Submission Harborough Local Plan 2020-2041

Flood Risk Topic Paper

March 2026

Contents

1. Purpose and Structure

1.1 Topic Papers are an important source of information, helping to explain how the policies in the Proposed Submission version of the Harborough Local Plan (2020–2041) have been prepared. They provide the "bridge" between the technical evidence base and the Local Plan policies, demonstrating the reasoning and justification behind the Council's chosen approach.

1.2 This Topic Paper focuses on the issue of flood risk management and sustainable drainage. Flooding is a significant risk in parts of Harborough District and has become a more frequent concern due to climate change. It is therefore vital that the Local Plan addresses flood risk comprehensively to ensure development is safe, resilient, and does not increase risk elsewhere.

1.3 The paper forms part of a suite of Topic Papers, alongside the Duty to Cooperate Statement, Statement of Common Ground and the Consultation Statement. Taken together, these documents provide transparency and a clear audit trail of the Plan's preparation.

1.4 The purpose here is not to repeat all the technical evidence but to interpret and signpost it. The emphasis is on setting out how the Council has applied the evidence, statutory consultee advice, and national policy to shape the flood risk policies in the Local Plan.

1.5 The structure of this Topic Paper is as follows:

- The Topic and Policies
- Overall Approach to Flood Risk
- Key Evidence Studies
- Consultation Feedback
- Evolution of Policies
- Integration with the Leicestershire, Leicester and Rutland Local Nature Recovery Strategy
- Conclusion

2. The Topic and Policies

2.1 Flood risk and drainage are addressed through three key policies:

- **Policy DM07: Managing Flood Risk**, which directs development away from areas of highest flood risk, requires Flood Risk Assessments (FRAs), and ensures residual risks are managed.
- **Policy DM08: Sustainable Drainage**, which sets a district-wide standard for SuDS in all major development and requires a 20% reduction in pre-development run-off rates.

- **Policy DS03: Development Strategy – Tackling Climate Change and Enhancing the Natural Environment**, which promotes resilience, green/blue infrastructure, and natural flood management as part of the spatial strategy.

2.2 Together, these policies, wherever possible, ensure that development is steered to the areas of lowest risk, is designed to be resilient, and actively contributes to reducing flood risk across the district.

2.3 Harborough District lies within three principal catchments: the River Welland, the River Avon, and the River Soar. The 2024 Level 1 Strategic Flood Risk Assessment (SFRA1) identifies that the most significant sources of flood risk in the district are fluvial and surface water while sewer and reservoir inundation also affect some parts (see SFRA1 Executive Summary).

2.4 Historic flood incidents are recorded throughout Harborough District, with notable surface water and drainage-related flooding in recent years. According to the Leicestershire County Council Lead Local Flood Authority (LLFA), recurring incidents have been documented in Market Harborough, Lutterworth, Kibworth, and Fleckney, typically associated with exceedance of local drainage systems, limited infiltration capacity of clay soils, and the interaction of fluvial and surface water pathways. The LLFA integrates information from the Environment Agency's (EA) Recorded Flood Outlines, Surface Water Flood Maps, and post-event incident reports into its Flood Incident Database, which provides the baseline for the Harborough Level 1 Strategic Flood Risk Assessment (SFRA1, 2024). The SFRA1's *Appendix E – Historic Flood Records* maps confirmed flood incidents reported by both the EA and LLFA, capturing significant local events in recent years (2021, and 2024/25 including aftermath of Storm Henk). These datasets collectively demonstrate the district's ongoing vulnerability to intense rainfall and surface water exceedance, particularly in built-up and low-lying areas where drainage infrastructure capacity is constrained (Harborough District Council, *Level 1 and 2 SFRAs*, 2024; Leicestershire County Council, *Flood Risk Management Strategy*, 2023; Environment Agency, *Recorded Flood Outlines Dataset*, 2024). Please note that more recent flooding events have occurred, which have also impacted Broughton Astley and Great Glen (see paragraph 3.4 below), but these are not covered by the SRFA.

National and Regional Policy Context

2.5 National flood risk planning policy is set by the National Planning Policy Framework (NPPF) and associated Planning Practice Guidance (PPG), which together require local authorities to direct development away from areas of highest flood risk through the Sequential Test, and, where necessary, apply the Exception Test to ensure development is safe for its lifetime and delivers wider sustainability benefits without increasing flood risk elsewhere. The NPPF (paras. 159–169) emphasises that all major development should incorporate sustainable drainage systems (SuDS) unless clearly inappropriate, taking full account of climate change and residual risks. The PPG expands on this by requiring that plan-making and site-specific assessments be based on up-to-date Strategic Flood Risk Assessments (SFRAs), that both fluvial and surface water risks are considered, and that drainage strategies follow the drainage hierarchy—prioritising water reuse, infiltration,

natural attenuation, and finally discharge. It also highlights the multifunctional benefits of SuDS for biodiversity, water quality, amenity, and climate resilience.

