Submission Harborough Local Plan 2020-2041

Climate Change Topic Paper

March 2026

Contents

1. Purpose and Context

1.1 Climate change represents one of the most significant long-term challenges facing Harborough District. The Harborough Local Plan (2020–2041) has therefore been prepared in the context of the Council's Climate Emergency Declaration (2019), which commits to reducing the district's carbon emissions and ensuring that development contributes to environmental resilience.

1.2 This Topic Paper explains how the Local Plan addresses both climate mitigation (reducing emissions and promoting renewable energy) and climate adaptation (building resilience to changing weather patterns, heat, and water pressures). It describes how relevant policies evolved, how they are informed by the evidence base, and how they collectively deliver the Council's strategic objectives for sustainable, low-carbon growth.

1.3 The policy framework has been guided by national and local commitments, including:

- The Climate Change Act 2008 (as amended) and the UK's net zero by 2050 target.
- The Environment Act 2021, which introduces statutory duties for biodiversity and resource efficiency.
- The National Planning Policy Framework (NPPF, 2023), particularly paragraphs 152–165, which require plans to shape sustainable places that contribute to carbon reduction and climate resilience.
- The Leicestershire County Council Climate and Nature Strategy (2022), which sets out shared local priorities for carbon neutrality and nature recovery.
- Harborough District Council Climate Emergency Action Plan (2022- 2030)

1.4 Harborough District Council declared a climate emergency in July 2019, recognising there is a need for urgent action to reduce emissions and to ensure that communities are prepared and resilient to the effects of climate change. The Council has committed to reducing its own emissions to net zero, as far as practicable by 2030. One of the Council's six key commitments promotes resilient natural systems to help to reduce the impacts of climate change. The Local Plan aligns with these priorities by directing growth to sustainable locations such as Market Harborough and Lutterworth, where access to services, public transport, and digital infrastructure can reduce reliance on private vehicles. Large strategic sites are expected to deliver energy-efficient, low-carbon homes and incorporate renewable energy generation, sustainable drainage, and biodiversity enhancement measures. Climate change considerations also underpin policies for renewable and low-carbon energy (AP05), sustainable transport and active travel, and green and blue infrastructure, ensuring a cross-cutting response to mitigation and resilience. This integrated approach reflects national commitments to the Future Homes Standard and supports Harborough's trajectory toward net zero and climate-resilient growth.

1.5 This Topic Paper follows the standard structure:

- Section 2: The Topic and Policies
- Section 3: The Main Issues
- Section 4: Guiding Approach and Policy Development

- Section 4: Key Evidence Studies
- Section 5: Evolution of Policies and Policy Linkages
- Section 6: Consultation feedback and policy evolution
- Section 7: Conclusion

2. The Topic and Policies

2.1 Climate change is a cross-cutting theme embedded throughout the Local Plan. The relevant policies are:

- DS03 – Tackling Climate Change and Enhancing the Natural Environment
- DM01 – High Quality Design and Placemaking
- DM05 – Green and Blue Infrastructure and Open Space
- DM06 – Sustainable Transport and Active Travel
- DM07 & DM08 – Managing Flood Risk and Sustainable Drainage
- DM09 – Sustainable Construction and Climate Resilience
- DM10 – Biodiversity and Geodiversity Protection and Enhancement
- AP05 – Renewable and Low Carbon Energy Development

2.2 Together, these policies form a single climate framework delivering emissions reduction, nature-based adaptation, and long-term resilience.

3. Evidence Base and Policy Linkages

3.1 There is a comprehensive evidence base sitting behind the Local Plan. All the documents are listed and are available in the Examination Library.

