

Harborough Local Plan

Sustainability Appraisal

*Post Adoption
Statement*

May 2019

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1 Introduction

- 1.1.1 Sustainability appraisal (SA) is a mechanism for considering and communicating the likely effects of a draft plan, and reasonable alternatives; with a view to avoiding and mitigating negative effects and maximising the positives before the Plan is finalised.
- 1.1.2 This document is the Sustainability Appraisal (incorporating the Strategic Environmental Assessment) Statement to accompany the adoption of the Harborough Local Plan. The Sustainability Appraisal (SA) statement describes the process, how the findings of the SA were taken into account and informed the development of the Local Plan, and the monitoring indicators that will be applied to check the accuracy of predicted effects and to monitor progress against sustainability objectives.
- 1.1.3 A parallel process of SA was undertaken alongside plan-making. AECOM was commissioned to support Harborough District Council in undertaking the SA process.
- 1.1.4 It is a requirement that SA involves a series of procedural steps. The final step in the process involves preparing a 'statement' at the time of plan adoption.
- 1.1.5 The aim of the SA Statement (i.e. this document) is to present –
1. The 'story' of plan-making / SA up to the point of adoption
Specifically, the Regulations¹ explain that there is a need to: “summaris[e] how environmental considerations have been integrated into the plan or programme and how the environmental report... the opinions expressed... and the results of consultations... have been taken into account... and the reasons for choosing the plan... as adopted, in the light of the other reasonable alternatives dealt with.”
 2. Measures decided concerning the monitoring of plan implementation.
- 1.1.6 This Statement considers (1) and (2) in turn.

¹ Environmental Assessment of Plans and Programmes Regulations (2004)

2 The Plan making ‘story’

2.1 Introduction

- 2.1.1 This section gives consideration to each of the main plan-making / SA steps in turn. It is typical for the plan-making / SA process to involve numerous iterations of the draft Plan, and this was the case with the Harborough Local Plan.

2.2 Key plan making milestones

- 2.2.1 This section briefly outlines the key milestones throughout the plan-making process and the key elements of the Plan that were developed during each stage.

Identifying the need for a Local Plan

- 2.2.2 The Harborough District Core Strategy was adopted in November 2011 and therefore did not fully reflect changes in legislation introduced through the Localism Act 2011 (e.g. neighbourhood planning) and national policy as articulated through the NPPF.

- 2.2.3 Consequently, on 3rd December 2012 the Council resolved to prepare a Local Plan with the following main aims:

- update the broad planning strategy for the District to ensure that it is NPPF compliant, setting out a vision and strategic objectives for the District;
- update housing and employment land requirement figures;
- update Gypsy and Traveller requirement figures;
- identify areas for strategic growth such as housing and employment along with supporting infrastructure requirements;
- set out policies for sustainable settlements, development in the countryside, housing types, density and mix, protection of the environment, town centres, community facilities, sustainable transport and climate change;
- define green infrastructure including green wedges and local green space (where not defined in neighbourhood plans);
- set out policy in relation to preventing the merging of settlements (where not defined in neighbourhood plans);
- provide the policy context for Neighbourhood Plans prepared by qualifying bodies; and
- identify land use allocations on a policies map.

New Local Plan Scoping (2013)

- 2.2.4 The scoping consultation was the first stage in preparing the new Local Plan for Harborough. Its aim was to gather the views of interested parties on the proposed contents of the new Local Plan. These views were used to finalise the scope of the Plan and to inform the identification of any further evidence requirements.
- 2.2.5 The scoping consultation took place between 18 March and 28 April 2013
- 2.2.6 The scoping report structure contained two main sections: Section 2 provides an overview of the contents of the new Local Plan for Harborough District. Section 3 explored the proposed new policies and the main policy areas where change was proposed in more detail, outlining the reasons for the proposed changes and seeking views on the proposed approach.

