

Harborough Local Plan Proposed Submission
Draft Consultation (Regulation 19)
Representations

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Prepared on behalf of Castlethorpe Homes | April 25

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APPENDICES

Appendix 1. Highways Site Access Appraisal

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1. INTRODUCTION

- 1.1 The below representations have been prepared by Boyer on behalf of Castlethorpe Homes ('the client') in response to Harborough District Council's (HDC) Regulation 19 Proposed Submission Draft Local Plan Submission Consultation.
- 1.2 These representations follow our earlier submissions to the Harborough District Council Call for Sites (2022) as well as the Issues and Options Regulation 18 Consultation which took place in February 2024. The Issues and Options consultation previously set out HDC's views on a range of planning issues and potential options for the future development of the District.
- 1.3 Castlethorpe Homes are promoting the Land to the South of Shawell Road, Swinford for residential development with a capacity for approximately 50 dwellings. The site is approximately 2.51 Ha in size and lies to the west of the village and adjacent to the existing built form.
- 1.4 Castlethorpe Homes are a bespoke Small and Medium Sized Developer (SME) who will work positively with both local stakeholders and the Local Planning Authority in precuring a desirable permission of both private and affordable homes. Castlethorpe Homes intend to immediately deliver such a scheme following the granting of permission should the site be allocated.
- 1.5 The site was submitted to the Council as part of a previous Call for Sites exercise which was undertaken in 2022. The site was subsequently assessed in the Council's Strategic Housing and Economic Land Availability Assessment (SHELAA) (2021/22). This assessment was carried forward as part of the SHELAA Assessment Update 2024.
- 1.6 Land south of Shawell Road (SHELAA Ref: 21/8203) was recognised as a developable site for 47 dwellings as part of this assessment. The assessment also concluded there were no major constraints on site which would prevent development.
- 1.7 Further work was also undertaken to accompany the previous Call for Sites and Regulation 18 Consultation submission which includes:
 - A Highways Site Access Appraisal – Prepared by Bancroft Consulting (Appendix 1)
 - A High Level Illustrative Concept Masterplan – Prepared by Boyer Design (Appendix 2)
- 1.8 These representations provide Castlethorpe Homes response to the Regulation 19 Consultation and are made with respect to the continuation of the promotion of their land south of Shawell Road, Swinford. It is considered that the site is suitable for delivery of approximately 50 dwellings with supporting infrastructure.
- 1.9 These representations consider the Council's evidence base in relation to the preparation of the Draft Local Plan and Sustainability Appraisal which have been presented and that underpin the Regulation 19 Consultation Document. These representations consider the suitability of this approach and whether this meets the requirements of the NPPF's test of soundness.

- 1.10 HDC confirm that the New Local Plan will progress under the previous version of the National Planning Policy Framework (NPPF) (December 2023) as per the transitional arrangements of the 2024 Framework. This allows plans to proceed, so long as the Regulation 19 Plan is published prior to the 12th March 2025 and that 80% of the new standard method for housing requirement has been met. The Regulation 19 Plan was published by the Council on the 10th March 2025, in accordance with these arrangements.
- 1.11 It is important to note in December 2023, HDC signed the Leicester and Leicestershire Statement of Common Ground (SoCG) in relation to Leicester City's unmet housing and employment needs. As HDC has agreed to progress the plan under the previous version of the Framework they are therefore required to still provide an appropriate apportionment of Leicester City's unmet need in order to accord with the Duty to Cooperate
- 1.12 The following sections of these representations are as follows;
- **Section 2:** Vision & Objectives
 - **Section 3:** Approach to Housing
 - **Section 4:** Housing Allocations Policies & Proposed Trajectory
 - **Section 5:** Sustainability Appraisal
 - **Section 6:** Land South of Shawell Road, Swinford
 - **Section 7:** Conclusion
- 1.13 Paragraph 35 of the National Planning Policy Framework (NPPF) (2023) provides the criteria by which emerging Local Plans are found to be 'sound' when subjected to examination; namely that the Local Plan must be positively prepared, justified, effective and consistent with national policy.

2. VISION AND OBJECTIVES

Plan Period

- 2.1 Within the Regulation 19 Draft Local Plan, it is stated that the plan period for the New Local Plan will cover the period from 2020 to 2041. HDC's Local Development Scheme (LDS) was recently updated (February 2025) in accordance with the requirements of the Ministry of Housing, Communities and Local Government (MHCLG) which required Local Planning Authorities to update their LDS within 12 weeks of the publication of the new Framework. A summary of the updated February 2025 LDS is summarised in Table 2.1 below.

Table 2.1 Summary of Harborough Borough Council LDS Timetable (Feb 2025)

	Local Plan Stage	Time Period
1	Regulation 18 – Issues and Options Consultation	January and February 2024
2	Regulation 19 & 20 – Proposed Submission Local Plan	Between March and May 2025
3	Regulation 22 – Submission of Local Plan for Examination	September/October 2025
4	Regulation 26 – Local Plan Adoption	October – December 2026 (Dependent on detailed arrangements to be confirmed by the Planning Inspectorate)

- 2.2 We raised concerns over the proposed plan period as part of our Regulation 18 representations. As previously set out Paragraph 22 of the NPPF, states that Local Plans should have a minimum 15 year plan period from adoption in order “to anticipate and respond to long-term requirement and opportunities”. Although the Council are providing a 21 year plan period and are therefore in accordance with this, we consider enough time needs to be factored in to take into account possible delays to the plan making process and possible impacts on the date of adoption.
- 2.3 The previous LDS (December 2023) anticipated Regulation 19 to take place between January – March 2025, Regulation 22 in May – June 2025 and adoption of the new Local Plan to be between May – December 2026. As per Table 2.1 above these timescales have been updated and pushed back to reflect the delays to the Regulation 19 consultation meaning adoption is now anticipated to be between October – December 2026. As outlined in our previous Regulation 18 submission, if adoption of the plan were to occur in December of 2026, in order to achieve the minimum 15 year period, the plan would need to run until at least 2042. This would need to be done in order to avoid double counting of the year 2026 as the plan may only be adopted for the final month.

- 2.4 The start date of the plan as detailed by the Council is set at 2020, five years ago. Given the significant delays to the progress of the New Local Plan following debate around the signing of the SoCG for Leicester City's unmet housing need and delays following the publication of the updated NPPF (Dec 2024) further consideration needs to be given to the start date of the plan period, which we consider should be brought forward to 2025. In addition, the majority of the supporting evidence base of the Local Plan has been commissioned and published post-2020.
- 2.5 We outlined as part of our Regulation 18 submission the HENA and Housing Distribution Paper were published/amended in 2022, and these documents provide a basis for the Housing Options considered as part of the Local Plan. Furthermore, documents such as the Site Selection Methodology (Feb 2025), Settlement Hierarchy Assessment (Jan 2025), Viability Report (Jan 2025) and Strategic Housing and Economic Land Availability Assessment Update (2024) have all been published after 2020 and provide an important basis for the emerging policy and determine selection of the proposed allocations within the Local Plan. We therefore consider the start date of 2020 to be inappropriate and that this should be amended to start from 2025 in order for the plan to look ahead and to be found sound in accordance with the NPPF.
- 2.6 Additional consideration of a realistic start and end date for the new Local Plan is required in order to make the plan sound in line with the requirements of the NPPF. We would recommend the start date is amended to 2025 and to reflect this the end date 2046, in line with the proposed set 21 year period defined by the Council. As a minimum an additional year should be added, for adoption in 2027 meaning the 15 year plan period would run until 2042. Similarly, in the event adoption is delayed beyond 2027, the minimum 15-year period as required by Paragraph 22 of the NPPF should be reflected in the plan period from the year of adoption.
- 2.7 Furthermore, we consider HDC should commit to an early review of the plan. In accordance with Paragraph 33 of the NPPF (Dec 2023), this requires strategic policies to be updated at least once every five years. However this also states if an authority's local housing need figure has changed significantly then an early review will likely be required sooner.
- 2.8 Although the District meets the transitional arrangements of the December 2024 NPPF, through the inclusion of additional homes as part of Leicester City's unmet need, HDC can therefore progress under the Dec 2023 Framework (discussed further at Section 3 below). We consider, due to the significant increase in housing requirement across the District, from 534 dwellings per annum to 723 dwellings per annum (an increase of 189 homes a year), we consider the Council need to commit to an early review of the plan to meet the increased housing requirement introduced under the new standard method.

Strategic Vision

- 2.9 On Page 4 of the Regulation 19 Draft Local Plan HDC have set out the Local Plan Vision. We welcome the recognition within the Vision to provide a range of housing, which includes affordable tenure, as this was raised during our previous submission. Although welcomed, the

Vision also states housing will mainly be focused towards areas near to Leicester City and the Borough of Oadby and Wigston, around market towns and a lesser extent large and medium villages.

