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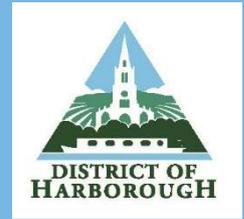
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No:

# Proposed Submission Draft

## Harborough Local Plan 2020-2041

### Representation Form



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

Please send completed forms by email to [localplan@harborough.gov.uk](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

Title

First Name

Last Name

Organisation  
(where relevant)

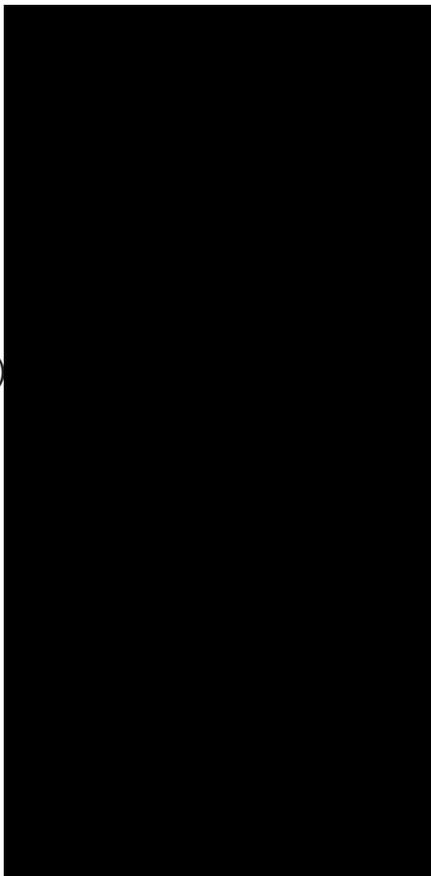
Address Line 1

Address Line 2

Address Line 3

Post Code

Email



#### 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

**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*

Plan Period

**Policies:** DS01 ; DS03 ; HN01 ; HN02 ; HN03 ; AP01 ; AP03 ; DM05 ; DM06 ; DM07

**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 refer to attached documentation.

*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:**

**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).

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

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

Yes     No

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

*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.**

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

Sent by email to: [localplan@harborough.gov.uk](mailto:localplan@harborough.gov.uk)

2<sup>nd</sup> May 2025

Dear Sir/Madam,

**RE: TERRA REPRESENTATIONS TO THE HARBOROUGH LOCAL PLAN REVIEW PUBLICATION CONSULTATION (REGULATION 19)**

This document comprises Terra's representations to the Regulation 19 ("Reg. 19") version of the Harborough Local Plan Review consultation. These have been prepared in relation to our land interest at Claybrooke Magna, identified as Land off Main Road, Claybrooke Magna. We therefore submit the following representations to the Harborough Authorities, Reg. 19 Consultation, May 2025.

***1. The Site and Planning History – Land off Main Road***

- I.1 Terra control Land off Main Road which is to the northwest of the village of Claybrooke Magna, Harborough. The site is located outside of, but adjacent to, the built-up area of Claybrooke Magna.
- I.2 The northern and eastern boundaries of the site are defined by High Cross Road/Main Road which sweeps around the edge of the site. To the east, on the opposite side of the road, the area contains predominantly two storey, residential homes. To the north and west is open countryside. Adjacent to the southern boundary of the site is an existing timber yard. The boundaries of the are largely contained by existing hedgerows and trees.
- I.3 The village has accessibility to some facilities, including a public house and village hall. A primary school is located in the 'twin village' of Claybrooke Parva which is situated approximately 1km south of this site.
- I.4 The majority of the site is located within an area least at risk of flooding, Flood Zone 1. A single PROW runs through the field in a north-east to south-west alignment. Therefore, it is a relatively unconstrained site with limited planning concerns.
- I.5 As it currently stands, the site has no planning history. The majority of this site is identified as 'white land'. The western edge of the site is identified as an 'open space, sport and recreation site', however it is not publicly accessible due to separation from the highway by an existing hedge.

**Figure 1: Location of Land off Main Road**



## 2. Settlement Context – Claybrooke Magna

- 1.6 Within the adopted Local Plan, Claybrooke Magna is associated with Claybrook Parva to the south and are collectively referred to as ‘the Claybrookes’. The Claybrookes are identified as one of eleven ‘selected rural villages’ in the adopted local plan. Within the Preferred Options Local Plan, Claybrooke Magna has now been identified as a Small Village within the Settlement Hierarchy.
- 1.7 Claybrooke Magna lies in the most westerly part of Harborough district. It is located within a mile of the A5 motorway and the Parish’s northwestern extent forms the border with Blaby district. The village lies between Hinckley and Lutterworth, both approximately 6 miles away.
- 1.8 The village has a reasonable range of service and facilities including a pub (Pig in Muck), village hall, allotments and a play area. It also has a primary school which, although located in the adjoining parish of Claybrooke Parva, serves both villages and is accessible by foot.
- 1.9 There are few employment opportunities in the village. However, Magna Park/Lutterworth and Hinckley are relatively close by and provide a wide range of job opportunities. These villages can be easily accessed either via private vehicles, or sustainable public transport services. The nearest train stations are Hinckley (6 miles), Narborough (9 miles), Nuneaton (9 miles) and Rugby (11 miles). The village is also served by a scheduled hourly bus service to Hinckley - Lutterworth and Magna Park (No 8).
- 1.10 Within the evidence document Settlement Hierarchy Paper (2024), Claybrooke Magna was identified as having a *reasonable range of services for a village of its size and benefits from a scheduled bus service and a primary school within walking distance. It is considered that its classification as a Small Village is appropriate as it can meet some of the day-to-day needs of its residents.*
- 1.11 Given the sustainable location of the site, with good access to public transport services and neighbouring villages, as well as the unmet local housing need, Terra politely requests that Land off Main Road, Claybrooke Magna is allocated within the draft Local Plan for residential development.