Local Plan Options Consultation

- 2.2.7 A new Local Plan Options Consultation Paper was consulted on in September – October 2015. The paper focused on meeting the district's future need for homes and jobs. It set out nine strategic options for locating housing and employment across the district and other proposed policy approaches. The paper was accompanied by an interim Sustainability Appraisal of the options.
- 2.2.8 The Options presented in the consultation took into account the requirements of national planning policy and guidance and were informed by the available evidence.
- 2.2.9 The 9 options set out in the new Local Plan Options Consultation Paper were assessed in the light of consultation responses, the results of the sustainability appraisal, their conformity with local and national planning objectives and other evidence. The results of this assessment were presented to the council's Executive Committee on 9 May 2016 and resulted in the approval of 4 selected options for further, more detailed assessment.
- 2.2.10 Following the new Local Plan Options Consultation in 2015 and, the assessment of the 9 strategic options, detailed analysis was carried out of the 4 selected options approved by the council's Executive Committee in May 2016. These were:

Selected Option 2: Core Strategy distribution

Selected Option 4 (amended): Scaptoft North Strategic Development Area

Selected Option 5: Kibworth North and East Strategic Development Area

Selected Option 6: Lutterworth East Strategic Development Area

- 2.2.11 These selected options underwent further tests relating to land availability, infrastructure requirements, transport impact, flood risk, viability, landscape impact, environmental sensitivity/mitigation and sustainability.

- 2.2.12 On 10 October 2016 the Executive Committee noted a report containing the minutes of the Local Planning Advisory Panel on 19 September 2016 which recommended that:

A Strategic Development Area on land east of Lutterworth should be the preferred option for meeting Harborough district's housing and employment needs over the Plan period to 2031 and beyond

Scraptoft North Strategic Development Area should be allocated as a reserve site for 1200 dwellings, only to be released if needed to contribute to meeting housing need from other local authorities as agreed within a Memorandum of Understanding or equivalent.

- 2.2.13 At its meeting on 17 October 2016, the Advisory Panel resolved to advise the Executive Committee that subsequent submission of the Local Plan for examination be subject to the risks associated with the East of Lutterworth Strategic Development Area being satisfactorily addressed. The Executive noted the minutes of this meeting at its meeting on 5 December 2016.
- 2.2.14 Following publication of the Leicester and Leicestershire Housing and Economic Development Needs Assessment (HEDNA), the Local Plan Executive Advisory Panel noted that the objectively assessed need for the District had increased to 532 dwellings per annum (10,640 2011-2031) at its meeting on 3rd April 2017.
- 2.2.15 The Panel considered the need for an uplift of 20% over the objectively assessed need to bring the total provision to 12,800 dwellings to allow for unforeseen circumstances and flexibility to make a contribution to meeting unmet housing need elsewhere in the Housing Market Area.
- 2.2.16 Associated with this uplift, the Panel considered a recommendation that a hybrid option constitute the preferred option, involving Strategic Development Areas at both East of Lutterworth and at Scraptoft North.
- 2.2.17 At its meeting on 15 May 2017, the Executive committee subsequently confirmed the advice of the Panel at its meeting on 3rd April 2017 and recommended to Council that the total housing provision in the draft submission Local Plan be 12,800 dwellings and inclusion in the draft submission Local Plan of a hybrid of Options 6 and a variation of Option 4, including SDAs at both east of Lutterworth and Scraptoft North.

Proposed Submission Local Plan Consultation

- 2.2.18 A consultation on the Harborough Local Plan 2011 to 2031 Proposed Submission was held for a period of 8 weeks from 22 September to 17 November 2017.

Submission of the Harborough Local Plan 2011 to 2031

2.2.19 On Friday 16 March 2018, the Harborough Local Plan 2011 to 2031 and its supporting documents were submitted to the Secretary of State for Ministry of Housing, Communities and Local Government via the Planning Inspectorate. Submission of the Local Plan represents the start of the Examination process to determine if the Council's Local Plan is 'sound'.

2.2.20 The Secretary of State, in accordance with Section 20 of the Planning and Compulsory Purchase Act 2004 (as amended), appointed an Inspector to conduct the examination.

Harborough Local Plan Examination

2.2.21 Examination Hearings were held by the Planning Inspector Jonathan Bore BA MRTPI DipUD in October 2018.

Local Plan Modifications Consultation

2.2.22 Following the Hearings, a number of Main Modifications were prepared at the request of the Planning Inspector. A Main Modification is an amendment which is considered necessary to make the Plan sound, and is required in order to address concerns raised by the Inspector or other representors during the examination process.