- 2.10 As per our Regulation 18 response we outlined how the New Local Plan needs to consider the necessary plan led requirements which are aimed to be delivered via the plan led process, which is recognised under paragraph 15 of the NPPF. We stated that a higher consideration for the delivery of key areas covered by the plan was necessary. Although HDC have marked areas close to Leicester City and Oadby and Wigston as a key focus for housing no recognition has been given to the apportionment of unmet need from Leicester City required through the signing of the SoCG. On this basis, we consider particular regard should be given within the Vision for the need to cater for Leicester City's unmet need and effective delivery. We also consider the Vision should state specifically the housing requirement of the new Local Plan in order to outline clearly the aims of delivery across the plan period.
- 2.11 As discussed further below we consider that there is an overreliance on large strategic allocations to meet overall housing requirements (Section 4). Therefore, as outlined as part of our Regulation 18 submission we consider a greater emphasis needs to be placed on the provision of smaller, more deliverable sites to complement these larger schemes. This would support a proportional amount of development across the District to support the delivery of much needed market and affordable housing. Although the Vision has stated development will go towards large and medium villages it has been stated this will be a lower provision than areas adjoining Leicester City and Oadby and Wigston. Although we agree growth should be proportional, we consider the Vision should accurately reflect the Settlement Hierarchy and support sustainable patterns of growth and development across the District in accordance with this.
- 2.12 Furthermore, the Vision states that new and innovative businesses will be supported in order to generate skilled jobs, training opportunities which will support local supply chains and the local economy. Although we welcome the recognition of the local economy as part of the Vision we consider further consideration needs to be given to the intrinsic link between homes and jobs. Housing delivery supports economic growth and prosperity by allowing the necessary labour force to be strategically located close to areas of employment. The delivery of both housing and employment need to be brought forward together to harmoniously support growth. We therefore consider further emphasis of this important link needs to be reflected in the overall Vision.

Strategic Objectives

- 2.13 We previously provided comments in relation to the objectives proposed as part of the Regulation 18 Consultation (Feb 2024). As part of the Regulation 18 Consultation the Council proposed 10 objectives with supportive text to provide further detail of what each objective sought to achieve. As part of our previous submission we supported the range of objectives proposed and that the topics covered were appropriate, although further consideration for Leicester City's unmet housing need was required. Having regard to the updated objectives

published as part of the Regulation 19 Proposed Submission Local Plan, this has decreased the amount of objectives proposed from 10 to just 5.

- 2.14 The updated objectives remove reference to the spatial strategy to support sustainable development (Reg 18 - Objective 3), the need to protect and enhance villages and towns as centres for the communities they serve (Reg 18 - Objective 4), the need to secure sustainable, high-quality places through design led development (Reg 18 - Objective 5) and monitoring the delivery and review of the Local Plan (Reg 18 – Objective 10). Furthermore, Objective 6 and 8 have been combined to form a singular objective ‘Tackling climate change and enhancing the natural environment’.
- 2.15 Previously at Regulation 18 stage, Objective 1 sought to deliver the right amount and type of housing to meet need. The updated objective is now titled ‘Delivering Homes’. The updated objective seeks to deliver housing needs to meet specific groups and provide affordable, accessible and adaptable housing. It removes reference to the right type and choice of housing, in relation to size, type and tenure and reference has also been removed in relation to making an appropriate contribution in meeting the unmet need of other authorities within the Leicester and Leicestershire housing market area.
- 2.16 We question why the Council have decided to ‘water down’ the previous objectives drafted and consider the updated objectives do not accord with Paragraph 15 of the NPPF which seeks a plan-led system and for plans to “provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings.” (Para 15, NPPF, Dec 2023). These are important principles and objectives enshrined in Government planning policy and guidance that should be given emphasis as a priority in the new HDC Local Plan.
- 2.17 Furthermore, HDC state these objectives have been based on and framed by the Corporate Plan. Within our previous submission, we raised concerns about the Corporate Plan being used as a basis for the overall Vision of the Plan and how is not a spatial planning document as it does not consider broader spatial planning issues effecting Harborough. Previously at Regulation 18 stage the objectives were not based on the Corporate Plan and considered a much broader range of planning issues, as outlined above.
- 2.18 We consider the revised objectives proposed as part of the Regulation 19 consultation are not reflective of the broad range of spatial planning issues currently present within the District. We consider the objectives proposed at Regulation 18 stage were more appropriate and covered a broader range of topics than the revised objectives. On this basis we consider the Council should review the proposed objectives and ensure they accord with the aims of Paragraph 15 of the NPPF (Dec 2023).

3. APPROACH TO HOUSING

- 3.1 The following section of these representations provides Castlethorpe Homes response to the approach to housing need that has been taken by HDC within the Draft Submission Regulation 19 Harborough Local Plan.

Policy DS01 Development Strategy: Delivering Homes

- 3.2 Within the Regulation 19 Harborough Local Plan, Policy DS01 sets out the housing requirement for the District. The Policy confirms that HDC have a housing requirement of 13,182 dwellings between 2020 and 2041. This housing requirement incorporates the unmet need of Leicester City within the first 16 years of the plan period. To meet the housing requirement, HDC anticipate a supply of 14,839 dwellings across the District. This figure includes completions of 2,965 dwellings between 2020-2023, as well as commitments as at the 1st April 2023 for 5,452 dwellings.
- 3.3 Leicester City are unable to meet the full housing needs of the City and faced a shortfall of 18,700 dwellings that could not be provided in Leicester. To ensure housing needs were met, the unmet need was distributed to Leicestershire authorities through an agreed Statement of Common Ground (SoCG) July 2022. In December 2023, Harborough District Council signed the Statement of Common Ground with the Leicestershire authorities, demonstrating their commitment to providing the housing that Leicester City is unable to provide.
- 3.4 It is proposed in the plan that the housing need for the first 16 years of the plan period is 657 dwellings per annum, incorporating the Harborough housing requirement of 534 dwellings per annum and Leicester City's unmet need of 123 dwellings as agreed within the SoCG. From 2036 to the end of the current proposed plan period of 2041, a housing requirement of 534 dwellings per annum is expected to meet Harborough's housing requirement.
- 3.5 Harborough District Council are submitting their emerging Local Plan for examination under the December 2023 NPPF. As per the transitional arrangements of the revised NPPF (December 2024), the Council are required to meet 80% of the new standard method requirement. The new standard method with the 2024 affordability uplift for Harborough is 723 dwellings per annum. By using the new standard method across the proposed 21 year plan period, this would see a total of 15,183 dwellings required across the plan period (723 dpa x 21 year plan period = 15,183 dwellings across total plan period).
- 3.6 HDC are unable to meet the 80% transitional arrangement requirement with a housing requirement of 534 dwellings per annum, as across the plan period, this would see a shortfall of 548 dwellings. However, with the addition of 123 dwellings per annum targeted towards Leicester City's unmet need in the first 16 years of the Plan, the Council are proposing that they would be able to provide a total of 13,182 dwellings, thus meeting and exceeding the 80% of the new standard method requirement.
- 3.7 Although HDC are able to meet 80% of the new standard method as required by the NPPF transitional arrangements (December 2024), the Council appear to now be disregarding the

unmet needs of Leicester City. Harborough have committed to provide 123 dwellings per annum for Leicester's unmet need, as agreed through the Leicestershire wide SoCG.

- 3.8 Under the new standard method, Harborough have a revised housing requirement of 723 dwellings per annum. In order to meet 80% of the new standard method figure, the Council would need to provide 579 dwellings per annum. However, currently HDC have only planned for 534 dwellings per annum for their own housing needs and therefore do not meet the 80% requirement. Within the first 16 years of the currently proposed plan period, a higher housing provision of 657 dwellings per annum is proposed, which although would meet the 80% of the new standard method, it would result in Harborough failing to meet the housing contribution of 123 dwellings per annum required to Leicester City's unmet need as set out within the SoCG.
- 3.9 We consider that it is important that Harborough adhere to the SoCG and assist in providing housing for Leicester City to meet the unmet needs, as Leicester faces physical constraints which prevent the City from meeting its own needs. No further SoCG has been agreed beyond the July 2022 SoCG.
- 3.10 Without further details being provided as to whether Harborough District Council are prioritising their own housing requirement or Leicester City's unmet need, the proposed Draft Local Plan cannot be considered sound in its current form. Within paragraph 62 of the NPPF (December 2023), it is outlined that authorities should meet their housing requirements unless there are voluntary cross boundary agreements in place. In regard to Leicester City, there is in agreement between the Leicestershire authorities to provide this housing. Additionally, paragraph 24 of the NPPF states that local authorities are under a duty to cooperate on strategic matters that cross boundaries. The Council have agreed to the SoCG as part of the duty to cooperate, and if Council are not providing the agreed housing distribution to meet Leicester's need as set out within the SoCG, we consider that the requirement under the duty to cooperate has not been met.
- 3.11 The Council state within Table 2 of the Draft Harborough Local Plan that there is a supply of 14,839 dwellings available. However, this figure includes completions between 2020 and 2023. As discussed within Section 2 of these representations, we consider that the plan period should be amended to commence from 2025 in line with the evidence base that informs this Plan. However, although this evidence has been updated, the housing figures have remained based on 2020 evidence, including completions from 2020-2023, which accounts for 2,965 dwellings in the total supply. With the removal of these completions that the Draft Local Plan is relying on, this would see an overall provision of 11,874 dwellings across the plan period. It is concerning that there is a shortfall of 2,965 dwellings, as this housing accounts for approximately 20% of the overall housing provision in the Draft Harborough Local Plan, and this results in the Council being unable to meet the full housing needs of the District with the plan period being correctly set in 2025 in line with the evidence base.
- 3.12 To ensure that all housing needs are met, Harborough should provide the dwellings agreed upon within the SoCG, as well as the 80% requirement of the new standard method, across

the amended plan period. This would result in a housing requirement of 579 dwellings per annum for Harborough, and 702 dwellings per annum with the addition of Leicester's unmet need to the 80% requirement of the transitional arrangements.

