See reference 74] 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

Appendix B Review of Relevant Plans, Policies and Programmes

inexorably linked and that poor environments contribute significantly to poor health and health inequalities”.

B.76 Laying the foundations: A housing strategy for England [See reference 75] aims to provide support to deliver new homes and improve social mobility.

B.77 Healthy Lives, Healthy People: Our strategy for public health in England 2010 [See reference 76] sets out how the Government’s approach to public health challenges will:

- Protect the population from health threats – led by central Government, with a strong system to the frontline;
- Empower local leadership and encourage wide responsibility across society to improve everyone’s health and wellbeing and tackle the wider factors that influence it;
- Focus on key outcomes, doing what works to deliver them, with transparency of outcomes to enable accountability through a proposed new public health outcomes framework;
- Reflect the Government’s core values of freedom, fairness and responsibility by strengthening self-esteem, confidence and personal responsibility; positively promoting healthy behaviours and lifestyles; and adapting the environment to make healthy choices easier; and
- Balance the freedoms of individuals and organisations with the need to avoid harm to others, use a ‘ladder’ of interventions to determine the least intrusive approach necessary to achieve the desired effect and aim to make voluntary approaches work before resorting to regulation.

B.78 The Environmental Noise Regulations 2006 [See reference 77] apply to environmental noise, mainly from transport. The regulations require regular noise mapping and action planning for road, rail and aviation noise and noise in large urban areas. They also require Noise Action Plans based on the maps for road and rail noise and noise in large urban areas. The Action Plans identify Important Areas (areas exposed to the highest levels of noise) and suggest ways the relevant authorities can reduce these. Major airports and those which

affect large urban areas are also required to produce and publish their own Noise Action Plans separately. The Regulations do not apply to noise from domestic activities such as noise created by neighbours; at workplaces; inside means of transport; or military activities in military areas.

Environment

B.79 The Green Infrastructure Framework (2023) [\[See reference 78\]](#) by Natural England will help increase the amount of green cover to 40% in urban residential areas. The Green Infrastructure Framework provides a structure to analyse where greenspace in urban environments is needed most. It aims to support equitable access to greenspace across the country, with an overarching target for everyone being able to reach good quality greenspace in their local area. From parks to green roofs, and increased tree cover, the Green Infrastructure Framework will make a significant contribution to nature recovery by embedding nature into new developments. Increasing the extent and connectivity of nature-rich habitats will also help increase wildlife populations, build resilience to the impacts of climate change, and ensure our cities are habitable for the future.

B.80 Nature Recovery Network [\[See reference 79\]](#) is a national network of wildlife-rich places to increase and restore nature, and the role of the delivery partnership and management groups. The Nature Recovery Network document explains:

- how Defra and Natural England will work with partners to create a national NRN
- what the NRN will achieve
- the roles of the delivery partnership and management group
- how to become a partner

B.81 The Environment Improvement Plan 2023 [\[See reference 80\]](#) for England is the first revision of the 25YEP. It builds on the 25YEP vision with a new plan

Appendix B Review of Relevant Plans, Policies and Programmes

setting out how we will work with landowners, communities and businesses to deliver each of our goals for improving the environment, matched with interim targets to measure progress. Taking these actions will help us restore nature, reduce environmental pollution, and increase the prosperity of our country. To achieve its vision, the 25YEP set out 10 goals. We have used those 10 goals set out in the 25YEP as the basis for this document: setting out the progress made against all 10, the specific targets and commitments made in relation to each goal, and our plan to continue to deliver these targets and the overarching goals. The environmental goals are:

- Goal 1: Thriving plants and wildlife
- Goal 2: Clean air
- Goal 3: Clean and plentiful water
- Goal 4: Managing exposure to chemicals and pesticides
- Goal 5: Maximise our resources, minimise our waste
- Goal 6: Using resources from nature sustainably
- Goal 7: Mitigating and adapting to climate change
- Goal 8: Reduced risk of harm from environmental hazards
- Goal 9: Enhancing biosecurity
- Goal 10: Enhanced beauty, heritage, and engagement with the natural environment

B.82 The Air Quality Strategy for England (2023) [\[See reference 81\]](#) sets out local authorities powers and responsibilities as well as the actions that Defra expects local authorities to take in support of the governments long-term air quality goals, including new PM2.5 targets.

B.83 The waste prevention programme for England: Maximising Resources, Minimising Waste (2023) [\[See reference 82\]](#) sets out government's priorities for managing resources and waste, in line with the resources and waste strategy for England. The programme aims to move to a circular economy by

keeping goods in circulation for as long as possible and at their highest value. This includes increasing the reuse, repair and remanufacture of goods.

B.84 Establishing the Best Available Techniques for the UK (UK BAT) (2022) [See reference 83] sets out a new framework that aims to improve industrial emissions and protect the environment through the introduction of a UK BAT regime. It aims to set up a new structure of governance with a new independent body in the form of Standards Council and the Regulators Group, consisting of government officials and expert regulators from all UK nations. It aims to also establish a new UK Air Quality Governance Group to oversee the work of the Standards Council and the delivery of the requirements under this new framework. It is anticipated that the BATC for the first four industry sectors will be published in the second half of 2023. Climate Change Allowances (2022) [See reference 84] details when and how local planning authorities, developers and their agents should use climate change allowances in flood risk assessments.

B.85 Working with nature (2022) [See reference 85] discusses the importance of nature in providing ecosystem services and presents recent and historical trends in biodiversity. It outlines some of the main pressures affecting England's habitats, wildlife and ecosystems: land use; climate change; pollution; invasive non-native species; and hydrological change.

B.86 The Environment Act 2021 [See reference 86] sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. Biodiversity elements in the Act include:

- Strengthened biodiversity duty. Both onsite and offsite enhancements must be maintained for at least 30 years after completion of a development.
- Biodiversity net gain to ensure developments deliver at least 10% increase in biodiversity
- Local Nature Recovery Strategies to support a Nature Recovery Network.
- Duty upon Local Authorities to consult on street tree felling.

Appendix B Review of Relevant Plans, Policies and Programmes

- Strengthen woodland protection enforcement measures.
- Conservation Covenants.
- Protected Site Strategies and Species Conservation Strategies to support the design and delivery of strategic approaches to deliver better outcomes for nature.
- Prohibit larger UK businesses from using commodities associated with wide-scale deforestation.
- Requires regulated businesses to establish a system of due diligence for each regulated commodity used in their supply chain, requires regulated businesses to report on their due diligence, introduces a due diligence enforcement system.

B.87 Managing Water Abstraction (2021) [See reference 87] is the overarching document for managing water resources in England and Wales and links together the abstraction licensing strategies.

B.88 National Chalk Streams Strategy (2021) [See reference 88] was built around the “trinity of ecological health”: water quantity, water quality and habitat quality and included 30+ recommendations to Defra, the Environment Agency, Natural England, the water companies, NGOs and stakeholders.

B.89 Meeting our future water needs: a national framework for water resources (2020) [See reference 89] set the strategic direction for long term regional water resources planning. The framework is built on a shared vision to:

- leave the environment in a better state than we found it
- improve the nation’s resilience to drought and minimise interruptions to all water users

B.90 The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 [See reference 90] protect biodiversity through the conservation of natural habitats and species of wild fauna and flora, including birds. The Regulations lay down rules for the protection, management and

Appendix B Review of Relevant Plans, Policies and Programmes

exploitation of such habitats and species, including how adverse effects on such habitats and species should be avoided, minimised and reported.

B.91 The national framework [See reference 91] marks a step change in water resources planning. The 5 regional water resources groups will produce a set of co-ordinated, cross-sector plans. These plans will:

- address the scale of challenges we face by identifying the options needed in their region to manage demand and increase supply
- realise opportunities from water resources planning by working collaboratively

B.92 The Clean Air Strategy 2019 [See reference 92] sets out the comprehensive action that is required from across all parts of Government and society to meet these goals. This will be underpinned by new England-wide powers to control major sources of air pollution, in line with the risk they pose to public health and the environment, plus new local powers to take action in areas with an air pollution problem. These will support the creation of Clean Air Zones to lower emissions from all sources of air pollution, backed up with clear enforcement mechanisms. The UK has set stringent targets to cut emissions by 2020 and 2030.

B.93 The Environment Agency's Approach for Groundwater Protection (2018) [See reference 93] contains position statements which provide information about the Environment Agency's approach to managing and protecting groundwater. They detail how the Environment Agency delivers government policy for groundwater and adopts a risk-based approach where legislation allows. Many of the approaches set out in the position statements are not statutory but may be included in, or referenced by, statutory guidance and legislation.

B.94 The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 [See reference 94] protect inland surface waters, transitional waters, coastal waters and groundwater, and outlines the associated river basin management process. These Regulations establish the

need to prevent deterioration of waterbodies and to protect, enhance and restore waterbodies with the aim of achieving good ecological and chemical status.

B.95 The UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations 2017 [\[See reference 95\]](#) sets out the Government's ambition and actions for delivering a better environment and cleaner air, including £1 billion investment in ultra-low emission vehicles, a £290 million National Productivity Investment Fund, a £11 million Air Quality Grant Fund and £255 million Implementation Fund to help Local Authorities to prepare Air Quality Action Plans and improve air quality, an £89 million Green Bus Fund, £1.2 billion Cycling and Walking Investment Strategy and £100 million to help improve air quality on the National road network.

B.96 Drought response: our framework for England (2017) [\[See reference 96\]](#) tells you how drought affects England and how the Environment Agency works with government, water companies and others to manage the effects on people, business and the environment. It aims to ensure consistency in the way we co-ordinate drought management across England. It sets out:

- how drought affects different parts of England
- who is involved in managing drought and how we work together
- how we and others take action to manage drought
- how we monitor and measure the impacts of drought to advise senior management and government on the prospects and possible action
- how we report on drought and communicate with others

B.97 The Nitrate Pollution Prevention Regulations 2016 [\[See reference 97\]](#) provides for the designation of land as nitrate vulnerable zones and imposes annual limits on the amount of nitrogen from organic manure that may be applied or spread in a holding in a nitrate vulnerable zone. The Regulations also specify the amount of nitrogen to be spread on a crop and how, where and when to spread nitrogen fertiliser, and how it should be stored. It also

Appendix B Review of Relevant Plans, Policies and Programmes

establishes closed periods during which the spreading of nitrogen fertiliser is prohibited.

B.98 The Water Supply (Water Quality) Regulations 2016 [\[See reference 98\]](#) focus on the quality of water for drinking, washing, cooking and food preparation, and for food production. Their purpose is to protect human health from the adverse effects of any contamination of water intended for human consumption by ensuring it is wholesome and clean.

B.99 The Environmental Permitting (England and Wales) Regulations 2016 [\[See reference 99\]](#) streamline the legislative system for industrial and waste installations into a single permitting structure for those activities which have the potential to cause harm to human health or the environment. They set out how to prevent or, where that is not practicable, to reduce emissions into air, water and land and to prevent the generation of waste, in order to achieve a high level of protection of the environment and human health.

B.100 The Air Quality Standards Regulations 2016 [\[See reference 100\]](#) set out limits on concentrations of outdoor air pollutants that impact public health, most notably particulate matter (PM10 and PM2.5) and nitrogen dioxide (NO₂). It also sets out the procedure and requirements for the designation of Air Quality Management Areas (AQMAs).

