

02 May 2025

Project Ref: 333101943

VIA EMAIL: planningpolicy@harborough.gov.uk

Dear Sir / Madam,

RE: Submission Draft Harborough Local Plan 2020-2041: Regulation 19 Consultation

Introduction

These representations have been prepared by Stantec on behalf of our client, The Co-operative Group, in response to the Submission Draft (Regulation 19) Harborough Local Plan ('the Draft Plan') consultation, which closes on 6th May 2025.

Our Client has a joint land interest with the University of Leicester at the 'Land South of Gartree Road and East of Stoughton Road, Oadby' ('the Site') which falls within the administrative boundary of Oadby and Wigston Borough Council (OWBC). Whilst the Site is located outside of Harborough District Council (HDC), it bounds the 'South of Gartree Road Strategic Development Area' in the Draft Plan which is a cross-boundary allocation which straddles the two Councils.

Our Client welcomes the progress of the Local Plan and strongly supports the intention to prepare a Plan which meets development needs over the next plan period and beyond (including cross-boundary matters and a Duty to Cooperate). The purpose of these representations is, therefore, not to test for or object to the Draft Plan on the grounds of soundness, but to provide a constructive commentary to ensure that our Client's Site can be brought forward without being prejudiced by the cross-boundary allocation and the infrastructure and funding which will be necessary for its delivery.

Context

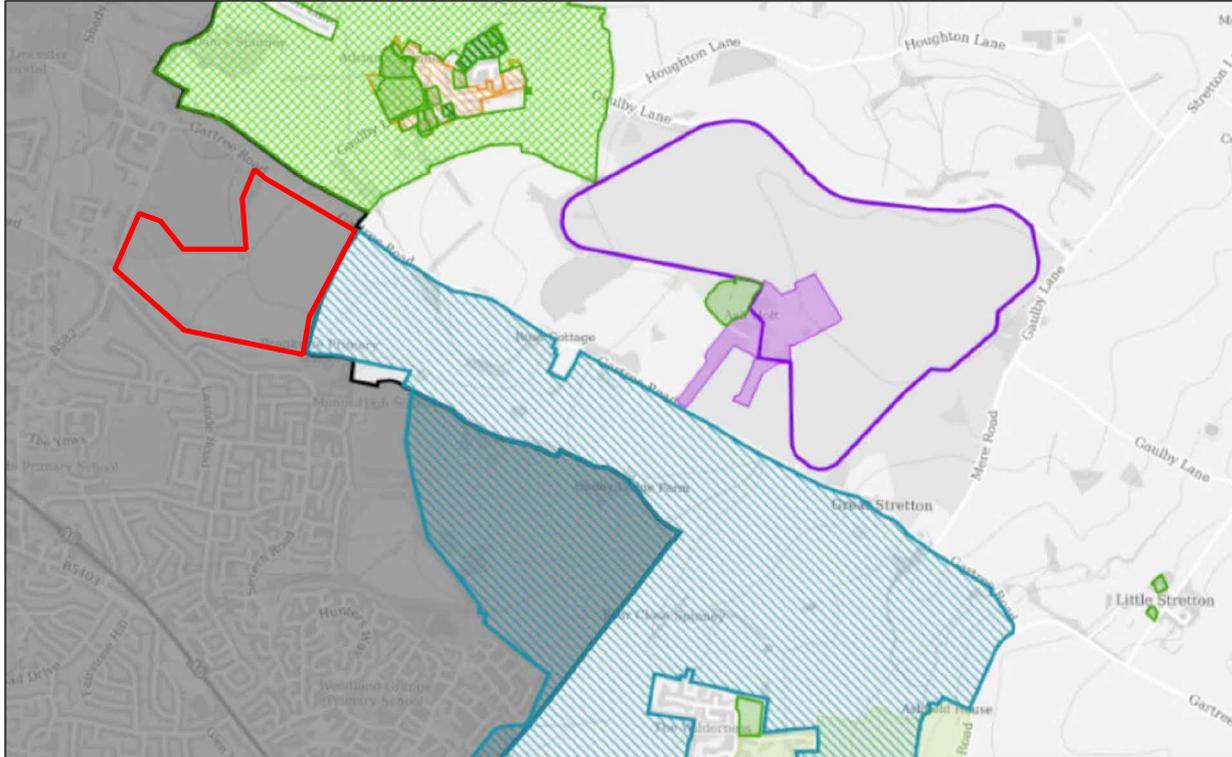
As set out above, our Client is promoting 'Land South of Gartree Road and East of Stoughton Road, Oadby'. Which is proposed for allocation as part of the emerging OWBC Local Plan. The Site is identified under Allocation Policy 6 (AP6) in the Regulation 19 Draft Local Plan for OWBC to accommodate at least 600 new homes. The Site is also expected to deliver a new Local Centre of at least 3 units, new community building, and associated infrastructure as well as the provision of off-site transport infrastructure through financial contributions (where appropriate / necessary) towards other infrastructure to ensure the new development is sustainable in its own right.