2.6 Regionally, Harborough sits across the Welland, Avon, and Soar catchments, all of which extend into neighbouring authorities. The Environment Agency's Catchment Flood Management Plans and the Surface Water Management Plans produced for Leicester and Leicestershire have informed the Council's evidence base. The Flood and Water Management Act 2010 gives the Lead Local Flood Authority (Leicestershire County Council) a statutory role, and their standing advice has been embedded into Harborough's Local Plan policies.

3. Overall Approach to Flood Risk

3.1 Harborough District Council has adopted a precautionary, evidence-led approach to flood risk in the preparation of the Local Plan. The Council recognises that while the majority of the district is rural and at relatively low fluvial risk, there are significant challenges in towns and villages where surface water and drainage exceedance has caused repeated flooding. Climate change is likely to make these risks more severe.

3.2 The Council's overarching approach rests on three principles:

1. **Avoidance first** – steering development to areas of lowest flood risk through application of the Sequential Test.
2. **Mitigation where unavoidable** – where small areas of higher-risk land are included in allocations, developers are expected to avoid these areas and use it for open space, ecological corridors, or flood storage, with built development kept in the lowest-risk parts of the site. A sequential approach to site layout is expected from the developers.
3. **Betterment, not neutrality** – new development should not simply avoid making flood risk worse; it should actively reduce run-off and improve resilience.

3.3 This approach aligns with national policy requirements and reflects locally evidenced flood risk issues identified through ongoing investigation. Recent significant flood events highlighted the vulnerability of existing drainage infrastructure, including culvert exceedance, sewers surcharge, and surface water ponding in clay-soil catchments. These events have reinforced the importance of robust SuDS policies and justify the requirement of a 20% reduction in run-off rates to mitigate future risk.

3.4 These events, currently subject to or informing formal section 19 investigations by the Leicestershire County Council, include:

- Storm Henk: January 2, 2024 – Broughton Astley (East) and Glooston are included in the wider formal investigation. However, while the flooding in Great Glen and Fleckney did not formally trigger the investigation threshold, due to the local severity of impact and numbers of internal property flooding experienced they will be included within the formal investigation.
- Market Harborough: September 21, 2024 - formal investigation.

- Countywide: January 6, 2025 - Broughton Astley (West), Great Glen and Thurnby are included in the wider formal investigation.

3.5 The Council also sees flood risk management as part of a broader climate change strategy. SuDS, green corridors, and wetland restoration are viewed not just as drainage solutions but as opportunities to deliver biodiversity net gain, contribute to the Local Nature Recovery Strategy, and provide new recreational and amenity spaces. This integrated approach is embedded in policies DM07, DM08 and DS03.

4. Key Evidence Studies

4.1 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 flood risk comprise:

- EN-NLP 6: Strategic Flood Risk Assessment Level 1 (October 2024)
- EN-NLP 7: Strategic Flood Risk Assessment Level 2 (December 2024)
- EN-NLP 9: Sequential and Exception Test (January 2025)
- EN-NLP 8: Strategic Flood Risk Assessment Level 2 Addendum Report (August 2025)
- EN-NLP 10: Sequential and Exception Test: Update following SFRA Level 2 Addendum Report (September 2025):
- EN-NLP 5: Joint Water Cycle Scoping Study (December 2024)
- EN-NLP 3: Climate Change and Renewable Energy Study (October 2024)

4. 2 The Council's approach to flood risk and drainage is rooted in this comprehensive and up-to-date evidence base. Each of the key studies has played a role in shaping the policies of the Harborough Local Plan. The following sections set out the main findings of these studies, how they have been interpreted, and how they have directly influenced policy development.

Strategic Flood Risk Assessment – Level 1 (SFRA1) (January 2024)

4.3 The Level 1 Strategic Flood Risk Assessment provides an up-to-date, policy-compliant evidence base for understanding flood risk across Harborough District. Prepared in line with the National Planning Policy Framework (2023) and supporting Planning Practice Guidance, it consolidates the most recent data on all sources of flooding fluvial, surface water, groundwater, sewer, and artificial, while taking account of the projected impacts of climate change. It provides detailed mapping and spatial analysis to guide sustainable site allocation and development management, and offers advice for applicants undertaking site-specific Flood Risk Assessments (FRAs), setting out expectations for mitigation, resilience measures, and long-term risk management. It encourages developers to achieve a 20% reduction in runoff rates compared to pre-development conditions to account for existing surface water runoff problems. If this is not viable, developers will need to demonstrate why such a betterment is unattainable (Section 11 Recommendations). The SFRA1 informed the initial identification of potential site allocations and formulation of policies within the emerging Harborough Local Plan. The SFRA1 mapping provided the basis for carrying out the SFRA

Level 2 which assessed in detail potential development sites, including emerging site allocations.