B.101 Environmental Damage (Prevention and Remediation) Regulations 2015 [\[See reference 101\]](#) are wide-ranging government regulations that can potentially apply to many businesses. The regulations oblige those who create environmental damage, whether by water pollution, adversely affecting protected species or sites of special scientific interest (SSSIs), or by land pollution that causes risks to human health, to not only cease the damage, but also to implement a wide variety of remedial measures to restore affected areas.

B.102 Biodiversity offsetting in England Green Paper (2013) [\[See reference 102\]](#). Biodiversity offsets are conservation activities designed to compensate for residual losses. The Green Paper sets out a framework for offsetting.

Appendix B Review of Relevant Plans, Policies and Programmes

B.103 The Water White Paper (2012) [\[See reference 103\]](#) sets out the Government's vision for the water sector including proposals on protecting water resources and reforming the water supply industry. It states outlines the measures that will be taken to tackle issues such as poorly performing ecosystem, and the combined impacts of climate change and population growth on stressed water resources.

B.104 The National Policy Statement for Waste Water (2012) [\[See reference 104\]](#) sets out Government policy for the provision of major waste water infrastructure. The policy set out in this NPS is, for the most part, intended to make existing policy and practice in consenting nationally significant waste water infrastructure clearer and more transparent.

B.105 Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011) [\[See reference 105\]](#) guides conservation efforts in England up to 2020 by requiring a national halt to biodiversity loss, supporting healthy ecosystems and establishing ecological networks.

B.106 Defra Right of Way Circular (1/09) (2011) [\[See reference 106\]](#) gives advice to local authorities on recording, managing and maintaining, protecting and changing public rights of way.

B.107 The Flood and Water Management Act 2010 [\[See reference 107\]](#) and The Flood and Water Regulations (2019) [\[See reference 108\]](#) sets out measures to ensure that risk from all sources of flooding is managed more effectively. This includes incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; rolling back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

B.108 The Countryside and Rights of Way Act 2010 [\[See reference 109\]](#) is an Act of Parliament to make new provision for public access to the countryside.

B.109 Safeguarding our Soils – A Strategy for England (2009) [See reference 110] sets out how England's soils will be managed sustainably. It highlights those areas which Defra will prioritise and focus attention on tackling degradation threats, including better protection for agricultural soils; protecting and enhancing stores of soil carbon; building the resilience of soils to a changing climate; preventing soil pollution; effective soil protection during construction and dealing with contaminated land.

B.110 Groundwater (England and Wales) Regulations 2009 [See reference 111] implement in England and Wales Community legislation on pollution of groundwater. They provide rules for the granting by the Environment Agency of a permit under these Regulations, consent under section 91(8) of the Water Resources Act 1991 and (with exceptions) an environmental permit under the Environmental Permitting (England and Wales) Regulations. In addition, the Regulations create an offence of discharge of a hazardous substance or non-hazardous pollutant without a permit, provide for powers of enforcement of the Environment Agency and prescribe penalties for offences committed under these Regulations.

B.111 Flood Risk Regulations 2009 [See reference 112] regulations were enacted in December 2009. They outline a set of tasks, which the county council is required to follow between now and approximately 2015. The regulations also implement the 2007 EU Floods Directive. In accordance with the regulations the council has a series of new responsibilities, these are:

- The preparation of a Preliminary Flood Risk Assessment (PFRA) Report, including the identification of flood risk areas
- The preparation of Flood Hazard Maps and Flood Risk Maps
- The preparation of Flood Risk Management Plans
- Cooperating with the Environment Agency and other Lead Local Flood Authorities.

B.112 England Biodiversity Strategy Climate Change Adaptation Principles (2008) [See reference 113] sets out principles to guide adaptation to climate change. The principles are take: practical action now, maintain and increase

Appendix B Review of Relevant Plans, Policies and Programmes

ecological resilience, accommodate change, integrate action across all sectors and develop knowledge and plan strategically. The precautionary principle underpin all of these. Natural Environment and Rural Communities Act 2006.

B.113 Future Water: The Government's Water Strategy for England (2008) **[See reference 114]** sets out how the Government wants the water sector to look by 2030, providing an outline of steps which need to be taken to get there. These steps include improving the supply of water; agreeing on important new infrastructure such as reservoirs; proposals to time limit abstraction licences; and reducing leakage. The document also states that pollution to rivers will be tackled, whilst discharge from sewers will be reduced.

B.114 The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007) **[See reference 115]** sets out a way forward for work and planning on air quality issues by setting out the air quality standards and objectives to be achieved. It introduces a new policy framework for tackling fine particles and identifies potential new national policy measures which modelling indicates could give further health benefits and move closer towards meeting the Strategy's objectives. The objectives of the Strategy are to:

- Further improve air quality in the UK from today and long term; and
- Provide benefits to health quality of life and the environment.

B.115 The Natural Environment and Rural Communities Act 2006 **[See reference 116]** places a duty on public bodies to conserve biodiversity.

B.116 The Environmental Noise Regulations 2006 **[See reference 117]** apply to environmental noise, mainly from transport. The regulations require regular noise mapping and action planning for road, rail and aviation noise and noise in large urban areas. They also require Noise Action Plans based on the maps for road and rail noise and noise in large urban areas. The Action Plans identify Important Areas (areas exposed to the highest levels of noise) and suggest ways the relevant authorities can reduce these. Major airports and those which affect large urban areas are also required to produce and publish their own Noise Action Plans separately. The Regulations do not apply to noise from

Appendix B Review of Relevant Plans, Policies and Programmes

domestic activities such as noise created by neighbours; at workplaces; inside means of transport; or military activities in military areas.

B.117 The Urban Waste Water Treatment Regulations (2003) [\[See reference 118\]](#) protect the environment from the adverse effects of urban waste water discharges and certain industrial sectors, notably domestic and industrial waste water. The regulations require the collection of waste water and specifies how different types of waste water should be treated, disposed and reused.

B.118 Environment Agency policy against the culverting of watercourses (1999) [\[See reference 119\]](#) provides technical guidance for people applying for Environment Agency consent to culvert a watercourse or to modify an existing culvert.

B.119 Land Drainage Act 1991 [\[See reference 120\]](#) consolidates the enactments relating to internal drainage boards, and to the functions of such boards and of local authorities in relation to land drainage.

B.120 The Environmental Protection Act 1990 [\[See reference 121\]](#) makes provision for the improved control of pollution to the air, water and land by regulating the management of waste and the control of emissions. Seeks to ensure that decisions pertaining to the environment are made in an integrated manner, in collaboration with appropriate authorities, non-governmental organisations and other persons.

B.121 Wildlife and Countryside Act 1981 (as amended) [\[See reference 122\]](#) was enacted primarily to implement the Birds Directive and Bern Convention in Great Britain. The Act received royal assent on 30 October 1981 and was brought into force in incremental steps. It is supplemented by the Wildlife and Countryside (Service of Notices) Act 1985, which relates to notices served under the 1981 Act. The act contains four parts and 17 schedules, which cover:

- Part 1: Wildlife (includes protection of birds, animals and plants; and measures to prevent the establishment of non-native species which may be detrimental to native wildlife).

Appendix B Review of Relevant Plans, Policies and Programmes

- Part 2: Nature conservation, the countryside and National Parks (including the designation of protected areas).
- Part 3: Public rights of way.
- Part 4: Miscellaneous provisions of the act.

B.122 The National Parks and Access to the Countryside Act 1949 [See reference 123] is an Act of Parliament to make provision for National Parks and the establishment of a National Parks Commission; to confer on the Nature Conservancy and local authorities' powers for the establishment and maintenance of nature reserves; to make further provision for the recording, creation, maintenance and improvement of public paths and for securing access to open country.

Historic Environment

B.123 Historic England, Corporate Plan 2023-26 [See reference 124], contains the action plan which sets out how the aims of the corporate plan will be delivered. The plan includes priorities to demonstrate how Historic England will continue to work towards delivering the heritage sector's priorities for the historic environment.

B.124 The Heritage Statement 2017 [See reference 125] sets out how the Government will support the heritage sector and help it to protect and care for our heritage and historic environment, in order to maximise the economic and social impact of heritage and to ensure that everyone can enjoy and benefit from it.

B.125 The Setting of Heritage Assets (2017) [See reference 126] sets out guidance, against the background of the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guide (PPG), on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas, and landscapes. It gives general advice on understanding setting, and how it may contribute to the

Appendix B Review of Relevant Plans, Policies and Programmes

significance of heritage assets and allow that significance to be appreciated, as well as advice on how views contribute to setting.

B.126 Sustainability Appraisal and Strategic Environmental Assessment, Historic England Advice Note 8 (2016) [\[See reference 127\]](#) sets out requirements for the consideration and appraisal of effects on the historic environment as part of the Sustainability Appraisal/Strategic Environmental Assessment process.

B.127 The Historic Environment and Site Allocations in Local Plans (2015) [\[See reference 128\]](#) offers advice to all those involved in the process, to help ensure that the historic environment plays a positive role in allocating sites for development. It offers advice on evidence gathering and site allocation policies, as well as setting out in detail a number of steps to make sure that heritage considerations are fully integrated in any site selection methodology.

B.128 Managing Significance in Decision-Taking in the Historic Environment (2015) [\[See reference 129\]](#) contains information on assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness.

B.129 The Historic Environment in Local Plans (n.d) [\[See reference 130\]](#) sets out information to help local planning authorities make well informed and effective local plans.

B.130 Historic Landscape Characterisation (n.d) [\[See reference 131\]](#) can be used to help secure good quality, well designed and sustainable places. It is a method of identification and interpretation of the varying historic character within an area that looks beyond individual heritage assets as it brigades understanding of the whole landscape and townscape into repeating HLC Types.

B.131 The Government's Statement on the Historic Environment for England 2010 [\[See reference 132\]](#) sets out the Government's 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. Includes reference to promoting the role of the historic environment within the Government's response to climate change and the wider sustainable development agenda.

B.132 The Planning (Listed Buildings and Conservation Areas) Act 1990 [See reference 133] is an Act of Parliament that changed the laws for granting of planning permission for building works, with a particular focus on listed buildings and conservation areas.

B.133 The Ancient Monuments and Archaeological Areas Act 1979 [See reference 134] is a law passed by the UK government to protect the archaeological heritage of England and Wales and Scotland. Under this Act, the Secretary of State has a duty to compile and maintain a schedule of ancient monuments of national importance, in order to help preserve them. It also creates criminal offences for unauthorised works to, or damage of, these monuments.

B.134 The Historic Buildings and Ancient Monuments Act 1953 [See reference 135] is an Act of Parliament that makes provision for the compilation of a register of gardens and other land (parks and gardens, and battlefields).

Economic Growth

B.135 The Growth Plan 2022 [See reference 136] makes growth the government's central economic mission, setting a target of reaching a 2.5% trend rate. Sustainable growth will lead to higher wages, greater opportunities and provide sustainable funding for public services. The Chancellor of the Exchequer's "growth plan" contained a raft of significant tax measures, with major changes being announced for both individuals and businesses.

B.136 Build Back Better: Our Plan for Growth (2021) [See reference 137] sets out a plan to ‘build back better’ tackling long-term problems to deliver growth that delivers high-quality jobs across the UK while supporting the transition to net zero. This will build on three core pillars of growth: infrastructure, skills and innovation.

