



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

Boyer

Prepared on behalf of Barratt David Wilson Homes (North Midlands) & Mr Charles
John Halford Brooks | April 25

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APPENDICES

Appendix 1. Harborough Rural Centres Landscape Assessment (2014)

Appendix 2. Previous engagement with HDC

Appendix 3. Draft Framework Plan – Submitted to Support 25/00400/OUT

1. INTRODUCTION

- 1.1 These representations have been prepared by Boyer on behalf of Barratt David Wilson Homes (North Midlands) and Mr Charles John Halford Brooks, (“The Landowner’s”) in response to Harborough District Council’s (HDC) Regulation 19 Proposed Draft Local Plan Submission Consultation.
- 1.2 These Principal Parties are the respective landowners, developer and promoter that have come together to promote the site at Land West of Leicester Road, Fleckney for residential development.
- 1.3 These representations follow our earlier submission to the Regulation 18 Issues and Options Consultation which was held 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.
- 1.4 The landowners control approximately 9 Ha of land to the west of Leicester Road, Fleckney. The site is close to associated facilities within one of the District’s recognised Large Villages. The site lies immediately adjacent to the existing built form of the village, which sits to the south east of the site. Surrounding the site, permission has recently been granted for a Solar Farm (Planning Ref: 22/01133/FUL) and along the southern boundary the site adjoins the proposed allocation F1 (Land north of Kilby Road and Land west of Longgrey), as proposed in the Regulation 19 Draft Local Plan.
- 1.5 The site was assessed as part of the Harborough Rural Centres Landscape Assessment, 2014 marked under Site 18. As part of this assessment it identifies that the site has "medium-high capacity to accommodate development" and that "residential development is felt to be most appropriate in this location". (see Appendix 1). The site was also 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) and scored ‘green’ on the assessment map.
- 1.6 Land west of Leicester Road , Fleckney (SHELAA Ref: 21/8101) was recognised as a developable site as part of this assessment. The assessment acknowledges the high pressure gas pipeline which runs within the site boundary. Previously, BDW North Midlands submitted evidence to the Council in relation to this matter (Appendix 2) to demonstrate that an appropriate buffer to the gas pipeline can be accommodated and therefore development of the site is not precluded.
- 1.7 An outline planning application was recently prepared and submitted on the site for the development of up to 170 dwellings (with all matter reserved except for access) (Planning Reference: 25/00400/OUT). This application is currently being determined with an anticipated determination deadline of the 24th June 2025. The Draft Framework Plan, submitted to support the application can be viewed at Appendix 3, this plan also shows a potential future access route can be achieved through to the F1 proposed allocation which lies to the south of the site. The submission of the application outlines the Landowners clear commitment to

bring the site forward for development. The site is suitable, deliverable and available for residential development and can support the delivery of residential units early in the plan period (the first 0-5 years). Land at Leicester Road, Fleckney can be planned and delivered comprehensively, in accordance with statutory requirements, to form a logical extension to the settlement of Fleckney.

- 1.8 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.
- 1.9 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.
- 1.10 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.
- 1.11 The following sections of these representations are as follows:
- Section 2:** Vision and Objectives
 - Section 3:** Approach to Housing
 - Section 4:** Housing Allocations Policies & Proposed Trajectory
 - Section 5:** Sustainability Appraisal
 - Section 6:** Land West of Leicester Road, Fleckney
 - Section 7:** Conclusion
- 1.12 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. however these do not seem to have been considered by the Council. As previously set out per Paragraph 22 of the NPPF, this 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 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 it 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 the landowners 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 face 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 the 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 it's own needs. No further SoCG has been agreed beyond the July 2022 SoCG. We consider that the SoCG should cover the entire plan period (up to 2041) to ensure HDC are delivering the correct proportion of housing. Furthermore, as outlined within the PPG for plan-making, this suggests unmet need should be met through effective joint working and not deferred to subsequent Local Plan updates or reviews. We consider this has not been met and instead HDC are deferring meeting the full required unmet need.
- 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 the 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. The Landowners continue 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.