4.4 Overall, the SFRA1 shows that the most significant sources of flood risk in the district are fluvial and surface water:

- Fluvial flood risk: The primary sources of fluvial flood risk in Harborough District are along the Rivers Swift, Welland, Jordan and Sence as well as the Langton Brook, and their associated tributaries. These and other watercourses present fluvial flood risk to rural communities as well as the main urban areas in Harborough District.
- Surface water flood risk**:** The risk of flooding from surface water map shows a number of prominent overland flow routes, predominantly channelled by topography into watercourses and low-lying areas. There are also flow routes following roads through the main urban areas, most notably Lutterworth, Market Harborough and Broughton Astley.

Strategic Flood Risk Assessment – Level 2 (SFRA2) (December 2024)

4.5 Given the findings of the SFRA1 in relation to fluvial and surface water flood risk, it was clear that a Level 2 SFRA would be required to provide further flood risk information on emerging site options which were subject to potential fluvial or surface water risk. The SFRA2 provides detailed, site-specific analysis and was used to inform the Sequential and Exception Test for potential allocations in the Harborough Local Plan. It built on identified risks from the Level 1 SFRA to provide a detailed understanding of fluvial, surface water, groundwater, and reservoir related flooding risks to potential development sites. It assessed almost 180 potential development sites, including proposed allocations. It identified 13 proposed allocations as having significant risk of flooding and/or access and egress issues (see SRFA2 Appendix B: Site Screening Summary). These 13 sites have been further assessed in Site Tables forming part of the SFRA2[1]. Appendix A below lists the site allocations for which summary Site Tables have been prepared in order to inform the Exception Test.

4.6 These detailed Site Tables set out the flood risk to each site and NPPF requirements for the site. Guidance for site specific FRAs has been produced for each site along with a broadscale assessment of suitable SuDS options.

4.7 In addition to Site Tables, SFRA2 Appendix B (Site Screening Summary) identifies some specific issues relating to sites which should be ‘Considerations in Development’. Such considerations were set out for 5 proposed allocations and these are set out in Table 2 of Appendix A below. Site Tables and ‘Considerations for Development’ informed the policy requirements for proposed allocations where appropriate.

4.8 A summary of key site issues is set out at section 7.2 of SFRA2. It finds some areas of Harborough to be at greater risk than others, particularly those in the vicinity of the River Welland, River Sence, and from the Wash Brook. Most sites that are situated in close proximity to watercourses are shown to be at significant fluvial flood risk.

[1] This includes the Site Table for site 8631 (OA1 Land south of Gartree Road SDA) which had already been subject to a joint assessment with Oadby and Wigston Borough Council due its cross-boundary nature.

4.9 It identifies surface-water flooding as the principal source of risk across the District, particularly as the water predominantly flows into and along topographically low-lying areas, including Market Harborough, and Lutterworth, into watercourses such as the River Welland, River Sence, River Swift, and into the larger unnamed watercourses. Most of the sites detailed in the Level 2 summary table are at surface water flood risk but the degree of flood risk varies significantly. Several sites have potential access and egress issues as a result of fluvial and surface water flooding on the surrounding roads.

4.10 In terms of the effects of climate change, fluvial and surface water climate change mapping indicates that flood extents are generally predicted to increase. As a result, the flood depths, velocities, and hazard of flooding may also increase. The significance of the increase tends to be dependent on the topography of the site and the climate change percentage allowance used.

4.11 Overall, the Level 2 SFRA supports the Council's approach in Policies DM07 (Managing Flood Risk) and DM08 (Sustainable Drainage) and provides appropriate evidence to ensure that flood risk has been appropriately considered in the identification of site allocations. The findings informed site specific policy requirements for allocations and will inform site FRAs. It confirms that opportunities for betterment should be sought where surface water flooding issues are present and encourages the incorporation of nature-based SuDS solutions aligned with the latest Environment Agency and Lead Local Flood Authority guidance.

Policy response:

- The Sequential and Exception Test for allocations was applied using the 2024 SFRA Level1 and Level 2 work.
- The findings of the Level 2 SFRA and associated site tables were made available through the Regulation 19 consultation and informed the 'policy requirements' for proposed allocations set out in the draft Local Plan.
- Policy DM07 explicitly references the use of the drainage hierarchy, reflecting the SFRA's emphasis on sustainable, layered solutions.
- Supports the principle of seeking betterment as set out in policy DM08.

Sequential and Exception Test (January 2025)

4.12 To inform site selection and ensure a robust approach to flood risk, the Council undertook a Sequential and Exception Test assessment (January 2025). This involved the screening of around 180 potential development sites against available flood risk datasets, including fluvial and surface water flood risk, to provide a high-level assessment of flood risk from all sources.