B.137 The Agricultural Transition Plan 2021 to 2024 [See reference 138] aims to drive competitiveness, increase productivity, reduce carbon emissions, and generate fairer returns across the agricultural industry. The Transition Plan introduces several new schemes to improve the environment, animal health and welfare, and farm resilience and productivity (e.g., grants will be available for sustainable farming practices, creating habitats for nature recovery and making landscape-scale changes such as establishing new woodland and other ecosystem services). Heritage and the Economy 2020 [See reference 139] examines the economics of heritage conservation and presents evidence on the numerous ways that the historic environment contributes to the national economy and to local economies. The key findings include:

- In 2019, pre COVID-19 pandemic, the heritage sector provided over 206,000 jobs directly and supported a further 357,000 jobs through indirect and induced mechanisms in multiple sectors including the construction, tourism, public, creative industries and social services sectors.
- Heritage employment growth outstripped the rest of the UK economy, growing almost twice as fast between 2011 to 2019.
- However, like many sectors the heritage sector has been hard hit by the COVID-19 pandemic and subsequent restrictions to reduce the spread of the virus.
- The conservation, use, and re-use of our precious heritage assets exemplify the fundamental principles of the circular economy.
- The cost of reducing pollution as measured by the marginal abatement cost (MAC) is generally lower for retrofitted historic buildings, than for an equivalent new building.

Appendix B Review of Relevant Plans, Policies and Programmes

- It has been estimated that for every €1 million invested in energy renovation of buildings, an average of 18 jobs are created in the EU (Wade, 2020).
- Historic assets form a significant part of our retail environment and our high streets with up to 48% of all national retail stock built before 1919. Local distinctiveness can be key to high street renewal.
- Heritage has an important role to play in our wellbeing economy. Heritage is an essential part of the social fabric of our society.
- Heritage has an important role to play in building back more inclusive local economies, communities and identities.

B.138 The Heritage Sector in England and its impact on the Economy 2020

[See reference 140] assesses the economic contributions and impacts of England's heritage sector in the UK. The report also provides detailed estimates of the national and regional economic impact of the heritage sector.

B.139 The Agriculture Act 2020 **[See reference 141]** sets out how farmers and land managers in England will be rewarded in the future with public money for “public goods” – such as better air and water quality, thriving wildlife, soil health, or measures to reduce flooding and tackle the effects of climate change, under the Environmental Land Management Scheme. The Act will help farmers to stay competitive, increase productivity, invest in new technology and seek a fairer return from the marketplace. Agricultural Transition Plan 2021 to 2024.

B.140 UK Industrial Strategy: Building a Britain fit for the future (2018) **[See reference 142]** lays down a vision and foundations for a transformed economy. Areas including artificial intelligence and big data; clean growth; the future of mobility; and meeting the needs of an ageing society are identified as the four ‘Grand Challenges’ of the future.

B.141 The National Infrastructure Delivery Plan 2016-2021 **[See reference 143]** brings together the Government's plans for economic infrastructure over this five year period with those to support delivery of housing and social infrastructure.

B.142 The LEP Network Response to the Industrial Strategy Green Paper Consultation (2017) [See reference 144] seeks to ensure that all relevant local action and investment is used in a way that maximises the impact it has across the Government's strategy. Consultation responses set out how the 38 Local Enterprise Partnerships will work with Government using existing and additional resources to develop and implement a long-term Industrial Strategy.

Transport

B.143 Future of Transport: supporting rural transport innovation (2023) [See reference 145] shows how innovative and emerging transport technologies could address some of the major challenges in rural communities. It highlights the importance of transport to everyday life rural life and provides guiding principles for the introduction of new technologies and services.

B.144 The Cycling and Walking Investment Strategy Report to Parliament (2022) [See reference 146] sets out the objectives and financial resources for cycling and walking infrastructure. It states the Government's long-term ambition is to make walking and cycling the natural choices for shorter journeys. It aims to double cycling by 2025, increase walking activity, increase the percentage of children that usually walk to school and reduce the number of cyclists killed or seriously injured on England's roads.

B.145 Decarbonising Transport: A Better, Greener Britain (2021) (Decarbonising Transport Plan (DTP)) [See reference 147] sets out the Government's commitments and the actions needed to decarbonise the entire transport system in the UK. It follows on from the Decarbonising Transport: Setting the Challenge report published in 2020. The DTP commits the UK to phasing out the sale of new diesel and petrol heavy goods vehicles by 2040, subject to consultation, in addition to phasing out the sale of polluting cars and vans by 2035. The DPT also sets out how the government will improve public transport and increase support for active travel, as well as creating a net zero rail network by 2050, ensuring net zero domestic aviation emissions by 2040, and a transition to green shipping.

B.146 Decarbonising Transport: Setting the Challenge (2020) [See reference 148] sets out the strategic priorities for the new Transport Decarbonisation Plan (TDP), published in July 2021. It sets out in detail what government, business and society will need to do to deliver the significant emissions reduction needed across all modes of transport, putting us on a pathway to achieving carbon budgets and net zero emissions across every single mode of transport by 2050. This document acknowledges that while there have been recently published strategies to reduce greenhouse gas emissions in individual transport modes, transport as a whole sector needs to go further and more quickly, therefore the TDP takes a coordinated, cross-modal approach to deliver the transport sector's contribution to both carbon budgets and net zero.

B.147 The Road to Zero (2018) [See reference 149] sets out new measures towards cleaner road transport, aiming to put the UK at the forefront of the design and manufacturing of zero emission vehicles. It explains how cleaner air, a better environment, zero emission vehicles and a strong, clean economy will be achieved. One of the main aims of the document is for all new cars and vans to be effectively zero emission by 2040.

B.148 The Transport Investment Strategy 2017 [See reference 150] sets out four objectives that the strategy aims to achieve:

- Create a more reliable, less congested, and better connected transport network that works for the users who rely on it;
- Build a stronger, more balanced economy by enhancing productivity and responding to local growth priorities;
- Enhance our global competitiveness by making Britain a more attractive place to trade and invest; and
- Support the creation of new housing.

B.149 The Highways England Sustainable Development Strategy and Action Plan (2017) [See reference 151] is designed to communicate the company's approach and priorities for sustainable development to its key stakeholders. Highways England aims to ensure its action in the future will further reduce the impact of its activities seeking a long-term and sustainable benefit to the

environment and the communities it serves. The action plan describes how Highways England will progress the aspirations of their Sustainable Development and Environment Strategies. It describes actions that will enable the company to deliver sustainable development and to help protect and improve the environment.

B.150 Door to Door: A strategy for improving sustainable transport integration (2013) [See reference 152] focuses on four core areas which need to be addressed so that people can be confident in choosing greener modes of transport. There are as follows:

- Accurate, accessible and reliable information about different transport options;
- Convenient and affordable tickets;
- Regular and straightforward connections at all stages of the journey and between different modes of transport; and
- Safe and comfortable transport facilities.

B.151 The strategy also includes details on how the Government is using behavioural change methods to reduce or remove barriers to the use of sustainable transport and working closely with stakeholders to deliver a better-connected transport system.

Sub-national Plans and Programmes of Most Relevance to the Local Plan

B.152 Guiding Principles in Land Contamination (2010) [See reference 153] provides answers to a series of questions and includes numerous references to other published guidance on land contamination.

B.153 Land contamination risk management (2020) [See reference 154] details how to manage the risks from land contamination.

B.154 Fairer, greener, stronger: our Strategic Transport Plan for the Midlands: Midlands Connect (2022) [See reference 155] aims to develop, analyse and prioritise the most important transport investments. The projects need to support a more productive, prosperous and sustainable Midlands. The plan makes the following commitments:

- Deliver a Business Case for our full Midlands Engine Rail programme.
- Provide evidence to Government as it investigates how high speed trains will run from the East Midlands.
- Strengthen the position of the Midlands as a leader in the take-up of Electric Cars.
- Publish a Transport Technology Route Plan.
- Develop a clear plan to assist the take up of alternatively fuelled vehicles in the freight sector.
- Continue to invest in the development of new ideas to improve the major road network for all road users.
- Publish a Freight Improvement Plan.
- Develop a funding strategy that outlines the opportunities to bring in private sector funding.
- Support the development of rural mobility solutions.
- Deliver a Decarbonisation Policy Toolkit.
- Establish a Midlands Transport Decarbonisation Forum.

B.155 Leicester and Leicestershire 2050: Our Vision for growth: The Strategic Growth Plan (2018) [See reference 156] has been prepared by the ten partner organisations to provide a long term vision that will address the challenges and opportunities presented in Leicester & Leicestershire . It is a non-statutory plan but it sets out the agreed strategy for the period to 2050. The vision will be delivered through the Local Plan.

B.156 Leicester & Leicestershire Housing & Economic Needs Assessment – Housing Distribution Paper [See reference 157] and Employment Distribution

Appendix B Review of Relevant Plans, Policies and Programmes

Paper (2022) [See reference 158] - District councils across Leicestershire, working with the City Council and County Council, have a proposed approach to the distribution of new homes and employment land to meet future needs which cannot be accommodated in Leicester. The papers set out the proposed redistribution including an average annual housing need contribution of 123 dwellings between 2020 to 20236 by Harborough District to meet the unmet housing need of Leicester.

B.157 Leicester & Leicestershire Economic Growth Strategy 2021-2030 [See reference 159]: The Leicester and Leicestershire Economic Growth Strategy 2021-2030 seeks to deliver recovery and growth. Leicester and Leicestershire face the challenges of recovering from the Covid-19 pandemic, and the post-EU transition – from a position of strength as the region has transformed into a leading technology and knowledge-based economy over the past 10 years. This strategy is built on robust research, stakeholder views and existing policies.

B.158 Energy Infrastructure Strategy for Leicester and Leicestershire 2018 [See reference 160]: Leicester and Leicestershire Enterprise Partnership (LLEP), in partnership with Leicester City Council & Leicestershire County Council, have commissioned Element Energy and Cambridge Econometrics to develop and deliver an Energy Infrastructure Strategy and implementation plan for the LLEP area. The Energy Infrastructure Strategy sets the level of ambition, and guides investment in the low carbon energy sector, which has been identified as one of the LLEP's priority sectors for economic growth. The strategy identifies a set of concrete project opportunities that can be pursued immediately and over the coming years. The projects proposed span the LLEP area, and involve a wide range of sectors including homes, businesses, transport, power generation and energy networks. The strategy takes into account national policy (including the Clean Growth Strategy) and local policies and will feed into the development of the LLEP's Industrial Strategy.

B.159 Leicestershire Rural Framework 2022-2030: The Leicestershire Rural Partnership (LRP) [See reference 161] is an established and successful partnership which brings together public, private and voluntary stakeholders to improve services and support to rural communities and businesses. The work of the Partnership is shaped by the priorities in its Rural Development Framework,

Appendix B Review of Relevant Plans, Policies and Programmes

and its success is dependent on the input from a range of organisations that sit on the LRP Management Board. The vision of the framework is to make rural Leicestershire a thriving, inclusive, digitally well connected and healthy communities and businesses, that are adapting to the challenges posed by climate change to become resilient and maximising the opportunities offered by a net zero carbon future.

B.160 Leicestershire Public Health Strategy 2022-2027 [\[See reference 162\]](#) sets out the authority's priorities and identifies areas for focus over the next five years. In setting out the Public Health strategy, the county council's Public Health team look to deliver services and support which reduce the causes of ill-health and improve the health and wellbeing of residents.

