



Submission Draft Harborough Local Plan 2020 to 2041

**Sequential and Exception Test: Update following SFRA Level
2 Addendum Report**

September 2025

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1. Introduction

- 1.1 This document is an update to the Sequential and Exception Test prepared in January 2025 relating to development sites proposed for allocation in the Submission Draft Harborough Local Plan 2020 to 2041. It follows on from the Level 2 Strategic Flood Risk Assessment: Addendum (August 2025) which provides an overview of the new NaFRA2 mapping published by the Environment Agency, a summary of the risk shown at the sites assessed within Level 2 SFRA with the new NaFRA2 mapping, and recommendations for developers.
- 1.2 The Level 2 SFRA Addendum rescreened all the sites originally screened as part of the Level 2 SFRA. The schedule of sites comparing the original outcomes with the new NaFRA2 mapping is available alongside the Level 2 SFRA Addendum.
- 1.3 This Update does not repeat sections in the Sequential and Exception Test (January 2025) but provides an update to the Exception Test for sites where necessary.

2. Level 2 SFRA Addendum: Fluvial risk

- 2.1 The original Level 2 SFRA identified three proposed allocations shown to be at fluvial flood risk based on the previous Environment Agency FMfP:
 - 8054 (GB2: Land off Dingley Road and Nether Green)
 - 8631 (OA1: Land South of Gartree Road Strategic Development Area)
 - 12231 (MH8: Commons Car Park)
- 2.2 Site Tables were prepared for these sites and the Exception Test was carried out. The sites were shown to pass both parts of the Exception Test subject to appropriate mitigation measures specified in the Site Tables.
- 2.3 The Environment Agency published the updated FMfP on the 25 March 2025. The Level 2 SFRA Addendum re-screened the original sites to assess how the percentage of each site at fluvial flood risk changed between the previous FMfP dataset and the new NaFRA2 FMfP.
- 2.4 In terms of findings for fluvial flood risk, the main findings (see Addendum Main Report Table 2-1) of the re-screening were as follows:
 - Site 8054 (proposed allocation GB2): the site was found to have a significant increase in Flood Zone 2/3 extents in the eastern site corner. The Site Table has been updated to reflect this. The Exception Test is revisited in Appendix A to this Update and makes reference to the Updated Site Table. The site is shown to pass the Exception Test.
 - Sites 12212, 12202 and 8088: although not previously shown to be at risk, these sites were found to be at fluvial flood risk in the NaFRA2 Flood Zones. However, as the sites are not proposed allocations in the draft Local Plan, no Exception Test is needed.

3. Level 2 SFRA Addendum: Surface water risk

3.1 The Environment Agency's RoFSW mapping was updated in January 2025 with the publication of NaFRA2. Surface water flood risk is subdivided into the following four categories:

- **High:** An area has a chance of flooding greater than 3.3% AEP (1 in 30) each year.
- **Medium:** An area has a chance of flooding between 1% AEP (1 in 100) and 3.3% AEP (1 in 30) each year.
- **Low:** An area has a chance of flooding between 0.1% AEP (1 in 1,000) and 1% AEP (1 in 100) each year.
- **Very Low:** An area has a chance of flooding of less than 0.1% AEP (1 in 1,000) each year.

3.2 The Level 2 SFRA Addendum should be consulted for full details of the RoFSW mapping. As part of the Addendum, all previously screened sites were re-screened against the new RoFSW mapping. Due to the large number of sites screened, almost all of which have some degree of surface water risk, only those sites proposed for allocation were included in the summary table in the SFRA Addendum (Table 2-2).

3.3 For most sites there is no significant change to the picture of surface water risk. However, the following proposed allocation sites were found to have a significant increase in surface water flood extents compared to the original screening:

- Site 8737 (MH5 Land OS3070, Leicester Road – employment allocation):
- Site 10240 (MH7 St Marys Road – mixed use allocation)
- Site 10248 (Part of MH6 Compass Point - employment allocation)

3.4 Sites 10240 and 10248 were covered by the Sequential and Exception Test (Jan 2025). Given the increased surface water flood risk, the Exception Test has been revisited in Appendix A below to reference the Updated Site Tables at Appendix 1 (Level 2 SFRA Addendum). The increased surface water flood risk associated with site 8737 merited the preparation a new Site Table for the site (see Level 2 SFRA Addendum Appendix 2). While not required for employment use, for the sake of consistency and comprehensiveness, the site has undergone the Exception Test.

4. Conclusions

4.1 Appendix A of this report sets out the details of the Update Exception Test for the 4 preferred allocation sites identified in the SFRA 2 Addendum. All the sites are shown to be able to pass both parts of the Exception Test subject to appropriate mitigation measures specified in the Updated Tables for 8054 (GB2), 10248 (MH6 part), 10240 (MH7) and the new Table for 8737 (MH5). The guidance contained within the relevant site tables will need to be considered as development proposals are brought forward.

