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No:

Proposed Submission Draft Harborough Local Plan 2020-2041 Representation Form



This form has two parts, A & B. Part A only needs to be completed once. Please complete Part B for each Policy you wish to comment on.

Please send completed forms by email to localplan@harborough.gov.uk or by post to: Strategic Planning, Harborough District Council, The Symington Building, Adam and Eve Street, Market Harborough, Leicestershire, LE16 7AG.

The consultation is open from 9am on Monday 10 March and closes at 9am on Tuesday 6 May 2025. Forms received after the closing date cannot be considered.

Part A: Part A only needs to be completed once

1. Personal details

Title	[Redacted]
First Name	[Redacted]
Last Name	[Redacted]
Organisation (where relevant)	[Redacted]
Address Line 1	Kibworth Community Hub
Address Line 2	School Road
Address Line 3	Kibworth Beauchamp
Post Code	LE8 0JE
Email	[Redacted]

2. Agent's details (if applicable)

Title	<input type="text"/>
First Name	<input type="text"/>
Last Name	<input type="text"/>
Organisation (where relevant)	<input type="text"/>
Address Line 1	<input type="text"/>
Address Line 2	<input type="text"/>
Address Line 3	<input type="text"/>
Post Code	<input type="text"/>
Email	<input type="text"/>

Part B:

Please complete a new Part B form for every Policy/Map/Paragraph you wish to comment on

Representation Form

You do not need to return this form if you have sent the same response using the Council's online form for this consultation. Duplicates will not be considered.

Which part of the Local Plan document does this representation relate to?

E.g. Paragraph/Policy/Map/Other

The whole plan but mainly policies involving the Kibworths and the A6 corridor

Do you consider the Local Plan to be legally compliant?

Yes No

Do you consider the Local Plan is sound?

Yes No

Does it comply with the Duty to Cooperate?

Yes No

If you do not consider the Local Plan is sound, please specify on what grounds:

Positively prepared Justified Effective Consistent with National Policy

Please give details below why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the statutory Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the statutory Duty to Cooperate, please also use this box to set out your comments.

Policies throughout the whole HDC Local Plan fail to adequately describe the current traffic congestion situation on the A6 corridor, so proposed mitigation measures fail to address the underlying problem which will be exacerbated by the lack of using the Duty to Cooperate with the County Council.

Attached is the parish council's representation / response to the HDC Local Plan Regulation 19 consultation.

Continue on a separate sheet/ expand box if necessary

If your representation is more than 100 words, please provide a brief summary here:

The proposed plan overstates the housing requirement and proposed mitigation measures to ease access onto the A6 in the Kibworths are inadequate, will create massive congestion queueing and fail to propose measures to improve air quality.

Please specify the modifications needed to make the Local Plan sound/legally compliant
(Please note any non-compliance issue relating to the statutory Duty to Cooperate cannot be resolved through modification at examination).

The plan is fundamentally flawed, premature and unsound. No mention is made of a Kibworth bypass which has not even been considered. Nor has the support of the County Council Integrated Traffic Model been used despite the Duty to Cooperate.

Continue on a separate sheet/ expand box if necessary

If your representation is suggesting a modification do you wish to participate at the oral hearing part of the examination?

Yes No

If Yes - you wish to participate at the oral hearing part of the examination, please outline why you consider this to be necessary.

The lack of policies to improve air quality and reduce congestion along the A6 corridor

The lack of any consideration for a Kibworth bypass.

The lack of any involvement with the County Council's integrated traffic modelling which would underline the impact of the proposed mitigation measures for access onto the A6 from side roads in the Kibworths.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

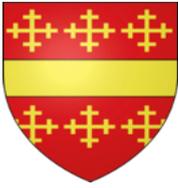
Do you wish to be notified?

When the Plan is submitted for independent examination?

When the Inspector's Report is published?

When document is adopted?

**Please return completed forms no later than
9am on Tuesday 6 May 2025.**



Response by Kibworth Beauchamp Parish Council to HDC Local Plan Regulation 19 Consultation (2020-2041)

Summary

The main issues that the parish council has with the new Local Plan are summarised in these bullet points, with more detail provided in the main text below.

- The parish council supports the conclusions of the Leicestershire County Council in the Cabinet report of 18th March that stated the HDC Local Plan is premature and unsound.
- With so much of the new housing being proposed on or near the A6, there is a distinct lack of detailed mitigation measures.
- Why is no Kibworth bypass mentioned when so much of the extra traffic will add to the existing congestion on the A6 especially if traffic lights are installed at New Road and Church Road?
- Why are there no measures to mitigate the increased pollution levels on the A6 from all the new proposed housing passing through the Kibworths Air Quality Measurement Area?
- There are no mitigations proposed to ease congestion from the 475 houses on Warwick Road, by improving the railway bridge crossing or the junction with Fleckney Road.