### 3. Policy Background

3.1 The Harborough Local Plan was adopted in April 2019. It sets out the Councils strategies and policies covering the period of 2011 – 2031. Within the adopted plan, Section 12 states that:

*A full or partial update of the Local Plan will be commenced.... within 6 months of the following....*

*b. in the absence of an adopted MOU or SoCG, 12 months from the date of publication of a Local Plan for Leicester City (defined as publication of an invitation to make representations in accordance with Regulation 19 of the Town and Country (Local Planning) (England) Regulations 2012) ('a Regulation 19') that includes satisfactory evidence of an unmet local housing need; **OR***

*Any full or partial update of the Local Plan triggered by 2. above will be submitted for examination within 30 months from the date it commenced*

3.2 This trigger has been activated by Leicester City publishing a Regulation 19 plan on the 16th of January 2023.

3.3 In July 2021, Cabinet commenced the review of their Local Plan to update it to 2041. The current timetable for the remainder of the review is as follows:

- Regulation 19 and 20 Proposed Submission Consultation – between March and May 2025
- Submission (Regulation 22) – September/October 2025
- Adoption (Regulation 26) – October – December 2026 (indicative)

3.4 The Revised NPPF was published in December 2024 and sets out the Government's planning policies for England and how they are expected to be applied in decision-making and plan making. It does not form part of the statutory development plan but does provide significant guidance for Local Planning Authorities, establishing an up to date and comprehensive expression of national planning policy.

3.5 At a high level, the adopted and emerging local plan are consistent with the NPPF guidance in seeking to deliver sustainable development and recognising the positive impact of the delivery of rural housing in rural settlements.

### 4. Plan Period

4.1 The emerging Local Plan currently covers the period of 2020 to 2041. Terra considers that the plan should cover a period of 15 years from the adoption of the plan, in line with NPPF Strategic Policies. To ensure that the Plan covers 15 years on adoption, the Plan is required to be adopted in 2026. In the unlikely event that this is not possible, Terra suggests that the Plan period should be extended until at least 2042, allowing for any delays in adoption.

### 5. Policy DS01: Development Strategy: Delivering Homes

5.1 Terra are concerned that Claybrooke Magna is identified as an area that has a need for housing growth, but no sites have been put forward for allocation.

5.2 Policy DS01 outlines that the housing requirement for Harborough District is 13,182 across the Plan period, with an annual requirement of 657 dwellings between 2025 and 2036. A minimum of 350 new homes will be delivered in Small Villages, of which Claybrooke Magna is allocated a total of 31 homes (**Figure 2**).

5.3 Whilst Terra agree with the distribution of 31 dwellings to Claybrooke Magna in order to increase the supply of housing within the District, there have been no site allocations to enable this requirement to be met.

5.4 Given that Harborough is now taking on some of Leicester's local housing need, which is increasing the housing requirements in turn, it is important to put forward sites that are available, developable and deliverable.

- 5.5 Terra are promoting Land off Main Road which is available, deliverable and suitable for meeting the identified local housing need outlined within the draft Local Plan.
- 5.6 Terra agrees with the concerns outlined by the HBF within their representation regarding monitoring delivery of housing to meet the unmet needs of Leicester within Harborough. By providing a separate monitoring system, it will ensure that Harborough meets its own needs, as well as contributing towards Leicester’s unmet need, especially regarding tenancy mix and size of developments.

**Figure 2: DS01: Delivering Homes**



**6. Policy DS03 Development Strategy: Tackling Climate Change and Enhancing the Natural Environment**

- 6.1 Terra agree with Policy DS03 regarding environmental policies and tackling climate change, in principle.
- 6.2 Terra supports the preference of development being prioritised in areas that prioritise sustainable active travel modes, as described in Draft Policy DS03 Development Strategy. This Policy complies with para. 117 of the NPPF, enforcing developments give priority first to pedestrian and cycle movements to facilitate and encourage access to and use of public transport.
- 6.3 Land off Main Road, Claybrooke Magna has good accessibility to means of public transport and pedestrian / cycle routes within the surrounding area.