The key evidence documents relevant to the Local Plan's approach to climate change comprise:

- EN-NLP 3: Climate Change and Renewable Energy Study Policy Review (October 2024)
- EN-NLP 2: Climate Change and Renewable Energy Study Risk Assessment (September 2024)
- EN-NLP 4: Harborough Renewable Energy Assessment (October 2024)
- EN-NLP 6: Strategic Flood Risk Assessment Level 1 (October 2024)
- EN-NLP 7: Strategic Flood Risk Assessment Level 2 (December 2024)
- GR-NLP 4: Green and Blue Infrastructure Study (December 2024)
- TRP-NLP 2: Strategic Transport Impact Assessment (January 2025)
- EN-NLP 11: Leicestershire, Leicester and Rutland Local Nature Recovery Strategy (July 2025)
- EN-NLP 12: Ecological Assessment of Proposed Site Allocations (April 2026)

The Net Zero Leicestershire Strategy 2023-2025 (2022)

3.2 The Net Zero Leicestershire Strategy (2022) sets a countywide pathway to achieve net zero carbon by 2045 and restore natural capital alongside the restoration of natural capital. Harborough District Council has worked collaboratively with the County Council and partners to align the Local Plan with the Strategy's four key priorities: clean energy generation, sustainable transport, energy-efficient buildings, and nature-based carbon sequestration. These priorities provide the overarching strategic context for the Local Plan's climate approach and are embedded throughout the Plan.

Policy Links:

- DS03 establishes the overarching climate framework.
- DM09 promotes low-carbon design.
- AP05 supports renewable energy generation.
- DM10 advances biodiversity and carbon sequestration.

Harborough Climate Change and Renewable Energy Study (2024)

3.3 Land Use Consultants (LUC) were commissioned to undertake a comprehensive Climate Change and Renewable Energy Study to inform the new Harborough Local Plan (2020–2041). The study consists of two components: a Climate Change Risk Assessment (CCRA), and a Policy Review. The Policy Review report provides an evidence-led framework and practical recommendations for how the Local Plan can most effectively address both climate change mitigation (reducing emissions) and adaptation (building resilience).

3.4 Drawing on the findings of the CCRA, the study identifies spatially specific climate risks for Harborough, including increased flood risk from rivers and surface water, and overheating, particularly in Market Harborough where areas of social vulnerability overlap with exposure to surface water flooding. It advises that Local Plan policies should therefore seek higher standards of risk avoidance, design resilience, and mitigation in such locations.

3.5 The study also highlights that some climate risks, such as those affecting energy and transport infrastructure or agricultural productivity—may be more effectively managed through other mechanisms outside the planning system. Importantly, it stresses that policy responses should reflect the different timescales over which climate risks evolve and ensure that both built environment and land use policies incorporate adaptation planning.

3.6 The Renewable Energy Assessment (2024) identifies approximately 98 MW of existing renewable energy capacity in Harborough District, saving over 16,000 tCO_2 annually, enough to power 45,000 homes. The study highlights significant untapped potential, with up to 33,800 MW theoretically achievable, mainly through ground-mounted solar PV and onshore wind, though actual deployment will be limited by land availability, viability, and local constraints. The study recommends embedding supportive criteria-based policies, providing detailed guidance, and introducing robust monitoring to track progress toward the district's 2030 net zero goal. It also highlights the need for officer and committee training to ensure climate policies are applied consistently and given appropriate weight in planning decisions.

3.7 Building on this evidence, the Policy Review assesses the 2019 Adopted Local Plan and sets out recommended new and strengthened policies to ensure the updated plan reflects national climate priorities. These recommendations include:

- Retaining effective existing policies.
- Revising policies to raise ambition on energy efficiency, flood resilience, and green infrastructure.
- Introducing new policies where gaps exist, particularly on renewable energy generation, whole-life carbon reduction, and climate adaptation design principles.

Policy Links:

These findings underpin Policies AP05 and DS03, which promote renewable and low-carbon energy development while managing landscape and environmental impacts. Together, the policies embed renewable generation within the Local Plan's broader net zero and climate resilience framework, ensuring an evidence-led and spatially responsive approach aligned with national decarbonisation goals. The Policy Review recommendations (Tables 1.1 and 1.2) have informed policy preparation, and some examples are set out below:

- Policy DS03: adopts the principle of "reduce, adapt, and generate" from the study. It embeds a sustainable transport hierarchy as recommended in Table 1.1 Policy Review.
- Policy AP05: reflects renewable potential mapping, supporting well-sited solar and wind schemes.
- Policy DM06: ensures that new developments are designed to support safe, efficient and inclusive transport networks for all. It takes on board the Policy Review's recommendations in relation to making provision for car club spaces and EV charging points.
- Policy DM08: incorporates the drainage hierarchy as recommended by the Policy Review in Table 1.2.
- Policy DM09: introduces whole life-cycle carbon assessment for major development within the HQM and BREEAM process, informed by the recommendations of the Policy Review.