Introduction

The main strategic development area in this Plan is to be around Stretton Hall near Great Glen where some 4,000 houses are proposed eventually on Homes England land between Great Glen and Oadby – some 850 will be in Oadby, and some 1,200 are proposing to be built in the Harborough district to 2041. However, there are no details of access to the location although access from both Gartree Road and the A6 will be needed. In addition, sites for 400 houses are proposed off Leicester Road in Great Glen and for Fleckney. There are also proposals for 1,700 new houses north of Market Harborough off the B6047 near the Innovation Centre.

The Parish Council does not have expertise in planning nor transport infrastructure so relies on advice and support from Leicestershire County Council and have therefore included sections from the recent response to the HDC draft Local Plan approved by the County Council Cabinet.

Response by Leicestershire County Council Cabinet on 18th March 2025

The following paragraphs are taken and summarised from the Leicestershire County Council response to the HDC draft Local Plan consultation. These were approved by the LCC Cabinet meeting on 18th March.

In two-tier areas like Leicestershire, it is critical for Local Plans to be prepared with sufficient evidence to secure contributions and delivery for critical infrastructure and it is necessary for the district councils to work with the County Council to ensure Local Plans include policies that balance the need to support delivery of growth without exposing the County Council to further financial risk.

At this Regulation 19 stage of local plan-making, the comments of the County Council need to focus on compliance and tests of soundness. Paragraph 35 of the NPPF (December 2023 – the version under which this Local Plan will be examined) sets out that for a Local Plan to be found ‘sound’ it needs to be Positively Prepared, Justified, Effective, and Consistent with National Policy.

However, it is considered by the County Council that there are still substantive issues associated with the Plan’s evidence base.

- As the Local Transport Authority, the County Council considers that the Plan in its current form fails to meet the NPPF tests of soundness insofar both its Effectiveness and Consistency with national policy.
- A number of policies require updating to reflect required land and monetary contributions to deliver the necessary education provision.

- It is considered that the Plan should include clearer definitions around health and health inequality to set the tone for the health content in the Plan.
- Reference to the importance of and support for Neighbourhood Plans is welcomed.

Much of the housing proposed in the HDC draft Local Plan will feed onto the A6 corridor, but no separate transport testing (e.g. county council transport modelling, i.e. Leicester and Leicestershire Integrated Transport Model (LLITM) of the Plan's proposed spatial strategy has been undertaken.

The South Leicestershire Joint Transport Evidence (JTE) [*key part of South Leicestershire Local Plan Making Statement of Common Ground*] was referred to by HDC as part of the evidence base for the draft Local Plan and includes cumulative and cross-boundary impacts, including routes within the district of Oadby and Wigston and the City of Leicester.

Most notably, those impacts include:

- Adding to existing traffic issues on the A6 (and other routes) through the Kibworths; but perhaps more significantly
- Congestion on the A6 corridor through the Kibworths and into Oadby is leading to a 'haloing effect' of (relatively longer-distance) trips, whereby traffic is avoiding routes through the Leicester Urban Area by using lower class rural routes around the east of the Area, including the B6047; via Stoughton; and routes north of the A47 towards the Thurmaston Syston area and the A46(N), including through communities such as Houghton on the Hill, Keyham and Barkby and Beeby; and
- Likewise, a similar effect to the south of Leicester, including impacting on lower class rural routes through communities such as Saddington and, via Shearsby Crossroads, Gilmorton across towards Lutterworth and M1 J20.

Without mitigation, these impacts might be considered as being **severe**, as per paragraph 116 of the National Planning Policy Framework. Additionally, from an asset management perspective the impacts will increase levels of damage to routes that were never designed to be used by such volumes of traffic. Further, it has implications for the health and well-being of local communities

From the Local Transport Authority's (LTA) perspective, this is an issue of the draft Plan's evidence base not being sufficiently mature at this time and thus, by extension, it has an incompletely developed policy framework. This raises questions as to the Plan's **soundness**, i.e. in terms of the effectiveness of its delivery.

Aside from the JTE Stage 1 report, the district council has also published its own Harborough Strategic Transport Impact Assessment (HSTIA). The LTA had no input in the development for the brief for this piece of work by AECOM. The contents of the HSTIA remain of concern to the LTA. In particular:

- Data about the impacts of growth on the A6 corridor appears to have been presented without full analysis and proper context. It therefore appears to give a misleading impression that the impacts will not be material. Consequently, placing this information in the public domain risks significantly undermining the LTA's ability to deal with such matters as and when allocation sites come forward through the development management system.
- The way by which possible levels of developer contributions have been ascribed towards particular mitigation measures does not appear to be a lawful mechanism in reality.