4.13 Section 3.9 of the Sequential and Exception Test document details the outcomes of the application of the Sequential Test. Of the sites assessed, some 109 sites passed the Sequential Test (classified as Green and Amber sites) and are most/more compatible with their proposed use in current fluvial and surface water risk terms. Of these, 22 sites were taken forward as preferred allocations within the Draft Local Plan. Of the 62 sites which did not pass the Sequential Test (Red sites), 13 sites were identified as preferred allocations requiring the Exception Test. The Exception Test assessed whether:

- the development would provide wider sustainability benefits to the community that outweigh flood risk; and
- the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

4.14 The detailed outcomes of the Exception Test are set out in Appendix 5 of the Sequential and Exception Test document. All 13 sites were found to satisfy both elements of the Exception Test subject to the appropriate mitigations detailed in the Site Tables.

Level 2 Strategic Flood Risk Assessment: Addendum (August 2025) / Sequential and Exception Test: Update following SFRA Level 2 Addendum Report (September 2025)

4.15 Since the preparation of the SFRA1 and SFRA2, the Environment Agency has published the first outputs of their National Flood Risk Assessment 2 (NaFRA2) and National Coastal Erosion Risk Map (NCERM), updating the national flood mapping for England. Outputs were published in January 2025 (surface water mapping) and March 2025 (Flood Map for Planning). The Level 2 SFRA Addendum was commissioned to provide an overview of the new NaFRA2 mapping, a summary of the risk shown at the sites assessed within the SFRA2 under the new NaFRA2 mapping, and recommendations for developers.

4.16 The review of the new NaFRA2 Flood Zones and RoFSW data found that for the majority of sites, there are no significant changes to overall flood risk and therefore the recommendations made in most of the SFRA2 Site Tables remain appropriate. However, three sites being taken forward as proposed allocations in the draft Local Plan had significant changes and the associated Site Tables have been updated as part of the Addendum work. These are:

- Site 8054: GB2 Land off Dingley Road and Nether Green (housing allocation): Significant increase in Flood Zone 2/3 extents, and significant decrease in surface water flood extents;
- Site 10240: MH7 St Marys Road (retail and leisure): Significant increase in surface water flood extents; and
- Site 10248: Part of MH6 Land East of Northampton Road, north of Harborough Enterprise Centre (employment): Significant increase in surface water flood extents.

4.17 One additional proposed allocation, namely site 8737: MH5 Land OS3070, Leicester Road (employment), is shown to be at significant risk of surface water flooding in the NaFRA2 RoFSW dataset where previously the risk was shown to be lower. A new Site Table has been prepared for the site as part of the Addendum work.

4.18 Following on from the Level 2 SFRA Addendum and taking into account the changed flood risk picture for the 4 proposed allocations (set out in 6.16-4.17 above), an update to the Sequential and Exceptions Test (January 2025) was undertaken in September 2025. The schedule of sites comparing the original outcomes with the new NaFRA2 mapping is available alongside the Level 2 SFRA Addendum. This formed the basis of the Sequential Test update but did not result in any changes to the proposed allocations.

4.19 Given the increased flood risk of the 4 proposed allocation sites, an updated Exception Test for sites was carried out (see Appendix A of the Update). All the sites are shown to be able to pass both parts of the Exception Test subject to appropriate mitigation measures specified in the SFRA2 Addendum updated Site Tables for 8054 (GB2), 10248 (MH6 part) and 10240 (MH7), and the new Site Table for 8737 (MH5). The guidance contained within the relevant Site Tables will need to be considered as development proposals are brought forward.

Policy response:

- Proposed allocations were rechecked against the updated mapping as part of the SFRA2 Addendum.
- A update to the Sequential and Exception Test was carried out taking into account the changes to flood risk identified and the new/updated Site Tables. No changes to proposed allocations resulted but policy requirements in the draft Local Plan were checked to ensure that flood issues are appropriately addressed.
- Policy DM07 requires developers to demonstrate that FRAs use the latest EA modelling as their evidence base.
- DM08 references the need for climate change allowances in SuDS design, ensuring that attenuation basins and wetlands are sized for future rainfall, not just historic records.

4.20 The updated hydraulic modelling enhances confidence that the Local Plan is justified, effective, and consistent with national policy (NPPF paragraphs 159–165) by ensuring the allocations are based on the most up-to-date, modelled evidence.

Harborough Climate Change and Renewable Energy Study (2024)

4.21 This policy review evaluates the effectiveness of the existing Local Plan in addressing climate change mitigation and adaptation, drawing on evidence from the Climate Change Risk Assessment. It identifies flood risk, particularly from rivers and surface water, as a key climate-related challenge for Harborough, with spatial variations in vulnerability and particular concentrations of risk in areas such as Market Harborough, where more vulnerable communities are exposed.