Strategic Flood Risk Assessment - Level 1 (2024)/Strategic Flood Risk Assessment – Level 2 (2024)

3.8 Although flooding is not the central focus of this topic paper, the SFRA studies underpin the adaptation components of climate policy. They identify flood risk areas, outline updated climate change allowances, and highlight where surface water and groundwater issues intersect with growth areas.

Policy Links:

- Policies DM07 and DM08: respond to SFRA findings by embedding sustainable drainage and flood mitigation in development design.

Green and Blue Infrastructure Strategy (2024)

3.9 GBI is now embedded across related policies (DS03, DM05, DM06–DM08, DM10), reflecting a shift towards a whole-plan, climate-led approach in which natural systems form critical infrastructure supporting Harborough's net zero and resilience objectives.

Policy Links:

- DM05: delivers multifunctional, climate-resilient GBI networks.
- DM10: aligns biodiversity net gain with carbon and climate outcomes.
- DS03: embeds GBI as a core mechanism for mitigation and adaptation.
- DM06–DM08: integrate GBI with active travel, drainage, and flood management.

Joint Water Cycle Scoping Study (2024)

3.10 This study identified Harborough as being within serious water stress zones - the Severn Trent and Anglian Water supply areas. It highlighted the importance of water efficiency and rainwater reuse.

Policy Links:

- Policy DM09: sets minimum water efficiency standards (110 litres/person/day).
- Policy DM08: promotes sustainable drainage and water reuse through SuDS.
- Policy DM07: integrates nature-based solutions for managing surface water.

Leicestershire, Leicester and Rutland Local Nature Recovery Strategy (LNRS) (2025)

3.11 The LNRS provides a countywide framework for nature recovery and carbon sequestration. Harborough officers contributed to defining priority areas—notably the Welland Valley and South Leicestershire Farmlands. The LNRS identifies natural flood management, woodland expansion, and wetland creation as actions delivering both biodiversity and climate benefits.

Policy Links:

- Policy DS03: explicitly references the LNRS and its priority areas.
- Policy DM10: ensures off-site biodiversity net gain supports LNRS opportunity zones.
- Policy DM05: promotes habitat connectivity in line with LNRS mapping.

Strategic Transport Impact Assessment (January, 2025)

3.12 The Strategic Transport Impact Assessment (STIA) provides key evidence on how transport decarbonisation and sustainable mobility have shaped the Development Strategy and site selection process for the Harborough Local Plan (2020–2041). The assessment adopts a vision-led approach, consistent with the Leicestershire Local Transport Plan 4 (2024), focusing on reducing carbon emissions through compact, accessible patterns of growth and prioritising active and public transport over private car use. It demonstrates that the Local Plan's large site allocations, particularly in Market Harborough and an area adjoining Leicester/Oadby have been selected for their potential to integrate walking, cycling, and bus infrastructure in line with LTN 1/20 and Active Travel England design principles. The STIA also aligns with the Council's climate change mitigation objectives by promoting network management policies that reduce congestion, improve air quality, and support the transition to low-carbon transport modes. Collectively, this evidence confirms that transport planning is integral to achieving the Local Plan's net zero ambitions and complements the policy framework set out in DS03 (Tackling Climate Change), DM06 (Sustainable Transport and Active Travel), and DM01 (High Quality Design and Place-making).

Policy Links:

- Policy DM06: requires developments to deliver walking, cycling, and public transport connectivity.
- Policy DS03: directs growth to locations accessible by sustainable modes.
- Policy DM01: requires layouts that prioritise walking and cycling networks.

Local Plan Viability Report (January, 2025)

3.13 Aspinall Verdi were commissioned to provide an up-to-date viability assessment (INF-NLP 3). The Whole Plan Viability Assessment tested the cumulative impact on the draft policies and proposed site allocations in the emerging Draft Local Plan – including allowance for water efficiency and future home standards – to ensure they do not undermine the overall viability of development.