2.2.23 The Council prepared a schedule setting out the proposed Main Modifications considered necessary in order for the Local Plan to be found sound. This document, along with an addendum to the Sustainability Appraisal Report and Habitats Regulations Assessment were published for public consultation from 15 January 2019 until 26 February 2019.

2.2.24 As an outcome of the examination into the soundness of the Harborough Local Plan 2011-2031, the Council received the report of final recommendations and its accompanying appendix of main modifications from Planning Inspector Jonathan Bore BA MRTPI DipUD on 8 April 2019.

2.2.25 The report concluded that the Harborough Local Plan 2011-31 provides an appropriate basis for the planning of the District. The Inspector's Report and the final version of the Plan were considered by the Council's Executive on Thursday 25 April 2019, which made recommendations to Full Council on whether to adopt the Local Plan. The Full Council meeting was held 30 April 2019.

New Local plan adopted (2019)

2.2.26 This major milestone was reached when councillors voted to adopt the Local Plan at a meeting of Harborough District Council Full Council on 30 April 2019.

2.2.27 The Harborough Local Plan provides for 12,800 new homes between 2011 and 2031.

- 2.2.28 Significantly, over 70 per cent of these homes have already been built or permitted through planning applications and Neighbourhood Development Plans.
- 2.2.29 The Harborough Local Plan has the potential to generate approximately £155m of investment in local infrastructure in tandem with the planned developments – including affordable housing, schools, parks, cycle-ways, policing, health facilities and road improvements.

2.3 SA Preparation alongside the Local Plan

- 2.3.1 This section outlines the key outputs from the SA process and how they related to the preparation of the Local Plan.

SA Scoping

- 2.3.2 The start of the SA process was to prepare and consult on a SA Scoping Report. The three statutory bodies (Historic England, the Environment Agency and Natural England) were consulted on the Scoping Report in April 2014. The scope of the SA was then updated in October 2014, with findings presented in an interim SA Report for the Harborough Local Plan Options consultation. An additional update was provided in the pre-submission SA Report.

Interim SA Report –Options Consultation – September 2015

- 2.3.3 At the earlier options stage, two Interim SA Reports were produced to accompany the ‘A new Local Plan for Harborough – Options Consultation Paper’ for which consultation took place in Sept/Oct 2015 and February 2016. These reports appraised reasonable alternatives and helped to inform the selection of the approach and options presented in the Proposed Submission Local Plan.

- 2.3.4 The Interim SA Report in September 2015 accompanied the Local plan Options Consultation Document. The Interim report included an updated Scoping section, and assessed the impact of the following reasonable alternatives:

- Housing and employment growth;
- The strategic distribution of housing and employment (i.e. the spatial strategy);
- Strategic Distribution;
- Site specific options for delivery of the spatial strategy.
- Development in the Countryside;
- Affordable Housing;
- Green Infrastructure;
- Town Centres and Retail;
- Gypsy and Traveller, and Travelling Showpeople.

- 2.3.5 Of particular importance at this stage was the appraisal of nine strategic options for the distribution and growth of development across the district.

Interim SA Report – Second interim SA Report: appraising options for strategic distribution growth February 2016

- 2.3.6 Three growth scenarios for the expansion of strategic distribution land provision were presented in the Council’s Options Consultation Paper (Published in September 2015).
- 2.3.7 The SA undertaken at this time (and presented in the first Interim SA Report) did not contain an appraisal of these three options as it was considered beneficial to gather further evidence to support the appraisal; not least because strategic distribution employment has a large travel to work catchment area straddling counties and regions.
- 2.3.8 The second interim SA report, which supplements the earlier interim report, sets out a discussion of alternatives, (including consideration of each planning application individually and in combinations), followed by an assessment of the potential significant effects.
- 2.3.9 The Council published the second interim SA Report for consultation in February 2016, and the findings fed into the draft Plan, as well as informing decisions being made on each live planning application.

Third interim SA Report – August 2016 (no public consultation)

- 2.3.10 At this stage, further appraisal work was undertaken to help identify a preferred strategy for development. The outcome was a third interim SA Report that was prepared by AECOM and provided to the Council prior to the draft Plan being finalised. This report was prepared in response to consultation on the second interim SA Report (concerning Strategic Distribution Land Provision).

In response to comments received, and the emergence of additional site options, the Council commissioned AECOM to review the reasonable alternatives for strategic distribution and undertake a fresh appraisal.