Large 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 1,500 dwellings are proposed to be allocated within the large villages, contributing only 23% of the allocations proposed within the Draft Local Plan, and 10% 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 client's 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 10% of the housing provision to the large villages within the Draft Harborough Local Plan to be an unsound approach. Large 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 1st April 2023, there have been 1,320 dwellings which have been completed or been committed to within large villages (as set out within Table 2 Policy DS01). This demonstrates that there is a demand for housing which has been successfully completed within the large villages in Harborough.
- 3.27 Within subparagraph 2c of Policy DS01, Harborough District Council have outlined four site allocations in large villages at Broughton Astley, Kibworth, Great Glen and Fleckney. 150 dwellings have been allocated within Fleckney at the Land north of Kilby Road and land west of Longgrey (F1). We consider given the scale and location of Fleckney it has the ability to support further proportionate growth across the District. The landowners site lies to the north of proposed allocation F1 and there is the potential for a future access point to be retained through the site to the proposed allocation. This would therefore make a logical extension to the village and been seen to be 'rounding off' development as this is restricted from further sprawl via the recent granting of the Wistow Lodge Farm Solar Scheme which lies to the north of the village (Planning Ref: 22/01133/FUL).
- 3.28 We consider that the Council should further review the proportion of housing being allocated to Large Villages and review how this is being distributed. As previously discussed, although HDC have opted for refined option 3 which seeks some distribution this is still largely targeted towards the urban areas and market towns. Therefore 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 additional allocations in large 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 and which are in sustainable locations. This includes, allocating sites such as land west of Leicester Road, Fleckney for 170 dwellings to meet the local housing needs.

Settlement Hierarchy

- 3.29 To support the Draft Harborough Local Plan and to inform the scale of growth for settlements, the Council have prepared a Settlement Hierarchy Assessment.
- 3.30 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)
- 3.31 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 large village (as a minimum), the settlement will need to receive a score of 100 or higher.
- 3.32 Within the Settlement Hierarchy Assessment, Fleckney is classed as the 5th overall largest settlement in the District and is a recognised large village. Fleckney received a settlement audit score 115. Although this is the same score as Great Glen, Fleckney has a larger population meaning it sits above. To be classed as a market town the settlement would need to receive a score of 150 as part of this assessment.
- 3.33 Within Table 4 of the Settlement Hierarchy Assessment, a large village is classed as having a good range of important and supporting services and facilities which includes a local supermarket, transport links and employment opportunities. It meets the day-to-day needs of its own residents as well as supporting surrounding rural communities. It is considered Fleckney has a good range of services and regular transport connections to both Market Harborough and Leicester. It is recognised that the village does not benefit from a secondary school however the range of services and access to the nearby major road network means a large village classification is appropriate. We agree with the assessment as Fleckney as a large village.
- 3.34 As set out during our previous submission, we consider it is appropriate for a reasonable level of growth to be directed towards Fleckney to cater for housing need and also support and maintain the use of existing facilities and service provision. Although the proposed F1 housing allocation has been put forward for 150 dwellings we consider further growth and development should be directed here to support the housing requirement across the District. Furthermore, within the Settlement Hierarchy Assessment this sets out the SHELAA assessment for Fleckney and recognises the village has a significant housing capacity of 962 dwellings which could be provided in 5 to 16 + years within the village. Although this would be subject to site specific constraints and the relationship between Fleckney and Saddington.
- 3.35 Within our previous submission we acknowledged Fleckney's close relationship with the village of Saddington and stated consideration needed to be given to prevent the coalescence of the two settlements. We previously set out how a high amount of past development has been directed to the south of Fleckney, nearing the Saddington border. We argued further consideration of the placement of future development within Fleckney needed to be carefully considered and locations should be considered to the north of the village. On this basis, we welcome the Council taking into account our response and directing the F1 proposed housing allocation towards the north of the village. We consider the additional allocation of the landowners site, which lies to the north of the proposed F1 allocation and to the south of the granted solar farm scheme (Planning Ref: 22/01133/FUL), is a sustainable location which would preserve the village from a landscape perspective and act as a robust village boarder. Our client's site at Land to the West of Leicester Road, Fleckney should be

appropriately supported in assisting in delivering future housing need within the most appropriate side of the village of Fleckney.