- 3.13 Within our clients representations to the Regulation 18 consultation, it was considered that from the varying levels of growth which were proposed, the high growth approach of 780 dwellings per annum should be taken. Castlethorpe Homes continued to consider that this approach towards housing growth is most suitable. By taking the high growth approach, this will meet 80% of the new standard method, as well as providing towards Leicester City's unmet need and allowing, for an adequate buffer to be applied to housing.
- 3.14 The high growth option is supported by the National Planning Practice Guidance (NPPG). Within the NPPG, document 'Housing and Economic Needs Assessment', it is stated that "the standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area".
- 3.15 The NPPG continues to state that provision of a higher housing need is acceptable in circumstances where a higher housing need than the standard method is appropriate, such as instances where housing need is likely to exceed past trends. This includes where an authority has agreed to take on unmet need arising from neighbouring authorities, as set out within a statement of common ground.
- 3.16 In December 2023, Harborough signed the SoCG with the Leicestershire authorities to provide the unmet housing need of 18,700 dwellings within their respective authorities. Of the total 18,700 dwellings, Harborough received 10.5%, resulting in an annual requirement of 123 dwellings (total of 1,968 dwellings across the Leicester City plan period).
- 3.17 Through the agreement of the SoCG, it is therefore justified that a housing need greater than the standard method is provided for Harborough District Council and is accordance with the guidance within the NPPG.
- 3.18 Furthermore, although it has been agreed within the SoCG that the Leicestershire authorities will provide housing for Leicester City's unmet need until 2036, we consider that due to Harborough's relationship with Leicester City, and ability to provide housing, Harborough should extend the provision of housing towards Leicester City's unmet need beyond 2036.
- 3.19 In addition to the above, within our clients previous response to the Regulation 18 consultation, we raised concerns over the delivery of Leicester City's unmet need within the authority of Oadby and Wigston. Oadby and Wigston Borough Council have previously faced constraints in regard to housing land supply due to the small size of the Borough. Due to the boundaries shared between Harborough and Oadby and Wigston, there is an opportunity for collaboration to meet housing needs. This is demonstrated further through the allocation of the land south of Gartree Road, with 4,000 dwellings to be provided across both authorities.
- 3.20 Further to this, Oadby and Wigston have paused their previous Regulation 19 Local Plan in order to review the new standard method requirements and the increases to housing need within the Borough. Due to the uncertainty of meeting their own housing needs, a portion of

the housing being provided for Leicester City should be redistributed to authorities with greater opportunities, and with less capacity constraints, such as Harborough.

Small Villages

- 3.21 HDC are proposing to provide 14,839 dwellings to meet the housing requirement of 13,182 dwellings across the plan period. However, only 350 dwellings are proposed to be allocated within the small villages, contributing only 5.4% of the allocations proposed within the Draft Local Plan, and 2.4% of the total housing provision in the plan period.
- 3.22 Within the previous Regulation 18 Issues and Options consultation, the following growth options were assessed by HDC:
- Option 1: Local Plan Strategy
 - Option 2: Proportional Growth
 - Option 3: Urban Area Focus
 - Option 4: Strategic Sites Focus
 - Option 5: Market Town Focus
 - Option 6: Large Village Focus
- 3.23 Within our clients representations to the Regulation 18 consultation, we considered that Harborough should utilise either Option 1 or Option 2, due to the advantages these options can bring to provide sustainable housing growth to the District.
- 3.24 Option 1 would continue the adopted approach to distribution of housing need which has shown to be successful in providing housing thus far. This Option also ensured that growth was provided across all settlements, supporting the viability and vitality of villages. Furthermore, Option 2 would be able to provide even growth proportionate to the size of settlements within Harborough District. Option 2 would also provide an advantage of development being brought forward steadily and evenly, rather than allowing a few strategic sites to provide a majority of the housing needs. This will assist in sustaining village services that may otherwise not have been able to remain in operation.
- 3.25 It is disappointing that HDC have not taken these views into full consideration and have proceed with a refined housing distribution option (RO3), which focuses on elements of initial Option 3 and 4 through providing 4,120 dwellings to the adjoining Leicester Urban Area and the Market Towns. Although this distributes growth slightly across the District there is still a heavy reliance being placed on large strategic sites. Within the Leicester Urban Area and Market Towns alone this accounts for 64.2% of the proposed housing allocations being made within Policy DS01. Furthermore, the adjoining Leicester Urban Area and the Market Towns account for approximately 63.9% of the total housing provision in Harborough District.
- 3.26 Our client considers that 2.4% of the housing provision to the small villages within the Draft Harborough Local Plan to be an unsound approach. Small villages have proven to provide a

meaningful contribution to the housing stock in Harborough and can continue to do so if planned accordingly. As at the 1st April 2023, there have been 715 dwellings which have been completed or been committed to. This demonstrates that there is a demand for housing which has been successfully completed within the small villages in Harborough.

- 3.27 Within subparagraph 2e of Policy DS01, Harborough District Council have recognised that there is a need for houses within the small villages. The table allows for development to provide specific number of homes but does not reinforce this need with allocations to provide housing. The Policy recognises that there is a need for at least 8 dwellings within Swinford. However as set out within our previous response, we consider Swinford has the ability to support a higher housing provision due to it being in close proximity to Lutterworth and Rugby and having strong transport connections to these larger settlements. To ensure that communities such as Swinford remain prosperous and viable, housing allocations should be made in these villages to provide for their local housing needs.
- 3.28 Within the SHELAA Update Assessment 2024 this identifies Swinford as having the capacity to support 117 dwellings across the plan period with 30 dwellings being marked as deliverable in the first 5 years of the plan (SHELAA Update 2024, Table 6). The client's site at Shawell Road (21/8203) is marked as developable for 47 dwellings within years 6-10. We therefore question as to why only 8 dwellings have been proposed as part of the emerging plan when the village has the ability to support a higher proportion of housing growth.
- 3.29 We consider that the Council should review the proportion of housing being allocated to Small Villages and review how this is being distributed. As previously discussed, we consider HDC should proceed with Option 1 or Option 2 to ensure that even, and proportionate growth is being delivered to where it is necessary. The provision of allocations in Small Villages where there is an identified need will support both Option 1 and Option 2 by ensuring that settlements of different scales are receiving growth that will support their communities, such as, allocating land within Swinford for a minimum of 8 dwellings to meet the local housing needs. However as set out above we consider a higher proportion of housing should be directed towards Swinford as recognised within the SHELAA Update 2024 it is a sustainable location which benefits from being in close proximity to nearby larger settlements.

Settlement Hierarchy

- 3.30 To support the Draft Harborough Local Plan and to inform the scale of growth for settlements, the Council have prepared a Settlement Hierarchy Assessment.
- 3.31 The Settlement Hierarchy Assessment (January 2025) carries out a quantitative assessment of all the settlements, looking at the quantity of services available and the presence of significant services within or adjacent to the settlement itself. The services were organised into the following three categories:
- Higher order services and facilities (worth 15 points per facility available)
 - Important services and facilities (worth 10 points per facility available)

- Supporting services and facilities (worth 5 points per facility available)
- 3.32 To further support the assessment and ensure settlements were categorised correctly, HDC carried out a qualitative analysis following the initial assessment. This assessment looked at each settlement in greater detail, looking at their roles and how individual settlements function. The reports concludes to be classed as a small village (as a minimum), the settlement will need to receive a score of 40 or higher. Within the Settlement Hierarchy Assessment, Swinford is classed as a small village and received a settlement audit score of 40.
- 3.33 Within Table 4 of the Settlement Hierarchy Assessment, a small village is classed as being able to meet some day to day needs, where as a medium village has a reasonable range of services and facilities, can meet most day to day needs, and has a scheduled bus service but lack employment facilities.
- 3.34 It is considered that Swinford is able to meet some day to day needs, however, the access to services needs to be considered in relation to providing housing in these settlements. There is direct access from Swinford to Lutterworth which lies approximately 4 miles north (7 minute drive) and is accessed via Lutterworth/Swinford Road and Rugby also lies around 5 miles south-west and is around a 15 minute drive. Swinford is recognised as having strong access to the highway network and has the ability to access the range of services and facilities which are available in these close by larger settlements.
- 3.35 This accessibility should be taken into consideration when deciding where growth should be directed. Providing allocations for growth in the small villages will assist in preventing medium and large villages from becoming over developed. The provision of housing in Swinford will be able to support the facilities in settlements such as Lutterworth, whilst also benefiting from good access to bigger settlements such as Rugby.
- 3.36 The Draft Local Plan identifies a need for 8 dwellings in Swinford but does not make for any allocations in the settlement. We consider the provision of 8 dwellings in this location is low and a higher proportion of dwellings could be supported within Swinford to support the local community and their housing needs. The identification of the settlement as a 'small village' within the Settlement Hierarchy Assessment should not prevent sustainable growth coming forwards. It is considered that the plan is unsound as it does not seek to allocate housing to small villages where there is an identified need.

Policy HN01 Housing Need: Affordable Housing

- 3.37 Our client has concerns in regard to the soundness of Policy HN01 'Housing Need: Affordable Housing'. Harborough District Council request 40% affordable housing to be provided within residential developments. Although the Policy positively allows for flexibility such as offsite provision or financial contribution, or accepting of a viability assessment for lower provision, we do not consider a requirement for 40% affordable housing to be viable.
- 3.38 Within the Viability Report (January 2025), a range in values of greenfield and brownfield land were assessed for different scales of development. For the purposes of the Local Plan,

it was acknowledged that there is minimal brownfield land available and thus was provided little weight. The Viability Report applies values to land depending on the locational value within the District, whether the site is greenfield or brownfield, and the use of the proposed development (residential use within this Viability Report).