Full SA Report (Autumn, 2017)

- 2.3.11 The Full SA Report accompanied the Proposed Submission version of the Local Plan, for which consultation took place Autumn 2017.
- 2.3.12 The SA Report at this stage documented the SA process, set out an appraisal of the sustainability implications of the proposed submission version, and captured how the SA process had influenced the development of the plan.
- 2.3.13 The SA Report appraised a range of alternative approaches to the delivery of the Local Plan strategy to address the local plan objectives:
- Housing
 - Employment
 - Location of development

- Infrastructure
- Protection of Local Services
- Natural Environment
- Historic Environment
- Town/Village centres
- Design
- Transport
- Flood Risk
- Environmental Impact
- Tourism and Culture
- Neighbourhood planning

2.3.14 The SA Report appraised the selected options:

- Selected Option 2: Core Strategy distribution
- Selected Option 4 (amended): Scraftoft North Strategic Development Area
- Selected Option 5: Kibworth North and East Strategic Development Area
- Selected Option 6: Lutterworth East Strategic Development Area

2.3.15 And, then went on to appraise the effects of the preferred option (referred to as Alternative A for the purposes of this SA) and the two other alternatives which could potentially have been selected to deliver the higher level of objectively assessed need of 12,800 dwellings.

2.3.16 The SA Report finally appraised the Proposed Submission Local Plan 'as a whole', looking at individual policies, site allocations and the overall strategy to understand the sustainability effects and the potential for mitigation and enhancement.

SA Addendum Report 2019

2.3.17 A Sustainability Appraisal report was prepared to accompany the Main Modifications to the Local Plan. The report sets out an appraisal of the sustainability implications of the modifications and an appraisal of 'the Plan as modified', thereby updating the findings presented in the Proposed Submission SA Report

3 How has the SA influenced decision making?

3.1 Introduction

- 3.1.1 Essentially, SA must feed-into and inform plan-making in two ways:
1. Appraisal of alternatives and draft policies should inform preparation of the draft plan.
 2. The SA Report, and consultation responses received during the Draft Plan / SA Report consultation, should inform plan finalisation.
- 3.1.2 This section briefly discusses the key elements of the SA process, and how the findings were fed-into the Plan making process. There is a focus on explaining how sustainability considerations have been taken into account and influenced plan-making, including as a result of alternatives appraisal, site assessments, policy appraisal, and consultation on Plan / SA documents.

3.2 Influencing the spatial strategy

- 3.2.1 In working towards a preferred strategy for housing and employment distribution in the Local Plan, the Council identified nine strategic options ranging from dispersed approaches, through to those reliant on the delivery of Sustainable Development Areas (SDAs). Each of these nine options was assessed through the sustainability appraisal (SA) with the findings presented in an interim SA Report (September 2015).
- 3.2.2 The conclusions of the SA interim report were taken into consideration by the Council (alongside a range of other factors) to establish four selected options that it considered to be the most appropriate to take forward to the next stages of testing and plan development.
- 3.2.3 These four options are outlined below, and they each broadly correlate with one of the original nine strategic options. However, some adjustments to the distribution of homes were made to account for updated evidence about housing availability and constraints.

Selected Option 2	This is a broad continuation of the Core Strategy approach (Correlating with Option 2 in the Options document)
Selected Option 4	This involves an SDA to the north of Scraftoft with development elsewhere distributed according to the Core Strategy (This is a variant of Option 4 in the Options document)
Selected Option 5	This involves an SDA at to the north east of Kibworth, with development elsewhere distributed according to the Core Strategy (Correlating with one of the alternative Kibworth SDAs set out in Option 5 of the Options document)
Selected Option 6	This involves an SDA to the east of Lutterworth, with development elsewhere distributed according to the Core Strategy (Correlating with Option 6 in the Options document)