The HDC Local Plan, as a whole, lacks any coherent approach seeking to address the issue of its transport impacts overall. The policies are currently weakly worded in terms of providing a robust basis for the coordinated delivery of transport measures required to address the Plan's cumulative transport impacts, particularly on the A6 corridor. The Plan does not have sufficient policies to reflect the challenges specific to highways and transport.

In September 2024, the County Council Cabinet, in response to the consultation on the National Planning Policy Framework reform stated ... *that the scale of infrastructure requirements, as demonstrated by the HDC Local Plan, is increasingly beyond that which Local Plan development sites can afford from a viability perspective and thus would render a Plan financially unviable.*

The Cabinet meeting on 18th March concluded that the draft HDC Local Plan was **premature** and **unsound**.

Proposals for the Kibworths in the draft Local Plan

Kibworth (Beauchamp and Harcourt) is included in the settlement hierarchy as a Large Village along with Broughton Asley, Fleckney and Great Glen.

Housing (K1) – 475 houses off Warwick Road opposite the Centurion Place estate. So together with commitments from 2020, this will make 730 overall for the Kibworths. There will be a Masterplan and start of building, if approved, is likely from 2030/31. There will be contributions for primary and secondary education but no details about improved health (GP and dental) facilities, improved retail facilities but, surprisingly, no details about actual improvements to the A6 corridor highways infrastructure which will require considerable capital funding to ensure that future congestion is not a daily occurrence.

Principal issues – the railway bridge on Warwick Road only allows 6 or 7 vehicles through on each traffic light change. No mitigation measures have been included in the HSTIA or draft Plan to resolve this major issue which would see lengthy traffic delays, especially at peak periods. Also, no measure is included for resolving safety issues for the Fleckney Road/Warwick Road junction. Detailed mitigation measures and costs are essential for resolving the limitations of the existing single lane, traffic-light controlled, bridge over the railway line and to improve safety of the Fleckney Road/Warwick Road junction. Modelling of the effect of the increased traffic levels on Wistow Road/A6 junction are needed. No mention is made regarding safe crossing for pedestrians across the Warwick Road from the new estate, especially young people needing to walk to the primary and secondary schools. Why is no pedestrian crossing not included?

Employment (K2) – extend the existing Priory Business Park by 3.1 hectares on Wistow Road. This will put further pressure on the A6/Wistow Road junction. Previous proposals have been raised for providing a new retail shop and gym facilities at this location. Are these being considered?

Traveller and Travelling Showpeople - 21/8060 - Land north east of Kibworth Harcourt by junction with West Langton Road. The Plan proposes for this site to be **Allocated** with an estimated capacity for 21 pitches. However, this land is not available because the larger surrounding area has not been allocated as a Strategic Development Area in this draft Plan.

A6 corridor issues

Some mitigation measures and estimated costs are proposed in an appendix (Harborough Strategic Transport Impact Assessment - HSTIA) to improve access from side roads onto the A6 but with very limited details.

New Road junction – 3-way traffic lights (estimate £3m), **Church Road/Marsh Drive** - 4-way traffic lights (estimate £2.9m). **Wistow Road roundabout** - lane widening (estimate £300k).

As is well known locally any hold-up of traffic by roadworks on the A6 results in long congestion queues, so clearly the AECOM highways specialists for HDC did not actually observe the daily A6 congestion problems either nor ask questions of local councillors or residents! Their proposals would greatly increase lengthy weekday delays, especially at peak times.

Kibworth Beauchamp Parish Council purchased six real-time, continuous traffic data measurement sensors in 2024 from Telraam, a Belgian company. One of these is located overlooking the A6 in the Harcourt Estate area, which lies in the Kibworth AQMA. The sensor has been providing live data since September 2024 to the present day. Data for the month 16th March to 15th April 2025 shows a total of 501,469 cars and HGVs were recorded (65,096 at night). On one occasion in March when the A14 was closed to traffic heading to the M1, it was noted that HGV traffic for that day rose by 30% on the A6 through the Kibworths.

A Cumulative Development Traffic Impact Study by Jacobs (2017) was commissioned by Harborough District Council and Leicestershire County Council, so why has this not been referred to in the draft HDC Local Plan? And why is there no reference to further LLITM microsimulation modelling by LCC either?

Overall, the Local Plan's Strategic Traffic Impact Assessment estimates that all of the road improvements for the whole district will cost some £65,675,000. Yet, there is no mention of a Kibworth bypass, average speed cameras in the 30mph section or mitigation for the increased levels of pollution that will happen in the Kibworth Air Quality Management Area (AQMA).

- what effect will 85% more traffic have on the Kibworth AQMA? The last HDC Air Quality action plan was 2019. This should have been updated in time for consideration in the draft HDC Local Plan.