An Illustrative Masterplan is included at **Appendix 1** of these representations which shows the extent of the Site and the indicative proposals for new homes, public open space, and a new Local Centre.

The Site bounds the proposed allocation 'South of Gartree Road Strategic Development Area' of the Draft Plan for HDC, shown as the blue hatched area on the HDC Draft Policies Map (see Figure 1 below). Under Policy SA02 of the HDC Draft Plan, this cross-boundary allocation is to accommodate approximately 4,000 new homes - of which 3,150 will be in HDC's administrative area, and 850 will be in OWBC's administrative area.

Our client's Site is shown in red on the Policies Map extract below.

Figure 1: Harborough District Council Draft Policies Map Extract



At the outset, there appears to be no expectation within the Draft Plan that our Client's Site will need to be part of any cross-boundary masterplanning or infrastructure delivery exercise. However, to be found sound, the Draft Plan must provide sufficient evidence that the delivery of the allocation and any infrastructure requirements under Policy SA02 is viable, and that a holistic approach is undertaken to ensure coherent development with regard to our client's forthcoming proposals.

These representations, therefore, seek to ensure that HDC and OWBC are aligned in terms of what is expected of the respective allocations, particularly in respect of pedestrian and vehicle connectivity and infrastructure provision. This will ensure that all stakeholders (including for the other proposed allocations within the OWBC Local Plan) are clear in terms of what is expected to fund and/or deliver the allocations.

Set within this context, we provide our commentary to the Draft Plan, with particular emphasis towards infrastructure requirements (Policy DS05) and the cross-boundary site allocation (SA02). Our representations mention relevant evidence base documents which are referenced throughout this letter.

Draft Local Plan Section 4: Overall Development Strategy

Draft Policy DS05 (Supporting Strategic Infrastructure) requires new development to be supported by the provision of the necessary infrastructure, services, utilities and facilities identified to meet the needs arising from the new development in a phased and timely manner. Our Client welcomes that development proposals are required to be supported by robust evidence of the type and timing of infrastructure needed and to prioritise and fund the reasonable costs of infrastructure on site and, where appropriate, off-site through the use of Section 106 Legal Agreements or Section 278 Legal Agreements.

As we discuss later in these representations, it must be demonstrated prior to the adoption of the Draft Local Plan that the cross-boundary allocation situated adjacent to our Client's Site can be delivered with all necessary infrastructure requirements, without having to rely on other sites, such as our Client's site to 'top up' any funding gaps.

Our Client welcomes the inclusion of Part 2 of Policy DS05 which states the detailed site-specific mitigation schemes included within the site allocation Policies SA01, SA02, SA03 and SA04 are required and expected to be included within development proposals and site development costs. Development

proposals should make provision for all the land required to accommodate any additional infrastructure arising from the development on site.

Part 6 of the Policy confirms that the policies within the draft Plan have been viability tested, and it is the expectation that policy compliant contributions will be made. Our client considers that the Local Plan can be more explicit here. Rather than an 'expectation' that policy compliant contributions should be made based on viability, the Local Plan should state policy compliant contributions must be made and have been thoroughly tested to ensure that its draft allocations and infrastructure requirements are deliverable.