- 3.2.4 At this stage of plan-making, the effects of these four options had already been broadly identified in the first interim SA Report. However, this was at a scale of growth that would deliver 9500 dwellings to 2031 (i.e. the full objectively assessed housing need for the district of 475 dwellings per annum identified at the time). In light of the emerging HEDNA and an indication that there could be un-met housing needs from neighbouring authorities, the Council uplifted the scale of housing growth to 550 dwellings per annum (11,000 over the plan period), giving greater flexibility. The selected options were therefore adjusted to reflect this higher level of need.
- 3.2.5 The council took the findings of the SA into consideration when identifying a preferred option for the Draft plan of 12,800 dwellings. The preferred approach, involved an SDA to the East of Lutterworth (Option 6), along with a variant of Option 4 including an SDA at Scraftoft North with development elsewhere distributed according to the Core Strategy.
- 3.2.6 The SA broadly supported this approach stating that although there could be negative effects on built an natural heritage and the natural environment, the preferred alternative does not have a significant negative impact on resilience to climate change or resource use and has the least adverse impacts on built and natural heritage compared to the reasonable alternatives at the same scale of growth.
- 3.2.7 Recommendations for mitigation were also made for the appraisal of each option. For example, where an option performed relatively well across the district, but would have negative implications for a limited number of settlements, it was suggested that the strategy was adjusted for those areas to avoid negative effects (*for example, at the smaller rural settlements effects on the historic environment could be avoided*).
- 3.2.8 The Council responded positively to these recommendations, and made amendments to the housing targets for certain settlements to take account of sensitivities identified in the SA. For example:
- Minor changes were made to lower housing targets for Bitteswell, Swinford, South Kilworth and Foxton (to avoid significant negative effects upon the historic environment in particular).
 - The housing target for Great Glen was increased in the preferred strategy to ensure positive effects upon socio-economic effects are realised.

3.3 Influencing site allocations

Housing sites

- 3.3.1 The Council considered it might be necessary and beneficial to allocate sites for housing development within the Plan (including for Gypsy and Travelling Show People). Doing so helps to implement the spatial strategy and give greater certainty that the Plan is deliverable. It also allows for potential issues and opportunities associated with sites to be identified and addressed upfront, rather than a reactive approach to development management.
- 3.3.2 The Council undertook a 'Call for Sites' in Jan/Feb 2015. This resulted in the submission of 398 sites, of which 83 were excluded and the remainder were assessed for their development potential for housing in the 2015 SHLAA Update (published May 2016).
- 3.3.3 A total of 189 sites were deemed to be either deliverable or developable for housing.
- 3.3.4 This initial 'long list' of sites was then filtered to remove those that were considered to be unreasonable, either because they did not accord with the overall spatial strategy and settlement hierarchy for the Local Plan or had a capacity of below 50 dwellings (Local Plan only intended to allocate 'strategic sites' of above 50 dwellings). The resulting shortlist of 83 site options were appraised through the SA process.
- 3.3.5 With regard to Gypsy and Traveller site options, the Council proposes to allocate all available and suitable sites that are considered appropriate. Therefore, no reasonable alternatives to the preferred approach have been identified.
- 3.3.6 The SA helped to influence the choice of sites for allocation by providing an indication of the broad constraints and opportunities at different settlements. This was linked to the spatial strategy, which determined how much growth would be involved in different locations.

Scraptoft Thurnby and Bushby

- 3.3.7 The total capacity of alternative sites is greater than the target for the settlement under the preferred spatial strategy. Many alternative sites were flagged as having issues, particularly for separation or resulting in coalescence, making them less favourable for development. The selected site is central to the spatial strategy, and enables a comprehensive approach to development and mitigation.

Market Harborough

- 3.3.8 The total capacity of alternative sites is greater than the target for the settlement under the preferred spatial strategy. Some alternative sites were flagged as having issues making them less favourable for development.

- 3.3.9 The 3 sites selected were assessed to perform most favourably, compared to the alternatives, in terms of: their location, scale and relationship with the settlement, individual site characteristics, overall impact and effect (both positive and negative) and in terms of general conformity with relevant policies of the plan.

Kibworth

- 3.3.10 The high level of completions and commitments means that no dwellings were required to be found. The total capacity of alternative sites is therefore greater than the target for the settlement under the preferred spatial strategy. A number of sites relate to SDAs which don't form part of the preferred option.

Lutterworth

- 3.3.11 The selected site is central to the delivery of the spatial strategy. The total capacity of alternative small sites around the settlement is insufficient to deliver the target for the settlement under the preferred option. Alternative sites are either under-development or flagged as having issues making them less favourable for development.