4.22 The review highlights the need for planning policy to respond to both current and future flood risk, recognising that climate change will increase the frequency and severity of flood events over time. It emphasises that policy responses must account for different timescales of climate change and ensure that development is both located and designed to avoid or minimise flood risk.

4.23 In response, the review recommends strengthening the policy framework to improve resilience to flooding. Key recommendations include incorporating the drainage hierarchy within policy; requiring sustainable drainage systems (SuDS) to be delivered as part of wider green infrastructure objectives; and ensuring that development integrates climate adaptation measures from the outset. The review also supports a more targeted approach in higher-risk and more vulnerable areas, where stronger requirements for flood risk avoidance and mitigation may be justified. Key findings included:

- Peak rainfall events in the East Midlands are expected to increase by 20–40% by the 2050s.
- Clay soils across much of the district reduce infiltration potential, leading to faster surface run-off and ponding.
- Heatwaves and droughts will be interspersed with more frequent intense rainfall events, placing additional pressure on drainage infrastructure.

Policy response:

- DS03 (Development Strategy) was strengthened to promote climate resilience as a cross-cutting principle, embedding flood management within green infrastructure.
- DM07 requires all FRAs to ensure that the design of development incorporates flood residence measures to allow for increased risk associated with climate change.
- DM08 requires SuDS to be designed as multifunctional green/blue infrastructure, delivering amenity, cooling, and biodiversity benefits alongside drainage. They must also ensure that flooding does not occur in the event of an a 1 in 100-year rainfall event (including an allowance for climate change).

Joint Water Cycle Scoping Study Scoping Report (2024)

4.24 The Joint Water Cycle Scoping Study (2024), prepared for four south Leicestershire Local Authorities (Blaby District Council, Harborough District Council, Hinckley and Bosworth Borough Council, Oadby and Wigston Borough Council), provides a high-level assessment of water management, flood risk, and infrastructure capacity to support sustainable growth. At the time the study was carried out only scale of planned growth in the local authority areas was known as potential allocations had not been identified.

4.25 Section 11 of the study brings together a summary of the conclusions which are wide-ranging and high-level relating to water resources (water efficiency in new development), wastewater network (need for early engagement with Severn Trent and Anglian Water), wastewater treatment (providing an initial estimate of spare capacity within the network), water quality (potential for growth to lead to water quality deterioration through increased discharge from treatment works), and environmental impact (SuDS design should consider both water quality and water quantity and offer multiple benefits such as flood risk reduction, amenity value and biodiversity/habitat creation).

4.26 The Scoping Study also emphasises the need for integrated catchment-based planning, promoting nature-based and blue-green infrastructure solutions to manage surface-water flows and enhance ecological resilience. The report supports the Council's collaboration with the Environment Agency and the Lead Local Flood Authority (LLFA) to ensure that site-specific Flood Risk Assessments and drainage strategies are informed by the latest modelling and best practice.

Policy response:

- DM08 requires a 20% reduction in peak run-off rates. This requirement is framed as a default standard.

- DM08 supports opportunities for the planning system to ease pressure on the wastewater network through the requirement for SuDS and recognises their potential benefits not only in reducing flood risk, but also for amenity and biodiversity/habitat creation. The WCS evidence underpins the requirement for all major development to incorporate SuDS, even on brownfield land.
- Engagement has taken place through Infrastructure Delivery Plan and through the Duty to Cooperate activities with water companies, the Environment Agency and the Lead Local Flood Authority given the opportunity to comment on emerging Local Plan policies prior to Regulation 19 consultation.

5. Consultation Feedback

5.1 During the Regulation 18 consultation, stakeholders recognised that the Strategic Flood Risk Assessment (SFRA) and associated Sequential Test provide a critical foundation for identifying sustainable locations for future growth. Both the Environment Agency (EA) and the Lead Local Flood Authority (LLFA, Leicestershire County Council) expressed strong support for the Council's evidence-led approach. The EA were keen to ensure that any policy approach regarding flood risk included new development contributing to reducing flood risk elsewhere, where possible. Natural England also endorsed the commitment to Sustainable Drainage Systems (SuDS), highlighting their role in both managing surface water and enhancing biodiversity.

5.2 Following the Regulation 18 stage, the Council engaged further with the EA, LLFA, and other key stakeholders through informal consultation on its emerging policies. Comments helped to fine its flood risk and drainage policies. Through this engagement:

- The LLFA welcomed the inclusion on run-off rates being reduced by 20% compared to greenfield rates but considered it should be required rather than encouraged in DM08.
- The LLFA provided further, site specific detail as regard surface water risks/issues associated with proposed allocations and this was added to the 'policy requirements' as appropriate.
- Among its comments, the EA suggested refinements to the wording of criteria in DM07 and suggested the inclusion of the current criterion 4.