4. SITE SELECTION METHODOLOGY & HOUSING ALLOCATIONS POLICIES

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 Large villages, such as Fleckney have been recognised as part of this process and have the ability to support growth. We welcome growth being directed here however also consider further allocations should be recognised in smaller settlement hierarchy tiers rather than overall provision to support growth across the plan period.
- 4.5 When considering Table 4, looking at completions, commitments and the new local plan proposed allocations this outlines 19% of the overall growth will be within large villages. When considering the overall distribution of housing growth across the large villages, Fleckney is shown to have the largest total in comparison to the other villages within this tier. We consider this is reflective of the sustainable location of the settlement and it having strong access to other main built up areas such as Leicester and Market Harborough. We welcome development being directed towards Fleckney however consider as the settlement has been successful in past delivery and is a proven sustainable location further development can be supported here.
- 4.6 Within the 2024 SHELAA, the land west of Leicester Road, Fleckney was assessed (site reference: 8101). The site is considered as developable for 156 dwellings in 6 – 10 years. However the site was removed from consideration at Stage 3 of the Site Selection Process. The reason for this was due to following assessment against the development strategy and key policies it was considered “The site encroaches into open countryside to the northwest of Fleckney”. When considering all other Stage 3 site assessment criteria the site scores well and only due to the perceived encroachment on the countryside was the site not carried forward for detailed assessment.

- 4.7 We consider due to the changing context of the land surrounding the site, following the recent planning permission which has been granted for the Wistow Lodge Solar Farm (Planning Ref: 22/01133/FUL) that it has a significant impact on the site's relationship with the surrounding countryside and perceived encroachment. The site is contained by robust field boundaries and the Solar Farm Development prevents any further encroachment into the countryside. On this basis, we consider the site should be reassessed and carried forward for detail assessment as part of the Site Selection Methodology.

Policy SA02: Land South of Gartree Road

- 4.8 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.
- 4.9 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.
- 4.10 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.
- 4.11 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.
- 4.12 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.
- 4.13 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.

- 4.14 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.
- 4.15 We consider that 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.
- 4.16 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

- 4.17 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 Union Canal (MH1)
 - East of Market Harborough Road (MH2)
 - Land south of Gallow Field Road (MH3)
- 4.18 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.
- 4.19 Although the Policy consists of three different sites, these will all be required to be delivered in conformity with a single masterplan. This masterplan requires a coordination of built form, green infrastructure and that the sites need to demonstrate an integrated community. Furthermore, a phasing plan is required to ensure the delivery of key facilities and

infrastructure. Therefore, although identified as individual sites coordination is required in order to adhere to the requirements of the masterplan.

- 4.20 Due to the various sites which make up the allocation we consider this could have an impact on the logical timescales for delivery. Although they are collectively proposed as a 'cluster of sites' MH1 would be required to come forward first due to this neighbouring Market Harborough before the other sites which make up the allocation can come forward. MH1 seeks contribution towards significant infrastructure and a new three form entry primary school, early years provision and a new secondary school as well as community facilities. Furthermore part (g) of Policy SA03 seeks for a coordinated provision of infrastructure between the sites. Should MH1 face delays this would have implications on the delivery of the other sites which form this allocation (MH2 and MH3). This could in turn impact the delivery of MH2 as would increase the infrastructure costs which would have to be absorbed should MH1 not come forward as anticipated.
- 4.21 Although the individual quantum of housing to be delivered at each site is stated within the Proposed Submission Draft Plan, as these sites are proposed as a singular allocation which needs to adhere to an overarching masterplan and phasing plan, we consider it is appropriate to consider deliverability across the allocation as a whole. 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 that 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.
- 4.22 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 (MH1), only two years from adoption of the emerging Local Plan. Although we consider that housing on MH1 is likely to be the first to come forward out of the 'cluster sites', we still consider the proposed delivery rates as set out within the Housing Trajectory are unrealistic and should be put back. 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.
- 4.23 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.

