

# Proposed Submission Draft Harborough Local Plan 2020-2041 Representation Form



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

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

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

## Part A: Part A only needs to be completed once

### 1. Personal details

### 2. Agent's details (if applicable)

Title  
First Name  
Last Name  
Organisation (where relevant)  
Address Line 1  
Address Line 2  
Address Line 3  
Post Code  
Email



Title  
First Name  
Last Name  
Organisation (where relevant)  
Address Line 1  
Address Line 2  
Address Line 3  
Post Code  
Email

Title
First Name
Last Name
Organisation (where relevant)
Address Line 1
Address Line 2
Address Line 3
Post Code
Email

**Part B:**

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

# Representation Form

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

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

*E.g. Paragraph/Policy/Map/Other*

Housing Requirement Duty to Cooperate Location of Development
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**Do you consider the Local Plan to be legally compliant?**

Yes  No

**Do you consider the Local Plan is sound?**

Yes  No

**Does it comply with the Duty to Cooperate?**

Yes  No

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

Positively prepared  Justified  Effective  Consistent with National Policy

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

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

Please find attached Gladman's full representation.

*Continue on next page*

*Continue on a separate sheet/ expand box if necessary*

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

The Local Plan is unsound. It should not be submitted for examination. The proposed housing requirement in the Local Plan clearly underestimates housing need for the authority. Consequently, Policy DS01 Development Strategy: Delivering Homes is neither positively prepared, justified, effective or consistent with national policy. It is therefore 'unsound'. On this basis the Plan is likely to fail without a fundamental review of the proposed housing requirement.

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

The Council should reconsider its position and revise the housing requirement to account for the area's full housing need including the revised standard method and a new allowance for future unmet needs from Leicester City.

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

Yes  No

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

The proposed housing requirement in the Local Plan clearly underestimates housing need for the authority. Gladman have land interests in the District.

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

**Do you wish to be notified?**

- When the Plan is submitted for independent examination?
- When the Inspector's Report is published?
- When document is adopted?

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



# Harborough District Council Local Plan

## Regulation 19 Proposed Submission Consultation

May 2025



[gladman.co.uk](https://www.gladman.co.uk)



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# 1 INTRODUCTION

## 1.1 Context

- 1.1.1 Gladman Developments Ltd. (Gladman) welcome the opportunity to comment on the Harborough District Council Local Plan Proposed Submission consultation and request to be updated on future consultations and the progress of the Local Plan.
- 1.1.2 Gladman specialise in the promotion of strategic land for residential development and associated community infrastructure and have considerable experience in contributing to the development plan preparation process having made representations on numerous planning documents throughout the UK alongside participating in many Examinations in Public. Gladman has been involved throughout the plan preparation process of the emerging Harborough Local Plan, having previously submitted representations as part of the previous Regulation 18 consultation in February 2024.
- 1.1.3 Gladman has land interests in Harborough which are being promoted through the emerging Local Plan at Coventry Road, Broughton Astley which is being promoted for residential use. The site could deliver up to 200 units and is available, suitable, and deliverable for housing as summarised in Section 3.2 of this representation.
- 1.1.4 Gladman contend that there is a need for the Council to address the housing requirement in the plan to ensure that the district's housing needs, and unmet needs from neighbouring Leicester City, are fully met, therefore there is a cogent case for these sites to be identified as housing allocations in a subsequent version of the emerging Local Plan.
- 1.1.5 Gladman consider the Local Plan fundamentally unsound in its current form. The proposed housing requirement is inadequate and will not address the actual housing needs of the area. The failure to address this clear demand will only perpetuate the acute socio-economic consequences of the ongoing housing crisis through a lack of available and affordable housing. It will also stymie the economic growth in the area contrary to the Leicester and Leicestershire Economic Growth Strategy.

1.1.6 It is clear that progress of the Local Plan has been accelerated so that it proceeds under the previous NPPF (2023) rather than the latest NPPF (2024) to evade the increased housing requirement originating from the revised standard method.