- 3.39 The Report found that the provision of 40% affordable housing on sites of low greenfield value would not be viable. In particular, sites of a scale to 20-45 dwellings were found to be completely not viable, and sites of all other scales on low value greenfield land was only marginally viable.
- 3.40 Land which is of lower greenfield value should be used first in development in order to protect higher value greenfield land. The affordable housing requirement requested by HDC should take this into consideration in requesting affordable housing on site. A lower affordable housing provision will encourage and support the development of lower value greenfield land as these were assessed to have lower costs per hectare by HDC, rather than the use of high value greenfield land which not only have higher costs for development, but would also have greater impacts on the quality of the environment.

4. HOUSING ALLOCATIONS POLICIES & PROPOSED TRAJECTORY

Site Selection Methodology

- 4.1 Accompanying the Draft Harborough Regulation 19 Local Plan, HDC published the Site Selection Methodology (February 2025). The Site Selection Methodology outlines how the Council chose sites to be allocated within the Draft Local Plan.
- 4.2 The Site Selection Methodology took a four stage approach in deciding which sites to allocate for development.
- Stage 1: Site Identification
 - Stage 2: Sustainability Appraisal Regulation 18
 - Stage 3: Assessment of sites against the development strategy and key policies
 - Stage 4: Settlement level assessment of sites and identification of preferred allocations
- 4.3 The Site Selection Methodology states that the main source of sites were taken from the 2024 Strategic Housing and Economic Land Availability Assessment (SHELAA). The SHELAA assesses whether a site is considered to be suitable, available, and achievable to conclude whether the site is deliverable within 5 years.
- 4.4 However, within paragraph 4.8 of the Site Selection Methodology, it is stated that sites that are located within or extending from, small villages were not assessed, and have been excluded from the site selection process. It is concerning that small villages have been excluded as this forms a large proportion of the settlements in Harborough. Therefore, we do not consider the exclusion of small villages to be a sound approach. The Draft Local Plan has recognised that there is a need for 350 dwellings as a minimum in the small villages, and we consider allocations should be made to provide this growth. It is important to provide allocations in small villages, to ensure sustainable growth is allowed which support the operations of the small villages.
- 4.5 Furthermore, paragraph 4.9 states only sites which have a reasonable prospect of being delivered within the plan period (identified within the SHELAA to be developable in 16 years) have been included within the site selection process.
- 4.6 Within the 2024 SHELAA, the land to the south of Shawell Road, Swinford was assessed (site reference: 21/8203). The assessment of the site was largely positive, concluding that there were no major on constraints on site which would prevent development, and that this is available, potentially suitable, and potentially achievable, to deliver housing within 6 – 10 years. The site was considered only potentially suitable due to the need to gain satisfaction from the Highway Authority and that the scale of the site was considered inappropriate for the size of the settlement. Similarly, the site was assessed as only potentially achievable due to the scale. The Client has undertaken a Highways Site Access Appraisal (Appendix 1) to demonstrate that suitable access to the site can be achieved therefore we consider

assessment against this is not reflective of this evidence. In terms of the scale of the site, the client is promoting the site for approximately 50 dwellings however would consider further review of dwelling numbers should the Council consider a slighter lower figure more reflective of the scale of the settlement.

Policy SA02: Land South of Gartree Road

- 4.7 Policy SA02 allocates the land south of Gartree Road for a new residential led, mixed use development. The site will provide approximately 4,000 dwellings, community uses, and land for travelling show people of Harborough. This allocation will form a cross-boundary allocation with Oadby and Wigston Borough Council, with 3,150 dwellings located within Harborough, and the remaining 850 dwellings will be located within Oadby and Wigston.
- 4.8 The Housing Trajectory in Appendix 5 anticipates that delivery will commence in 2033/34 and will provide 150 dwellings per annum from commencement. This would see that 1,200 dwellings were provided in Harborough within the plan period.
- 4.9 In March 2024, Lichfields published the Start to Finish Report 3, which provides data and analysis of delivery timeframes of strategic sites. Within the Start to Finish Report, it was found that sites of 2,000 dwellings or more, on average delivered the first dwellings 7.7 years from commencement. It is important to consider that the allocation of the land south of Gartree Road is twice that of the maximum scale of development assessed in the Start to Finish Report, and so the delivery timeframes is likely to exceed the median average of 7.7 years.
- 4.10 There are further complications which require consideration. Firstly, as previously stated, the site is located across the boundary of two authorities, which significant scale of developments within both Harborough District and Oadby and Wigston Borough. Time needs to be provided for within the Housing Trajectory to account for delays which may be incurred in working with two local authorities, each with their own concerns and requirements.
- 4.11 With subparagraph 5b of Policy SA02, a requirement of 40% affordable dwellings is proposed. Within the Viability Report (January 2025), it was found that the site is only marginally viable when a 40% requirement for affordable housing is applied. This is largely concerning as the site provides approximately 49.1% of the total housing allocations for the whole District. It is further concerning that this allocation is only marginally viable with 40% affordable housing, and no other costs or considerations have been applied, such as financial contributions to be agreed through future Section 106 agreements.
- 4.12 This creates a series of risks. Firstly, if the development is not viable with the affordable housing requirements and financial costs of the S106, Harborough will not be able to meet a large proportion of its housing needs due to the large reliance on the allocation. Secondly, if the development does come forwards, there is a risk that a lower proportion of affordable housing is provided, and thus not meeting the affordable needs of the District. Thirdly, there is a risk that the allocation comes forwards, but is not able to provide an appropriate level of contributions to mitigate against the impacts that this allocation will have on both local

authorities. We consider that the housing trajectory should be amended to push back the commencement of delivery in order to allow for further details and certainty in the viability of the delivery of this allocation.

- 4.13 Furthermore, within subparagraph 7h of Policy SA02, it is confirmed that there is contamination present on site at the former Ministry of Defence (MOD) land. HDC have requested a contamination assessment to be required prior to development, and if significant levels of contamination is found on site, this can create further delays in the delivery of housing in order to allow for remediation.
- 4.14 We consider the commencement of delivery from this strategic allocation should be amended to 9 years following adoption of the Local Plan. If the Local Plan is adopted in 2026 (as anticipated within the current Local Development Scheme adopted in March 2025), this would see delivery pushed back to 2035/36.
- 4.15 In addition to the delivery of the first dwellings on site, the build out rate also needs to be considered. Appendix 5 currently proposes a build out rate of 150 dwellings per annum. We consider that this build out rate should be reduced to be more realistic. Within Lichfield's Start to Finish Report, sites of a scale of 2,000 dwellings or more on average deliver 138 dwellings per annum. The build out rate of the site should be based on the evidence and a build out rate which has been shown to be achievable. This will ensure that a realistic and achievable build out rate is provide, which assists in ensuring that Harborough is not subjected to under delivery of needed dwellings.

Policy SA03: North of Market Harborough

- 4.16 The Draft Harborough Local Plan allocates the land to the north of Market Harborough for a residential led, mixed used development, providing 1,700 dwellings. This Policy allocates a cluster of sites, formed by the following:
- Land east of Leicester Road and south of Grand Unition Canal
 - East of Market Harborough Road
 - Land south of Gallow Field Road
- 4.17 Although there are separate sites which can provide varying scales of development, the Draft Local Plan approaches the sites as a singular allocation, and therefore the assessment of Policy SA03 will continue this approach.
- 4.18 Although the Policy consists of different sites, these will all be required to be delivered in conformity with a single masterplan. This presents a challenge in itself, as it has been acknowledged by Harborough District Council that there are several various landowners between the three allocated sites. These landowners may have differing opinions in how development should come forwards.
- 4.19 Within Lichfield's Start to Finish Report, following analysis of data of past delivery rates, it was found that sites of a scale of 1,700 dwellings commence approximately 6.6 years from

validation of the outline application. The Housing Trajectory within Appendix 5 provides a series of commencement years for the different sites, despite the allocation requiring a singular masterplan needing to be in place for all the sites. We consider the Housing Trajectory should align with the proposed policy, to ensure that a carefully designed masterplan is brought forwards to provide direction for development across the whole allocation area.

- 4.20 We consider there needs to be consideration in the housing trajectory towards agreement to the overarching masterplan. Currently, the first delivery of the three sites is anticipated in 2028/29 on the land east of Leicester Road and south of Grand Union Canal, only two years from adoption of the emerging Local Plan. This is concerning, because if housing is anticipated and not provided, the housing needs will not be met. Therefore, the commencement of delivery of the allocation should commence from 2032/33 to allow for agreement in how development is brought forwards.
- 4.21 Additionally, the Viability Report (January 2025) assessed the whole allocation to be viable. However, it is important to note that there has been no consideration given towards any financial contributions that will be required through the Section 106 agreement, or any additional onsite infrastructure that may be required due to the scale of development. When the level of impact is assessed during the determination of the site, the costs of mitigation can have significant impacts on viability and can result in needed mitigation not being provided. We consider that the site should be put back in the Housing Trajectory to allow for greater certainty and details to be provided, to ensure that the site is viable.
- 4.22 We therefore suggest that commencement of delivery is pushed back to commence from 2032/33 for all sites included within Policy SA03. This will ensure that housing delivery in the short term is not jeopardised and expected delivery does not slip back due to complications in agreement from landowners, as well as allowing for a suitable masterplan to come forwards.