The supporting text at paragraph 4.55 states:

"It is important that cumulative infrastructure impacts and requirements, and the opportunities for a coordinated approach to infrastructure provision arising from clusters of development are considered in a comprehensive manner by developers. For the clusters of development listed above in Policy DS05 the Council will require evidence to be submitted in the form of a Joint Infrastructure Framework in support of planning applications to demonstrate that a comprehensive approach to infrastructure impact assessment and a coordinated approach to provision, in particular for transport, education, health and green infrastructure has been followed."

However, the 'South of Gartree Road Strategic Development Area' is not listed in Policy DS05 as a cluster of development and so it appears that a Joint Infrastructure Framework is not required. On the basis that this is a cross-boundary and strategic allocation, our client considers that a Joint Infrastructure Framework should be required under Policy SA02 to ensure a coordinated approach to infrastructure provision arising from the allocation and to ensure confidence and certainty as to where funding is expected to be sourced from (and equally where it is not to be sourced from).

Draft Local Plan Section 5: Key Development Sites

Policy SA02 (Land South of Gartree Road Strategic Development Area) is of key significance to our Client as it relates to the cross-boundary allocation for circa. 4,000 homes which abuts their Site.

Part 2 of Policy SA02 requires 'mechanisms' for effective delivery of infrastructure to support the development, and that infrastructure, as set out in the Infrastructure Delivery Plan (IDP), must be implemented alongside development in accordance with a 'Phasing Strategy'.

It is not clear from the policy wording above what these 'mechanisms' will be, nor what the timing or requirements for the Phasing Strategy will be. Our Client requests that the Council makes this clear.

With regard to the IDP referenced above, the Stage 2 IDP [INF-NLP1] in the Council's evidence base sets out further details on infrastructure costings, delivery mechanisms and prioritisation for infrastructure delivery.

Section 4.1.1 (Highways) of INF-NLP1 states that a robust masterplan to fully integrate 'Land South of Gartree Road' with neighbouring Oadby and Great Glen will be imperative to ensure the allocation is delivered in a sustainable way which maximises opportunities for non-car-based travel and provides alternative vehicular access routes to avoid Great Glen village. Our Client seeks clarification whether this relates to the same masterplan required under Policy SA02 (which we discuss further below), or a separate infrastructure masterplan which considers the wider infrastructure needs and neighbouring settlements.

Appendix A of INF-NLP1 sets out the range of infrastructure costs associated specifically with the draft cross-boundary allocation for infrastructure works including walking and cycling enhancements, public transport, travel planning measures and junction improvement works. It is our understanding that these works relate to Policy SA02 alone, and we welcome clarification from the Council that our Client's land interest would not be responsible for contributing towards these infrastructure costs given that its own infrastructure requirements are set out in the OWBC Draft Plan.

Conversely to Policy SA02, the Local Plan Viability Report [INF-NLP2] in the evidence base does not recommend making any policy concessions or adopting allocations until (i) the education and all other

S106/S278 costs are known; (ii) there is full transparency on minimum land values; (iii) updated appraisals have confirmed the viability position.

On the basis on the above, it is crucial that robust evidence is prepared, and developers are fully transparent so that the Council can robustly assess that the allocation can come forward and all necessary infrastructure can be funded and delivered.

The Local Plan Viability Report recognises that:

“The scheme is a cross-boundary site split between Oadby and Wigston and Harborough, which creates difficulties from a developer contributions perspective in terms of how contributions are apportioned / collected”

We reiterate the above concerns, noting that this area of uncertainty should be resolved at this stage rather than waiting for a situation to arise, as allocations start to come forward for development, whereby a funding gap becomes apparent resulting in additional contributions being sought from other developments (within both OWBC and HDC districts). As stated above, it is imperative that all sources of funding are clarified at this stage to provide developer confidence and certainty moving forward, and to also ensure that otherwise sustainable development proposals are precluded from coming forward as a result of protracted negotiations over S106 obligations.

The Viability Report concludes that Allocation SA02 is marginally viable. There was a lack of transparency in respect of minimum land values in option / promotion agreements and the whole off-site transport costs are anticipated at £22,273,000 and total S.106/278 costs are equivalent to £20k per unit.

