

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.

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- 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.

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- 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

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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...

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- 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:

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- 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

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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/

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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).

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- 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.

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- 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

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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

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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

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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.”

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- 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

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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 Trust 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.

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- 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

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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

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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

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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.

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- 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

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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 options. 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 to 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)).

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- 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

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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.

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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.

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- 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. 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.

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- 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

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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

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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

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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.

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- 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

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

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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 site's 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

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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.

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- 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)

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- 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.

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- 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.

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- 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

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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

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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

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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.

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- 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 +.

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- 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.

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- 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

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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

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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

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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

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,

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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

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

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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.

- 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

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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

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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.

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- 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

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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.

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- 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

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- 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

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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,

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'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

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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

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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

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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.

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- 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.

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- 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.