4. The Main Issues

4.1 The evidence identifies several key issues central to achieving a sound, climate-responsive Local Plan:

- Reducing Emissions: Addressing high carbon emissions from the domestic and transport sectors.
- Adapting to Climate Risks: Managing increasing flood risk, overheating, and water scarcity.
- Integrating Nature-Based Solutions: Using green infrastructure and biodiversity to deliver co-benefits for carbon storage and flood mitigation.

- Securing Deliverability: Ensuring requirements for low-carbon construction, BNG, and renewable energy remain viable and proportionate.
- Future-Proofing: Aligning local policy with evolving national standards (Future Homes Standard, Net Zero Carbon Building Standard) and ensuring long-term adaptability.

5. Consultation feedback

5.1 In addition to the evidence base, consultation responses at different stages of plan preparation have played a key role in shaping the Local Plan's approach to climate change and environmental policy. Early (Regulation 18) consultation identified strong support for a comprehensive response to climate change, alongside a broad range of suggested policy interventions. Key themes included the need to maximise multi-functional green and blue infrastructure, incorporate nature-based solutions, enhance biodiversity, and manage flood risk through sustainable drainage systems. Respondents also emphasised the importance of directing development to sustainable and accessible locations to reduce reliance on private vehicles, support modal shift, and minimise carbon emissions.

5.2 Further representations supported the integration of sustainable design and construction practices, including passive design, energy efficiency measures, and the use of low-carbon materials. There was also support for renewable and low carbon energy generation, including community-led schemes, and for the provision of electric vehicle charging infrastructure. However, some respondents raised concerns about the clarity, viability, and deliverability of certain requirements, particularly where policies were perceived to be overly prescriptive or insufficiently justified.

5.3 At Regulation 19 stage, responses reinforced the importance of aligning climate objectives with infrastructure capacity, transport impacts, and the spatial distribution of development. Concerns were raised about the cumulative impacts of growth, particularly in relation to traffic, environmental quality, and pressure on existing infrastructure, as well as the need to ensure that climate policies are supported by a robust and up-to-date evidence base.

5.4 Representations also highlighted the need for greater clarity and flexibility in policy wording to ensure effective implementation, including clearer thresholds, definitions, and alignment with national policy. In some cases, respondents considered that policies did not go far enough in addressing biodiversity enhancement or climate resilience, while others raised concerns about viability and the cumulative burden of policy requirements.

6. Evolution of Policies

6.1 Climate change is a cross-cutting theme embedded throughout the Local Plan, influencing a range of strategic and development management policies. The Council's approach has evolved in response to an expanding evidence base, statutory consultee input, and emerging best practice, as well as real-world events that have reinforced the urgency of climate action. The following sections set out how key policies have developed

over the course of plan preparation and how they collectively contribute to a comprehensive and effective response to the climate emergency.

Guiding Approach and Policy Development

6.2 From the early stages, Harborough District Council adopted a guiding principle that climate change should not be treated as a standalone issue but as a cross-cutting consideration integrated throughout the plan. The approach is underpinned by three central principles:

1. Avoid and Reduce: prioritising energy efficiency, compact settlement patterns, and sustainable transport to reduce emissions at source.
2. Adapt and Build Resilience: ensuring design, green infrastructure, and drainage systems anticipate future climate risks.
3. Restore and Enhance: using biodiversity recovery and green infrastructure to sequester carbon, enhance ecosystem services, and improve quality of life.

6.3 These principles were embedded across strategic and development management policies following evidence review and consultation with statutory agencies, including Natural England, the Environment Agency, and the Lead Local Flood Authority (LLFA) on emerging polices.

6.4 From the outset, the Council adopted an evidence-led and precautionary approach, using the Climate Change and Renewable Energy Study (LUC, 2024), Strategic Flood Risk Assessment (SFRA, 2024), and Water Cycle Study (2024) to inform decisions. These studies identified both mitigation and adaptation imperatives, reducing emissions, promoting renewable and low-carbon energy, and strengthening resilience to flooding, overheating, and water stress. These priorities establish climate change as a central pillar of the Development Strategy (Policy DS03), steering growth toward sustainable, accessible locations while embedding carbon reduction and climate resilience into the spatial choices, site selections, and performance standards of all new developments.