Policy SA04: Scraftoft East

- 4.23 The Regulation 19 Draft Harborough Local Plan allocates the land between Scraftoft and Bushby within Policy SA04. The Policy allocates the land for the development of 950 dwellings with essential infrastructure, including a new primary school.
- 4.24 It is proposed within the Housing Trajectory in Appendix 5 of the Draft Local Plan, that the allocation will deliver the first housing in 2030/31, with 50 dwellings delivered within the first year, and 100 years per annum until completion in 2039/40.
- 4.25 The Start to Finish Report produced by Lichfields found the average time for delivery from validation of the application to be 4.9 years for sites of a scale of 500 – 999 dwellings. If an application were to be submit on adoption of the emerging Plan, this would therefore see delivery commence in 2031/32 rather than 2030/31 as currently expected.
- 4.26 Furthermore, the Report found that the average build out for sites of this scale to be 68 dwellings per annum but acknowledges that there is a lower build out rate within a

developments first year of delivery due to construction of supporting infrastructure. To ensure an accurate delivery rate is provided on site, from the second year of delivery the build out rate should be amended to 68 dwellings per annum. This will see a total delivery of 662 dwellings in the plan period.

- 4.27 Within HDC's Viability Report (January 2025), it was concluded that the allocated site would only marginally be viable when providing 40% affordable housing on site. This is particularly concerning as this assessment does not include additional financial considerations, such as contributions required through the Section 106 to mitigate against adverse impacts caused by the development.
- 4.28 The Policy has acknowledged within subparagraph 1d that there are existing cumulative traffic issues on the south eastern side of Leicester's highway network which this allocation will need to address. If the application is only marginally viable currently, the addition of costs to mitigate the highway impacts may cause the development to become unviable.
- 4.29 This further supports the need for the delivery of housing to be delayed in the Housing Trajectory to 2031/32, to allow for additional time for confirmation the proposed allocation is indeed viable, with the ability to provide the affordable housing, with the needed mitigation works on the identified highways.

Housing Trajectory

- 4.30 Table 4.1 below provides the housing trajectory as is currently proposed within Appendix 5 of the Draft Local Plan. As currently planned for, the strategic allocations discussed above provide 3,450 dwellings over the 21 year plan period.
- 4.31 The revised housing trajectory in Table 4.2 provides our reconsidered delivery timeframes and build out rates of these strategic allocations. With the amended timescales and delivery rates, this would see a total of 2,320 dwellings being provided in the plan period, 1,130 dwellings less than what is currently anticipated.
- 4.32 To rectify this shortfall, we consider that the Council should provide further allocations in order to ensure that the housing needs of Harborough are met within the short term. The land south of Shawell Road, Swinford is deliverable, suitable, and available to provide approximately 50 dwellings within the initial years of adoption of the Plan, in a location which has been identified to have a housing need for 8 dwellings and the capacity to support 117 dwellings. The allocation of this site would see that some short term needs are met within Harborough.

Table 4.1 Proposed Housing Trajectory by HDC in the Draft Harborough Local Plan

	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/28	2038/39	2039/40	2040/41	Total
Land South of Gartree Road														150	150	150	150	150	150	150	150	1,200
North of Market Harborough									50	50	50	80	100	120	120	130	130	160	160	120	80	1,300
Scraptoft East											50	100	100	100	100	100	100	100	100	100		950
Total									50	50	100	180	200	370	370	380	380	410	410	380	380	3,450

Table 4.2 Boyer Amended Housing Trajectory based on the Draft Harborough Local Plan

	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/28	2038/39	2039/40	2040/41	Total
Land South of Gartree Road																138	138	138	138	138	138	828
North of Market Harborough													50	50	50	80	100	120	120	130	130	780
Scraptoft East												50	68	68	68	68	68	68	68	68	68	662
Total												50	150	150	150	318	338	358	358	368	368	2,320

5. SUSTAINABILITY APPRAISAL

- 5.1 HDC have commissioned LUC to carry out a Sustainability Appraisal (SA) to support the emerging new Harborough local Plan. We previously considered the options proposed as part of the SA which was published to support the Regulation 18 Consultation. Since this consultation, LUC on behalf of the Council, have updated the SA in accordance with the Proposed Submission Draft Local Plan.
- 5.2 We consider, the stages which define the SA to be robust in nature and ensure that the fundamental areas in relation to the plan making process have been considered. For the purpose of this set of representations the Housing Options will be the focus due to the nature of our Landowner/client's site at Fleckney.

Housing Spatial Options

- 5.3 As outlined within our Regulation 18 submission, the approach used to define the Housing Options across the District has been informed by The Leicester and Leicestershire Housing and Economic Needs Assessment (HENA) (2022), The Leicester and Leicestershire HENA Housing Distribution Paper (Housing Distribution Paper) (2022) and the updated Settlement Hierarchy Assessment (Oct 2023).
- 5.4 The SA originally considered six broad options for the distribution of growth across the District. Each of these six options were then considered in the context of three alternative levels of growth: low (A), medium (B) and high (C). As outlined during our previous submission, the SA assessed Option 3 and 4 as scoring highly in terms of the positive impact which would result across the District.
- 5.5 However, we consider these options would not allow for a proportionate amount/spread of growth which would limit the delivery of the other key SA objectives. We considered as part of our previous submission, how advantages could also be delivered through pursuing growth in relation to Options 1 and 2 as this would direct development towards recognised sustainable locations (such as Large Villages) and seek to spread development more evenly across the District. This would result in less dependency on additional new infrastructure and allow for a steady rate of housing delivery rather than relying on one or two specific large strategic sites (which as outlined above in Section 4 we consider the timescales for delivery are unrealistic). These options would also spread growth across the District more proportionally and provide support to local towns and villages.
- 5.6 Appendix A of the updated SA provides a summary of consultation responses received in relation to SA scoping report and how they have been addressed. In response to some of the consultation responses received the Council stated:

“Options 3 and 4 proposes growth towards the most sustainable locations within the District. Options 1 and 2 scored the same as Option 3 as each of the options provided a level of growth to each of the settlement levels. Albeit, Option 1 and 2 provides a larger spread of growth to the lower level settlements within the settlement hierarchy. It was identified that

Option 4 resulted in the least spread of growth resulting in a mixed effects in relation to SA9: Housing.”

- 5.7 Within the Council’s response it is recognised that Options 1 and 2 score the same as Option 3 and it is further stated that Option 4 results in the least spread of growth and has ‘mixed effect’ in relation to Objective SA 9: Housing. We therefore consider the Council need to provide clear justification over the chosen housing approach pursued as we consider as per the SA assessment these all to score similarly.
- 5.8 As part of our last submission, we considered the high growth option (Option C) should be pursued as this option would factor in the increase in the amount of housing required by using the standard method and the uplift in housing needed in relation to Leicester City’s unmet need, as well as allowing for an adequate buffer.
- 5.9 Following the Regulation 18 consultation, a revised NPPF (Dec 2024) has been published which outlines a new standard method for calculating housing need. This new standard method is no longer based on the 2014 household projections and instead focuses on a stock-based approach. Most authorities see an increase in requirement due to the new stock-based approach. This approach aims to increase the amount of housing stock within an area by 0.8% year on year. This is then further adjusted for areas facing the greatest affordability challenges, using a more robust affordability multiplier.
- 5.10 For Harborough, the new standard method results in an increase in housing requirement from 534 homes per year to 723 homes per year (an increase of 189). Although the Draft Plan is being progressed under the previous version of the Framework, as per the transitional arrangements, we consider (as outlined above in Section 3) that the Council are only according with the 80% requirement due to the over provision in housing as a result of providing for Leicester City’s unmet need. We therefore consider the high growth (C) approach is the most suitable as will meet the 80% housing requirement sought via the transitional arrangements, the required apportionment of unmet need from Leicester City and an adequate buffer.
- 5.11 As set out within the Proposed Submission Local Plan, the Council have stated they have a housing requirement of 13,182 dwellings across the plan period. This is based on an annual requirement of 657 dwellings for the period of 2020-2036, which then drops to 534 homes a year between 2036-2041.
- 5.12 Following review of the proposed growth options presented as part of the SA, the medium growth option (Option B) sought a Local Housing Need (LHN) figure of 657 across the whole plan period which took into account Harborough’s LHN and the unmet need arising from Leicester City (534 HDC LHN + 123 LC Unmet Need = 657). This Option provided a requirement for 14,715 dwellings to be delivered across the plan period, this is 1,533 homes higher in comparison to what is being proposed as part of the Proposed Submission Local Plan.
- 5.13 The reason behind this reduced figure is due to the introduction of three revised housing options (discussed further below) and the refinement of the medium growth housing option

(B) which now removes “any contribution to unmet need post 2036, apply[s] a 15% buffer and [does] not apply the buffer to homes already built.” (Para 2.33, SA, 2025).

- 5.14 In our view, we consider the Council have opted to pursue a combination of the low (A) and medium (B) growth option as are only providing for Leicester City’s unmet need for the first 16 years of the plan. We consider this is not justified in accordance with the NPPF’s test of soundness and is not a scenario which was previously assessed as part of the SA and therefore is not an appropriate strategy.
- 5.15 The main differences between the SA produced at Regulation 18 Stage and the updated SA produced as part of the Regulation 19 Consultation are in relation to the Refined Housing Distribution Options. The SA states that following the appraisal of the initial distribution and growth options (as outlined above) these options were further refined for the distribution of housing. We consider the refined housing distribution options further in the below section.