1.1.7 The Government has made its position clear- authorities should not be submitting deficient plans for examination believing that the Inspector(s) will use significant time and resources to address the fundamental soundness issues. Given the concerns regarding the housing requirement, Gladman assert that the plan should not be submitted for examination.

1.1.8 Rather, the Council should revise the Local Plan housing requirement to account for the area's full housing need including the revised standard method and the allowance for unmet need from Leicester City beyond that already planned for.

## 1.2 National Planning Policy Framework

1.2.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied within which plan-making and decision-taking. The NPPF requires plans to set out a vision and a framework for future development and seek to address the strategic priorities for the area. Local Plans should be prepared in line with procedural and legal requirements and will be assessed on whether they are considered 'sound'.

1.2.2 The National Planning Policy Framework sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is:

- **Positively Prepared** – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- **Justified** – the plan should be an appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.

- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

1.2.3 The NPPF reaffirms the Government’s commitment to ensuring up-to-date plans are in place which provide a positive vision for the areas which they are responsible for, to address housing, economic, social and environmental priorities and to help shape the development of local communities for future generations.

#### **Transitional Arrangements**

1.2.4 Paragraph 234 of the NPPF (2024) outlines the transitional arrangements for emerging Local Plans. It outlines that plans that reach Regulation 19 stage on or before the 12<sup>th</sup> March, and where the draft housing requirement meets at least 80% of the Local Housing Need, should progress and be examined under NPPF 2023.

1.2.5 In this respect, the Council contend that as the proposed housing requirement in the Local Plan (657 dpa) meets 90% of the new standard method figure (723 dpa), the Local Plan will be examined and adopted under these transitional arrangements whereby the policies in the previous version of the Framework apply.

1.2.6 The 80% threshold is only achieved, however, by incorporating the previously agreed commitment of 123 homes per year toward the Leicester City’s unmet need. Thus, the proportion of the housing requirement to meet Harborough’s local housing needs is 534 which is only 73.8% of the new Harborough standard method figure.

1.2.7 Gladman question whether the transitional arrangements should be applied in this case, given that a substantial proportion of the proposed housing requirement is to meet the housing needs of another area. If this approach is maintained and endorsed, the gap between the proposed housing requirement in the Local Plan and the Local Housing Need would be the equivalent of a just under 4,000 home shortfall across the plan period. This is ahead of factoring in an additional unmet need that will inevitably arise from Leicester City.

- 1.2.8 The approach taken by the Council quite clearly does not represent positive, justified or effective plan-making. It is a cynical approach that contradicts the Government's wider recasting of policy to drive growth and tackle the entrenched national housing crisis. The Local Plan has been fundamentally fast tracked towards submission, with the driver for that being to limit growth to the absolute minimum and circumvent the significant increase in local housing need and future unmet needs from Leicester City for as long as possible.

### **1.3 Duty to Cooperate**

- 1.3.1 Gladman is aware of the work in Leicester and Leicestershire under the Duty to Cooperate to try and address unmet housing needs of Leicester. We welcome the Statement of Common Ground between the Leicestershire authorities and the efforts to redistribute the unmet housing needs of Leicester amongst the Leicestershire Authorities. However, the latest SoCG is from 2022 and there have been significant contextual changes since then, notably the Leicester EIP, the ongoing Charnwood EIP and changes to the NPPF and the Standard Method calculations. Gladman therefore recommend that the SoCG is reviewed and updated to reflect the work that is progressing now that Leicester's EIP has concluded, and what impact if any the challenges raised in Charnwood's EIP may have on this Plan.
- 1.3.2 The Council will need to ensure that it can fully demonstrate that it has effectively with all the neighbouring areas with regard to housing needs. In particular the council will need engage with its partners to produce appropriate and up to date Statements of Common Ground to reflect the latest evidence available to the Council, including the implications of the Leicester and Charnwood EIPs.