6.5 The site selection process integrated the Sequential and Exception Tests from the SFRA, ensuring that allocations avoid areas of high flood risk where possible and, where risk exists, that it can be mitigated through design, green infrastructure, and sustainable drainage (SuDS). Spatial decisions were reinforced by the Sustainability Appraisal, which required that each allocation demonstrate how climate risks are mitigated and opportunities for renewable energy, biodiversity gain, and sustainable travel are maximised.

6.6 At the strategic level, Policy DS03 establishes climate change as a cross-cutting theme linking energy, transport, biodiversity, water, and design policies. It prioritises low-carbon, resource-efficient growth; active and sustainable travel; and the creation of multifunctional green and blue infrastructure networks that deliver flood management, carbon sequestration, cooling, and ecological connectivity. Supporting policies translate these principles into delivery mechanisms: DM07 (Managing Flood Risk) and DM08 (Sustainable Drainage) operationalise the sequential approach and require a 20% reduction in surface water run-off; DM09 (Sustainable Construction and Climate Resilience) ensures all major development meets high environmental standards (Home Quality Mark, BREEAM, whole-life carbon assessments); and AP05 (Renewable and Low Carbon Energy

Development) promotes renewable generation whilst managing landscape and environmental impacts. In addition, the site-specific requirements set out in Policy SA01 include a variety of mechanisms to implement climate action and the master plan requirements in Appendix 6 encourage a design approach that addresses climate change adaptation and mitigation.

6.7 Together, these policies demonstrate that climate change has not been treated as a standalone issue but as a core organising framework for spatial planning, site selection, and design across the Plan. The approach ensures that all allocations contribute to net zero ambitions, adapt to future climatic conditions, and deliver multiple co-benefits for residents, nature, and infrastructure resilience.

Policy DS03 – Tackling Climate Change and Enhancing the Natural Environment

6.8 While Regulation 18 responses informed the scope of climate change policies, draft DS03 was formulated as the overarching policy within the Development Strategy part of the plan relating to climate change. Informal feedback from partners on the emerging policy in autumn 2024 saw the following changes introduced:

- Waste prevention was added alongside waste management (1.a); and
- New criterion added re: development contributing to the delivery of the national Nature Recovery Strategy, LNRS and BNG (1.d).

6.9 A modification to the policy is being proposed to add reference to Local Nature Reserves under Part 2.

Policy AP05 – Renewable and Low Carbon Energy Development

6.10 AP05 evolved from adopted Local Plan Policy CC2 (Renewable energy generation). However, part 2 of CC2 pertaining to wind energy development was considered overly prescriptive and has not been taken forward into AP05, allowing the acceptability of proposals to be assessed on a case by case basis. The policy aligns with national net zero pathways and promotes local generation to improve energy resilience. There are no proposed modifications to this policy at this stage.

Policy DM01 – High Quality Design and Place-making

6.11 DM01 evolved to embed climate-responsive design principles, including protecting/enhancing existing natural assets, promoting opportunities for sustainable public transport and active travel modes, and providing open spaces along with links to the wider green infrastructure network. Following on from informal consultation with partners, a criterion was added making reference to the need for the design of new buildings to incorporate water and energy efficiency measures in accordance with DM09.

Policy DM05 – Green and Blue Infrastructure and Open Space

6.12 DM05 developed through the broadening out of adopted Local Plan policies GI2/GI4 (Open space, sport and recreation/Local Green Space respectively) to recognise the wider contribution and benefits of green and blue infrastructure. It requires all development to contribute to high quality multifunctional green and blue infrastructure which provides access to shade and manage surface water run-off, contributing to wider climate change resilience. It recognises the role green/blue infrastructure can play as a pollution barrier, absorbing

pollutants and reducing noise levels. Following informal consultation, clarification that Part 1 applies to all development was added.