B.161 Leicester and Leicestershire SHELAA Joint Methodology Paper 2019 [\[See reference 163\]](#): Provides guidance to the Leicester and Leicestershire Councils undertaking housing and economic development land availability assessments. Local Planning Authorities within the Leicester and Leicestershire Housing Market Area have agreed a joint approach to the preparation of housing and economic land availability assessments through this methodology and have agreed common working arrangements in line with Duty to Cooperate requirements.

B.162 Leicester City and Leicestershire Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) 2017 [\[See reference 164\]](#): The fieldwork for the study was completed after the publication of the Planning Policy for Traveller Sites. There were seven Gypsy or Traveller households identified in Harborough District that meet the planning definition, 52 unknown households that meet the planning definition and 11 households that do not meet the planning definition. The GTAA identified a need for six additional pitches for households that meet the planning definition and upto 18 additional pitches for unknown households.

B.163 Harborough District Council Gypsy and Traveller Accommodation Assessment (2024) provides an assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in Harborough

Appendix B Review of Relevant Plans, Policies and Programmes

District. The fieldwork for the study was completed between March 2024 and June 2024, and the baseline date for the study is June 2024. There were 7 Gypsy or Traveller households identified in Harborough District that met the 2023 PPTS planning definition; 17 households that did not meet the PPTS planning definition; and 77 undetermined households that may meet the PPTS planning definition. In relation to Gypsy and Travellers, there is a need for 7 pitches for households that met the 2023 planning definition and 77 pitches for undetermined households. In relation to Travelling Showpeople, there is a need for 69 plots for households that met the planning definition and 37 plots for undetermined households.

B.164 Strategic B8 Needs Sensitivity Report (2024) provides an interim updated assessment of the need for additional strategic B8 development, comprising warehousing and logistics units of > 9,300 sq.m in size across Leicester & Leicestershire; and considers what proportion of this might be planned for in Harborough's Local Plan. The study indicates that an appropriate contribution for the District is between 100-140 ha of additional B8 development to meeting the residual or net need. This is in addition to current commitments at Magna Park.

B.165 Warehousing and Logistics in Leicester and Leicestershire: Managing Growth and Change (2022) [See reference 165], examines the current state and future needs of the logistics sector in the region up to 2041. It highlights key drivers of change, including the rise of e-commerce, the push for decarbonisation, and advances in technology, all of which are reshaping the logistics market. The study addresses land and floorspace requirements, identifying shortfalls at both rail-served and road-served sites, and proposes planning policies to support sustainable growth. The report also explores labour and skills implications, forecasting significant job creation while emphasising the need for higher-skilled roles due to automation and innovation. The report recommends strategic investments in rail infrastructure, warehouse modernisation, and grid capacity to support electric vehicles. Additionally, it stresses the importance of monitoring trends, enhancing local planning policies, and addressing HGV parking shortages to maintain the region's competitive edge in logistics and distribution.

B.166 Harborough District Landscape Character Assessment 2007 [See reference 166] provides a comprehensive Landscape Character Assessment of the District. The assessment also examined the relationship between the urban edge settlements and adjoining landscapes. The District is analysed in landscape terms according to a range of key characteristics: topography, vegetation cover, ecology, heritage, land use and settlement patterns. The study uses landscape character areas, of which, there are five within Harborough. The landscape character areas have been refined, described and evaluated in relation to landscape qualities and capacity.

B.167 The Leicestershire Local Transport Plan for Leicestershire 2026–2040 [See reference 167] outlines a comprehensive strategy to create a safe, resilient, and well-connected transport network that supports economic growth, enhances community health, and protects the environment. The plan is structured around five core themes: delivering economic growth, improving resilience, enabling health and wellbeing, embracing innovation, and protecting the environment. The plan addresses key challenges, such as population growth, ageing demographics, housing demand, and climate change, while promoting active travel, decarbonisation, and sustainable transport solutions. The plan also includes phased implementation, starting with a strategic vision in the core document, followed by focused strategies and investment plans for multi-modal transport and infrastructure improvements. Regular monitoring and evaluation aims to ensure the plan adapts to emerging needs and opportunities, providing value to communities and stakeholders across Leicestershire.

B.168 The Leicestershire Highways Design Guide (2022) [See reference 168] deals with highways and transportation infrastructure for new developments in areas for which Leicestershire County Council is the highway authority. This version is a 2022 interim guide, which contains minor amendments and updates to references to standards and guidance. A full refresh project is now underway, which will be subject to consultation.

B.169 Leicestershire Minerals and Waste Local Plan up to 2031 (2019) [See reference 169] - Leicestershire County Council is responsible for minerals and waste planning in the administrative area of Leicestershire (outside the City of Leicester). The Council is reviewing its current planning policies dealing with

Appendix B Review of Relevant Plans, Policies and Programmes

mineral extraction and waste management. This Minerals and Waste Local Plan includes a spatial vision, spatial strategy, strategic objectives, and core policies which set out the key principles to guide the future winning and working of minerals and the form of waste management development in the County of Leicestershire over the period to the end of 2031. The Development Management Policies set out the criteria against which planning applications for minerals and waste development will be considered. Smaller non-strategic waste facilities will be sought in the first instance within the Broad Locations for strategic waste facilities but also in Market Harborough.

B.170 The Leicester and Leicestershire Strategic Transport Priorities 2020-2050 (LLSTP) [See reference 170] has been prepared by Leicestershire County Council and Leicester City Council. The LLSTP outlines the key long-term transport priorities that will support the future development and prosperity of Leicester and Leicestershire. It highlights where the two transport authorities will work together to deliver common transport aims and objectives. The LLSTP will provide a transparent framework for determining decisions on key long-term transport priorities, ensure cross-boundary co-ordination and build on the effective partnership and joint work that is undertaken with Leicester City Council.

B.171 The Cycling and Walking Strategy for Leicestershire (2022) [See reference 171] aims to support people across the county to make more sustainable travel choices, with a vision for Leicestershire to become a county where walking and cycling are safe, accessible and obvious choices for short journeys and a natural part of longer journeys, helping to deliver healthier, greener communities by reducing congestion, and improving air quality, health and wellbeing. The Action Plan sets out the practical actions that are being taken to help deliver the strategy over the short, medium and long term. It will be updated annually to take account of funding availability, changes to national guidance, priorities and any changes to delivery of proposals.

B.172 Leicester and Leicestershire Rail Strategy 2017 [See reference 172] identifies priorities for Leicester and Leicestershire which are:

- To maximise the benefit from the Midland Main Line services.

Appendix B Review of Relevant Plans, Policies and Programmes

- To achieve the best result from the implementation of HS2 Phase 2.
- To improve radically direct fast connectivity to key regional and national destinations.
- To ensure that rail access and economic development are planned together.
- To support modal shift from cars and lorries to sustainable transport.

B.173 Leicester and Leicestershire have poor rail connectivity particularly between regional and national centres. The strategy proposes a number of developments to improve rail travel within Leicestershire.

B.174 Harborough Retail Town Centres Study (2024) includes a detailed centre health checks and audits for the six key designated towns in Harborough District. The study identified a combined floorspace projection for retail and food/beverage upto 2041 of 11,300 sq.m gross. The majority of the floorspace is required in Market Harborough. The leisure expenditure projections indicate there may be potential to accommodate an additional 1,500 sq.m gross of commercial leisure and cultural floorspace by 2041.

B.175 Leicester and Leicestershire Tourism Growth Plan 2018 **[See reference 173]** sets out how Leicester and Leicestershire will be positioned as a destination for leisure and business tourism. The Plan provides a framework to support Leicester and Leicestershire attracting more leisure and business visitors while encouraging visitors to spend more and stay longer. The Tourism Growth Plan Framework has three strategic priorities which is underpinned by four enablers:

- Strategic Priority 1: Creating a strong, distinctive and visible destination.
- Strategic Priority 2: Improve productivity.
- Strategic Priority 3: Strategic product development.

B.176 The Net Zero Leicestershire Strategy 2023-2045 **[See reference 174]** outlines a comprehensive plan for the county to transition to net zero carbon

Appendix B Review of Relevant Plans, Policies and Programmes

emissions by 2045. The document acknowledges the pressing challenge of climate change and commits to bold action to mitigate its impacts while promoting sustainable development. Key elements include achieving net zero in County Council operations by 2030, reducing greenhouse gas emissions countywide by 65% by 2035 compared to 2019 levels, and engaging residents, businesses, and organisations in collaborative efforts. The strategy emphasises a just transition, ensuring equitable climate action, and highlights co-benefits such as improved public health, job creation, and biodiversity enhancement. To achieve these goals, the plan focuses on areas like energy efficiency, sustainable transport, renewable energy, waste reduction, and nature conservation. Annual reviews and public consultations aim to ensure accountability and adaptation to evolving circumstances.

B.177 Harborough Renewable Energy Strategy (2024) identifies the potential for different renewable and low carbon energy technologies at all scales within the District and where they are most suitable for development. The study seeks to provide a robust evidence base to underpin planning policies relating to renewable and low carbon energy generation and low carbon development. There is currently 98MW of operational renewable electricity generation capacity across Harborough. The findings of this study show that there is significant technical potential for renewable and low carbon energy within the District. The greatest technical potential lies in the form of ground-mounted solar PV. Onshore wind also has significant technical potential.

B.178 Net Zero Leicestershire Carbon Roadmap 2021 [\[See reference 175\]](#) informs the future development of coordinated climate action by all citizens, businesses, public authorities and other stakeholders across Leicestershire. The conclusions drawn from this research were:

- The net zero carbon 2045 target for Leicestershire cannot be delivered by the council working alone - we need a team effort and we're driving this forward by encouraging our residents and businesses to help shape a cleaner, greener future for the county, and for future generations.
- The pathway to net zero is challenging but feasible if all available policy levers are employed at pace and scale.

Appendix B Review of Relevant Plans, Policies and Programmes

- Investment will be required from all sectors but there are benefits to be accrued for the economy, society, and the environment if the transition is just and fair.
- Net zero should be progressed within the context of other environment objectives to enhance biodiversity and provide resilience.
- Carbon capture and storage should be built into plans but not relied upon, with offsetting carbon used as the last resort.

B.179 The Draft Leicestershire, Leicester, and Rutland Local Nature Recovery Strategy for [\[See reference 176\]](#) is aimed at enhancing and restoring biodiversity across the region. It promotes a landscape-scale approach to nature recovery, addressing critical issues such as habitat loss, species decline, and climate change. Developed collaboratively with various stakeholders, the strategy identifies priority habitats like woodlands, wetlands, grasslands, and urban areas, alongside key species requiring targeted conservation efforts. The strategy aims to integrate nature-based solutions to improve habitat quality, ecological connectivity, and climate resilience. It emphasises community engagement, sustainable land use, and the role of local partnerships in delivering its aims. Specific actions include creating new habitats, improving existing ones, and establishing networks to connect wildlife corridors. It also outlines mechanisms for monitoring progress, ensuring long-term success in fostering a biodiverse and sustainable natural environment.

B.180 Harborough District Green Wedge Assessment 2024 reviews the Green Wedges within Harborough District. There are currently two Green Wedge designations within Harborough District: Leicester/Scraftoft/Bushby Green Wedge and the Leicester/Thurnby /Oadby Green Wedge. The Green Wedge Assessment found that both Green Wedges strategically achieve the four evaluation functions of the Green Wedge with no recommended changes to their boundaries.