Refined Housing Distribution Options

- 5.16 The refined housing distribution options considered as part of the updated SA are as follows:
- Refined Option 1 (RO1) – Market Town Focus (including new Strategic Site adjoining Lutterworth)
 - Refined Option 2 (RO2) – Urban Area Focus (including new Strategic Site adjoining Oadby)
 - Refined Option 3 (RO3) – Urban Area and Market Town Focus (including Strategic Site at Oadby)
- 5.17 It is stated within the SA that these options considered no more the two large strategic sites, Land South of Gartree Road and Land South of A4303 Lutterworth. It is stated the refined options combine elements of initial options 4, 3 and 5 as the Council recognised the sustainability benefits arising from large sites but also the potential issues in relation to deliverability. We welcome this recognition by the Council and that a more even spread and proportional level of growth is a more sensible approach. It is concluded that RO3 performs better overall when assessed against all of the SA objectives. RO3 combines elements of RO1 and RO2 and was recognised as “spreading development more evening across the District.”. The Council have therefore decided to pursue this option as part of the Proposed Submission Local Plan.
- 5.18 As outlined within our previous submission, we considered the Council needed to spread growth more evenly across the District and we therefore welcome the recognition of this. However, we consider heavy reliance is still being placed on large strategic sites which as outlined in Section 3 above we consider will likely to struggle to deliver the required housing numbers across the plan period as anticipated. We consider it would be a more sound and positive approach to plan making if smaller sites in lower tiers of the settlement hierarchy were identified at this stage in the local plan process. This would assist in the delivery of growth across the District and avoid potential speculative applications being submitted to

meet the shortfall in growth. We consider this approach more strongly aligns with Initial Option 1 and 2 as discussed within our previous Regulation 18 response.

- 5.19 Furthermore, as outlined above all of the refined housing options have been considered in relation to the medium growth option (B). This options seeks to take into account Leicester City's unmet need until 2036 and apply a 15% buffer, however this will not be applied to homes which are already built. For the reasons set out above we consider the high growth scenario should be used however this has supposedly been discounted due to "local housing need assumptions calculated using the standard method; assumptions around Leicester's unmet needs and the difficulties in planning for this; assumptions in relation to housing supply buffers; and existing housing completions and commitments.". We consider given the increase in housing requirement as a result of the new standard method (Dec 2024) and to accord with the transitional arrangements the high growth scenario needs to be pursued.
- 5.20 HDC previously sought input of an appropriate buffer and recognised a range of 5-25% was used nationally. The current adopted local plan buffer is 16% and we suggested a buffer of between 20-25% should be applied to the emerging Local Plan in order to account for impacts that may occur to the delivery of housing supply. Although HDC were advised to apply a 15% by LUC as part of the SA it appears HDC have not opted to include this as part of their revised housing requirement. The housing requirement figure proposed within the Regulation 19 Plan is 13,182 dwellings across the plan period. When applying a 15% buffer this would increase the requirement to 15,498 dwellings (based on 738 dwellings per annum, taking into account Leicester City's unmet need). We consider HDC are required to provide an appropriate buffer in accordance with the NPPF (Dec 2023) in order for the plan to be found sound. Should the Council seek to progress the Local Plan under the new version of the Framework (Dec 2024) this removes the requirement for a buffer and instead seeks a flat annual rate of housing requirement under the new standard method. However, as the Council are progressing the Plan under the previous version of the Framework the requirement for a buffer still applies.
- 5.21 Overall, although it is welcomed that HDC have considered a more proportional approach to housing distribution we consider this could go further in order to support growth at all scales of the settlement hierarchy. We also consider an appropriate buffer and higher growth scenario need to be implemented in order to ensure the soundness of the Plan.

6. LAND SOUTH OF SHAWELL ROAD, SWINFORD

- 6.1 The land south of Shawell Road, Swinford is being brought forward and promoted to the Harborough Local Plan by Castlethorpe Homes, for the development of approximately 50 dwellings, with access, landscaping and associated infrastructure.

Site Characteristics and Context

- 6.2 The settlement of Swinford is located within the most south-westerly point of the District, lying close to the M1/M6 and A14. The village lies approximately 4 miles south of Lutterworth and 5 miles north-east of Rugby. Swinford has been recognised as having strong access to the highway network and have the ability to utilise these larger settlements for day to day needs.
- 6.3 To support previous promotions of the site, Bancroft Consulting prepared a Highway Site Access Appraisal (Appendix 1), which concluded that development on the site can be accessed safely through a new priority T-junction with a 2m wide footpath on either side of the carriage way. In regard to impact on the highway network, it was found that the proposed scheme would not have a material impact on the roads network or at junctions.
- 6.4 Castlethorpe Homes are committed to working with the local community. Within the masterplan previously submitted to the Regulation 18 consultation (Appendix 2), this aims to provide a potential pedestrian and cycle access across the site through to Rugby Road. The site will also provide appropriate buffers and open space across the site.
- 6.5 The site will be able to provide sustainable development and needed housing to the local community. Policy DS01 identified a need for 8 dwellings to be provided in Swinford, however, this was not supported by any allocations in the settlement and we consider the village is able to support a higher proportion of housing due to the strong access to the highway network. To address this requirement we consider a housing allocation should be made within Swinford.
- 6.6 The land south of Shawell Road, Swinford received a largely positive assessment by Harborough District Council within the SHELAA Companion Guide 2024. The Companion Guide provides an up to date assessment of sites in Harborough, including the land south of Shawell Road, Swinford (Ref: 21/8203). The site was assessed to be potentially suitable, potentially achievable, and available, with the Council considering that the site will be able to deliver housing within 6 - 10 years. The site was considered only potentially suitable due to the need to gain satisfaction from the Highway Authority and that the scale of the site was considered inappropriate for the size of the settlement. Similarly, the site was assessed as only potentially achievable due to the scale. The Client has undertaken a Highways Site Access Appraisal (Appendix 1) to demonstrate that suitable access to the site can be achieved therefore we consider assessment against this is not reflective of this evidence. In terms of the scale of the site, the client is promoting the site for approximately 50 dwellings however would consider further review of dwelling numbers should the Council consider a slighter lower figure more reflective of the scale of the settlement.

- 6.7 We consider the Council should update the SHELAA Assessment to reflect the Highways Access Note produced in order to allow for an accurate assessment of the site. Based on this, we consider the site is developable within the first 5 years of the plan period.

Conclusion

- 6.8 Castlethorpe Homes are promoting the Land south of Shawell Road, Swinford for the development of approximately 50 dwellings to the Harborough Local Plan. The site has received a largely positive score within the SHELAA Companion Guide, which considered the site to be potentially suitable, potentially achievable, available, and able to deliver housing within 6 - 10 years. However we consider a more accurate assessment of the site is needed to show the site to be developable within the first 5 years of the plan period. The site will be able to meet the identified need for 8 dwellings in Swinford as well as go some way in meeting the recognised capacity of the village. However, the Local Plan does not look to make any allocations in small villages, which we consider to be an unsound approach.
- 6.9 The land south of Shawell Road, Swinford is suitable, available, and deliverable to provide the needed housing to the local community of Swinford within the initial years following adoption of the Harborough Local Plan.

7. CONCLUSION

- 7.1 These representations have been prepared by Boyer on behalf of Castlethorpe Homes, in response to the Regulation 19 Draft Harborough Local Plan consultation. Castlethorpe Homes are promoting the land south of Shawell Road, Swinford which has the potential to deliver approximately 50 dwellings.
- 7.2 Castlethorpe Homes have previously prepared responses to the Regulation 18 Issues and Options consultation (February 2024), as well as the Harborough Call for Sites in 2022.
- 7.3 We consider that the strategy defined within the Regulation 19 Harborough Local Plan is not a sound approach and should be reviewed prior to the plan being submitted for Examination. We consider the Council are not proposing sufficient housing allocations to meet the needs for growth of the District, based on their housing requirement as well as the unmet need of Leicester City, as agreed through the Statement of Common Ground.
- 7.4 In order to meet the needs of Harborough District, the housing requirements should be reviewed to ensure a suitable level of housing is provided. As currently planned for, Harborough District Council are at risk of either not meeting the required 80% of the new standard method as per the transitional arrangements, or the Council are at risk of breaching the Statement of Common Ground and not providing the agreed housing on behalf of Leicester City, as it has not been made clear which the Council are prioritising.
- 7.5 Furthermore, the housing distribution needs to be reviewed in order to ensure that the housing that is being delivered is distributed suitably where there has been a need for housing identified, as currently, the Plan focuses only on the Leicester Urban Area and few market towns.
- 7.6 Without consideration being given to the above, we consider it highly likely that the strategic vision and objectives of the Regulation 19 Plan will not be achieved, and the Plan will fall short in delivering the full objectively assessed need for housing.
- 7.7 Therefore, for the reasons set out within these representations, we do not consider that the Regulation 19 Plan is compliant with the tests of soundness and has not been proactively prepared in line with the December 2023 NPPF.

APPENDIX 1. HIGHWAYS SITE ACCESS APPRAISAL

Boyer Planning
Land West of Swinford,
Leicestershire
Site Access Appraisal

May 2021



BANCROFT
CONSULTING

bancroftconsulting.co.uk

LAND WEST OF SWINFORD, LEICESTERSHIRE
SITE ACCESS APPRAISAL
MAY 2021

1.0 INTRODUCTION

- 1.1 Bancroft Consulting were appointed by Boyer Planning to provide highways and transportation advice in respect of proposals to develop up to 50 dwellings on land at Shawell Road in Swinford, Leicestershire. This Site Access Appraisal has been prepared to support the allocation of the site within the upcoming Local Plan “Call for Sites”. **Appendix A** contains the location of the site, which demonstrates how the development of up to 50 dwellings would be within Phase 1, whilst there could also be potential for an additional Phase 2 on land located adjacent to the site.
- 1.2 This Site Access Appraisal has been completed as a desk top study with the objective of providing an initial review of the potential access opportunities and the overall deliverability of the scheme. Accordingly, all details presented within this report are the initial opinions of Bancroft Consulting and subject to agreement with the local highway authority in due course.
- 1.3 This Site Access Appraisals has been prepared with consideration of current Government policy contained within the National Planning Policy Framework [NPPF] (MHCLG, February 2019) and in particular those within Paragraph 108 and 109, which state that:
- “In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:*
- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
 - b) safe and suitable access to the site can be achieved for all users; and*
 - c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway*

safety, can be cost effectively mitigated to an acceptable degree.” [Paragraph 108]

“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.” [Paragraph 109]

- 1.4 Consideration has also been given to policy contained within Paragraph 103 which states that:

“opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.”