- 4.24 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

- 4.25 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.
- 4.26 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.
- 4.27 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.
- 4.28 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.
- 4.29 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.
- 4.30 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.
- 4.31 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

- 4.32 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.
- 4.33 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.
- 4.34 To rectify this shortfall, we consider Council should provide further allocations in order to ensure that the housing needs of Harborough are met within the short term. The land west of Leicester Road, Fleckney is deliverable, suitable, and available to provide 170 dwellings within the initial years of adoption of the Plan. The site is currently subject to a live policy compliant planning application. Therefore, the allocation of this site would see that some short term needs are met in a sustainable location within Harborough.

Table 1.1 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 1.2 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 our Regulation 18 submission 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 WEST OF LEICESTER ROAD, FLECKNEY

- 6.1 Land to the west of Leicester Road, Fleckney is being promoted by Barratt David Wilson Homes (North Midlands) and Mr Charles John Halford Brooks to accommodate up to 170 dwellings over approximately 9 Ha of land adjoining the Large Village of Fleckney.

Site Characteristics and Context

- 6.2 The village of Fleckney is located in the centre of the District and lies between Market Harborough and the Urban Area of the District which adjoins Leicester City and Oadby and Wigston. As outlined above Fleckney is recognised as a large village within the settlement hierarchy and is the 5th overall largest settlement in the District (according to the Settlement Hierarchy Assessment 2025).
- 6.3 The village of Fleckney is a linear settlement which stretches north to south, with varying amenity provisions located throughout the village. Local services and amenities include: a primary school, a Co-Op supermarket, post office, pharmacy, two GP surgeries, two public houses, several hair salons, a village hall, and a sports centre. Fleckney is also home to a large employment site which is located towards the south end of the village.
- 6.4 Leicester Road provides good onward connections from the site to surrounding areas. Leicester is located 8km to the north of the site, with Market Harborough located 10km to the south-east. These larger settlements provide a further range and access to various services including secondary schools, hospitals and leisure facilities.
- 6.5 The nearest bus stop is located on Leicester Road approximately a 250m walk from the centre of the site. The bus stop is within walking distance, approximately a 3-minute walk from the site, and offers regular bus services from Fleckney to Leicester City Centre which run approximately every 60 minutes. Further along Leicester Road, approximately 620m (7 minute walk) from the site lies additional bus stop provision which provides bihourly services to Market Harborough.
- 6.6 The nearest railway station is located in South Wigston and is approximately 7.3km northwest of the site, this equates to approximately a 15-minute drive from the Site. The station offers rail services connecting to Leicester and Birmingham New Street.
- 6.7 As outlined above the site is currently subject to a live policy compliant outline planning application for the development of up to 170 dwellings (with all matter reserved except for access) (Planning Reference: 25/00400/OUT). This application is currently being determined with an anticipated determination deadline of the 24th June 2025. The Draft Framework Plan, submitted to support the application can be viewed at Appendix 3, this plan also shows a potential future access route can be achieved through to the F1 proposed allocation which lies to the south of the site. The submission of the application outlines the Landowners clear commitment to bring the site forward for development. The site is suitable, deliverable and available for residential development and can support the delivery of residential units early in the plan period (the first 0-5 years). Land at Leicester Road, Fleckney can be planned and

delivered comprehensively, in accordance with statutory requirements, to form a logical extension to the settlement of Fleckney.