Broughton Astley

- 3.3.12 The settlement has a made Neighbourhood Plan, which includes site allocations expected to deliver dwellings in excess of any target for the settlement under the preferred option. In addition to completions and commitments no dwellings are required to be found.

Fleckney

- 3.3.13 The total capacity of alternative sites is greater than the target for the settlement under the preferred spatial strategy. Some alternative sites were flagged as having issues making them less favourable for development. The selected site is assessed to perform most favourably, in addition to recent commitments, compared to the alternatives. NDP was expected to make further allocations.

Great Bowden

- 3.3.14 The total capacity of alternative sites is greater than the target for the settlement under the preferred spatial strategy. Due to the high level of completions and commitments the target can be delivered without selecting a site for allocation.

Great Easton

- 3.3.15 The total capacity of alternative sites is greater than the target for the settlement under the preferred spatial strategy. The settlement is at an advance stage of preparing a Neighbourhood Plan, which includes site allocations.

Great Glen

- 3.3.16 The total capacity of alternative sites is greater than the target for the settlement under the preferred spatial strategy.
- 3.3.17 A Neighbourhood Plan is at the later stages of preparation (no site allocations). Due to the high level of completions and commitments the target can be delivered without selecting a site for allocation

Houghton on the Hill

- 3.3.18 The total capacity of alternative sites is greater than the target for the settlement under the preferred spatial strategy. Some alternative sites were flagged as having issues making them less favourable for development. Due to the high level of completions and commitments the target can be delivered without selecting a site for allocation. In addition a Neighbourhood Plan is at the later stages of preparation, and includes site allocations.

North Kilworth

- 3.3.19 A high level of completions and commitments means no dwellings are required to be found. The settlement is at an advanced stage in preparing a Neighbourhood Plan, which includes site allocations.

Other settlements

- 3.3.20 Relatively few dwellings are required to be found in Rural Centres, where a large number of planning applications have recently been approved, nor in locations below Selected Rural Village in the settlement hierarchy under the preferred spatial strategy. Provision of smaller sites will be made through: the delivery of small site commitments, windfall sites and small sites identified in the SHLAA that accord with policies GD2 (Settlement development) and GD4 (New housing in the countryside) and allocations in neighbourhood plans.

Gypsy and Traveller sites

- 3.3.21 The Council's chosen approach to provide for the accommodation needs of gypsies, travellers and travelling show-people is through a combination of allocating sites and a criterion based enabling policy. In order to provide for identified need, in accordance with the evidence and the 2015 PPTS and new definition, all deliverable site alternatives are necessary and are identified as allocations. Further provision, including to meet needs of those that do not meet the definition, is expected to be achieved through the criteria based enabling policy.

Employment & Retail sites

- 3.3.22 The Council undertook a 'Call for Sites' in Jan/Feb 2015, which was supplemented by further submissions following consultation on the LP Options and the SA Interim Report (Provision for Strategic Distribution Growth) in late 2015/ early 2016.

- 3.3.23 Together this resulted in the submission of 50 sites, of these 16 were excluded and the remainder were assessed for their development potential for employment in the 2017 SELAA (published July 2017). A total of 24 sites were deemed to be either deliverable or developable for employment development.
- 3.3.24 An initial 'long list' of 25 potential employment sites and 7 potential retail / town centre use sites was appraised by this SA
- 3.3.25 Each site option was appraised using the SA site appraisal framework established in the Scoping Report. The framework provides a largely objective process for identifying the potential constraints and benefits associated with each site option.
- 3.3.26 The selection of sites for allocation is based on detailed assessment across a range of factors including, but not confined to, the SA site appraisal results.
- 3.3.27 A key site is allocated as part of the East of Lutterworth SDA (and this is central to the delivery of the spatial strategy), which involves an employment element to support the viability of the wider SDA.
- 3.3.28 Other sites are allocated in accordance with the settlement hierarchy to deliver the spatial strategy, with development focussed at the District's main economic centres and at Rural Centres all of which are well located, served by infrastructure and are accessible by sustainable modes of transport.
- 3.3.29 Sites for general employment have been discarded for a variety of reasons including; their reliance on an SDA not selected as part of the spatial strategy, developed or superseded by another site, fundamental constraints on development, their location, scale and relationship with the settlement, or because they perform less favourably than other alternatives assessed. In some Rural Centres there is no need to choose sites due to commitments or allocations in neighbourhood plans.