- 1.5 This report also considers current best practice advice and design guidance in the document Manual for Streets [MfS] (DfT, March 2007) and its companion document Manual for Streets 2 [MfS2] (CIHT, September 2010). Along with reference to the adopted ‘Leicestershire Highways Design Guide’ (2018).

2.0 SITE ASSESSMENT

- 2.1 The site is located on land to the south of Shawell Road in Swinford, Leicestershire. The site currently comprises an undeveloped agricultural field of approximately 2.6 hectares. It is immediately to the west of the village of Swinford, which mainly comprises residential dwellings and local amenities such as 'Swinford Village Hall', 'Swinford C of E Primary School', 'The Chequers' pub and 'Swinford Play Area'.
- 2.2 The site is currently served by an informal gated access off Shawell Road. This access measures approximately 4 metres wide and extends south directly into the site. An initial review of levels suggests that the site rises slightly above the level of Shawell Road, however, there appears to be no significant level changes. This point should be confirmed once a Topographical Survey has been completed of the site and surrounding area.
- 2.3 Shawell Road extends east to west along the site frontage and has a carriageway width of approximately 5.5 metres. Shawell Road also has verges that extend along either side of the carriageway that measures between approximately 2 and 5 metres wide. In the immediate vicinity of the site the carriageway features centreline road markings and has no street lighting. Shawell Road is subject to a national derestricted speed limit as it extends past the site frontage, however the speed limit changes to 30 miles per hour approximately 50 metres east of the site as Shawell Road extends further into Swinford.
- 2.4 An initial review of the 'CrashMap' website 'www.crashmap.co.uk' confirms that there have been no recorded accidents along Shawell Road within the immediate vicinity of the site within the latest 5-year study period (2016 to 2020). There have also been no recorded accidents at the junction with Lutterworth Road 200 metres to the east of the site. Based on this initial review it is considered that there are no existing highway safety problems within the immediate vicinity of the site.
- 2.5 An initial review of the 'Bustimes.org' website suggests that Swinford has one bus stop located opposite The Chequers pub. The stop is served by a single bus route operated by Flexibus. This route (bus route 9) operates circa 5 daily services

Monday to Saturday and connects Swinford to destinations such as North Kilworth, Rugby and Lime Tree Village.

- 2.6 Swinford also contains several footpath links which connect the site to the wider residential areas of the village. There is also a footpath link which extends north from the field opposite the site which extends towards a public bridleway. The planned National Cycle Route 50 will also extend through Swinford and would connect to key destinations such as Gilmerton, Crick, Daventry, and Buckingham once complete.

3.0 DEVELOPMENT CONSIDERATIONS

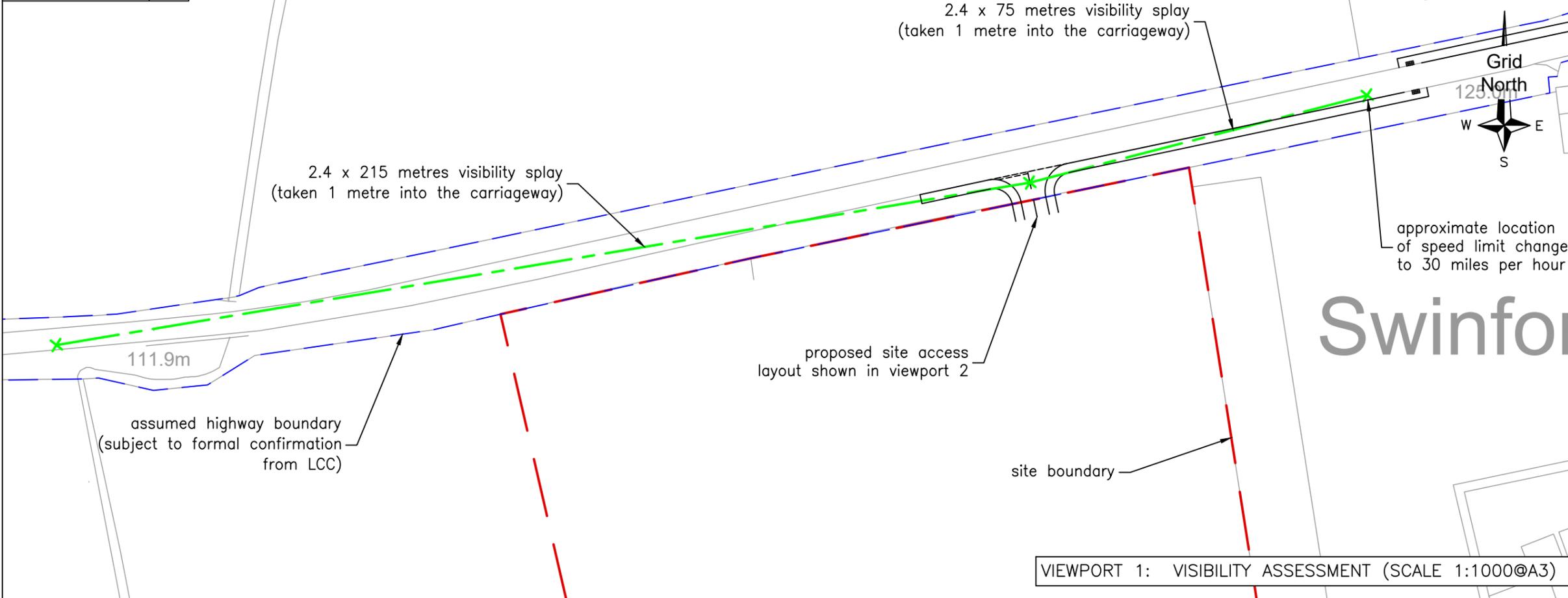
- 3.1 In terms of traffic generated by the proposals, it is expected that each dwelling would generate around 0.6 – 0.8 movements during the peak hour periods and between 5 to 8 daily movements. Based on this initial understanding, the proposals to develop up to 50 dwellings could result in between 30 and 40 two-way vehicle movements during each peak hour (0800 to 0900 and 1700 to 1800 hours) and between 250 and 400 daily two-way movements. Due to this it is likely that further consideration would be needed of the potential off site impacts of the development.
- 3.2 In terms of distribution of this traffic, an initial review of the site's location in context with local key destinations such as Rugby, Daventry, Leicester and Northampton and close proximity to the M1 and A5. It is anticipated that most vehicles would turn right out of the site, heading east towards Swinford and the junction with Lutterworth Road. To the north Lutterworth Road extends to Junction 20 of the M1, whilst to the south it connects to Rugby Road which extends to the A5.

4.0 ACCESS LAYOUT

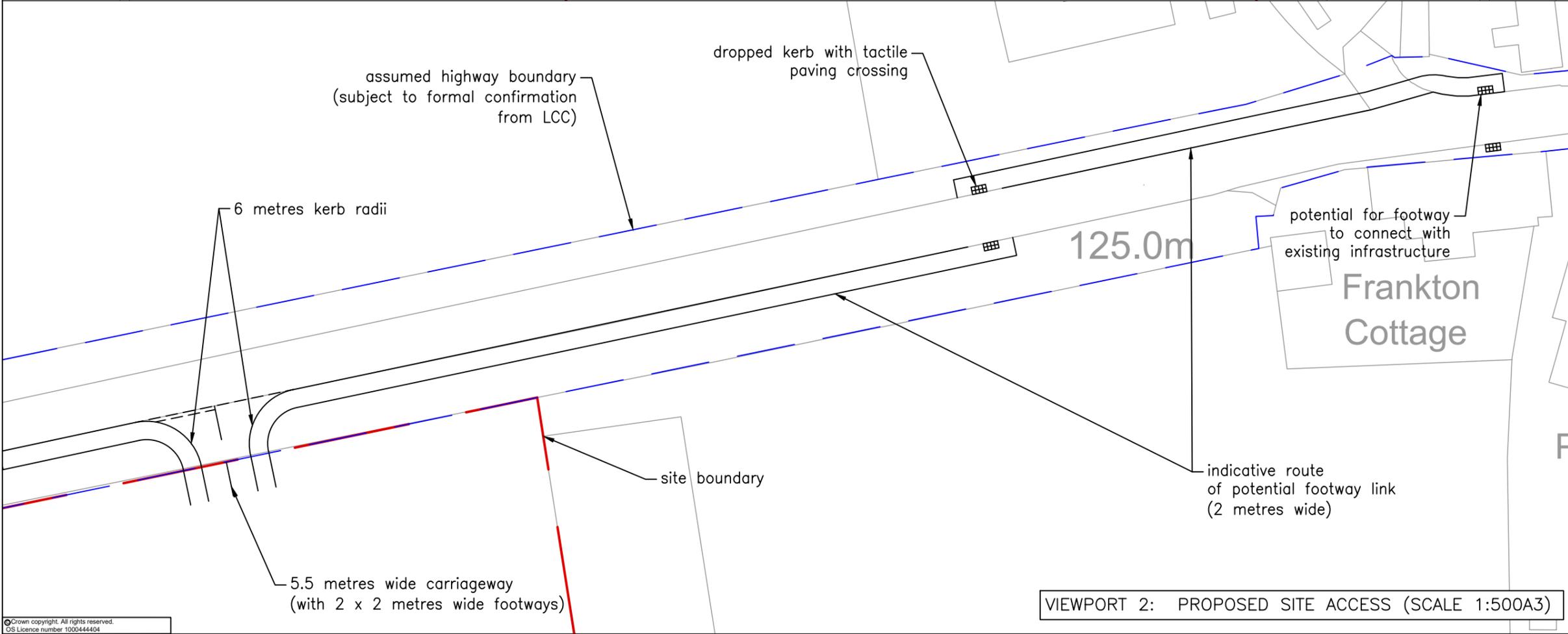
- 4.1 The Leicestershire Highways Design guide has been reviewed to determine a suitable access layout. The guidance states that a carriageway width of 5.5 metres and 6 metres corner radii should be suitable to serve the proposed 50 dwellings.
- 4.2 **Drawing Number F21077/01** demonstrates how this access layout could be provided at the site and include 2 metres wide footways on both edges of the carriageway. These footway links should extend into the site within any future masterplan. The drawing also demonstrates how there could be potential for the footway link to extend east and connect to existing infrastructure along Shawell Road. This could include a dropped kerb with tactile paving crossing and a new footway link within the verge area at the north of Shawell Road. These improvements would be subject to confirmation of land ownership along with supporting highway boundary plans.
- 4.3 Although the proposed site access has been designed in accordance with the adopted design guidance, any future site assessment should demonstrate how the proposed access layout could accommodate the largest anticipated vehicle to the site. This would likely require vehicle tracking of a refuse collection vehicle completing both a left turn in and out of the proposed site access.
- 4.4 **Drawing Number F21077/01** also demonstrates how a visibility splay of 215 metres could be achieved to the west of the proposed site access from a 2.4 metres setback distance to a point 1 metre into the carriageway within area that is assumed to be within the highway boundary. This reflects the requirements of Table DG4 of the Leicestershire Highways Design Guide for speeds of up to 62 miles per hour, in line with the derestricted speed limit. To the east, the visibility splay has been taken to the approximate location of the speed limit change where approaching vehicles should be travelling around 30 miles per hour. In this direction the maximum achievable visibility is approximately 135 metres which reflects vehicle approach speeds of up to 44 miles per hour. It is recommended that more accurate speeds readings should be obtained within any future site assessment to place greater accuracy on the visibility splay requirements.