Whilst our Client understands the above figures are not fixed, they are concerned around the acknowledgement that the allocation is “marginally viable”. Should factors such as infrastructure or build costs increase, and thus affecting viability, this should not have any impact on the ability of our Client’s land from being brought forward independently from the adjacent cross-boundary allocation. This is particularly important noting the urgent need to deliver new homes in the context of a national housing crisis.

Part 4 of Policy SA02 refers to a masterplan which is to be prepared in accordance with the requirement set out at Appendix 6 of the Draft Plan. Appendix 6 confirms that masterplans are to be prepared by developers and involve the active participation and input of all relevant stakeholders. This is welcomed by our Client, as it will be important for our Client to have an input in the forthcoming masterplan (or the opportunity to provide comments on the emerging proposals) to ensure it complements their proposals for their Site within OWBC.

The draft Plan confirms that the exact methodology for preparing the masterplan and its relationship with the development management process is yet to be agreed which will be at the pre-application stage. Where appropriate, masterplans may be adopted as Supplementary Planning Documents (SPD).

Any SPD will need to be subject to public consultation which our Client would seek to engage with.

Part 10 of Appendix 6 expects Masterplans to:

“Respond positively to the opportunities for integrating infrastructure provision between adjoining sites, including in respect of site access arrangements, other highways and transport requirements and landscaping and other green infrastructure”.

Whilst the above approach is admirable, our Client raises concerns with the integration of infrastructure between adjacent sites. Our Client’s Site should not be subject to delays in delivery whilst the masterplan is progressed before proposals can come forward, and integrated infrastructure between landowners and developers can be complex to navigate in terms of its delivery and maintenance. Notwithstanding this, a holistic approach towards the development of neighbouring sites is welcomed to ensure development is complementary, as we discuss below.

Part 6 of Policy SA02 establishes community infrastructure which is required to serve the new development which includes the provision of a new Local Centre. As noted earlier in these

representations, a Local Centre is also required on our client's Site under allocation AP6 of the OWBC Draft Local Plan. As such, a collaborative approach would be welcomed to ensure that the location of the Local Centre is appropriately situated with consideration towards our Client's land.

The same should apply for any proposed sports facilities and community facility buildings which are required under both our client's Site and draft Policy SA02, in addition to transport and connectivity (Part 9 of Policy SA02), noting the requirement for "comprehensive sustainable transport links across the entire site as well as linking to existing local networks to provide good connectivity into the urban area of Oadby" and impacts on the wider strategic network. As such, a joined-up approach would be beneficial, although this should not preclude our client's land from coming forward independently.

Summary

These representations have been prepared on behalf of The Co-operative Group in respect of the Submission Draft (Regulation 19) Harborough Local Plan 2020-2041.

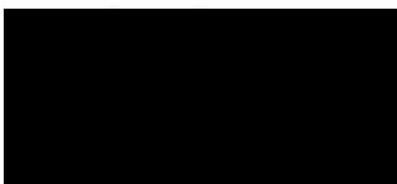
Our Client has joint land interests with the University of Leicester at the 'Land South of Gartree Road and East of Stoughton Road, Oadby' which abuts the proposed allocation under Policy SA02 of the Draft Plan.

Whilst our Client is supportive of the progress of the Draft Plan and the contribution of its proposed allocations towards meeting housing needs, these representations set out that it is crucial that our Client's allocation within OWBC can come forward independently without being prejudiced by the infrastructure requirements or viability constraints associated with the adjacent cross-boundary allocation.

Under housing allocation AP6 of the Draft Local Plan for OWBC, our Client would be required to deliver a new Local Centre, community building, appropriate number of new bus stops and associated infrastructure and various off-site transport improvements. As such, whilst our Client welcomes collaboration with the Council to ensure complementary development from a place-making perspective (such as location of Local Centre etc.) our Client's site should not be required to contribute towards the infrastructure which is required to deliver Policy SA02, and the Local Plan and its evidence should be robust to ascertain these works are deliverable.

Our Client respectfully requests that they are consulted on as part of any forthcoming masterplan or infrastructure framework for Policy SA02.

Yours faithfully,



STANTEC UK LIMITED

APPENDIX 1: ILLUSTRATIVE MASTERPLAN