B.181 Harborough Area of Separation Study (2024) provides an evidence base to justify the Areas of Separation to be proposed in the emerging Local Plan and to inform future reviews of Areas of Separation defined in made

Appendix B Review of Relevant Plans, Policies and Programmes

Neighbourhood Plans. A total of ten settlement gaps, two of which are defined as Areas of Separation within the Adopted Local Plan, were assessed.

B.182 Harborough Landscape Character Assessment (2024) provides a up to date strategic district scale framework to guide sustainable development. The Landscape Character Assessment identified and described variations in the character of the landscape; features that make the landscape distinctive; and, helps to guide positive change that conserves, enhances, restores, or creates local landscape character. Ten Landscape Character Types (LCT) are present within the District which share broadly similar patterns of geology, topography, vegetation, and human influences. The LCTs were further subdivided into 26 Landscape Character Areas (LCA).

B.183 Harborough Landscape Sensitivity Assessment (2024) considers whether the landscape around a number of the District's settlements as well as strategic development areas has the capacity to accommodate new development without causing significant adverse effects on its landscape character.

B.184 Harborough Green and Blue Infrastructure Study (2024) provides a district wide analysis of Green and Blue Infrastructure in Harborough District. The study identified the location of existing Green and Blue Infrastructure within the District while highlighting opportunities for new Green and Blue Infrastructure and making recommendations towards policies for protection, provision and enhancement of Green and Blue Infrastructure. The study identified many opportunities to improve the GBI resources and networks across Harborough District to benefit communities, businesses and nature. Some of these can be delivered through the Local Plan, others involve communication and collaboration with other stakeholders.

B.185 The Humber River Basin District Flood Risk Management Plan 2021 to 2027 (2022) [[See reference 177](#)] is a plan to manage significant flood risks in the Flood Risk Areas. The Humber River Basin District is 1 of 10 river basin Districts across England. There are 16 management catchments that make up the river basin District which include many interconnected rivers, lakes,

Appendix B Review of Relevant Plans, Policies and Programmes

groundwater and coastal waters. Harborough is also covered by the Anglian River Basin District Flood Risk Management Plan 2021 to 2027 (2022) [See reference 178]. The Anglian River Basin District (RBD) covers 27,900km². Within the Anglian river basin District there are 16 flood risk areas for significant risk of flooding from rivers and the sea and 12 flood risk areas for significant risk of flooding from surface areas. Harborough also is covered by the Severn River Basin District Flood Risk Management Plan 2021 to 2027 (2022) [See reference 179]. The Severn is the longest river in England with its River Basin District covers an area of over 21,000km². Within the Severn River Basin District there are five flood risk areas for significant risk of flooding from main rivers and the sea and five flood risk areas for significant risk of flooding from surface areas. These flood risk management plans will help to:

- Identify actions that will reduce the likelihood and consequences of flooding.
- Update plans to improve resilience whilst informing the delivery of existing flood programmes.
- Work in partnership to explore wider resilience measures, including nature-based solutions for flood and water.
- Set longer-term, adaptive approaches to help improve our nation's resilience.

B.186 River Basin Management Plans have been produced for Anglian [See reference 180], Humber [See reference 181] and Severn River Basin District [See reference 182]. River basin management plans describe the challenges that threaten the water environment and how these challenges can be managed.

B.187 As Lead Local Flood Authority, Leicestershire County Council is responsible for the development and delivery of the Flood Risk Management Plan. The Leicestershire Local Flood Risk Management Strategy (LFRMS) (2015) [See reference 183] adopts a collaborative approach to managing local flood risk by working with local partners and stakeholders to identify, secure and optimise resources, expertise and opportunities for reducing flood risk and increasing resilience to flooding.

Appendix B Review of Relevant Plans, Policies and Programmes

- The LFMRS assists in developing a greater understanding of local flood risk by improving local knowledge and the understanding of local flood risk.
- It also adopts a sustainable approach to reducing local flood risk, using tools that are economically viable, deliver wider environmental benefits and promote the wellbeing of local people.
- The LFMRS helps to reduce the harmful consequences of local flooding to communities through proactive actions; that enhance preparedness and resilience to local flood risk and contribute to minimising community disruption.
- It also aims to mitigate and manage flood risk relating to development through the promotion of sustainable drainage systems and supporting the development of local policies and guidance.
- Through the LFMRS the financial viability of flood related schemes is secured, through the development of appropriate policies and assessment tools to by establishing flood risk management measures that provide value for money whilst minimising the long-term revenue costs. Seeking to use natural processes where possible or source the costs of any maintenance from the financial beneficiaries of the development further improves the viability of the activities.
- The LFMRS also encourages flood management activities by private owners of ordinary watercourses and flood defence structures, as well as limiting the development of constrictions on ordinary watercourses.

B.188 Space for Wildlife – the Leicester, Leicestershire and Rutland Biodiversity Action Plan 2016-2026 **[See reference 184]** has three main components:

- To promote the restoration, management and creation of BAP priority habitats.
- To promote the creation of new wildlife habitat in the wider countryside.
- To survey, monitor and promote favourable management of existing good sites through the Local Wildlife Sites system.

Appendix B Review of Relevant Plans, Policies and Programmes

B.189 Harborough District Council Level 1 Strategic Flood Risk Assessment (2024) provides a comprehensive and robust evidence base on flood risk issues to support the review and update of the Harborough District Local Plan. The SFRA identifies the key areas of flood risk across Harborough District which includes from fluvial, surface water, groundwater, sewers and reservoir inundation.

B.190 Joint Water Cycle Scoping Study (2024) – the joint water cycle study covers Blaby District Council, Harborough District Council, Hinckley and Bosworth Borough Council and Oadby and Wigston Borough Council. The aim of the Water Cycle Study is to provide the local authorities with sufficient information of the water environment to inform site selection. The study assesses the potential issues relating to future development within the whole of the study area and the impacts on water supply, wastewater collection and treatment and water quality. The Water Cycle Study is required to assess the constraints and requirements that will arise from potential growth on the water infrastructure.

B.191 The Draft Harborough District Economic Development Strategy 2024–2031 aims to foster sustainable growth and prosperity in the district by leveraging its natural assets, strategic location, and diverse economy. It prioritises a collaborative approach involving local businesses, community organisations, and regional stakeholders. Key goals include supporting education and skills development, enhancing infrastructure, promoting sustainable practices, and boosting local businesses' competitiveness. The strategy is guided by four ambitions: Thriving People, focusing on health, education, and job opportunities; Thriving Places, enhancing the economic vitality of towns and rural areas; Thriving Enterprises, increasing productivity and investment; and Thriving Environment, promoting sustainable development and green growth. The strategy emphasises inclusivity, resilience, and adaptability to global and local challenges, ensuring that all residents benefit from economic improvements.

B.192 The Harborough Built Sports Facilities Strategy 2020 [\[See reference 185\]](#) is to identify the needs and guide the investment and funding which will be required up to 2031. The Strategy considers the demand for indoor sports

Appendix B Review of Relevant Plans, Policies and Programmes

facilities larger than 3 court badminton hall size, in addition to swimming pools, leisure centres, fitness gyms, indoor netball and tennis, indoor bowls and other built facilities for indoor sport. In addition, the Council's Community Partnerships Team has prepared a study of Village and Community Halls through out the District which is included as a section in the Strategy.

B.193 The Harborough District Council Open Spaces Strategy 2021 [See reference 186] considers the provision and use of 8 typologies of open space but does not consider outdoor sport as this is dealt with by the Playing Pitch Strategy. Additionally, the provision of cemetery and burial grounds is considered in detail as part of the Cemetery and Burial Ground Strategy for the capacity of cemeteries, but the typology is included here for accessibility, quality, value, and amount of provision. Detailed audits have been undertaken on 299 sites selected using agreed criteria in accordance with Green Flag audit guidelines.

B.194 Harborough Playing Pitch Strategy 2018 [See reference 187] covers up to 2031. The Strategy will also help the Council and its partners to:

- Understand provision needs now and in the future.
- Determine planning applications.
- Ensure that the management and maintenance of sports facilities is appropriate and sustainable.
- Prioritise local authority capital and revenue investment, including S106 and any future Community Infrastructure Levy (CIL).
- Prioritise and support bids for external funding to assist in the delivery of sporting infrastructure.
- Identify the role of the education sector in supporting the delivery of community sporting facilities.
- Contribute to the aims and objectives of improving health and well-being and increasing participation in sport.

B.195 Market Harborough Transport Strategy 2017 – 2031 [\[See reference 188\]](#) presents the overriding findings of a study jointly funded by Leicestershire County Council and Harborough District Council concerning the transport network in and around the settlement of Market Harborough, Leicestershire. The report makes recommendations for the promotion of a medium to long term (up to 2031) highway orientated transport improvement strategy for Leicestershire.

B.196 Lutterworth Town Centre Masterplan 2021: The Environment Partnership (TEP) Ltd [\[See reference 189\]](#), Mott MacDonald and Intali were commissioned by Harborough District Council to prepare a Vision and Masterplan for Lutterworth Town Centre in January 2019 (to be referred to as the Masterplan). The remit of the Masterplan is to ensure the future viability and vitality of the town centre and secure its role as a local destination for retail, leisure and hosting community networks and events. The Masterplan will also form part of the evidence base that will inform the implementation of relevant policies for the Harborough Local Plan (2019) and future versions of the Local Plan. The Masterplan process was paused during 2020 due to the Coronavirus pandemic but was re-started during early 2021.

B.197 Market Harborough Town Centre Masterplan 2022 [\[See reference 190\]](#): The Environment Partnership (TEP) Ltd, Mott MacDonald and BE Group were commissioned by Harborough District Council (HDC) to prepare a Vision and Masterplan for Market Harborough Town Centre from summer 2019 (to be referred to as the Masterplan). The remit of the Masterplan is to ensure the future viability and vitality of the town centre and secure its role as a local destination for retail, leisure and hosting community networks and events. The Masterplan will also form part of the evidence base that will inform the implementation of relevant policies for the Harborough Local Plan 2011-2031, (adopted in April 2019), and future Local Plans. The Masterplan process was paused during 2020 due to the Coronavirus pandemic but was restarted during late 2021.

B.198 Harborough District Council Climate Emergency Action Plan 2022 – 2030 [\[See reference 191\]](#): Harborough District Council declared a Climate Emergency in July 2019. This followed on from many years working on action

Appendix B Review of Relevant Plans, Policies and Programmes

plans devised as part of the Local Government Association initiative; “Climate Local”, which Harborough District Council committed to in 2013. Climate change is a cross cutting issue, with implications across the council’s priorities.

B.199 Harborough District Council Rural Strategy 2023-2028 [\[See reference 192\]](#): The rural strategy sets out how working together to overcome challenges, rural proof future policies to realise the unique opportunities to enhance well-being and prosperity across the District.

B.200 Harborough District Council Health & Wellbeing Strategy 2022-2027 [\[See reference 193\]](#) will support the Council to work with partners and the community to improve health and wellbeing through taking action on the wider factors that contribute to health and wellbeing - ensuring that we utilise our collective resources effectively.