3.4 Influencing delivery of land for strategic warehousing and distribution

- 3.4.1 In addition to 'local employment needs', there is an identified need across the housing market area for the growth of employment land suitable for strategic warehousing and distribution.
- 3.4.2 As part of the Plan-making process, the Council considered it important to explore alternative approaches to the delivery of such growth within Harborough.
- 3.4.3 Given the presence of three live planning applications relating to strategic B8 development, it was considered useful to base the plan options on the broad growth and distribution being proposed in the planning applications either individually or in combinations with one another. This resulted in five alternatives being appraised as follows:
- Option A – 37 ha (100,844sq.m.) of growth corresponding with the location of planning application 15/00919/FUL.

- Option B – 88ha (278,209sq.m.) of growth corresponding with the location of planning application 15/00865/OUT
 - Option C - 232ha (432,425sq.m.) of growth corresponding with the location of planning application 15/01531/OUT
 - Combination of A+B – (125 ha / 379,053sq.m. of growth)
 - Combination of B+C - (320 / 710,634sq.m. ha of growth)
- 3.4.4 Due to no other suitable development sites being proposed at that time the broad locations for developments were considered to be an appropriate geographical scale to focus the appraisal upon.
- 3.4.5 The appraisal findings relating to this assessment were presented in a second interim SA Report and published for consultation in February 2016.
- 3.4.6 In response to the consultation, some key points were made with regards to the nature of the alternatives; with several respondents contending that the options (i.e. alternative scales of growth) should not be linked to specific sites or projects (i.e. the live planning applications). In response to these comments, and the emergence of additional site options, the Council considered it beneficial to undertake a broader assessment of alternative growth options that did not refer to any particular site option or planning application. The alternative growth options considered were:
- Low: Between 0m² – 100,000m² Equivalent to approx. 25 ha
 - Low – Medium: Between 100,000m² – 300,000m² Equivalent to approx. 25 - 75 ha
 - Medium: Between 300,000m² – 400,000m² Equivalent to approx. 75-100 ha
 - High: Up to 700,000m² Equivalent to approx. 175ha
- 3.4.7 The council considered a number of further alternatives, such as a no growth option to be unreasonable in the context of the SA/Local Plan due to the evidence identifying a requirement for new land, Harborough falling within a recommended 'Key Area of Opportunity' and the existence of Magna Park in the district.
- 3.4.8 The chosen approach in the proposed Submission Local Plan was for a 'capped' criterion based policy allowing for up to 700,000sq.m of additional development for non rail-served strategic distribution at Magna Park. Following the Hearing sessions, Modifications to the Local Plan proposed additional development of up to 700,000sqm, including 380,000sqm already committed on two sites and the allocation of a further site to the North and West of Magna Park to deliver 320,000sqm of non-rail served strategic storage and distribution use. The results of the Magna Park Employment Sensitivity Study indicate that up to 700,000 sq. m.

of strategic distribution uses at Magna Park would not increase the OAN for Harborough District but would lead to a 5% increase in housing requirement for the District. However, the total amount of housing provision in the Local Plan (640 p.a. and 12,800 in total) is sufficient to cover this increase.

3.5 Influencing Site allocation for the delivery of land for strategic warehousing and distribution

- 3.5.1 Seven reasonable site options were put forward by site owners/developments in response to 2 separate 'call for sites' exercises undertaken by the Council (2011 and 2015) and in response to consultation on the Options Consultation Paper (Sept 2015) and Second Interim SA Report (Feb 2016).
- 3.5.2 Overall, there is little difference in the performance of the sites at a broad level.
- 3.5.3 The total capacity of site alternatives is greater than the 'cap' set out in the preferred strategy. Completions and commitments in the district and across the HMA are sufficient to meet minimum need without selecting a site for allocation. Therefore, the SA report helped to direct future growth under the preferred option and then following the Hearing sessions helped identify the most suitable land to allocate to deliver future growth.

3.6 Influencing policy content

- 3.6.1 Once draft policies had been written, these were appraised against the SA framework to identify potential positive and negative effects. Throughout the SA process mitigation and enhancement measures were identified, which were then considered by the Council when finalising the policies. As such, only one recommendation remained within the Pre-Submission version of the SA Report; reflecting the fact that the Council had made positive changes to policies in response to the SA findings at earlier stages of plan-making.