Appendix A: Updated Exception Test re: sites 8054 (GB2), 10248 (MH6 part), 10240 (MH7), 8737 (MH5)

Site Name	SHELAA Site Reference	Local Plan Policy Reference	Type of Development/ Level of Vulnerability	Sustainability benefits to the Community that outweigh flood risk (Exception Test Part A)	Development will be safe for its lifetime and where possible reducing flood risk overall (Exception Test Part B)
Land off Dingley Road and Nether Green, Great Bowden	8054	GB2	Residential: more vulnerable	<p>This site lies outside of the Great Bowden, Market Harborough Area of Separation which has excluded several candidate sites to the south and west. The site is relatively close to the village centre and rounds off the western edge of the settlement with the A6 highway forming a physical boundary for growth in that direction. Other candidate sites to the west and north west of the village are some distance from village services and facilities and in some cases could increase the risk of coalescence with proposed northern extension to Market Harborough.</p> <p>The wider sustainability benefits to the community outweigh the flood risk.</p>	See relevant Guidance for site design and making development safe section of the site table in Updated 8054 Site Table of Level 2 SRFA Addendum.
Land east of Northampton Road, north of Harborough Enterprise Centre	10248	MH6 (part)	Employment: less vulnerable	<p>The site is currently allocated for employment (Class B1: business/light industrial) in the adopted Local Plan.</p> <p>The site lies within the existing Compass Point Business Park on the southern edge of Market Harborough. The site represents infill development within the established business park in a sustainable location for employment use in the District's main town.</p>	See relevant Guidance for site design and making development safe section of site table in Updated 10248 Site Table of Level 2 SFRA Addendum.

Site Name	SHELAA Site Reference	Local Plan Policy Reference	Type of Development/ Level of Vulnerability	Sustainability benefits to the Community that outweigh flood risk (Exception Test Part A)	Development will be safe for its lifetime and where possible reducing flood risk overall (Exception Test Part B)
				<p>The site's development will make a meaningful contribution to employment needs and safeguard land in an established business park with good road links. Few other sites have been promoted for employment use and, as a result, it is important that this site, within an established business area, is allocated to prevent its loss to other uses such as residential.</p> <p>The site is at significant risk from surface water flooding but the potential economic and social benefits of the site outweigh the flood risk. It is considered that there is scope to avoid or significantly mitigate any negative effects through the policies in the Local Plan.</p> <p>The wider sustainability benefits to the community outweigh the flood risk.</p>	
St Marys Road, Market Harborough	10240	MH7	Mixed use/potential for some residential: more vulnerable	The site is an existing tourism and leisure allocation in the adopted Local Plan and has been reviewed for its appropriateness to be carried forward into the new Local Plan (Harborough Retail Town Centres Study). It is a brownfield site currently in mixed use with private car park and service yards.	See relevant Guidance for site design and making development safe section of site table in Updated 10240 Site Table of Level 2 SFRA Addendum.

Site Name	SHELAA Site Reference	Local Plan Policy Reference	Type of Development/ Level of Vulnerability	Sustainability benefits to the Community that outweigh flood risk (Exception Test Part A)	Development will be safe for its lifetime and where possible reducing flood risk overall (Exception Test Part B)
				<p>No alternative sites have been proposed.</p> <p>The site is inside the Market Harborough Town Centre boundary but about 100m to the west of the Primary Shopping Area with good pedestrian links to the High Street and the train station along St Marys Road.</p> <p>The site's development will make a contribution to leisure, entertainment, tourism and retail floorspace needs for the town in a secondary trading location. Some small-scale residential may be acceptable on the site.</p> <p>The site is at significant risk from surface water flooding but the potential community benefits of the site outweigh the flood risk and a sequential approach to site layout is advocated. It is considered that there is scope to avoid or significantly mitigate any negative effects through the policies in the Local Plan. The wider sustainability benefits to the community outweigh the flood risk.</p>	
Land OS3070, Leicester Road, Market Harborough	8737	MH5	Employment: less vulnerable	This greenfield site lies within the built form of Market Harborough. Whilst a relatively small site (0.6ha), the site's development will potentially support provision of employment space for SME businesses in the District's main market town. It is close to	See relevant Guidance for site design and making development safe section of site table in New 8737 Site Table of Level 2 SFRA Addendum.

Site Name	SHELAA Site Reference	Local Plan Policy Reference	Type of Development/ Level of Vulnerability	Sustainability benefits to the Community that outweigh flood risk (Exception Test Part A)	Development will be safe for its lifetime and where possible reducing flood risk overall (Exception Test Part B)
				<p>proposed residential allocations MH1 and MH2 (part of the SA03 North of Market Harborough cluster of sites). Few other sites have been promoted for employment use and, as a result, it is important that this site is allocated to prevent its loss to other uses such as residential.</p> <p>The site is at significant risk from surface water flooding, with potential access and egress issues, but the potential economic and social benefits of the site outweigh the flood risk. It is considered that there is scope to avoid or significantly mitigate any negative effects through the policies in the Local Plan.</p> <p>The wider sustainability benefits to the community outweigh the flood risk.</p>	