Policy DM06 – Sustainable Transport and Active Travel

6.13 DM06 has evolved from "transport" policies in the adopted plan into a more climate change focused policy. It takes on board recommendations from the Climate Change and Renewable Energy Study Policy Review and seeks to support modal shift away from car dependency. Following informal consultation, a further criterion requiring mitigation for any adverse impact on residential amenity and air quality was added (2.f). Responding to Leicestershire County Council concerns at Regulation 19 a proposed modification to DM06 emphasises the need for Transport Assessments to be guided by the place vision and transport vision produced for the site, taking account of the Leicestershire Enabling Travel Choice Strategy, underlining the imperative that sustainable transport and active travel modes must be at the heart of place-making. A proposed modification to the policy's supporting text recognises the need for any cross-boundary and cumulative impacts to be considered and is in response to Leicester City Council's representation.

Policy DM09 – Sustainable Construction and Climate Resilience

6.14 DM09 reflects the Climate Change and Renewable Energy Study (2024). The policy provides a clear link to the Future Homes Standard (2025) and the Council's long-term decarbonisation objectives. It includes requirements for:

- Whole life-cycle carbon assessments
- Minimum energy and water efficiency standards
- Passive design measures
- Waste minimisation (during construction and operation)

6.15 Informal consultation with partners resulted in minor changes to the emerging policy. Following Regulation 19 consultation there are no substantive proposed modifications bring put forward to the policy at this stage.

Policy DM10 – Biodiversity and Geodiversity Protection and Enhancement

6.16 DM10 integrates the LNRS's spatial priorities, ensuring that biodiversity net gain contributes directly to carbon sequestration and habitat connectivity. The Local Plan's approach to biodiversity and nature recovery is supported by a comprehensive and up-to-date evidence base that ensures development impacts are fully assessed and mitigated. The robust policy framework is integrated throughout the plan, ensuring climate change and biodiversity are managed as cross-cutting themes, particularly through Policy DM10 (Biodiversity and Geodiversity Protection and Enhancement).

- **Leicestershire, Leicester and Rutland Local Nature Recovery Strategy (LNRS) (2025):** Harborough officers contributed to defining priority areas within the LNRS, ensuring that the Local Plan aligns with the countywide framework for nature recovery and carbon sequestration (p.7). Policy DM10 ensures that any off-site biodiversity net gain supports these identified LNRS opportunity zones (p.7).
- **Site-Specific Assessments:** Detailed, site-specific ecological surveys (Ecological Assessment of Proposed Site Allocations) were conducted to identify habitats and

the potential for protected species, and to inform the application of the Biodiversity Net Gain (BNG) requirement.

6.17 Following comments by Natural England at Regulation 19 stage, proposed modifications are put forward to Part 3 to clarify when compensation will be required and to Part 5 to clarify the requirements for internationally, nationally and locally designated sites.

7. Conclusion

7.1 The Harborough Local Plan (2020–2041) demonstrates a comprehensive and integrated approach to tackling climate change. The policies have evolved through an iterative, evidence-based process that aligns local priorities with national objectives for net zero and resilience.

7.2 The guiding approach, based on reducing emissions, building resilience, and restoring ecosystems, has resulted in a cohesive framework where each policy contributes to climate action through its own domain:

- Design (DM01) promotes climate-sensitive development
- Green infrastructure (DM05) and biodiversity (DM10) provide for natural solutions
- Transport (DM06) seeks to reduce carbon emissions
- Flood Risk (DM07) seeks to steer development away from high-risk flood areas, and to ensure development actively reduces and manages future flood risk
- Sustainable Drainage (DM08) addresses climate change by requiring climate-resilient, nature-based drainage and water management that reduces flood risk, manages increased rainfall, improves water efficiency, and explicitly allows for future climate change impacts in design and runoff calculations
- Construction (DM09) improves energy and water performance
- Renewable energy (AP05) promotes local decarbonisation
- Policy DS03 addresses the climate change agenda by promoting low-carbon travel, resource-efficient development, and the protection and enhancement of green and blue infrastructure that improves flood resilience, supports carbon sequestration, and strengthens ecological adaptation to climate change.

7.3 Together, these policies ensure that Harborough's growth strategy delivers sustainable, low-carbon development, supports the Local Nature Recovery Strategy, and strengthens resilience to future climate risks.

7.4 The evidence base confirms that Harborough District Council's approach is robust, locally justified, and capable of demonstrating soundness under NPPF paragraph 35, ensuring that the Local Plan contributes meaningfully to both local and national climate goals.