Sustainability Appraisal – Site Assessment

- 6.8 The site west of Leicester Road, Fleckney was assessed as part of the Site Selection Report against the objectives as set out within the Sustainability Appraisal. As outlined above, the site was not carried forward for further detailed assessment or considered as an allocation due to it being discounted at Stage 3 in the process due to the site being viewed to encroach on the open countryside to the northwest of Fleckney.
- 6.9 As set out above we consider this is an inaccurate assessment and should be updated to reflect the surrounding nature and context of the site and the impact on the surrounding landscape following recent granted permissions and changes to the countryside in this location.
- 6.10 Furthermore, we have undertaken a review of the site against the SA objectives, this is summarised in Table 6.1 below. This has been compared to the SA assessment of the Proposed Allocated Site F1. Please note that some SA Objectives have been omitted from the below table due to these being scored '0' meaning they have a negligible effect.
- 6.11 We consider further clarification from the Council is required in relation to the assessment of the proposed site allocation F1 (SHELAA Ref: 24/10042) as within the Sustainability Appraisal – Chapters Report and the Sustainability Appraisal Appendix 4: Technical Site Assessments different scores are provided in comparison to the SA objectives (as shown in Table 6.1 below).

Site	SA2	SA3	SA4	SA6	SA8	SA9	SA10	SA13	SA14
Land West of Leicester Road, Fleckney (21/8101) – As set out within SA Chapters Report	-?	?/0	-?	+	0/+?	+	+	+	?
Land North of Fleckney Fields (24/10042) (Proposed Site Allocation F1) – As set out within SA Chapters Report	-?	?/0	-?	+	0/+?	+	+	+	?

Land North of Fleckney Fields (24/10042) (Proposed Site Allocation F1) – As set out within SA Appendix 4	-?	--?/0	-?	+	0/+?	+	+	+	--?
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Table 6.1 SA Summary Table for Land West of Leicester Road, Fleckney and Proposed Site Allocation F1

6.12 It should be noted that the proposed site allocation at the land west of Leicester Road, Fleckney score the in relation to the SA objectives as set out within the SA Chapters Report and better when considering against Appendix 4 in relation to SA3 and SA14 which considers resources and the use of the most best and versatile agricultural land and implications on landscape.

6.13 We consider the Council need to clarify which assessment of the proposed allocation F1 (SHELAA Ref: 24/10042) is correct. Nonetheless, it is show that the Landowner/client’s site at land west of Leicester Road, Fleckney scores the same if not better in relation to the SA objectives however has not been put forward as a proposed allocation for development.

Conclusion

6.14 As discussed above we consider there is a need for further sites to be allocated in order to meet the required 80% transitional arrangements as well as the unmet need from Leicester City. This is further reinforced through the identified above allocations which we consider to be unrealistic and undeliverable as per HDC’s proposed targets which are anticipated under the housing trajectory. On this basis, we consider further sites needs to be allocated to meet the increased housing targets and likely delays to allocations.

6.15 The site west of Leicester Road, Fleckney scores the same against the SA criteria as the other site proposed for development within the settlement with the only reasoning behind not carrying the site forward being due to encroachment on the countryside. Which as set out above, we consider should be reassessed taking into account the location context and planning permission for recent solar scheme.

6.16 Land West of Leicester Road, Fleckney is a suitable, deliverable, and available site for allocation in order to provide growth across the plan period that is supported by a technically sound planning application (25/00400/OUT).