B.201 Corporate Plan 2022 – 2031 Harborough District Council [\[See reference 194\]](#) shows how the District Council will help to ensure that the council are a place that stands out, not only in Leicestershire, but also nationally as an area where residents can have a good quality life and where businesses and communities continue to thrive. The Corporate Plan is the council’s overarching strategic document. It is the only plan which covers the full range of the council’s responsibilities and is an important tool to set out our ambitions for the District and help focus our efforts and resources on the right things. This is even more important in the context of constrained budgets, increases in demand and continuous change.

B.202 A Strategy for Housing and the Prevention of Homelessness and Rough Sleeping 2019-2024 [\[See reference 195\]](#) is the core document setting out Harborough District Council’s approach to meeting local housing needs. The strategy highlights the key housing issues facing the local community in the short and long term and identifies what we are doing to tackle these issues. This strategy combines a traditional five year Housing Strategy with a five year Homelessness Prevention Strategy and a five year Rough Sleeping Prevention Strategy. This recognises the complexity and interdependency between homelessness, the local housing market and the supply of affordable homes.

Surrounding Development Plans

B.203 Rugby Borough Council adopted the Rugby Borough Local Plan 2011-2031 on 4th June 2019. The adopted Local Plan and Policies Map now form the statutory development plan for Rugby Borough Council, setting out strategic planning policies and detailed development management policies. The Local Plan allocates for 12,400 additional homes and 208 ha of employment land. The Council has started reviewing the Local Plan. A call for sites ran alongside the Issues and Options consultation between 31 October 2023 and 02 February 2024. All sites are currently being assessed as part of the Housing and Economic Land Availability Assessment (HELAA).

B.204 Blaby District Local Plan (Core Strategy) 2013 sets out the vision, objectives, strategy and core policies for the spatial planning of the District up to 2029. The Local Plan (Core Strategy) was adopted by Blaby District Council in February 2013. It is the first part of the Local Plan and sits alongside the Local Plan Delivery Development Plan Document (DPD) adopted on 4 February 2019. The Local Plan (Core Strategy) states how the Council proposes to accommodate the need for new homes, jobs and infrastructure that is required in the District. The Local Plan (Core Strategy) sets a housing requirement of 8,740 and proposes development at two strategic employment sites while enabling development at a number of smaller employment sites.

B.205 Work is currently underway on the new Local Plan. The New Local Plan will set out a strategy for how the District will grow and change over the next 15 years and beyond. The New Local Plan, when adopted, will replace the current Local Plan (the Core Strategy and Delivery DPDs). A Regulation 18 consultation was held on the New Local Plan between January and March 2021. A review of the Local Plan timescales and housing targets has been undertaken, following changes to the national planning system. The planning policy reform through the December 2024 NPPF includes an increase in new mandatory housing targets for Blaby District. The Regulation 19 Local Plan is now planned to be consulted on by July 2025.

Appendix B Review of Relevant Plans, Policies and Programmes

B.206 Leicester City Council lies to the north west of Harborough District. The Core strategy was adopted in July 2014 and sets out the spatial planning strategy for the city and objectives and policies for new development. A number of 'saved' policies from the city of Leicester Local Plan 1996-2016 currently still form part of the development plan. A housing need of 25,600 homes between 2006 and 2026 was identified. Employment provision was proposed at three sites across Leicester: Ashton Green, Science Park and City Centres. This equates to a total of up to 10 ha of employment land and 30,000 sqm of B1(b) and 50,000sqm of B1(a).

B.207 Leicester City Council submitted the Leicester Local Plan 2020-2036 for examination on the 26th September 2023. For Leicester, the local housing need is 2,464 dwellings per annum with the local plan identifies a target of 1,296 dwellings per annum. Therefore, about 20,730 homes will be delivered over the plan period, with the remaining housing need being apportioned as agreed amongst the Leicestershire authorities. A need of 65 ha of employment land was identified with approximately 23 ha to be delivered outside of Leicester City.

B.208 Oadby and Wigston Borough lies to the west of Harborough District. The Borough of Oadby and Wigston Local Plan was adopted on 16th April 2019. The Local Plan sets out the Vision, Spatial Objectives, Spatial Strategy and Planning Policies for development for the entire Borough area, for the period up to 2031. The most up to date Housing and Economic Development Needs Assessment illustrates an Objectively Assessed Housing Need for the Borough of 148 new homes per annum up to 2031. In relation to employment land, the objectively assessed need was 1 ha of B1a/b and 4 ha of small scale B8 employment land.

B.209 Oadby & Wigston Borough Council undertook a public consultation on the Regulation 18A Issues and Options Consultation Draft New Local Plan and the Sustainability Appraisal Scoping Report 3rd September 2021 and 29th October 2021 and has now published the Local Plan Issues and Options (Regulation 18A) Statement of Consultation. The Preferred Options (Regulation 18B) Draft Local Plan undertook public consultation 3rd April to 15th May 2024. The next round of public consultation is due to take place in spring 2025 on the

Appendix B Review of Relevant Plans, Policies and Programmes

Pre-Submission Draft Local Plan (Reg 19). The new Local Plan will cover the period up to 2041 and will identify site allocations for housing and employment development and boundaries for designations such as Green Wedges, Local Green Spaces and Open Spaces.

B.210 Charnwood Borough lies to the north of Harborough District. The adopted Local Plan for Charnwood is made up of the Charnwood Local Plan 2011 to 2028 Core Strategy (2015) and the saved policies from the Borough of Charnwood Local Plan (2004). The Local Plan proposed to deliver 13,940 new homes and 75 ha of employment land between 2011-2028.

B.211 The new Charnwood Local Plan 2021-2037 was submitted for examination in December 2021 and hearing sessions concluded in Feb 2023. The consultation on the proposed Main Modifications takes took place between Wednesday July 17 and 5pm on Wednesday September 4, 2024. The Charnwood Local Plan provides a strategy to accommodate the development required to support growth in the borough up to 2037. Upon adoption, the new plan will replace the Charnwood Local Plan 2011 to 2028 Core Strategy. Between 2021 and 2037, 1,111 homes are required to be built annually. The majority of those homes, around 10,603, will come from existing planning permissions which have yet to be built. Additionally, a total of 154.8ha of employment land will be allocated. The Council is currently working to progress various work streams in response to the Inspectors' Letter.

B.212 Melton Borough lies to the north of Harborough District. The Melton Local Plan 2011-2036 was adopted on 10th October 2018. It sets out the Council's policies for the use and development of land across the whole of the Borough and replaces the saved policies from the 1999 Melton Local Plan. The Melton Local Plan seeks to meet a housing land requirement of 6,125 dwellings between 2011 and 2036. Additionally, there is a need for 50.75 ha of employment land up to 2036. Work is currently underway on the Local Plan. In June 2023, the Council undertook a Call for Sites to identify additional employment land within the Borough. Melton Borough Council consulted on the Melton Local Plan Update Issues and Options from Monday 6th November 2023 until Sunday 7th January 2024.

Appendix B Review of Relevant Plans, Policies and Programmes

B.213 Rutland lies to the north east of Harborough District. The Rutland Local Plan was adopted on 11th July 2011. The adopted Local Plan sets out the planning policies for Rutland up to 2026 and is made up of three development plan documents (DPDs):

- Core Strategy DPD
- Site Allocations and Policies DPD
- Minerals Core Strategy and Development Control Policies DPD

B.214 Rutland County has a housing requirement of 3,000 homes with an employment land requirement of 5 ha between 2010-2026.

B.215 The Rutland Local Plan 2018 to 2036 was withdrawn after being submitted to the Secretary of State for Examination on 3rd February 2020. Work is underway on the Rutland's new Local Plan which must allocate sites to meet housing and employment needs. A call for Sites was undertaken in February 2022. The new Local Plan underwent Issues and Options consultation from June to September 2022. The Regulation 18 Preferred Options Draft Local Plan was out for consultation between November 2023 and January 2024. The new Local Plan proposes to deliver 1,375 dwellings and 40.9 ha of employment land up to 2041.

B.216 Corby and Kettering now form part of North Northamptonshire Council which lies to the east of Harborough District. The North Northamptonshire Joint Planning Unit (JPU) was formally established in October 2004 by Corby, Kettering, Wellingborough and East Northamptonshire Councils, together with Northamptonshire County Council. The North Northamptonshire Joint Core Strategy (JCS) is the strategic Part 1 Local Plan for Corby, East Northamptonshire, Kettering and Wellingborough covering a period up to 2031. It outlines a big picture to be developed in more detail through the Part 2 Local Plans prepared by the District and Borough Councils. The North Northamptonshire Joint Core Strategy was adopted on 14th July 2016.

B.217 The Kettering Site Specific Part 2 Local Plan was formally adopted on 1st December 2021. The housing requirement for Kettering area between 2011-31

Appendix B Review of Relevant Plans, Policies and Programmes

was 10,400 with an employment target of 8,100 jobs. Approximately, 2,835 jobs will be within the service industry. The Part 2 Local Plan for Corby was formally adopted on 29th September 2021. The housing requirement for Corby is 9,200 dwellings between 2011-2031. Corby has an employment creation target of 9,700 jobs up to 2031.

B.218 North Northamptonshire Council is currently reviewing its Local Plan, extending the plan period to 2041. Consultation on the Issues and Options was undertaken Spring 2022. The Council is currently working towards publishing a Draft Plan for consultation, this was planned for June 2024, however there has been timetable slippage.

B.219 The Daventry area part of West Northamptonshire Council lies to the south of Harborough District. West Northamptonshire Council was formed on 1st April 2021 through the merger of the three non-metropolitan Districts of Daventry, Northampton, and South Northamptonshire. The West Northamptonshire Joint Core Strategy Local Plan (Part 1) sets out the long-term vision and objectives for the whole of the area up to 2029, including strategic policies for steering and shaping development. The Daventry Local Plan (Part 2) Local Plan 2011-2029 was adopted on 20th February 2020. Building on the West Northamptonshire Joint Core Strategy, it was prepared to help further guide planning decisions in the Daventry area and forms part of the Development Plan for the District. Between 2011 and 2029, a total of 12,730 homes will be delivered with a minimum net increase of 28,500 jobs.

B.220 West Northamptonshire Council is preparing a new plan for the area. This will replace the West Northamptonshire Joint Core Strategy and guide development in the period up to 2041. A consultation on spatial options for the Plan took place between 11th October and 24th December 2021. This was the second stage in preparing the new Plan (after the Issues Consultation in 2019). Consultation on a Regulation 18 Draft Plan ran between 8th April and 2nd June 2024, It is proposed that a final draft of the Plan will be consulted upon in early 2025.