5.3 At Regulation 19 stage, representations reinforced the importance of a robust and clearly justified flood risk policy framework. Key issues raised included:

- Concerns that Policy DM07 (Managing Flood Risk) did not adequately address surface water flooding, which has been identified as a significant and increasing issue across the district.
- Objections that some site allocations and strategic developments could exacerbate flood risk, including downstream impacts and cumulative effects.
- Requests from local residents and flood groups for stronger betterment requirements, site-specific flood risk assessment, and mitigation extending beyond site boundaries, reflecting the interconnected nature of catchments.

- Concerns that existing drainage infrastructure is inadequate in some locations and that development should not proceed without clear, enforceable mitigation measures.
- Representations highlighting the need to update the SFRA to reflect recent extreme flood events (including January 2025) and ensure policies respond to climate change impacts.
- Comments on Policy DM08 (Sustainable Drainage) seeking greater clarity around the 20% run-off reduction standard and stronger requirements.

5.4 The Council has carefully considered these representations and, where appropriate, is proposing modifications to clarify and strengthen the policy framework. In particular:

- Policy DM07 is supported in principle, with its requirement for a sequential approach and site-specific Flood Risk Assessments retained, while supporting text clarifies the role of surface water management.
- Proposed modifications to Policy DM08 will provide greater clarity on SuDS requirements particularly in respect of minimum 20% reduction in peak run-off rates.
- Site allocation policies and supporting text have been reviewed to ensure that flood risk is appropriately addressed at both site-specific and cumulative scales, including through requirements for mitigation, infrastructure capacity, and ongoing collaboration with the EA and LLFA.

5.5 Overall, the Regulation 19 representations have reinforced the need for a precautionary, evidence-led approach to flood risk management. The Council considers that the revised policy framework, supported by updated evidence and strengthened SuDS requirements, provides a clear and effective basis for managing flood risk and supporting climate resilience across the district.

6. Evolution of Policies

6.1 Flood risk policy in Harborough has not been static. It has developed in response to new evidence, statutory consultee advice, consultation feedback, and real-world events. This section sets out the evolution of the two main development management policies DM07 (Managing Flood Risk) and DM08 (Sustainable Drainage) and includes the evolution of Policy DS03, explaining how the Council refined its approach through the Local Plan process.

Site Allocation

6.2 From the outset, the Council committed to applying the Sequential Test at plan-making stage using the best available evidence. The SHELAA 2024 provided a pool of sites from which the Council could select land allocations for development. The site selection process informed by the Local Plan Development Strategy was then used to identify preferred allocation sites to meet the District's development requirements.

6.3 As part of assessing whether a site was suitable, flood risk was a consideration. Although no sites were excluded for flood risk (other than through the SHELAA which excluded sites fully within Flood Zone 3b), it was identified as a constraint which would need to be addressed through development and design principles in any site allocation,

particularly the location of uses across a site. Sites, including those in lower flood risk areas, were excluded for a range of reasons not related to flood risk. The site selection methodology paper provides further details.

6.4 The Development Strategy for the Local Plan and the site selection process has been informed by the Sustainability Appraisal (SA). SA Objective 12 deals with managing flood risk and is: *To manage and reduce flood risk from all sources and to protect the quality and quantity of water resources*

6.5 The SA notes 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. Therefore, the majority of site options fall within Flood Zone 1 and are at a low risk of fluvial flooding. However, the higher levels of surface water flood risk in Harborough District have resulted in the majority of site options being found to have a likely significant negative effect.

6.6 The SA recommended that if any of the sites with potential significant negative effects associated with flood risk are taken forward for allocation in the Draft Local Plan that mitigation requirements are built into any associated site allocation policies, for example the incorporation of Sustainable Drainage Systems (SuDS). Where only part of a site is in an area of higher flood risk, consideration should be given to whether built development can be directed to other parts of the site, with the area of higher flood risk remaining as open space, for example.

- **Reg 18 stage (2024):** This stage set out an approach to addressing flood risk committing to evidenced-led policy development in site selection work will be a based on SFRA as a key piece of evidence, allowing the application of a sequential, risk-based approach to the location of development to avoid, where possible, flood risk to people and property.
- **Reg 19 stage (2025):** Allocations were tested using the 2024 SFRA2. This confirmed that the majority of potential sites lie within Flood Zone 1. Sites underwent screening though at the SFRA2 and rescreened through the SFRA2 Addendum.

6.7 Where flood risk issues have been identified, they are specifically addressed in the policy requirements for site allocations. DM07 and DM08 policies will also apply to all development sites coming forward.