7. CONCLUSION

- 7.1 These representations have been prepared by Boyer on behalf of Barratt David Wilson Homes (North Midlands) & Mr Charles John Halford Brooks in response to the Harborough District Council Regulation 19 Proposed Draft Local Plan Submission Consultation.
- 7.2 These representations build on and expand further on our previous representations prepared and submitted on behalf of Barratt David Wilson Homes (North Midlands) & Mr Charles John Halford Brooks in response to the Harborough District Council Issues and Options (Regulation 18) Consultation which took place in February 2024.
- 7.3 Barratt David Wilson Homes (North Midlands) & Mr Charles John Halford Brooks are the respective landowners, developer and promoters who have an interest in the development at Land to the west of Leicester Road, Fleckney which is subject to a live outline planning application (25/00400/OUT) and has the potential to deliver up to 170 dwellings.
- 7.4 However, 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 positively prepared in line with the requirements of the NPPF (December 2023). 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.
- 7.5 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.
- 7.6 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.
- 7.7 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.
- 7.8 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. HARBOROUGH RURAL CENTRES LANDSCAPE ASSESSMENT (2014)

Site Assessment and Associated Plans

Site Assessment

This site is suitable and available for major residential development and associated facilities. It is both deliverable and developable offering the prospect of approximately 220 dwellings in one of the District's key Rural Centres which is set to provide housing, business, retail, leisure and community facilities to serve the needs of Fleckney and the surrounding areas.

Land at Leicester Road, as highlighted in red on Plan 1, can be planned and delivered comprehensively to form a logical extension to the settlement of Fleckney.

In location and sustainability terms, **this site:**

- a) **Represents** a logical extension to the settlement of Fleckney abutting existing residential development;
- b) **Offers**, in conjunction with adjoining land immediately to the south, the prospect of enhanced local connectivity through pedestrian and vehicular improvements on the north western side of the settlement i.e. between Leicester Road and Kilby Road;
- c) **Provides** an opportunity to deliver much needed housing to meet Harborough District's indigenous housing requirement;
- d) **Assists** in meeting Leicester City's "indigenous" housing requirement given the latter is unable to do so; and
- e) **Is** well located for the proposed A46 Growth Corridor which will involve the creation of a new junction onto the M1 and linking with the A46 Western Bypass. As such, the proposed site is in a sustainable location on the southern side of Leicester within close proximity to the City.

Against the above additional information, due consideration should be given to land at Leicester Road, Fleckney being identified for major residential development as a proposed Housing Allocation in due course.



Planning Director
Barratt David Wilson Homes North Midlands

Plan 1 – Site Location Plan

LEGEND

— Contract Boundary



NOT TO BE USED FOR CONSTRUCTION PURPOSES. THIS PLAN IS FOR INFORMATION ONLY. THE CONTRACTOR SHALL VERIFY ALL DIMENSIONS AND LOCATIONS ON THE GROUND. THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND APPROVALS. THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND APPROVALS.

No.	Description	Issue	Date



CONTRACT PLAN

BARRATT CONSTRUCTION

Day No: **LRF/CP** Plan No:

Date: **1/10/2024** Scale: **AS SHOWN**

NORTH MIDLANDS
Contract & Technical Department
 2 Welton Road, Lutterworth, Leicestershire, LE15 7EJ

APPENDIX 2. PREVIOUS ENGAGEMENT WITH HDC



3rd May 2022

Our Ref.: Site Form ID: 8101 – Land Off Leicester Road, Fleckney

Planning Policy Department
Harborough District Council
The Symington Building
Adam & Eve Street
Market Harborough
LE16 7AG

Dear Sirs

Harborough Strategic Housing and Economic Land Availability Assessment (HSHELAA) 2021:
Technical Consultation Between 20th April And 4th May – Barratt Developments PLC, North
Midlands Division;

Site Form ID: 8101 - Land Off Leicester Road, Fleckney;

Further to your recent email dated 20th April 2022 to my colleague Charlotte Readman - Holland, Senior Land Manager, please find detailed below additional information in relation to our initial submission (Form Number 8101) relating to land located off Leicester Road, Fleckney.