References

- 1 Available online at: [UK Parliament \(2023\) COP15: Global biodiversity framework](#)
- 2 Available online at: [United Nations \(2021\) Glasgow Climate Pact](#)
- 3 Available online at: [United Nations \(2021\) Land Use, Land-Use Change and Forestry \(LULUCF\)](#)
- 4 Available online at: [Department for International Development and Foreign, Commonwealth & Development Office \(2017\) Agenda 2030: Delivering the Global Goals](#)
- 5 Available online at: [UNECE \(1998\) Convention On Access To Information, Public Participation In Decision-Making And Access To Justice In Environmental Matters](#)
- 6 Available online at: [United Nations \(2002\) Johannesburg Declaration on Sustainable Development](#)
- 7 Available online at: [UNFCCC \(2015\) Adoption of the Paris Agreement](#)
- 8 Available online at: [Wetlands International \(1976\) Ramsar Convention](#)
- 9 Available online at: [The Council of Europe \(1979\) Convention on the Conservation of European Wildlife and Natural Habitats](#)
- 10 Available online at: [United Nations \(1992\) Convention on Biological Diversity](#)
- 11 Available online at: [United Nations \(1992\) Convention on Biological Diversity](#)
- 12 Available online at: [European Commission \(2009\) Directive 2009/147/EC of the European Parliament and of the Council](#)
- 13 Available online at: [United Nations \(2015\) New York Declaration on Forests - Halving the loss of natural forest by 2020, striving to end it by 2030](#)
- 14 Available online at: [Council of Europe \(2023\) Convention for the Protection of the Archaeological Heritage of Europe \(revised\) \(Valletta, 1992\)](#)

References

- 15 Available online at: [UNESCO World Heritage Convention \(1972\) Convention Concerning the Protection of the World Cultural and Natural Heritage](#)
- 16 Available online at: [Council of Europe \(2023\) Convention for the Protection of the Architectural Heritage of Europe \(Granada, 1985\)](#)
- 17 Available online at: [Council of Europe \(2000\) European Landscape Convention \[online\]](#)
- 18 Available online at: [Department for Environment, Food and Rural Affairs \(2024\). Policy paper: Third National Adaptation Programme \(NAP3\).](#)
- 19 Available online at: [Department for Energy Security and Net Zero \(2023\) Biomass Strategy 2023](#)
- 20 Available online at: [Department for Energy Security and Net Zero \(2023\) Carbon Budget Delivery Plan](#)
- 21 Available online at: [Department for Energy Security and Net Zero \(2023\) Powering up Britain](#)
- 22 Available online at: [Department for Energy Security and Net Zero \(2023\) Powering up Britain](#)
- 23 Available online at: [Department for Energy Security and Net Zero \(2023\) Powering up Britain](#)
- 24 Available online at: [Department for Environment, Food & Rural Affairs \(2023\) Environmental Improvement Plan 2023](#)
- 25 Available online at: [HM Government \(2022\) UK Climate Change Risk Assessment 2022](#)
- 26 Available online at: [Gov.uk \(2022\) British energy security strategy](#)
- 27 Available online at: [Legislation.gov.uk \(2021\) Environment Act 2021](#)
- 28 Available online at: [Gov.uk \(2022\) Net Zero Strategy: Build Back Greener](#)
- 29 Available online at: [Gov.uk \(2021\) Industrial decarbonisation strategy](#)
- 30 Available online at: [Gov.uk \(2023\) Heat and buildings strategy](#)

References

- 31 Available online at: [HM Government \(2021\) UK Hydrogen Strategy](#)
- 32 Available online at: [Legislation.gov.uk \(2021\) The Energy Performance of Buildings \(England and Wales\) \(Amendment\) Regulations 2021](#)
- 33 Available online at: [Natural England \(2021\) Natural England's Climate Change Risk Assessment and Adaptation Plan](#)
- 34 Available online at: [Natural England \(2020\) Climate Change Adaptation Manual: Evidence to support Nature Conservation in a Changing Climate](#)
- 35 Available online at: [Gov.uk \(2020\) Environment Agency, Forestry Commission, and Natural England outline a shared vision to use nature-based solutions to tackle the climate emergency](#)
- 36 Available online at: [HM Government \(2020\) Powering our Net Zero Future](#)
- 37 Available online at: [HM Treasury \(2020\) National Infrastructure Strategy](#)
- 38 Available online at: [Climate Change Committee \(2020\) The Sixth Carbon Budget The UK's path to Net Zero](#)
- 39 Available online at: [Department for Transport \(2020\) Decarbonising Transport](#)
- 40 Available online at: [HM Government \(2020\) Flood and coastal erosion risk management](#)
- 41 Available online at: [Climate Change Committee \(2019\) Net Zero – The UK's contribution to stopping global warming](#)
- 42 Available online at: [Historic England \(2018\) Energy Efficiency and Historic Buildings: How to Improve Energy Efficiency](#)
- 43 Available online at: [Legislation.gov.uk \(2011\) The Promotion of the Use of Energy from Renewable Sources Regulations 2011](#)
- 44 Available online at: [Environment Agency \(2022\) National Flood and Coastal Erosion Risk Management Strategy for England](#)
- 45 Available online at: [Legislation.gov.uk \(2010\) Flood and Water Management Act 2010](#)

References

- 46 Available online at: [Legislation.go.uk \(2019\) The Floods and Water \(Amendment etc.\) \(EU Exit\) Regulations 2019](#)
- 47 Available online at: [Department for Environment, Food & Rural Affairs \(2018\) The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting](#)
- 48 Available online at: [HM Government \(2018\) Our Waste, Our Resources: a Strategy For England](#)
- 49 Available online at: [HM Government \(2017\) The Clean Growth Strategy](#)
- 50 Available online at: [Department for Communities and Local Government \(2014\) National Planning Policy for Waste](#)
- 51 Available online at: [Department for Environment, Food & Rural Affairs \(2013\) Waste management plan for England 2013](#)
- 52 Available online at: [Department of Energy & Climate Change \(2012\) The Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK](#)
- 53 Available online at: [HM Government \(2008\) The UK Low Carbon Transition Plan](#)
- 54 Available online at: [Department of Energy & Climate Change \(2009\) The UK renewable energy strategy](#)
- 55 Available online at: [Legislation.gov.uk \(2008\) Climate Change Act 2008](#)
- 56 Available online at: [Legislation.gov.uk \(2008\) Planning and Energy Act 2008](#)
- 57 Available online at: [Legislation.gov.uk \(2020\) The Waste \(Circular Economy\) \(Amendment\) Regulations 2020](#)
- 58 Available online at: [Levelling-up and Regeneration Act 2023](#)
- 59 Available online at: [Department for Levelling Up, Housing and Communities \(2022\) Levelling Up the United Kingdom](#)
- 60 Available online at: [Department for Levelling Up, Housing and Communities \(2022\) Levelling Up the United Kingdom](#)

References

- 61 Available online at: [Environment Agency \(2023\) State of the environment: health, people and the environment](#)
- 62 Available online at: [Ministry of Housing, Communities & Local Government \(2021\) National Design Guide](#)
- 63 Available online at: [Gov.uk \(2022\) Build Back Better: Our Plan for Health and Social Care](#)
- 64 Available online at: [HM Government \(2021\) COVID-19 mental health and wellbeing recovery action plan](#)
- 65 Available online at: [Ministry of Housing, Communities & Local Government \(2021\) The charter for social housing residents: social housing white paper](#)
- 66 Available online at: [Public Health England \(2020\) Using the planning system to promote healthy weight environments](#)
- 67 Available online at: [Historic England \(2020\) Heritage and Society 2020](#)
- 68 Available online at: [Public Health England \(2019\) PHE Strategy 2020-25](#)
- 69 Available online at: [Homes England \(2022\) Homes England strategic plan 2018 to 2023 \(text version\)](#)
- 70 Available online at: [Ministry of Housing, Communities & Local Government \(2017\) Fixing our broken housing market](#)
- 71 Available online at: [Department for Communities and Local Government \(2015\) Planning policy for traveller sites](#)
- 72 Available online at: [Department for Communities and Local Government \(2015\) Technical housing standards – nationally described space standard](#)
- 73 Available online at: [UK Parliament \(2013\) Ready for Ageing?](#)
- 74 Available online at: [Institute of Health Equity \(2010\) Fair Society, Healthy Lives](#)
- 75 Available online at: [Prime Minister's Office, 10 Downing Street \(2011\) Laying the foundations: a housing strategy for England](#)

References

- 76 Available online at: [Department of Health and Social Care \(2010\) Healthy Lives, Healthy People: our strategy for public health in England](#)
- 77 Available online at: [Legislation.gov.uk \(2006\) The Environmental Noise \(England\) Regulations 2006](#)
- 78 Available online at: [Natural England \(2023\) Introduction to the Green Infrastructure Framework - Principles and Standards for England](#)
- 79 Available online at: [Gov.uk \(n.d\) Nature Recovery Network](#)
- 80 Available online at: [Department for Environment, Food & Rural Affairs \(2023\) Environmental Improvement Plan 2023](#)
- 81 Available online at: [Department for Environment, Food & Rural Affairs \(2023\) The air quality strategy for England](#)
- 82 Available online at: [Department for Environment, Food & Rural Affairs \(2023\) Waste prevention programme for England: Maximising Resources, Minimising Waste](#)
- 83 Available online at: [DEFRA \(2022\) Establishing the Best Available Techniques for the UK \(UK BAT\)](#)
- 84 Available online at: [Gov.uk \(2022\) Climate Change Allowances](#)
- 85 Available online at: [Environment Agency \(2022\) Working with nature \[online\]](#)
- 86 Available online at: [Legislation.gov.uk \(2021\) Environment Act 2021 \[online\]](#)
- 87 Available online at: [Environment Agency \(2021\) Managing water abstraction](#)
- 88 Available online at: [CIEEM \(2021\) Chalk Stream Restoration Strategy 2021 & Implementation Plan 2022](#)
- 89 Available online at: [Environment Agency \(2020\) Meeting our future water needs: a national framework for water resources](#)
- 90 Available online at: [Legislation.gov.uk \(2019\) The Conservation of Habitats and Species \(Amendment\) \(EU Exit\) Regulations 2019](#)

References

- 91 Available online at: [Environment Agency \(2020\) Meeting our future water needs: a national framework for water resources](#)
- 92 Available online at: [Department for Environment Food & Rural Affairs \(2019\) Clean Air Strategy 2019](#)
- 93 Available online at: [Environment Agency \(2018\) The Environment Agency's approach to groundwater protection](#)
- 94 Available online at: [Legislation.gov.uk \(2017\) The Water Environment \(Water Framework Directive\) \(England and Wales\) Regulations 2017](#)
- 95 Available online at: [Department for Environment Food & Rural Affairs and Department for Transport \(2017\) UK plan for tackling roadside nitrogen dioxide concentrations](#)
- 96 Available online at: [Environment Agency \(2017\) Drought response: our framework for England](#)
- 97 Available online at: [Legislation.gov.uk \(2016\) The Nitrate Pollution Prevention \(Amendment\) Regulations 2016](#)
- 98 Available online at: [Legislation.gov.uk \(2016\) The Water Supply \(Water Quality\) Regulations 2016](#)
- 99 Available online at: [Legislation.gov.uk \(2016\) The Environmental Permitting \(England and Wales\) Regulations 2016](#)
- 100 Available online at: [Legislation.gov.uk \(2016\) The Air Quality Standards \(Amendment\) Regulations 2016](#)
- 101 Available online at: [Legislation.gov.uk \(2015\) The Environmental Damage \(Prevention and Remediation\) \(England\) Regulations 2015](#)
- 102 Available online at: [Department for Environment Food & Rural Affairs \(2013\) Biodiversity offsetting in England](#)
- 103 Available online at: [UK Parliament \(2012\) The Water White Paper](#)
- 104 Available online at: [HM Government \(2012\) National Policy Statement for Waste Water](#)