5.0 SUMMARY

- 5.1 This Site Access Appraisal has provided an initial review the potential access opportunity and the overall deliverability for a potential development of up to 50 dwellings on land to the south of Shawell Road in Swinford, Leicestershire.
- 5.2 **Drawing Number F21077/01** demonstrates how the proposed site access would meet the requirements of The Leicestershire Highways Design Guide by providing a 5.5 metres wide carriageway and 6 metres kerb radii with 2 metres wide footways on both edges. The drawing also demonstrates how there could be potential for a footway link to extend east and connect to existing infrastructure along Shawell Road.
- 5.3 However, within any future site assessment, further consideration should be given to:
- Speed readings of vehicles approaching the site access along Shawell Road.
 - The impact of the development on the surrounding roads and understanding of likely traffic distribution.
 - The potential to improve the sites overall sustainability including the deliverability of potential footway links.
 - Further details of land ownership including plans to confirm the adopted highway extent.
 - A Detailed review of accident data obtained from LCC for the latest available 5-year period.
 - Vehicle tracking of the proposed access layout of the largest anticipated vehicle to the site.



VIEWPORT 1: VISIBILITY ASSESSMENT (SCALE 1:1000@A3)



VIEWPORT 2: PROPOSED SITE ACCESS (SCALE 1:500@A3)

- NOTES:
- DRAWING BASED ON OS MAPPING AND MAY REQUIRE CONFIRMATION FROM A TOPOGRAPHICAL SURVEY.
 - EXTENT OF HIGHWAY BOUNDARY SUBJECT TO CONFIRMATION FROM FORMAL LCC PLANS.

REV.	DATE	DESCRIPTION	BY	CHECKED BY
CLIENT				
BOYER PLANNING				
CONTRACT				
LAND WEST OF SWINFORD, LEICESTERSHIRE				
TITLE				
PROPOSED SITE ACCESS & VISIBILITY ASSESSMENT				
 BANCROFT CONSULTING Bancroft Consulting Ltd Jarodale House 7 Gregory Boulevard Nottingham NG7 6LB t 0115 9602919 f 0115 9648201 e office@bancroftconsulting.co.uk				
DRAWN BY				
NAME (PRINT)		DATE		
WM		26.05.21		
CHECKED BY				
NAME (PRINT)		DATE		
CJB		26.05.21		
SCALE AS SHOWN		STATUS PRELIMINARY		
DRG. NO. F21077/01				REV.

APPENDIX A – SITE LOCATION



Jarodale House
7 Gregory Boulevard
Nottingham NG7 6LB

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office@bancroftconsulting.co.uk

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APPENDIX 2. CONCEPT MASTERPLAN

Land west of Swinford, Harborough, Leicestershire

Framework masterplan | June 2021 1:2000@A3

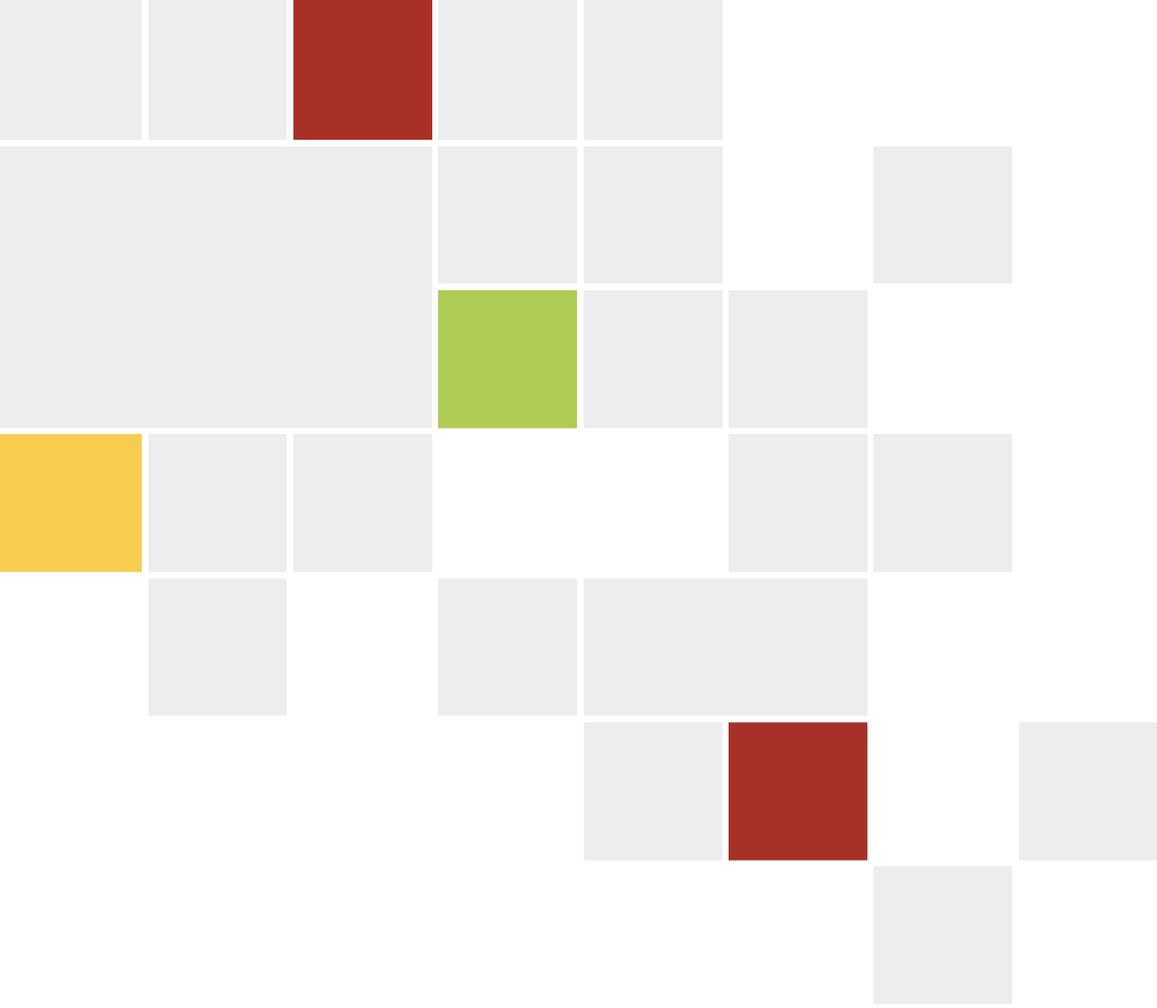


KEY

- 1 Main all modes access from Shawell Road
- 2 East West running Green finger along existing retained hedgerows
- 3 Phase 2 - Green setback consisting of sports, play and community allotments
- 4 Strengthened boundary vegetation
- 5 Main street with SUDS, tree planting and footpaths
- 6 North South running green finger creating buffer between Phase 1 and Phase 2

- Site boundary (5.05 ha/12.48 ac)
- Development parcels
Phase 1 - 50 units approx
Phase 2 - 50 units approx
- ⊙ Access points
- ↔ Potential pedestrian and cycle access to Rugby Road
- Existing vehicular network
- 🏠 Key buildings
- 🏠 Frontages





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