As part of the District Council's 'Assessment of Site Suitability', this particular site has not been assessed due to the presence of an existing gas main crossing part of the site. We submit this additional response to the Technical Consultation allowing due consideration and assessment, given the District Council's failure to (fully) reflect the genuine prospect of major residential development at this location.

The presence of the gas main does not represent an 'absolute constraint' to development. We are aware of its existence (and alignment), as detailed within our 'Section 15, Call for Sites Form', and confirm discussions have occurred with the Asset Holder (Cadent/National Grid) regarding our intention to progress major residential development at this location. Where normal easements are maintained, in accordance with the requirements of the Asset Holder, the site can be brought forward for major development. The alignment of the gas main crossing the site is indicated on the attached plan with the extent of the easement also indicated.

This particular site is suitable and available for residential development and associated facilities. Land at Leicester Road can be planned and delivered comprehensively, in accordance with statutory requirements, to form a logical extension to the settlement of Fleckney.



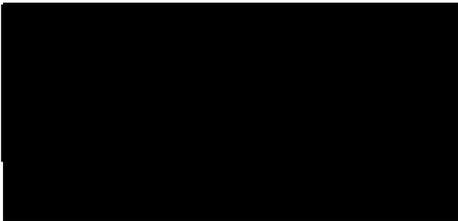
The presence of the gas main does **not** preclude major residential development nor does it represent an 'absolute bar' providing it is reflected in the overall design.

We have undertaken similar types of major residential development and associated facilities in other locations within the East Midlands Region i.e. Newton Solney, South Derbyshire District and Bourne, South Kesteven District acknowledging the presence of such gas mains - on site - with the endorsement of the Asset Holder. In respective cases, the 'gas main' has been incorporated successfully, through site masterplanning.

I trust the District Council will review the current position following receipt of this additional information. Please contact me if you require any further clarification on any of the above matters or you'd like to meet to discuss this particular item thereby enabling both principal parties to clear up any ambiguity and/or misunderstanding surrounding this site and its 'genuine' availability for major residential development.

My contact details are contained below and I look forward to hearing from you.

Yours faithfully



Planning Director

Barratt Homes - North Midlands Division



APPENDIX 3. DRAFT FRAMEWORK PLAN – SUBMITTED TO SUPPORT 25/00400/OUT

Notes:
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 Do not scale from this drawing. All contractors must visit the site and be responsible for taking and checking Dimensions.

- Key:**
-  Application boundary (8.81 ha // 21.77 ac)
 -  Residential development area (4.69 ha // 11.59 ac)
 -  Infrastructure
 -  Proposed access/egress for all modes (subject to detail design)
 -  Indicative primary route (subject to detail design)
 -  Indicative secondary route (subject to detail design)
 -  Potential future connection (subject to detail design)
 -  Potential future access/egress for all modes (subject to detail design)
 -  Proposed pathways
 -  Existing public right of way (PRoW)
 -  Indicative key frontages
 -  Proposed indicative location for attenuation basin (subject to detail design)
 -  Indicative location of pumping station
 -  15m buffer for pumping station (no-build)
 -  Proposed multi-functional greenspace
 -  Existing category A trees/hedges
 -  Existing category B trees/hedges
 -  Existing category C trees/hedges
 -  Local Area of Play (LAP)
 -  Locally Equipped Area of Play (LEAP)
 -  Electricity Line - 30m buffer each side
 -  Gas pipeline - 12m buffer each side
- Granted Solar Farm - Ref: 22/01133/FUL



*for approval

Rev	Date	Description	Drawn	Chkd
C	27.02.25	Layout revision	DB	SK
B	13.02.25	Amended main road	CR	NB
A	10.02.25	Amended developable area	CR	NB
-	29.01.25	First Issue	CR	NB

