



Date: 02/05/2025

Dear Sir/Madam

**FAO: Planning Policy, Harborough District Council**  
**Subject: Response to Submission Draft (Regulation 19) Harborough Local Plan 2020-2041**

Hinckley and Bosworth Borough Council (HBBC) welcomes the opportunity to comment on Harborough District Council's (HDC) Local Plan Regulation 19 Submission version consultation. HBBC is fully committed to collaborative joint working on an ongoing basis. It is recognized that HDC continues to work closely and collaboratively with us and other partners within the Leicester and Leicestershire Housing Market Area (HMA) and Functional Economic Area (FEMA). In order to fulfil the Duty to Cooperate, as set out in the Localism Act 2011 and National Planning Policy Framework 2024, HMA authorities should seek to jointly resolve any strategic cross-boundary matters, especially where robust evidence is presented that demonstrates there is unmet need to be addressed. Comments and observations from HBBC are set out below and are made at officer level.

Para. 1.14	<i>Part 1 set out the overall strategy for meeting the development needs of our area over the next 15 years</i> The plan period 2020 to 2041 is a period of 21 years.
Para 4.1	<i>We recognise Harborough District is changing – and will continue to do so over the next 15 years.</i> The Plan period 2020 to 2041 is a period of 21 years
DS01 Development Strategy: Delivering Homes and supporting text	The homes per annum figure for the initial period of 2020 – 36 accords with the agreed Leicester & Leicestershire Statement of Common Ground but does not include a clearly identified buffer figure to take account of flexibility and contingency although reference is made to contingency in para 4.12. HDC are making provision for 14,839 homes which is 12.5% above the calculated need of 13,182. However, it may be helpful for HDC to provide clarity around this but also commentary as to why 12.5% is an appropriate figure particularly as at their previous Local Plan Examination the Inspector considered a buffer of 15% to be more appropriate to provide flexibility.  For the remainder of the plan period 2036-41, Policy DS01 indicates that the annual housing requirement will decrease to 534 dpa which is the standard housing method figure prior to the SHM change that came in with December 2024's new NPPF. Again, there is no explicit buffer attributed to this figure and this figure would not address

	any further unmet need apportionment. It is acknowledged that Policy IM01 Monitoring and Review of the Local Plan provides the circumstances where a review of the Plan will be triggered, particularly related to determining any future unmet need apportionment. However, HBBC suggest that within the supporting text of DS01 there is an acknowledgement that the housing requirement for the district will be reviewed and updated to ensure that it includes any future apportionment of identified unmet need in line with policy IM01.
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Due to the matters raised in this response, HBBC do not anticipate any issues with soundness or legal compliance at this stage. In addition, HBBC consider that Harborough District Council have engaged constructively, actively, and on an ongoing basis with partners including neighbouring authorities, the County Council and other relevant bodies. The Strategic Growth Plan is a testament to the joint commitment across Leicester and Leicestershire to plan for long term growth through an agreed, proactive, and collaborative approach

We look forward to continuing to work with Harborough District Council in the development of our respective local plans and wider strategic planning.

Yours sincerely