**7. Policy HN01 Housing Need: Affordable Homes**

- 7.1 Terra agrees with the requirement for affordable housing to be delivered within new developments of 10 units and over.
- 7.2 The wording on Policy HN01 (f) is one which is onerous and does not allow for an alternative, preferable specification to be negotiated between parties. Therefore, we suggest that the reading of (f) should be altered to read as *Developers are expected to make efficient use of land and attempts to artificially reduce the scale of development*

to below the threshold for providing affordable housing will be reviewed on a case-by-case basis. This allows for developments to reduce the scale of their development in order to provide community beneficial facilities, such as larger play space for local and future residents to enjoy.

## **8. Policy HN02 Housing Need: Mix of New Homes**

- 8.1 Terra agree with the requirement for all housing to meet M4(2) Building Regulations in keeping with national technical standards.
- 8.2 The requirement for accessible homes within developments is something which Terra support, in principle.
- 8.3 Policy HN02 conforms to paragraph 135 (f) of the NPPF 2024, which states that developments should *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.*
- 8.4 5% minimum Market homes to meet M4(3)A regulations and 10% minimum Affordable homes to meet M4(3)B regulations within major developments is partially supported by Terra, in principle. However, the Council should be aware of National Building Regulation requirements and be conscious not to double count with regards to separating the percentage of M4(3)A and M4(3)B requirements for Market and Affordable Housing.
- 8.5 It should also be noted that if the Council are to implement such a policy in the way outlined within their draft plan, they should allow reflection of this within cost viability assessments. The implementation of such a policy may be a challenge from a viability and deliverability perspective, meaning that further flexibility would be favoured with regards to this policy in order to address these concerns. This is especially important given the mandatory delivery of 10% BNG throughout the UK affecting how viable and deliverable a scheme can be.
- 8.6 Whilst it is understood that there is a need for a mix of house types, tenures and sizes, it is important that such a policy is flexible and ensures that delivery of housing is not stalled due to overly prescriptive requirements that do not consider the scale and viability of sites. Terra politely request that the Council ensure that the Policy is flexibly applied to make allowance for home builders and developers to provide alternative housing mixes as required by the market,

## **9. Policy HN03 Housing Need: Housing Type and Density**

- 9.1 Terra agrees to the minimum density requirement of 30 dwellings per hectare to areas outside of the Lutterworth and Market Harborough settlements, unless a lower density is justified. This allows for alternative scheme specifications to be put forward for development and negotiated on a case-by-case basis to reflect the local areas character and appearance.
- 9.2 It is important to recognise that certain schemes will require a lower density in order to be viable and deliverable, as can be the case for smaller sites. The wording in this policy enables for flexibility around density levels, something which is supported by Terra.

## **10. Policy AP01: Development in Settlements**

- 10.1 Terra supports Policy AP01, outlining that development will be permitted on land adjoining the existing built-up areas of settlements and provides housing necessary to contribute to meeting the specific targets for housing in Small Villages established in Policy DS01 part 2 (e).
- 10.2 Allocating the site that Terra are promoting within the Local Plan will enable the Council to fulfil its obligations towards meeting the local housing needs, previously outlined in Chapter 4 of the Draft Local Plan, and allow the Council to achieve its outlined goal of 31 new dwellings within Claybrooke Magna.

## **11. Policy AP03: Development in the Countryside (Residential)**

- 11.1 Terra supports with draft Policy AP03 which outlines the approval for development within the countryside, permitted it consists of affordable housing and supports local communities regarding community cohesion and diversity.
- 11.2 Allowing development within the countryside, where suitable, will enable the Council to improve its Housing Land Supply position through the addition of further housing, as well as providing benefits to the local community.

## **12. Policy DM05: Green and Blue Infrastructure and Open Space**

- 12.1 The requirement for development to contribute to high-quality green and blue and, where on-site provision is not feasible, a payable contribution to be provided instead towards off-site provisions. Terra agrees and supports this Policy, in principle.

## **13. Policy DM06: Transport and Accessibility**

- 13.1 Terra agrees with the requirement to ensure developments are sustainably located with good transport networks and connections to provide safe access and movement.
- 13.2 The site that Terra are putting forward for allocation has connections to sustainable public transport networks via both train and local bus services available to local and future residents.

## **14. Policy DM07: Managing Flood Risk**

- 14.1 Terra supports the overall Flood Risk management policy, in principle.
- 14.2 Terra agrees with the preference of development being prioritised in areas that are least prone to flooding, as described in Draft Policy DM07 Managing Flood Risk. This Policy complies with para. 170 of the NPPF, requiring that inappropriate development in areas at risk of flooding should be avoided.
- 14.3 The site Terra is promoting for development at Land off Main Road, Claybrooke Magna is at a low risk of flooding due to its location being predominantly in Flood Zone 1.

## **15. Conclusion**

Terra Strategic politely requests that these representations are taken into consideration. Land off Main Road, Claybrooke Magna is readily available and deliverable within the desired timeframe. Terra recommend that the Council include the site within the emerging plan as an allocation for residential development.

I trust you have sufficient information to provide feedback. However, should any further points of clarification be required, please do not hesitate to contact me or my colleague Tamsin Almeida ([talmeida@livingspacehousing.co.uk](mailto:talmeida@livingspacehousing.co.uk)).

Yours Sincerely,