Client:
BDW North

Boyer

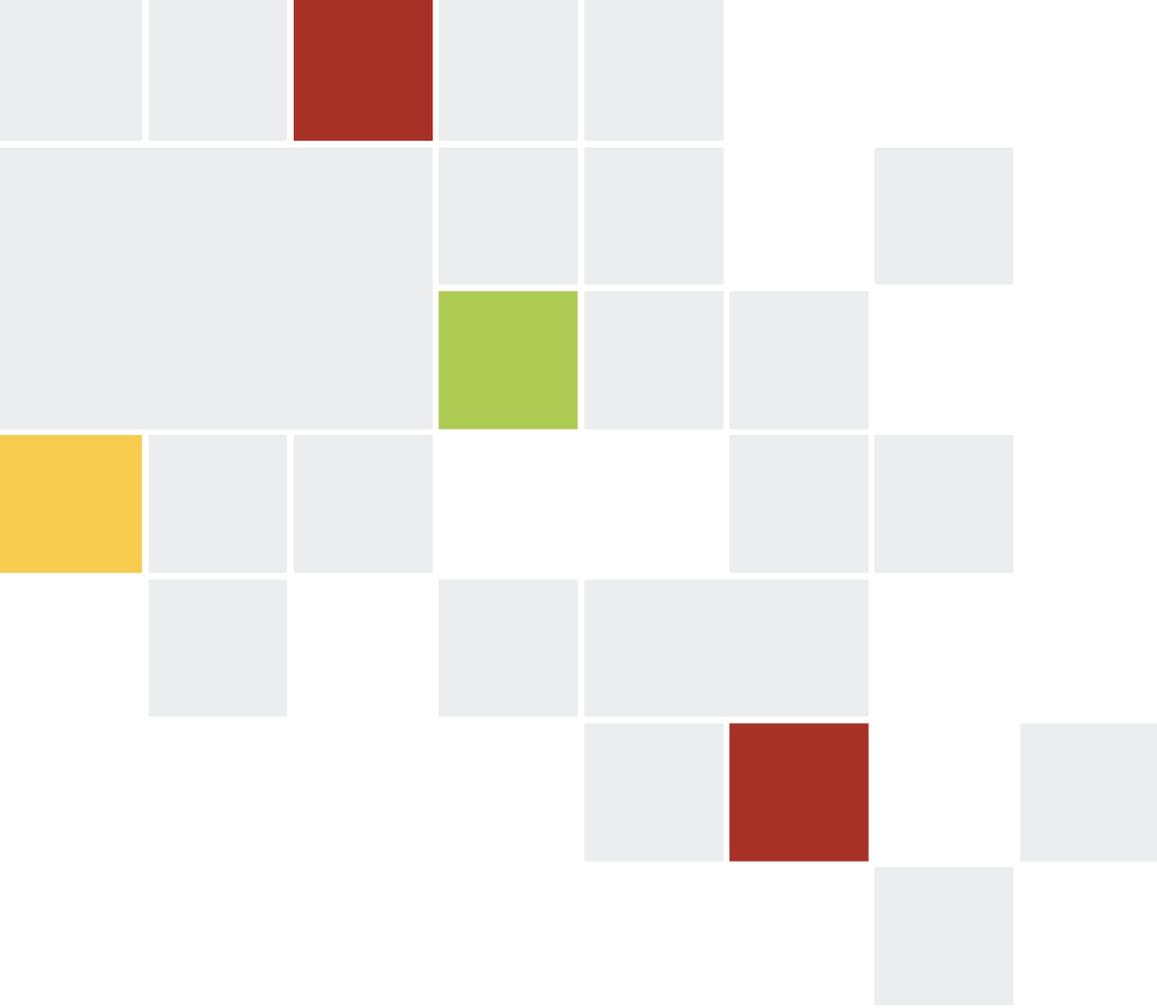
Project
Land West of Leicester Road
Fleckney

Drawing Title
Draft Framework Plan

Drawing No: DFP-01 Job Ref: 25.2002
 Scale @ A2: 1:1250 Revision: C



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