## 2 HARBOROUGH LOCAL PLAN SUBMISSION DRAFT

### 2.1 Overall Development Strategy

#### Policy DS01 Development Strategy: Delivering Homes

- 2.1.1 This policy outlines that the housing requirement for Harborough District is 13,182 between 2020 and 2041. The annual housing requirement is 657 homes per year between 2020 and 2036, and 534 homes per year between 2036 and 2041. This is derived from the previous Local Housing Need figure for Harborough of 534 homes per year, plus the established unmet need proportion arising from Leicester City of 123 homes per year (between 2020-2036). The housing requirement drops from 2036 as the unmet need for Leicester City is no longer accounted for.
- 2.1.2 As per the transitional arrangements outlined in paragraph 234, as the emerging Local Plan reached Regulation 19 on the 10<sup>th</sup> March ahead of the deadline of 12<sup>th</sup> March, the plan can progress as long as it plans for at least 80% of the updated Local Housing Need to progress. This would mean that the Local Plan housing requirement must be at least 578 dwellings per year (80% of 723 dwellings per year).
- 2.1.3 However, the previous Local Housing Need was 534 which is only 73.8% of the updated standard method requirement. Therefore, to progress with this percentage of the district's need is unsound. It would also not be sufficient to simply boost this requirement to 578 without robust evidence to justify the uplift.
- 2.1.4 By adding Leicester's unmet need to the previous Local Housing Need figure, the Council are artificially conflating their proposed housing requirement. It is our view that the Council have erroneously sought to incorporate the previously committed 123 dwellings per annum into the proposed housing requirement to assist in meeting the transitional arrangements set out within paragraphs 234 and 236 of Annex 1 in the NPPF (2024).
- 2.1.5 Should the unmet need not be incorporated into the total identified housing requirement, the requirement will reduce to 534 dwelling per annum which is only 73.8% of the updated Local Housing Need figure and therefore does not meet the

80% threshold. In the context of paragraph 62 of the NPPF (2023), any unmet need incorporated or planned for as part of the emerging Local Plan should be in addition to the identified housing need.

#### Plan Period

- 2.1.6 The proposed plan period for the Harborough Local Plan is 2020-2041. Gladman do not support a plan-period that starts in 2021, four years prior to the Local Plan being submitted for examination.
- 2.1.7 The standard method already factors into account previous delivery as part of the affordability stage. Therefore, it is not logical or consistent with national policy for the plan-period to start several years prior to the point at which development needs were assessed. It should start in the year in which the assessment was calculated, in this case, 2022. The plan period should therefore be modified and the associated impact on requirement and supply be addressed through additional plan years if needed and supporting allocations to deliver any deficit.

#### Trajectory

- 2.1.8 Gladman are concerned that the trajectory does not break down commitments into specific sites but rather groups them into one annual figure. Gladman do not consider this to be a robust trajectory as it is not possible to assess the validity of the timescales of delivery proposed for committed sites. For example, the commitments include Lutterworth East that has faced significant delays since securing planning permission in 2023, yet the expected delivery rate is not specifically noted. Without a developer on board 1,500 dwellings could not be deliverable, and the Council has not provided any compelling evidence to demonstrate said deliverability. Subsequently there remains a significant risk that the delivery of these sites will continue to be delayed. As such, the continued reliance on these sites as source of housing supply is problematic.

### Windfall Allowance

- 2.1.9 In relation to windfalls, the NPPF (2023/2024) only permits an allowance for windfall sites where there is compelling evidence that such sites have consistently become available and will continue to be a reliable source of supply. Gladman contend that any supply provided by windfall sites should be in addition to the buffer added to the housing need figures derived from the Standard Method to provide choice and competition in the land market. However, by including windfalls within the Plan's housing requirement supply, any opportunity for windfalls to provide some additional housing numbers and flexibility is removed. Windfalls do not provide the same choice and flexibility in the market as additional allocations, thus Gladman have concerns regarding the Council's reliance on windfall in place of allocating housing sites.