References

- 105** Available online at: [Department for Environment, Food & Rural Affairs \(2011\) Biodiversity 2020: A strategy for England's wildlife and ecosystem services](#)
- 106** Available online at: [Department for Environment, Food & Rural Affairs \(2011\) Rights of way circular \(1/09\)](#)
- 107** Available online at: [Legislation.gov.uk \(2010\) Flood and Water Management Act 2010](#)
- 108** Available online at: [Legislation.gov.uk \(2019\) The Floods and Water \(Amendment etc.\) \(EU Exit\) Regulations 2019](#)
- 109** Available online at: [Legislation.gov.uk \(2000\) Countryside and Rights of Way Act 2000](#)
- 110** Available online at: [Department for Environment, Food & Rural Affairs \(2009\) Safeguarding our Soils](#)
- 111** Available online at: [Legislation.gov.uk \(2009\) The Groundwater \(England and Wales\) Regulations 2009](#)
- 112** Available online at: [Legislation.gov.uk \(2009\) The Flood Risk Regulations 2009](#)
- 113** Available online at: [Department for Environment, Food & Rural Affairs \(2008\) England Biodiversity Strategy Climate Change Adaptation Principles \[online\]](#)
- 114** Available online at: [HM Government \(2008\) Future Water](#)
- 115** Available online at: [Department for Environment Food and Rural Affairs \(2007\) The Air Quality Strategy for England, Scotland, Wales and Northern Ireland](#)
- 116** Available online at: [Legislation.gov.uk \(2006\) Natural Environment and Rural Communities Act 2006](#)
- 117** Available online at: [Legislation.gov.uk \(2006\) The Environmental Noise \(Wales\) Regulations 2006](#)

References

- 118** Available online at: [Legislation.gov.uk \(2003\) The Urban Waste Water Treatment \(England and Wales\) \(Amendment\) Regulations 2003 \[online\]](#)
- 119** Available online at: [Environment Agency \(1999\) Environment Agency Policy Regarding Culverts](#)
- 120** Available online at: [Land Drainage Act 1991](#)
- 121** Available online at: [Legislation.gov.uk \(1990\) Environmental Protection Act 1990](#)
- 122** Available online at: [Legislation.gov.uk \(1981\) Wildlife and Countryside Act 1981](#)
- 123** Available online at: [Legislation.gov.uk \(1949\) National Parks and Access to the Countryside Act 1949](#)
- 124** Available online at: [Historic England \(2023\). Corporate Plan 2023-26.](#)
- 125** Available online at: [Department for Digital, Culture Media & Sport \(2017\) Heritage Statement 2017](#)
- 126** Available online at: [Historic England \(2017\) The Setting of Heritage Assets](#)
- 127** Available online at: [Historic England \(2016\) Sustainability Appraisal and Strategic Environmental Assessment](#)
- 128** Available online at: [Historic England \(2015\) The Historic Environment and Site Allocations in Local Plans](#)
- 129** Available online at: [Historic England \(2015\) Managing Significance in Decision-Taking in the Historic Environment](#)
- 130** Available online at: [Historic England \(n.d\) The Historic Environment in Local Plans](#)
- 131** Available online at: [Historic England \(n.d\) Historic Landscape Characterisation](#)
- 132** Available online at: [HM Government \(2010\) The Government's Statement on the Historic Environment for England 2010](#)

References

- 133 Available online at: [Legislation.gov.uk \(1990\) Planning \(Listed Buildings and Conservation Areas\) Act 1990](#)
- 134 Available online at: [Legislation.gov.uk \(1979\) Ancient Monuments and Archaeological Areas Act 1979](#)
- 135 Available online at: [Legislation.gov.uk \(1953\) Historic Buildings and Ancient Monuments Act 1953](#)
- 136 Available online at: [HM Treasury \(2022\) The Growth Plan 2022](#)
- 137 Available online at: [HM Treasury \(2021\) Build Back Better: our plan for growth](#)
- 138 Available online at: [Department for Environment, Food & Rural Affairs \(2020\) Agricultural Transition Plan 2021 to 2024](#)
- 139 Available online at: [Historic England \(2020\) Heritage and the Economy](#)
- 140 Available online at: [Historic England \(2020\) The Heritage Sector in England and its Impact on the Economy](#)
- 141 Available online at: [Legislation.gov.uk \(2020\) Agriculture Act 2020](#)
- 142 Available online at: [HM Government \(2018\) Industrial Strategy](#)
- 143 Available online at: [Infrastructure and Projects Authority \(2016\) National Infrastructure Delivery Plan 2016–2021](#)
- 144 Available online at: [LEP Network \(2017\) The LEP Network Response to the Industrial Strategy Green Paper Consultation](#)
- 145 Available online at: [Department for Transport \(2023\) Future of Transport: supporting rural transport innovation](#)
- 146 Available online at: [Department for Transport \(2022\) Cycling and walking investment strategy report to Parliament 2022](#)
- 147 Available online at: [Department for Transport \(2021\) Decarbonising Transport](#)
- 148 Available online at: [Department for Transport \(2021\) Decarbonising Transport](#)

References

- 149** Available online at: [Department for Transport \(2018\) The Road to Zero](#)
- 150** Available online at: [Department for Transport \(2017\) Transport investment strategy](#)
- 151** Available online at: [Highways England \(2018\) Highways England Sustainable Development Strategy and Action Plan](#)
- 152** Available online at: [Department for Transport \(2013\) Door to Door](#)
- 153** Available online at: [Environment Agency \(2010\) Guiding Principles in Land Contamination](#)
- 154** Available online at: [Gov.uk \(2020\) Land Contamination Risk Management](#)
- 155** Available online at: [Midlands Connect \(2022\) Fairer, greener, stronger: our Strategic Transport Plan for the Midlands](#)
- 156** Available online at: [Strategic Growth Plan Leicester & Leicestershire – Leicester & Leicestershire 2050: Our vision for growth](#)
- 157** Available online at: [Leicester & Leicestershire Local Authorities \(2022\) Leicester & Leicestershire Housing & Economic Needs Assessment Housing Distribution Paper](#)
- 158** Available online at: [Leicester & Leicestershire Local Authorities \(2022\) Leicester & Leicestershire Housing & Economic Needs Assessment Housing Distribution Paper](#)
- 159** Available online at: [Leicester & Leicestershire Enterprise Partnership \(2021\) Economic Growth Strategy 2021 – 2030](#)
- 160** Available online at: [Leicester & Leicestershire Enterprise Partnership \(2018\) Energy Infrastructure Strategy for Leicester and Leicestershire](#)
- 161** Available online at: [Leicestershire Communities \(2022\) About us](#)
- 162** Available online at: [Leicestershire County Council Public Health Strategy 2022-2027](#)
- 163** Available online at: [Harborough District Council \(2019\) Strategic Housing and Economic Land Availability Assessment](#)

References

- 164** Available online at: [Opinion Research Services \(2017\) Leicester City and Leicestershire Gypsy, Traveller and Travelling Showpeople Accommodation Assessment](#)
- 165** Available online at: [Warehousing and Logistics in Leicester and Leicestershire: Managing growth and change Study \(amended March 2022\)](#)
- 166** Available online at: [Harborough District Council \(2007\) Harborough District Landscape Character Assessment](#)
- 167** Available online at: [Leicestershire Local Transport Plan for Leicestershire 2026-2040](#)
- 168** Available online at: [Leicestershire County Council \(2022\) Leicestershire Highway Design Guide](#)
- 169** Available online at: [Leicestershire County Council \(2019\) Leicestershire Minerals and Waste Local Plan](#)
- 170** Available online at: [Leicestershire County Council \(2020\) Leicester and Leicestershire Working Together Strategic Transport Priorities](#)
- 171** Available online at: [Leicestershire County Council \(2022\) Cycling and Walking Strategy](#)
- 172** Available online at: [Leicestershire County Council \(2017\) Leicester and Leicestershire Rail Strategy](#)
- 173** Available online at: [Leicester and Leicestershire Tourism Growth Plan \(2018\)](#)
- 174** Available online at: [Net Zero Leicestershire Strategy 2023-2024](#)
- 175** Available online at: [Leicestershire County Council \(2021\) Leicestershire Net Zero Carbon Roadmap](#)
- 176** Available online at: [Draft Leicestershire, Leicester and Rutland Local Nature Recovery Strategy](#)
- 177** Available online at: [Environment Agency \(2022\) Humber River Basin District Flood Risk Management Plan 2021 to 2027](#)

References

- 178** Available online at: [Environment Agency \(2022\) Anglian River Basin District Flood Risk Management Plan 2021 to 2027](#)
- 179** Available online at: [Environment Agency \(2022\) Severn River Basin District Flood Risk Management Plan 2021 to 2027](#)
- 180** Available online at: [Environment Agency \(2022\) Anglian river basin district river basin management plan: updated 2022](#)
- 181** Available online at: [Environment Agency \(2022\) Humber river basin district river basin management plan: updated 2022](#)
- 182** Available online at: [Environment Agency \(2022\) Severn river basin district river basin management plan: updated 2022](#)
- 183** Available online at: [Leicestershire County Council \(2015\) Local Flood Risk Management Strategy](#)
- 184** Available online at: [Space for Wildlife – Leicester, Leicestershire and Rutland Biodiversity Action Plan 2016-2026 \(2016\)](#)
- 185** Available online at: [Harborough District Council \(2020\) Harborough Built Sports Facilities Strategy](#)
- 186** Available online at: [Harborough District Council \(2021\) Open Space Strategy](#)
- 187** Available online at: [Harborough District Council \(2018\) Harborough Playing Pitch Strategy](#)
- 188** Available online at: [Harborough District Council \(2017\) Market Harborough Transport Strategy 2017 – 2031](#)
- 189** Available online at: [Harborough District Council \(2021\) Lutterworth Town Centre Masterplan](#)
- 190** Available online at: [Harborough District Council \(2022\) Market Harborough Town Centre Masterplan](#)
- 191** Available online at: [Harborough District Council \(2021\) Climate Emergency Action Plan 2022-2030](#)

References

- 192** Available online at: [Harborough District Council \(2023\) Rural Strategy 2023-2028](#)
- 193** Available online at: [Harborough District Council \(2022\) Health and Wellbeing Strategy 2022-2027](#)
- 194** Available online at: [Harborough District Council \(2022\) Corporate Plan 2022 – 2031](#)
- 195** Available online at: [UK Parliament \(2023\) Rough sleeping \(England\)](#)

Report produced by LUC

Report produced by LUC

Bristol

12th Floor, Colston Tower, Colston Street, Bristol BS1 4XE
0117 929 1997
bristol@landuse.co.uk

Cardiff

16A, 15th Floor, Brunel House, 2 Fitzalan Rd, Cardiff CF24 0EB
0292 032 9006
cardiff@landuse.co.uk

Edinburgh

Atholl Exchange, 6 Canning Street, Edinburgh EH3 8EG
0131 202 1616
edinburgh@landuse.co.uk

Glasgow

37 Otago Street, Glasgow G12 8JJ
0141 334 9595
glasgow@landuse.co.uk

London

250 Waterloo Road, London SE1 8RD
020 7383 5784
london@landuse.co.uk

Manchester

6th Floor, 55 King Street, Manchester M2 4LQ
0161 537 5960
manchester@landuse.co.uk

landuse.co.uk

Landscape Design / Strategic Planning & Assessment
Development Planning / Urban Design & Masterplanning
Environmental Impact Assessment / Landscape Planning & Assessment
Landscape Management / Ecology / Historic Environment / GIS & Visualisation