3.7 Influencing the Main Modifications

- 3.7.1 Further sustainability appraisal work was undertaken at this stage to understand the implications of the proposed Main Modifications. The main task was to appraise the 'screened-in' proposed modifications against the SA framework, and also discuss the 'submission plan plus proposed modifications' (thereby updating the SA Report).
- 3.7.2 The appraisal is structured under six sustainability topic headings, with the following overall conclusion

- Proposed modifications mostly perform well in terms of the full range of sustainability objectives, with only a small number of minor tensions highlighted.

- Positive effects primarily stem from supplemented policy wording to guide development at the two Strategic Development Areas, the clarification of Local Plan review triggers and new detailed policy criteria to guide the expansion of Magna Park.

3.7.3 The nature of the modifications do not give rise to any reasonable alternative approaches, nor is there a need for mitigation or enhancement measures or additional monitoring indicators to be established.

Whilst there are positive implications highlighted for several modifications, these are not predicted to lead to a change in the overall conclusions with regards to the significance of effects.

The SA Report Addendum therefore demonstrated that the Main Modifications would not bring about significant changes and that the Plan would remain broadly sustainable.

4 Monitoring

4.1.1 There is a need to set out the monitoring measures that will be used to monitor the effects of the Local Plan, and whether these correlate to those identified in the SA Report. Monitoring also allows for unforeseen effects to be identified early, and to help understand why predicted positive or negative effects might not be occurring in reality.

4.1.2 The following table sets out the monitoring indicators against each of the SA themes presented in the SA Report. These indicators are unchanged from those identified in the final SA Report.

Sustainability Theme	Monitoring Measures
Natural Environment	<ul style="list-style-type: none"> • Net loss of any extent of a nationally or locally designated biodiversity or geodiversity asset arising from development that is permitted. • Loss of best and most versatile agricultural land (ha) as a % of total resources
Built and natural heritage	<ul style="list-style-type: none"> • Number of Listed Buildings and Conservation Areas on 'At Risk' registers. • Net additional convenience and comparison retail floor space provided at Market Harborough, Lutterworth and Broughton Astley. • Design standard achieved (of 10 randomly selected major developments) against Building for Life criteria.
Health and wellbeing	<ul style="list-style-type: none"> • Proportion of major housing developments with efficient, easy and affordable access to key services (employment, education, health care and food shopping) by public transport.

Sustainability Theme	Monitoring Measures
Resilience to climate change	<ul style="list-style-type: none"> ● Proportion of major development proposals supported by Design and Access Statements that fully cover climate change requirements.
Housing and economy	<ul style="list-style-type: none"> ● Amount of housing delivered. ● Progress against housing trajectory. ● A five year deliverable supply of housing land. ● Net additional floor space provided.
Resource use	<ul style="list-style-type: none"> ● Provision of housing and commercial development and associated infrastructure in Market Harborough, Lutterworth and Fleckney. ● Installed capacity of wind energy schemes.

5 Conclusions

- 5.1.1 This SA Adoption Statement demonstrates that a robust SA process has been progressed alongside plan-making, with appraisal findings feeding-in to decision-making at numerous junctures. The SA Report demonstrably complies with the SEA Regulations, and is found to be adequate by the Inspector.
- 5.1.2 Several reports having been published for consultation alongside Local Plan documents in order to help ensure informed and effective consultation. Most importantly, the SA Report was published alongside the 'Proposed Submission' version of the plan in 2017, presenting all of the information required by Regulations. The report served to inform representations on the plan, and then served to inform plan finalisation.
- 5.1.3 Updates to the SA Report and the preparation of SA Addendum Report² were also undertaken in response to proposed changes / Modifications to the Plan. This did not lead to a material change to the findings of the SA Report.
- 5.1.4 The Inspectors Final Report (April 8th 2019) states that an adequate SA process has been undertaken, which meets legal requirements³.

²http://www.harborough.gov.uk/download/downloads/id/4977/harborough_local_plan_sa_report_addendum_final.pdf

³

http://www.harborough.gov.uk/download/downloads/id/5631/report_of_recommendations_and_appendix.pdf pg 32