### Conclusions and Recommendations

- 2.1.10 The proposed housing requirement in the Local Plan clearly underestimates housing need for the authority. Consequently, Policy DS01 Development Strategy: Delivering Homes is neither positively prepared, justified, effective or consistent with national policy. It is therefore 'unsound'. On this basis the Plan is likely to fail without a fundamental review of the proposed housing requirement.
- 2.1.11 If the Local Plan does proceed to examination under the NPPF (2023) there will be a substantial shortfall in the number of homes the Council should be planning for based on the new NPPF (2024). In this context it is of fundamental importance that the LPR includes a specific review policy clearly detailing that the Council will immediately start preparing a new plan to address this sizeable shortfall.
- 2.1.12 To ensure that this policy is effective it will need to have consequences. The following wording is put forward for consideration :
- "The Local Planning Authority will undertake a review of the Local Plan immediately following the adoption of this plan. An updated or replacement plan will be submitted for examination no later than 30 months after the date of adoption of the plan.*

*The replacement plan will secure levels of growth that accord with government policy, serve to build stronger working relationships with adjoining and nearby authorities and accommodate any apportionment of unmet housing and employment needs that have been agreed.*

*In the event that this submission date is not adhered to, the policies in this Local Plan Review which are most important for determining planning applications for new dwellings will be deemed to be 'out of date' in accordance with paragraph 11 d) of the National Planning Policy Framework."*

### **Location of Development**

- 2.1.13 Table 1: Settlement Hierarchy outlines the district's most sustainable settlements. Gladman support Broughton Astley's inclusion as a Large Village. This suitably reflects the range of services, facilities and public transport links available to residents and therefore its suitability for growth across the plan period.
- 2.1.14 In Table 2: District Land Supply Position by Settlement, Broughton Astley is expected to deliver 2,820 homes between 2020-2041, including 475 homes allocated in this plan. Land East of Frolesworth Road was assessed under 21/8218 and Land off Coventry Road was assessed under 24/10135. Both sites scored comparably, with the only difference relating to flood risk. Gladman propose no built development in the area of Flood Zone 2 and 3 to the west of the site and this land will remain as functional flood zone for the River Soar. Therefore, as Gladman consider that additional sites will need to be found to address the shortfall in housing requirement, the Local Plan and Sustainability Appraisal supports additional growth in Broughton Astley which can be delivered south of Coventry Road.

## **2.2 Key Development Sites**

### **Policy SA01: Site Allocations**

- 2.2.1 The Local Plan is required to set out a logical settlement hierarchy which meets all the housing needs and addresses all areas of the housing market, with a range of sites proposed for allocation. The Plan should provide for a wide range of deliverable

and developable sites across the area in order to provide competition and choice to ensure that housing needs are met in full. Gladman recommend a dispersed spatial strategy that ensures all housing needs are met across the district.

- 2.2.2 As Gladman consider that the current housing requirement is unjustified and consider that the Council should be planning for a higher housing requirement, we would also be supportive of additional sites in additional locations being allocated. Gladman are promoting Land at Coventry Road, Broughton Astley for residential development. The site is suitable, deliverable and developable and will contribute to the provision of much needed market and affordable homes.

## 2.3 Strategic Policies for Housing

### **Policy HN01 Housing Need: Affordable Homes**

- 2.3.1 The policy requires that "To meet the need for affordable housing 40% of the total number of homes in residential developments of 10 or more homes (or capable of delivering 10 or more homes) must be affordable."
- 2.3.2 Gladman do not consider this approach is justified, based on the Aspinal Verdi whole plan viability appraisal which already shows that some sites are not viable. The report states that "despite viability being challenging within Lower Value Greenfield and Brownfield typologies, we recommend Harborough District Council adopt a blanket rate of 40% affordable housing across the District." Gladman do not consider that there is suitable justification for this approach.

### **Policy HN05 Housing Need: Self and Custom Build Housing**

- 2.3.3 The Council will require 10% of homes on sites of 40 or more dwellings to be delivered as self-build homes or as custom housebuilding. Gladman consider that evidence is required to understand the need for custom and self-build housing in Harborough. As currently proposed this policy will not assist in boosting the supply of housing and may even limit the deliverability of some sites and homes. In the context of insufficient housing requirement, robust evidence is required to justify this requirement on sites of 40 or more dwellings.

- 2.3.4 Gladman recommend that the policy sets out that following a 12 month marketing period any plots that remain unsold revert back to the developer to be delivered as market housing. This will ensure that there is no delay in the delivery of these homes.