DM07: Managing Flood Risk

6.8 At Regulation 18 consultation, there was overwhelming support for the preparation of an up-to-date Strategic Flood Risk Assessment as part of the evidence base for the new Local Plan. There was recognition that the SFRA and the associated Sequential Test forms an important element in identifying suitable and sustainable locations for new growth.

6.9 Policy DM07 is based on the adopted Local Plan Policy CC3 Managing flood risk and reflects current national guidance. It continues to emphasise that wherever possible development should take place within Flood Zone 1 and to advocate the application of the Sequential Test and, where necessary, the Exception Test to assess the suitability of the proposed development. The EA advised that a further criterion be added to Part 1 to ensure that a site-specific FRA is required within Flood Zone 1 for proposals relating to ‘catchments that have experienced sewer flooding’. This has been added a criterion 1.e).

6.10 Policy relating to development proposals within Flood Zones 2 or 3 remains largely the same. However, on the advice of the EA, a new part has been added to the policy to ensure that all development in Flood Zones 2,3a and 3b, or identified as at risk of flooding from other sources, contributes positively to actively reducing flood risk through avoidance, reduction, management and mitigation (DM07, part 4).

6.11 The updated evidence (SFRA1, SRFA2 and SFRA2 Addendum) provide a starting point for the consideration of development proposals and for site specific FRAs where required.

DM08: Sustainable Drainage

6.12 The Issues and Options consultation set out a broad approach based on carrying forward the existing commitment to the use of SuDS as part of the new Local Plan. Their potential for providing an effective way of both managing surface water while contributing to biodiversity net gain, through the creation of diverse habitats for wildlife, was also highlighted. The approach was broadly supported in feedback.

6.13 DM08 took as its starting point the adopted Local Plan policy CC4 Sustainable drainage. The need for all major development to incorporate SuDS is retained under Part 2 and for clarity the drainage hierarchy (in order of priority) has been added to this part. A new Part 1 requires that all development to promote an integrated approach to water management through planting and incorporating rainwater storage for reuse/irrigation.

6.14 Part 3 still deals with the design and layout of SuDS, but there is added overarching emphasis on prioritising nature-based solutions. The most significant change to the adopted Local Plan policy is the requirement for developments to achieve a 20% reduction in pre-development run-off rates under criterion 3.f). This is supported in principle by the evidence, consultation feedback including the LLFA which welcomes the requirement, although there were comments calling for greater clarity. It is accepted that the wording of the criterion could be clearer and, therefore, a proposed modification is being submitted to the Inspector relating to 3.f) which will improve its clarity and implementation.

6.15 A new Part 4 ensures that, prior to commencement of any development, there is clarity around the management and maintenance responsibilities of SuDS in perpetuity. This will safeguard the effectiveness of SuDS in the future.

DS03: Development Strategy – Tackling Climate Change[2]

6.16 Although not a flood risk policy per se, DS03 has been strengthened through the Local Plan process to integrate climate resilience more explicitly. Regulation 18 set out a general commitment to sustainable development and carbon reduction. A range of suggestions as to how policies in the new Local Plan could address the climate change were put forward.

6.17 Updated evidence was commissioned (Climate Change and Renewable Energy Study (2024)) to help inform policy formulation and recommended that the spatial strategy should explicitly recognise flood risk and green/blue infrastructure as part of climate adaptation.

[2] Please see separate Climate Change Topic Paper for a more comprehensive overview of the subject.

6.18 As part of a suite of policies forming the Local Plan's Development Strategy, DS03 (Tackling Climate Change and Enhancing the Natural Environment), this overarching policy seeks to ensure development:

- optimises the use of natural resources through, for example, water efficiency;
- contributes to the creation and connectivity of multifunctional green and blue infrastructure which, for example, improves flood resilience;
- contributes to the delivery of the national Nature Recovery Network and the Local Nature Recovery Strategy (see Section 6 below); and
- supports watercourse restoration projects to create wetland habitats and enhance water resilience.

6.19 DS03 provides the strategic "hook" that links site allocations to the more detailed requirements of DM07 and DM08, embedding flood resilience within the Plan's overarching climate agenda.

7. Integration with the Leicestershire, Leicester and Rutland Local Nature Recovery Strategy (LNRS, July 2025)

7.1 The LLR LNRS has been in the process of preparation since 2023 and was published on 1 August 2025. Harborough District Council has supported the County Council, by serving on the steering group established by the County Council under its governance structure for the delivery of the Local Nature Recovery Strategy (LNRS) (EN-NLP 11).

7.2 In preparing the Local Plan, Harborough District Council has actively aligned its flood risk policies with the objectives of the LNRS. The Council recognises that flood risk management and ecological enhancement are mutually reinforcing goals. Policies DM07 and DM08 embed nature-based solutions such as wetlands, green corridors, and multifunctional SuDS that not only mitigate flood risk but also contribute to habitat creation, biodiversity net gain, and landscape connectivity. Strategic allocations have been refined to reserve higher-risk areas for open space and ecological corridors, supporting LNRS priorities. Furthermore, Policy DS03 integrates climate resilience and nature recovery, ensuring that development contributes to a wider environmental strategy. This holistic approach ensures that flood risk management delivers long-term ecological benefits and supports the district's commitment to nature recovery.