## **2.4 Monitoring and Delivery**

### **Policy IM01: Monitoring and Review of the Local Plan**

- 2.4.1 If the Local Plan does proceed to examination under the NPPF (2023) there will be a substantial shortfall in the number of homes Harborough should be planning for based on the new NPPF (2024). In this context it is of fundamental importance that the LPR includes a specific review policy clearly detailing that the Council will immediately start preparing a new plan to address this sizeable shortfall. As outlined earlier in this representation, a robust commitment to an early review is required.

## **3 SITE SUBMISSION PROFILES**

### **3.1 Introduction**

- 3.1.1 As set out in these representations, the Local Plan is unsound. It should not be submitted for examination. The Council should take a step-back, reconsider its position and revise the housing requirement to account for the area's full housing need including the revised standard method and a new allowance for future unmet needs from Leicester City.
- 3.1.2 In doing so the Local Plan must inevitably identify additional sites to meet the uplifted housing requirement. Gladman are promoting land in Broughton Astley for residential-led development that accords with the proposed spatial strategy and can assist in maintaining a deliverable supply of housing land in the early part of the plan-period.

### **3.2 Land at Coventry Road, Broughton Astley**

- 3.2.1 The site is located to the south of Coventry Road to the west of the settlement. Measuring circa 22 hectares, the site is bound by built development to the east, open countryside to the south, the River Soar and the Mill on the Soar Hotel to the west, and emerging commercial development to the north (21/01803/REM and 24/00528/OUT). The site is a logical extension to Broughton Astley, allowing new and existing residents to access the strategic road network without travelling through the village centre.
- 3.2.2 The majority of the site is in Flood Zone 1. The western boundary is within Flood Zones 2 and 3, associated with the River Soar in this location. No built form is proposed here, and the land will remain as functional flood land and open space. This will also serve to provide a soft edge to the development.
- 3.2.3 There are no heritage assets on the site or adjacent to the site. The closest Listed Buildings are the Grade II Baptist Chapel, Quaker Cottage and The Stone House. These are located north of Broughton Way, off Sutton Lane and are well screened from the development site.

- 3.2.4 Pylons run across the site from the north western corner to the south eastern corner. These will be retained on site and the required swing distances will be incorporated into the masterplan. This area will create a significant area of public open space in the centre of the site that will provide connections to the existing Public Right of Way Network.
- 3.2.5 A range of services and facilities are located within walking distance of the site, including but not limited to pubs, a supermarket, medical centre, a small selection of shops, restaurants and takeaways, Orchard CofE primary school and a nursery. Therefore, this is a highly sustainable location for growth that will reduce the reliance on the private car when residents meet their day to day needs.
- 3.2.6 Gladman would welcome the opportunity to discuss the site with the Council.



Figure 1: Land South of Coventry Road, Broughton Astley

## 4 CONCLUSIONS

### 4.1 Summary

- 4.1.1 Gladman welcomes the opportunity to comment on the Local Plan that the Council intend to submit for examination. These representations have been drafted with reference to the revised National Planning Policy Framework (NPPF 2024) and the associated updates that were made to Planning Practice Guidance.
- 4.1.2 Gladman have provided comments on a number of the issues that have been identified in the Council's consultation material and recommend that the matters raised are carefully explored during the process of undertaking the new Local Plan.
- 4.1.3 As set out in these representations, the Local Plan is unsound. It should not be submitted for examination. The proposed housing requirement in the Local Plan clearly underestimates housing need for the authority. Consequently, Policy DS01 Development Strategy: Delivering Homes is neither positively prepared, justified, effective or consistent with national policy. It is therefore 'unsound'. On this basis the Plan is likely to fail without a fundamental review of the proposed housing requirement.
- 4.1.4 The Council should take a step-back, reconsider its position and revise the housing requirement to account for the area's full housing need including the revised standard method and a new allowance for future unmet needs from Leicester City. We hope you have found these representations informative and useful towards the preparation of the Harborough Local Plan.
- 4.1.5 Gladman welcome any future engagement with the Council and if you would like to discuss this representations or other matters, please contact us at [policy@gladman.co.uk](mailto:policy@gladman.co.uk).