7.3 The outcome is a set of policies that are locally tailored, nationally compliant, and evidence-based. DM07 ensures development avoids and mitigates flood risk, while DM08 ensures that surface water management delivers not just neutrality but betterment, aligned with climate adaptation goals.

8. Conclusion

8.1 The Harborough Local Plan adopts a robust, precautionary, and evidence-led approach to managing flood risk and drainage across the district. Drawing on successive Strategic Flood Risk Assessments (Levels 1 and 2, 2024 and SFRA 2 Addendum, 2025), the Joint Water Cycle Scoping Study (2024), Sequential and Exception Test (2025) and subsequent update (September 2025), and consultation with statutory bodies, the Council has embedded flood resilience as a central principle of spatial planning.

8.2 The evidence demonstrates that while most of Harborough District remains within areas of low fluvial flood risk (Flood Zone 1), significant localised challenges persist, particularly surface water exceedance, infiltration limitations in clay-soil catchments and constrained drainage networks in built-up areas. Climate change is expected to intensify these pressures, reinforcing the need for proactive management through sustainable design, nature-based solutions, and catchment-wide planning.

8.3 Policies DM07 (Managing Flood Risk) and DM08 (Sustainable Drainage) directly respond to these challenges. They require the Sequential and Exception Tests to be applied rigorously, ensure all new development delivers measurable betterment in surface-water management, typically a 20% reduction in runoff, and mandate the use of SuDS designed for multifunctional benefits, including biodiversity, amenity, and climate resilience. Together with DS03 (Development Strategy – Tackling Climate Change), these policies create an integrated framework that links flood management to wider environmental enhancement, supporting the Local Nature Recovery Strategy and the Council's climate adaptation objectives.

8.4 By aligning local planning policy with the most up-to-date Environment Agency modelling, national guidance, and Lead Local Flood Authority advice, the Local Plan seeks to ensure that development across Harborough District is safe, sustainable, and future-proofed. The Council's approach demonstrates clear compliance with the NPPF and PPG, while advancing beyond minimum standards to secure genuine flood risk reduction and wider ecological and community benefits.

Appendix A

Table 1: List of Site Tables prepared through SFRA2

Site Ref/Link	Site Name	Site Allocation Ref	Allocated Use
8054	**Land off Dingley Road and Nether Green, Great Bowden**	GB2	Housing
8143	**Land east of Leicester Road and south of Grand Union Canal, Market Harborough**	MH1	Housing
8155	**Land at Gaulby Lane, Billesdon**	B1	Housing
8234	**Land south of Gallowfield Road, Market Harborough**	MH3	Housing
8241	**Land north of A47, east of Zouche Way, Thurnby/Bushby**	TB1	Housing
8247	**Land West of Warwick Road, Kibworth**	K1	Housing
8631	**Great Glen Oadby SDA**	OA1	Strategic Development Area
10240	**St Marys Road, Market Harborough**	MH7	Retail/Leisure
10248	**Land east of Northampton Road, north of Harborough Enterprise Centre, Market Harborough**	MH6 (part)	Employment
10253	**Land east of Compass Way/Enterprise Centre, Market Harborough**	MH6 (part)	Employment
10595	**Land south of Coventry Road, Magna Park**	MP1	Strategic Warehousing
10649	**Land south of Ashby Road, Ullesthorpe**	U1	Housing
12231	**Commons Car Park, Market Harborough**	MH8	Retail

Table 2: List of proposed allocations for which ‘Considerations for Development’ were identified

Site Ref	Site Name	Site Allocation Ref	Allocated Use	Considerations for development
8122	**Market Harborough North, East of Harborough Road, Market Harborough**	MH2	Housing	Flow path shown in south of site, but likely to be manageable on site. Site borders the canal and consultation will be needed with the CRT, however the site is likely to be developable with regard to flood risk provided the above is considered.
8151	**Land north of Dingley Road, Great Bowden**	GB1	Housing	Access/egress issues, but site itself low risk.
8737	**Land OS3070, Leicester Road, Market Harborough**	MH5	Employment	Significant extent of surface water ponding shown, however site is small and this is likely to manageable on site.
10554	**Land off Frolesworth Road, Broughton Astley**	BA1	Housing	Access/egress issues, but site itself low risk.
10642	**Land west of Warwick Road and south of Priory Business Park**	K2	Employment	Surface water flow path through site, likely to be manageable via appropriate SUDS and drainage strategy